



September 22, 2017

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: In the Matter of: Nomination for Universal Service Administrative Company Board of Directors, CC Docket Nos. 97-21 and 96-45**

Dear Secretary Dortch:

INCOMPAS, the California Association of Competitive Telecommunications Companies ("CALTEL"), Competitive Carriers of the South, Inc. ("CompSouth"), and the Midwest Association of Competitive Communications ("MACC") are pleased to submit this letter as a formal nomination and request for consideration of Mr. Joseph Gillan for a three-year term on the Universal Service Administrative Company's Board of Directors as the representative of competitive local exchange carriers ("CLECs"). Mr. Gillan has served as the representative of competitive local exchange carriers on the USAC Board since 2008 and has made significant contributions to USAC. If re-elected to serve, Mr. Gillan would continue to offer his own expertise in the evaluation of regulatory policies in the telecommunications industry to the Council's efforts and provide the extensive experience and advice of the companies with which he works as a consultant.

As you know, INCOMPAS, CALTEL, CompSouth, and MACC represent competitive communications and technology companies large and small. Each of the associations represents CLECs, and they advocate for laws and policies that promote competition, innovation and economic development. The members of our organizations are catalysts for creating economic growth and improving the quality of life of all Americans through technological innovation, new services, affordable prices and greater choice. These entrepreneurial companies offer a wide array of broadband voice, video, Internet and data offerings, using both wireline (copper/fiber) and wireless networks to reach their customers. Among the state-of-the art solutions they deliver are managed services, cloud computing and unique applications that are developed and deployed

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via next-generation, IP-based managed networks. It is important that their interests are represented on the USAC Board.

Universal service and ensuring affordable connectivity via the four federal programs remains an important issue to our organizations' members, and we believe the active participation of the competitive telecommunications industry on the Board of Directors is critical to meeting the objectives of USAC. Mr. Gillan has been an able representative on the Board, and is a consultant who represents the competitive industry on universal service issues. During his time on the Board, Mr. Gillan has served extensively on the Executive, Audit (as Chair), and High Cost & Low Income committees and wishes to continue his service as USAC implements reforms to nearly all of the Universal Service programs. His experience on the Board during this critical time at USAC will benefit the Board, USAC, and the CLEC industry he represents.

A copy of Mr. Gillan's resume is attached to this letter. Should you have any questions about this nomination request, please feel free to contact us at any time.

Respectfully,

*/s/Chip Pickering*

Chip Pickering  
CEO  
INCOMPAS

*/s/Sarah DeYoung*

Sarah DeYoung  
Executive Director  
CALTEL

*/s/Carolyn Ridley*

Carolyn Ridley  
President  
CompSouth

*/s/Pamela H. Hollick*

Pamela H. Hollick  
President  
MACC

Attachment

**Joseph Gillan**  
**Gillan Associates**  
**joseph@gillanassociates.com**

**Education**

B.A. Economics, University of Wyoming  
M.A. Economics, University of Wyoming

**Professional History**

*Gillan Associates, Economic Consulting (1987-Present)*

Mr. Gillan manages a private consulting practice specializing in the economic evaluation of regulatory policies and business opportunities in the telecommunications industry.

*Vice President, US Switch, Inc. (1985-1987)*

Responsible for crafting the US Switch business plan to gain government approval for US Switch's pioneering concept of "centralized equal access." While at US Switch, Mr. Gillan was promoted to VP-Strategic Planning, gaining responsibility for contract negotiation/marketing with independent telephone companies and project management for the company's pilot project in Indiana.

*Policy Director/Market Structure - Illinois Commerce Commission (1980-1985)*

Primary staff responsibility for the policy analysis of issues created by the emergence of competition in regulated markets.

*Mountain States Telephone Company - Demand Analyst (1979)*

Responsible for conducting statistical analysis of the demand for access by residential subscribers.

**Listing of Expert Testimony – Regulatory and Court Proceedings**

Mr. Gillan has testified over 300 times before more than 40 state commissions, several dozen state legislatures, and the Federal Communications Commission (in addition to the international assignments listed below).

Mr. Gillan has also testified and/or filed expert reports before numerous state and federal courts addressing complex telecommunications issues in the context of civil litigation.

A complete listing of Mr. Gillan's extensive history filing testimony/reports is available upon request.

**Professional Appointments**

Senior Fellow	Institute of Public Utilities, Michigan State University, 2017 - Present
Board of Directors	Universal Service Administrative Company 2008-Present; Chair of Audit Committee and Vice Chair of High Cost/Low Income Committee
Advisory Council	New Mexico State University, Center for Regulation, 1985 – Present

**Professional Appointments (continued)**

Guest Lecturer	Northwestern University Law School 2007
Guest Lecturer	School of Laws, University of London, 2002, 2008
Instructor	Michigan State University, Institute of Public Utilities, 2005-Present
Instructor	Principles of Regulation, New Mexico State University Center for Regulation
Faculty	Summer Program, Public Utility Research and Training Institute, University of Wyoming, 1989-1992
Contributing Editor	<u>Telematics: The National Journal of Communications Business and Regulation</u> , 1985 - 1989
Chairman	Policy Subcommittee, NARUC Staff Subcommittee on Communications, 1984-1985
Advisory Committee	National Regulatory Research Institute, 1985
Distinguished Alumni	University of Wyoming, 1984

**Selected Publications**

"The Importance of Section 252 to Competition and the Public Interest: The Continuing State Role in the Age of IP Networks," October 2015.

"Managing the Transition to IP-Based Public Phone Networks in the United States," *6th Annual Competition in Regulated Industries Conference*, November 22, 2013, Brussels, Belgium.

"The Transition to an All-IP Network: A Primer on the Architectural Components of IP Interconnection," with David Malfara, National Regulatory Research Institute, NRRI 12-05, May 2012.

The Next Step for Next Generation Technology: Interconnecting Managed Packet Networks to Preserve Voice Service Quality and Competition," 2008, [http://www.freetocompete.com/files/gillan\\_nextstep-nxtgen\\_2008.pdf](http://www.freetocompete.com/files/gillan_nextstep-nxtgen_2008.pdf)

"The Local Exchange: Regulatory Responses to Advance Diversity," with Peter Rohrbach, Public Utilities Fortnightly, July 15, 1994.

"Reconcentration: A Consequence of Local Exchange Competition?" with Peter Rohrbach, Public Utilities Fortnightly, July 1, 1994.

"Diversity or Reconcentration: Competition's Latent Effect," with Peter Rohrbach, Public Utilities Fortnightly, June 15, 1994.

"Consumer Sovereignty: A Proposed Approach to IntraLATA Competition," Public Utilities Fortnightly, August 16, 1990.

**Selected Publications (continued)**

"Reforming State Regulation of Exchange Carriers: An Economic Framework," Third Place, University of Georgia Annual Awards Competition, 1988, Telematics: The National Journal of Communications, Business and Regulation, May, 1989.

"Regulating the Small Telephone Business: Lessons from a Paradox," Telematics: The National Journal of Communications, Business and Regulation, October, 1987.

"Market Structure Consequences of IntraLATA Compensation Plans," Telematics: The National Journal of Communications, Business and Regulation, June, 1986.

"Universal Telephone Service and Competition on the Rural Scene," Public Utilities Fortnightly, May 15, 1986.

"Strategies for Deregulation: Federal and State Policies," with Sanford Levin, Proceedings, Rutgers University Advanced Workshop in Public Utility Economics, May 1985.

"Charting the Course to Competition: A Blueprint for State Telecommunications Policy," Telematics: The National Journal of Communications Business, and Regulation, with David Rudd, March, 1985.

"Detariffing and Competition: Options for State Commissions," Proceedings of the Sixteenth Annual Conference of Institute of Public Utilities, Michigan State University, December 1984.

**International Assignments**

*Transitioning Universal Service Support to Broadband in the United States: Providing Incumbents a Right-of-First-Refusal or Competitive Bidding*, submitted to the Canadian Radio-television and Telecommunications Commission on behalf of Bell Canada, TNC 2015-134.

*Telecom Policy and Regulation for Next Generation Networks*, instructor with Dr. Mark Jamison, Public Utility Research Center, University of Florida, for the Office of the Communications Authority, Hong Kong, China, February 2013.

*The Federal Universal Service System in the United States: A History of Spiraling Contribution*, Report submitted to the Canadian Radio-television and Telecommunications Commission on behalf of Bell Canada.

*The Appropriate Pricing Standard for Wholesale Loops*, with George Hariton, Telecommunications Issues and Analysis, Report submitted to the Canadian Radio-television and Telecommunications Commission on behalf of Bell Canada.

*Forcing a Square Peg into a Round Hole: Applying the Universal Service Cost Model in the Cayman Islands*, Analysis Presented to the Government of the Cayman Islands on behalf of Cable and Wireless.

*Recovering Contribution: Lessons from the United States' Experience*, Report submitted to the Canadian Radio-television and Telecommunications Commission on behalf of CallNet.