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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

In the Matter of	)	
	)	CC Docket No. 93-123
National Exchange Carrier Association, Inc.	)	
	)	
Revisions to Tariff F.C.C. No. 5	)	Transmittal Nos. 518,
	)	527, 530
	)	
Universal Service Fund and Lifeline Assistance Rates	)	

**MTA COMMENTS ON NECA DIRECT CASE**

Matanuska Telephone Association, Inc. (MTA) hereby submits comments in response to the Common Carrier Bureau Investigation Order released April 23, 1993<sup>1</sup>. MTA is an Alaskan local exchange carrier and member of the National Exchange Carrier Association (NECA). The two issues identified for review in the Investigation Order were NECA's practice with respect to the recalculating the National Average Cost Per Loop (NACPL) when Exchange Carrier (EC) accounting data is changed, and the methods NECA uses to identify possible errors in EC data.

MTA supports the resizing methodology utilized by NECA and believes that it is a reasonable methodology that is consistent with the Commission's rules. NECA's method provides the EC's with a stable revenue stream. Since most if not all State Commissions mandate USF revenues support basic local rates, contribution of NECA's methodology will assure stable rates. The Commission should not require USF expense adjustment revisions for all companies to reflect changes in the National Average Cost Per Loop (NACPL) associated with Universal Service Fund (USF) data submission updates by individual companies. MTA also supports NECA position that if the Commission were to implement any changes in the methodology that these changes be prospective.

<sup>1</sup>National Exchange Carrier Association, Transmittal Nos. 518, 527,530, Order Designating Issues for Investigation, CC Docket No. 93-123, (April 23, 1993) (Investigation Order).