disastrous for rural telephone companies and their low volume customers, and encourage the use of least cost technology by new entrants. It will also assist in limiting the size of the fund. If a new eligible carrier were permitted to use the rural incumbent's costs as the basis for determining support, the new eligible carrier could receive a windfall if its unit costs were lower, and the amount of the windfall could increase significantly if the new eligible carrier was not required to serve the entire study area.

In high cost areas served by non-rural telephone companies, where multiple eligible carriers are expected because the cost of service is generally lower, it is reasonable to permit competitive eligible carriers to use the incumbent exchange carriers' costs to determine the amount of support. This will ensure that competition continues to grow by eliminating a potential barrier to entry. However, USTA has recommended that once the incumbent calculates its costs for the purposes of universal service support, the amount per line be frozen in order to limit the growth of high cost funding.[12] The use of booked costs ensures that the actual cost of providing universal service is utilized to determine the amount of support necessary.

<u>29. Should price cap companies be eligible for high-cost support, and if not, how would the exclusion of price cap carriers be consistent with the provisions of section 214(e) of the Communications Act? In the alternative, should high-cost support be structured differently for price cap carriers than for other carriers</u>?

The Act does not base eligibility for receipt of universal service support on the form of regulation under which a carrier operates. Therefore, excluding price cap carriers from eligibility

[12]A change in the definition of universal service may necessitate a change in the amount of support per line.

for universal service support is not consistent with § 214 of the Act.[13] There is no relationship between the form of regulation and whether the cost of serving a particular geographic area requires rates which are not affordable. This is an arbitrary distinction which cannot be justified, particularly when carriers not subject to any form of regulation can be eligible to receive support. The particular cost characteristics of a particular area relative to an affordability benchmark should determine support, regardless of the size or regulatory requirements of the carrier.

The Act does recognize that circumstances in rural areas may necessitate different treatment. Therefore, USTA has used that distinction as the basis to provide for alternate approaches. Such an approach ensures that all the eligible carriers in a rural or in a non-rural area are treated in the same manner so as to realize competitive neutrality.

<u>30. If price cap companies are not eligible for support or receive high-cost support on a different basis than other carriers, what should be the definition of a "price cap" company? Would companies participating in a state, but not a federal, price cap plan be deemed price cap companies? Should there be a distinction between carriers operating under price caps and carriers that have agreed, for a specified period of time, to limit increases in some or all rates as part of a "social contract" regulatory approach</u>?

This questions illustrates why differentiating eligibility for support based on a form of regulation is arbitrary. There are different forms of "price caps". Carriers may be price cap in one jurisdiction and rate of return in another jurisdiction. There are vestiges of rate of return regulation for carriers subject to the sharing requirements of price cap regulation. Such a distinction would only add enormous complexity to the administration of a new high cost fund Further, such a distinction could not be sustained in the long term since regulation is changing at

[13]Excluding price cap carriers from eligibility for universal service support provides another disincentive for non-price cap carriers to elect price cap regulation.

both the state and federal levels. High cost support should not be structured differently because the eligible carrier is regulated under price caps. The only differentiation permitted by the Act is one which recognizes the unique needs of rural areas.

31. If a bifurcated plan that would allow the use of book costs (instead of proxy costs) were used for rural companies, how should rural companies be defined?

Rural telephone company is defined in § 3(37) of the Communications Act as amended.

32. If such a bifurcated approach is used, should those carriers initially allowed to use book costs eventually transition to a proxy system or a system of competitive bidding? If these companies are transitioned from book costs, how long should the transition be? What would be the basis for high-cost assistance to competitors under a bifurcated approach, both initially and during a transition period?

Rural telephone companies should not be forced to adopt either a proxy or a competitive bidding system to determine support. Further, as noted above, even if another eligible carrier is permitted to receive support in a rural area, that carrier should receive support based upon its own costs of providing the core definition and that amount should be capped at a level no higher than the incumbent's cost.

However, if a rural telephone company opted to adopt a proxy, the transition should be undertaken in a revenue neutral manner and should be for a period of sufficient length to avoid customer rate shock.

33. If a proxy model is used, should carriers serving areas with subscription below a certain level continue to receive assistance at levels currently produced under the HCF and DEM weighting subsidies?

This question assumes a relationship between high cost and customer subscribership which does not exist. The pockets of customers which do not have telephone service should be addressed at the state level with specific programs designed to address specific problems.

If, for purposes of high cost support, a proxy model yields results which are lower than current levels of support, a transition period may be necessary to avoid customer rate shock and to ensure revenue neutrality. For example, under USTA's federal high cost fund, EUCL prices would be rebalanced over a four year period. As EUCL prices are rebalanced, interstate carrier common line (CCL) prices would be adjusted to recover the difference between the EUCL price and the interstate affordability benchmark. Interstate CCL would be eliminated at the end of the transition. Long Term Support (LTS) would continue to recover the difference between the nationwide average interstate CCL price calculated during the transition period and the interstate CCL price for exchange carriers participating in the NECA common line pool. LTS would also be eliminated at the end of the transition.[14]

In order to ensure that rural telephone companies continue to receive sufficient support, USF and weighted DEM should be continued for those companies.

[14]USTA's plan would freeze current USF and weighted DEM for non-rural telephone companies during the transition and then eliminate these programs for non-rural telephone companies. With only rural telephone companies eligible for USF and weighted DEM thereafter, the cap on USF should be allowed to expire.

Proxy Models

34. What, if any, programs (in addition to those aimed at high-cost areas) are needed to ensure that insular areas have affordable telecommunications service?

Lifeline and Linkup support should be available to low income customers in insular areas.

35. US WEST has stated that an industry task force "could develop a final model process utilizing consensus model assumptions and input data." US WEST comments at 10. Comment on US WEST's statement, discussing potential legal issues and practical considerations in light of the requirement under the 1996 Act that the Commission take final action in this proceeding within six months of the Joint Board's recommended decision.

While any delay in implementing a new universal service support fund would be problematic, the exchange carrier industry has been actively seeking ways to assuage concerns regarding the use of the proxies which several exchange carriers have proposed. The differences between the exchange carrier models and the model developed by Hatfield and Associates (Hatfield model) are too great to be reconciled.

36. What proposals, if any, have been considered by interested parties to harmonize the differences among the various proxy cost proposals? What results have been achieved?

As noted above, there has been an effort within the exchange carrier industry to address concerns and to reconcile the differences in the exchange carrier proxy models. However, in general, it is difficult for telephone companies with limited resources to examine any of the proxy models. The expense of obtaining the hardware and software required to run the proxy models may be prohibitive for some companies and the short time frame provided for analysis does not accommodate the learning curve necessary for some companies to understand the models. Some of the inputs come from sources that are not accessible to or that cannot be provided by all companies. These concerns are particularly acute for small telephone companies. In particular, inputs for small telephone companies may have to be addressed separately if those companies were forced to adopt or even transition to a proxy.

The algorithms and source data for the Hatfield model have not been made available making it difficult to analyze the model and therefore impossible to attempt any harmonization.

37. How does a proxy model determine costs for providing only the defined universal service core services?

The purpose of a proxy should be to identify high-cost areas, not to determine the costs of providing the core universal services. Proxies cannot accurately determine the costs which will be incurred to provide such services or the prices which should be charged to recover those costs. Proxies rely on uniform assumptions that may be appropriate under certain circumstances and may not be appropriate under other circumstances. A determination of the costs of providing universal service must include all the costs of service, including embedded and joint and common costs.

38. How should a proxy model evolve to account for changes in the definition of core services or in the technical capabilities of various types of facilities?

A proxy model should be updated periodically as the definition of universal service evolves.

39. Should a proxy model account for the cost of access to advanced telecommunications and information services, as referenced in section 254(b) of the Act? If so, how should this occur?

Again, this is not an issue if the proxy is used to identify high cost areas. If the proxy is used to identify costs, then the cost of access to advanced telecommunications and information services should be included if access to advanced services and information services is part of the core definition. Currently, access to advanced and information services is part of the provision of basic local exchange service provided by incumbent exchange carriers.

40. If a proxy model is used, what, if any, measures are necessary to assure that urban rates and rates in rural, insular, and high-cost areas are reasonably comparable, as required in Section 254(b)(3) of the 1996 Act.

A proxy model should not be used to set rates or to make a determination whether rates are reasonably comparable. The affordability benchmark will assist in ensuring that rates are reasonably comparable.

41. How should support be calculated for those areas (e.g., insular areas and Alaska) that are not included under the proxy model?

Such areas should be included in a proxy model or separate rules for identifying high cost areas will have to be developed.

42. Will support calculated using a proxy model provide sufficient incentive to support infrastructure development and maintain service quality?

High-cost support, regardless of whether it is determined based on the use of proxies to identify high-cost areas or not should be sufficient to provide an incentive for the carriers serving those areas to continue investing in the infrastructure and improving the network. This will occur if the receipt of support is on a revenue neutral basis.

<u>43. Should there be recourse for companies whose book costs are substantially above the costs projected for them under a proxy model? If so, under what conditions (for example, at what cost levels above the proxy amount) should carriers be granted a waiver allowing alternative treatment? What standards should be used when considering such requests</u>?

This question illustrates some of the concerns expressed regarding the initial proxy models, i.e., that the proxy did not match the high cost areas particularly of small telephone companies. One of the reasons for the concern is that the initial models did not recognize that small telephone companies lack the economies of scope and scale enjoyed by larger companies. The support needed to provide the core definition in high-cost areas must be sufficient and revenue neutral. Implementation of a funding mechanism which ignores those requirements will be detrimental to incumbent exchange carriers and their customers and a waiver system based on certain standards will not ameliorate the harm.

<u>44. How can a proxy model be modified to accommodate technological neutrality</u>?

If the proxy is used to identify high cost areas, it should accommodate technological neutrality. However, if the proxy is used to determine the cost of serving high-cost areas then some modification may be necessary to accommodate different technologies.

45. Is it appropriate for a proxy model adopted by the Commission in this proceeding to be subject to proprietary restrictions, must such a model be a public document?

While the company-specific inputs may be proprietary, the model and the algorithms used to develop the model must be public.

46. Should a proxy model be adopted if it is based on proprietary data that may not be available for public review?

Only the company-specific inputs should be treated as proprietary. Publicly available data should be used to develop a proxy model.

47. If it is determined that proprietary data should not be employed in the proxy model, are there adequate data publicly available on current book cots to develop a proxy model? If so, identify the source(s) of such data.

Sufficient publicly available data is contained in the ARMIS reports, tariffs and through the Census Bureau.

48. Should the materiality and potential importance of proprietary information be considered in evaluating the various models?

The use of publicly available data is preferable to the use of proprietary information.

Competitive Bidding

USTA cannot provide answers to questions 49 through 55 dealing with competitive bidding. USTA has taken the position that competitive bidding is not appropriate at this time for currently served areas. Among the concerns raised by USTA that have not been addressed has been the need to ensure that bids are sufficient to provide universal service. However, USTA has stated that a voluntary bidding process is appropriate to identify carriers willing to serve unserved areas. Such a process would only apply when no carrier voluntarily agrees to provide service in an unserved area. In addition, unserved areas should be considered to be unique universal service areas and should not be combined with any established universal service area. A carrier submitting the lowest bid for any unserved area should be declared the eligible carrier for the provision of both interstate and intrastate service and receive the universal service support based on the bid submitted. Funding should be provided through the high-cost support mechanism.

Benchmark Cost Model (BCM)

Questions 56 through 63 are based on the BCM. USTA has not analyzed the BCM and has not taken a position on whether it is the appropriate model to identify high-cost areas other than to state that no proxy should be mandated for small telephone companies.

Cost Proxy Model Proposed by Pacific Telesis

Questions 64 through 68 are based on the CPM. As noted above, USTA has not analyzed the CPM and has not taken a position on whether it is the appropriate model to identify high-cost areas other than to state that no proxy should be mandated for small telephone companies.

SLC/CCL

69. If a portion of the CCL charge represents a subsidy to support universal service, what is the total amount of the subsidy? Please provide supporting evidence to substantiate such estimates. Supporting evidence should indicate the cost methodology used to estimate the magnitude of the subsidy (e.g., long-run incremental, short-run incremental, fully distributed).

The total amount of the interstate CCL subsidy is approximately $3.6 billion based on fully distributed costs.

70. If a portion of the CCL charge represents a contribution to the recovery of loop costs, please identify and discuss alternatives to the CCL charge for recovery of those costs from all interstate telecommunications service providers (e.g., bulk billing, flat rate/per-line charge).

Since CCL is an implicit subsidy, USTA has recommended that it be eliminated over a four year period. As EUCL prices are rebalanced, interstate CCL prices will be adjusted to recover the difference between the EUCL price and the interstate affordability benchmark. Interstate CCL would decrease and be eliminated as EUCL prices are rebalanced. If the Federal-State Joint Board does not eliminate this implicit subsidy, incumbent exchange carriers should be permitted flexibility in how the remaining CCL is to be treated.

Low-Income Consumers

71. Should the new universal service fund provide support for the Lifeline and Linkup programs, in order to make those subsidies technologically and competitively neutral? If so, should the amount of the lifeline subsidy still be tied, as it is now, to the amount of the subscriber line charge?

The Lifeline and Linkup programs should be funded through the imposition of a surcharge on interstate retail revenues of all telecommunications service providers in order to make these programs technologically and competitively neutral. USTA has also recommended that the amount of the lifeline subsidy be increased to match any increase in the subscriber line charge.

Administration of Universal Service Support

72. Section 254(d) of the 1996 Act provides that the Commission may exempt carriers from contributing to the support of universal service if their contribution would be "de minimis." The conference report indicates that "[t]he conferees intend that this authority would only be used in cases where the administrative cost of collecting contributions from a carrier or carriers would exceed the contribution that carrier would otherwise have to make under the formula for contributions selected by the Commission." What levels of administrative costs should be expected per carrier under the various methods that have been proposed for funding (e.g., gross revenues, revenues net of payments to other carriers, retail revenues, etc.)?

The intent of Congress can be achieved by requiring every telecommunications carrier to pay into the fund, even if the amount is "de minimis". For example, all telecommunications carriers are required to contribute at least $100 to the TRS fund to cover administrative costs. Such a policy should also be applied to cover the administrative costs of the universal service funds.

Administrative cost is only one factor which should be used to determine which method of funding should be adopted. While the administrative costs of using gross revenues may be less, although only initially, than using retail revenues, the use of retail revenues is far superior to ensure that funding is economically efficient and competitively neutral. The use of retail revenues avoids the double counting that would occur if gross revenues were used and thereby minimizes the economic disincentive to prevent the double counting by avoiding wholesale transactions.

USTA appreciates this opportunity to answer these important questions and to further explain its proposals. USTA would be happy to respond to any further questions.

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I, Robyn L.J. Davis, do certify that on August 2, 1996 comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.

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