

carriers to receive support from the fund while not contributing to it.<sup>40</sup> BellSouth proposed a double-cap approach, under which amounts available from the fund for non-telecommunications services would be limited to a certain amount below the overall education cap, and would be subject to a sunset provision.<sup>41</sup>

However, this amount could only be made available to eligible telecommunications carriers.

Schools and libraries should not be required, as some parties argue, to reopen existing contracts with their current telecommunications supplier on a “fresh look” basis.<sup>42</sup> Many of these contracts have already been subjected to a competitive bidding or a best rate process. Schools and libraries may choose to renegotiate, but requiring them to do so would impose a burden on these entities, and it would create chaos in the marketplace due to the number of bids that would have to be entertained simultaneously. As the Minnesota Independent Coalition points out, the *Recommended Decision* recognizes that schools should not be required to abandon existing contracts.<sup>43</sup> The Coalition states that “this recognition should be clarified further by specifically exempting

---

<sup>40</sup> See Internet Consumers at p. 7.

<sup>41</sup> See BellSouth at p. 28.

<sup>42</sup> See, e.g., Teleport at p. 8; The American Assn. of Community Colleges and the Association of Community College Trustees at pp. 17-18.

<sup>43</sup> See Minnesota Independent Coalition at p. 31; *Recommended Decision* at para. 572.

existing arrangements from the procedural requirements imposed on new projects, including competitive bidding. . . ."<sup>44</sup>

Regarding the Joint Board's recommendation that carriers be funded for the discount from the lowest corresponding price ("LCP") to similarly-situated non-residential customers for similar services, some parties suggest that, in a truly competitive environment, an LCP requirement is not necessary.<sup>45</sup> We agree that the workings of the competitive marketplace obviate the need for such a mechanism. Therefore, the Commission should not adopt the Joint Board's recommendation. However, if the Commission proceeds with the LCP approach, it should not adopt proposals that would make it difficult, if not impossible, to administer. For example, EDLINC proposes that the LCP be calculated simply on the basis of volume, and that it not take into account factors such as distance or the term of the contract.<sup>46</sup> The Commission should not adopt this proposal. The LCP should be based on all factors that affect the cost of service. These include, but are not limited to, volume; term of contract; termination liability, if any; distance from the central office; whether the nearest central office is capable of providing the service; and any differences in billing arrangements.

---

<sup>44</sup> *Id.*

<sup>45</sup> *See, e.g.,* BellSouth at p. 31; Vermont PSC at p. 18.

<sup>46</sup> *See* EDLINC at pp. 6-9.

The Commission should clarify the definition of geographic area for purposes of calculating the LCP. NYNEX agrees with Pacific that requiring the carrier to offer the same LCP throughout its entire service area -- regardless of cost differences -- would be "irrational, and perhaps confiscatory."<sup>47</sup> Bell Atlantic and NYNEX propose that the geographic area should be the area where the customer orders service, which could be a school district, a county, or even an entire state.

EDLINC proposes that if no similarly-situated customer is available for comparison, the next lowest rate should apply.<sup>48</sup> However, this would lead to a downward spiral in prices that could not be sustained. We propose that, in the event no similarly-situated customer could be found within the geographic service area, a point should be chosen outside the geographic area which is as similar as possible, in terms of density and geographic characteristics.

Some parties argue that the pre-discount price should be set at total service long run incremental cost ("TSLRIC").<sup>49</sup> The *Recommended Decision* explicitly rejected TSLRIC as a basis for determining the pre-discount rate,<sup>50</sup> and the Commission should affirm the Joint Board on this point. Adoption of a pre-discount price other than a carrier's existing or LCP price would be inconsistent with Section 254(h)(1)(B) of the Act, which states that carriers should be

---

<sup>47</sup> Pacific at p. 49.

<sup>48</sup> See EDLINC at p. 9.

<sup>49</sup> See, e.g., EDLINC at p. 7; MCI at p.17.

<sup>50</sup> See *Recommended Decision* at para. 545.

reimbursed for the discounts from “amounts charged for similar services to other parties.”

The Commission may wish to impose an annual per-institution cap, as suggested by AT&T.<sup>51</sup> This would help forestall a rush by schools and libraries to take advantage of the program before the overall annual cap is reached, and it would minimize the provider’s need to engage in unrealistic pricing activities and staffing demand. An alternative is to establish a cap on funds going to each state, as proposed by The Alliance for Public Technology,<sup>52</sup> which would mitigate the concerns of states regarding equitable distribution.

### **VIII. The Commission Should Adhere To The Statutory Scheme For Support To Rural Health Care Providers.**

BellSouth argues that the Commission should concentrate its efforts in establishing rules for support to rural health care providers that will implement the specific provisions of the statute;<sup>53</sup>

The statute specifies that, for a necessary service, the rate charged to the health care provider in the rural area shall be comparable to the rate charged for a similar service in urban areas. It is only the difference between the rate charged to the health care provider and the rate charged to other rural customers that may be supported by the universal service fund.<sup>54</sup>

---

<sup>51</sup> See AT&T at p. 21.

<sup>52</sup> See APT at p. 3.

<sup>53</sup> See Bell South at p.40.

<sup>54</sup> See *id.* at p. 42.

The Commission should not expand the support for health care providers to subsidize network modernization in rural areas, to support provision of facilities to connect rural areas to databases dozens or hundred of miles away, or to subsidize specially constructed high-capacity facilities.<sup>55</sup> It would be inconsistent with the statutory requirements, and it would be poor public policy, to subsidize large network upgrades with universal service funds.

Bell Atlantic and NYNEX agree with Pacific that the Commission should not provide universal service funding for toll-free Internet access for rural health care providers. As Pacific states in its comments:

To the extent the Commission would have telecommunications carriers waive toll charges for a health care provider to reach the nearest Internet Service Provider's server, there is nothing in the statute that supports this provision. All Section 254 requires with regard to health care is that they pay rates that are no higher than the rates a carrier charges urban providers<sup>56</sup>

Other proposals also go beyond the intent of the statute. For instance, the District of Columbia states that;

To determine which health care providers are eligible for universal services support, the commission should employ a scheme similar to that recommended by the Joint Board for schools and libraries. Similar to the schools and libraries, the criteria for eligibility, and the amount of universal service support, given health care providers should be based on need rather than on location.<sup>57</sup>

---

<sup>55</sup> See Bell Atlantic at p. 19.

<sup>56</sup> See Pacific Telesis at p. 57.

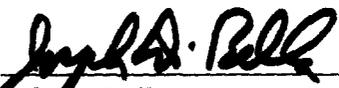
<sup>57</sup> See District of Columbia PSC at p. 3.

This would also go well beyond the terms of Section 254. Bell Atlantic and NYNEX fully support the intent of Congress to provide universal service support to rural health care providers. However, this support must be provided within the confines of the statute.

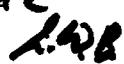
**IX. Conclusion**

The comments that were filed in this proceeding illustrate the danger of going beyond the Commission's statutory authority and creating an excessively large universal service fund that will burden telecommunications users. The Commission should adopt the Bell Atlantic and NYNEX proposals for narrowly tailored universal service funding mechanisms.

Respectfully submitted,

By:   
Joseph Di Bella

1300 I Street, N.W., Suite 400 West  
Washington, DC 20005  
(202) 336-7894  
Attorney for The NYNEX  
Telephone Companies

By:   
Lawrence W. Katz 

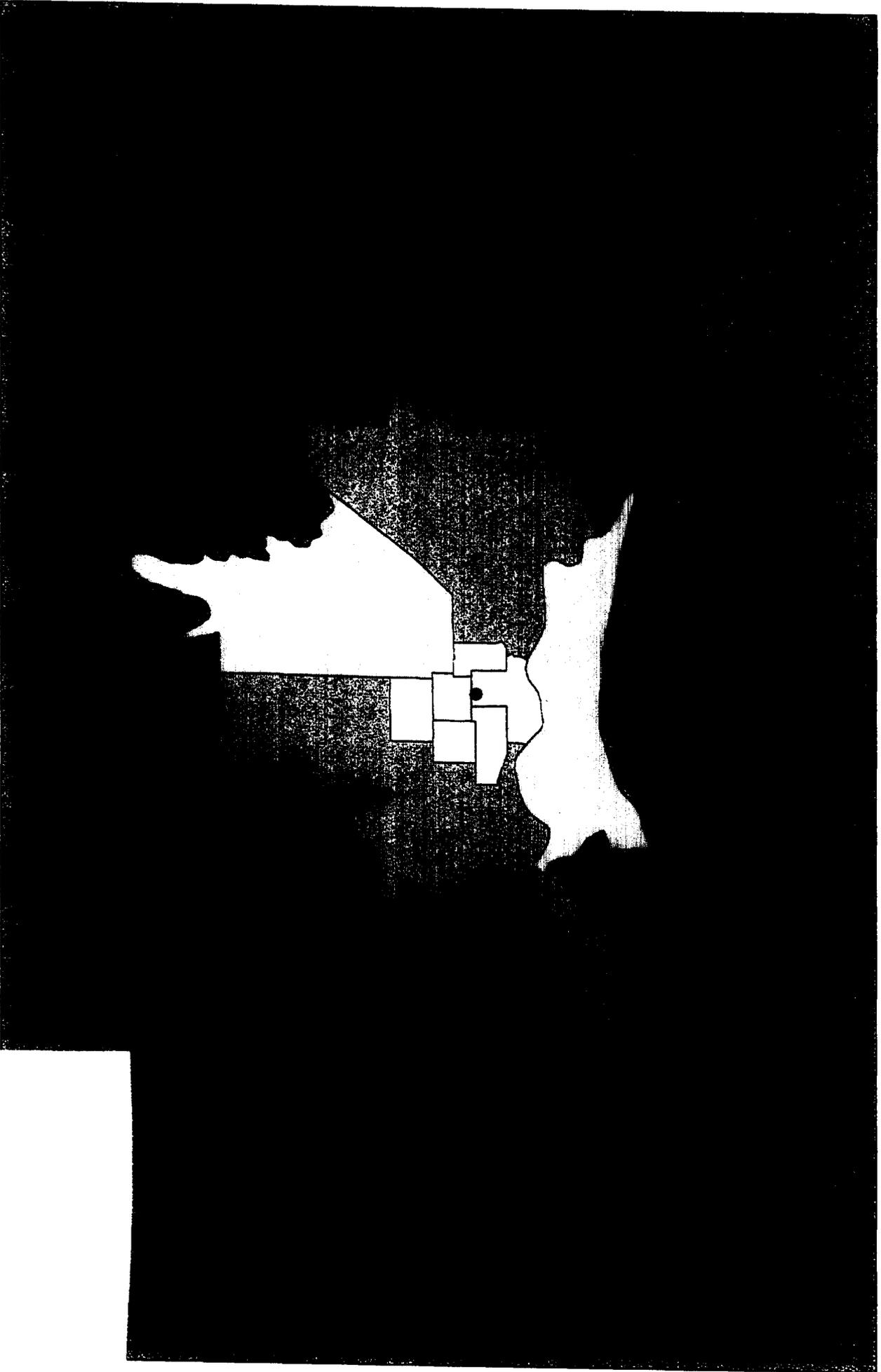
Edward D. Young, III  
Betsy L. Anderson  
Of Counsel

1320 North Court House Road, 8th Floor  
Arlington, VA 22201  
(703) 974-4862  
Attorney for the Bell Atlantic  
Telephone Companies

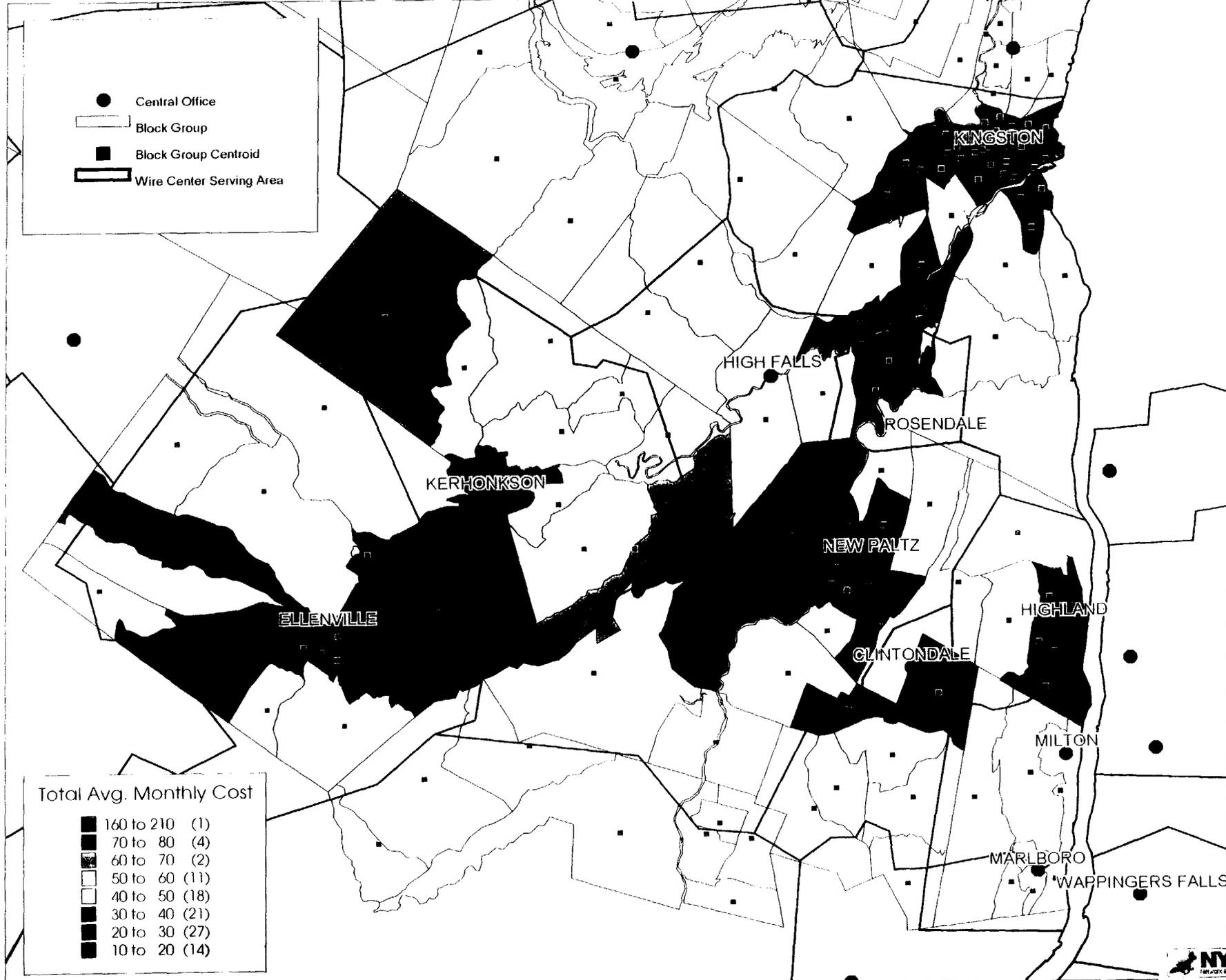
Dated: January 10, 1997

# LA JUNTA COLORADO

Attachment A



- Central Office
- Block Group
- Block Group Centroid
- ▭ Wire Center Serving Area



Total Avg. Monthly Cost

■	160 to 210	(1)
■	70 to 80	(4)
■	60 to 70	(2)
■	50 to 60	(11)
■	40 to 50	(18)
■	30 to 40	(21)
■	20 to 30	(27)
■	10 to 20	(14)

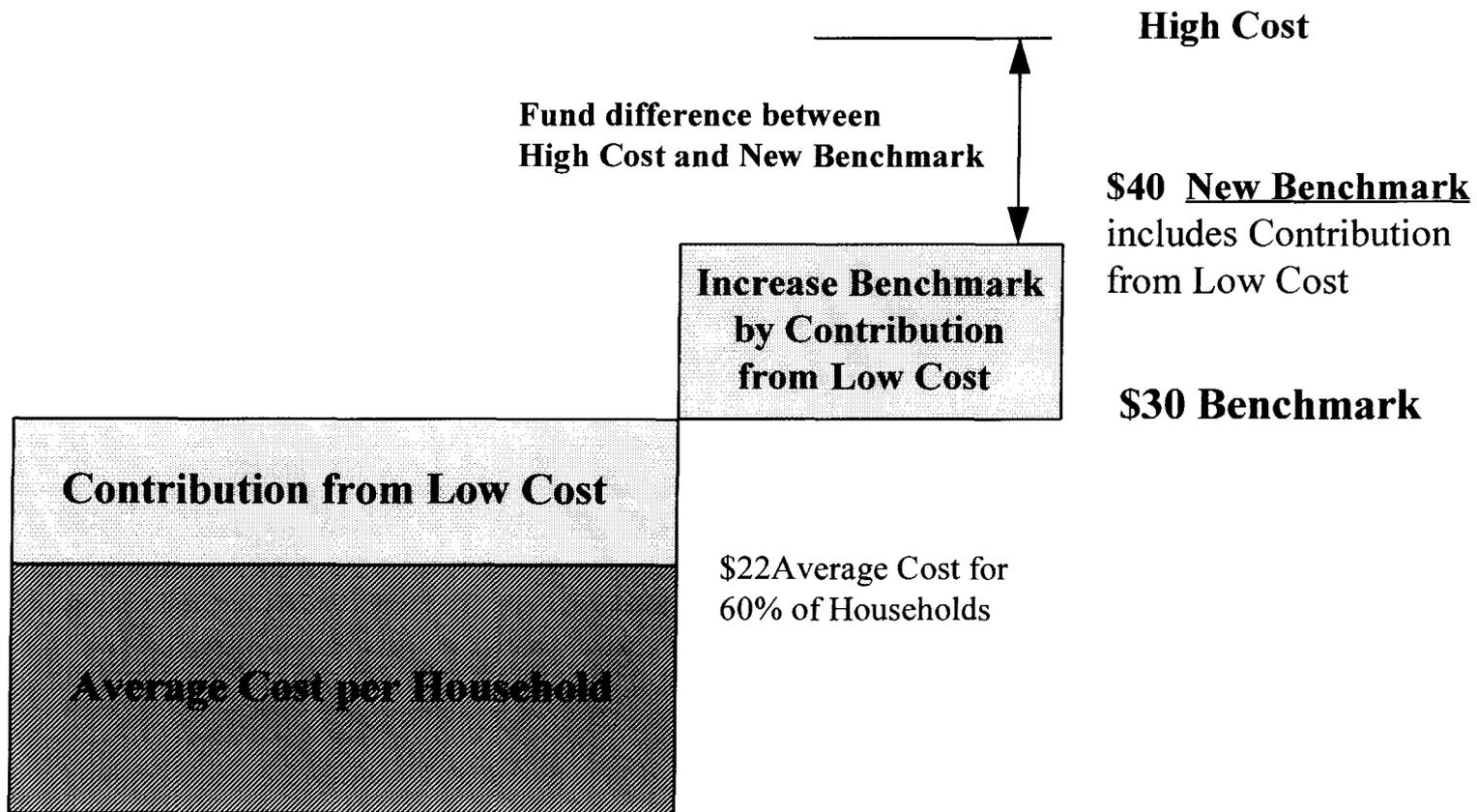
Comparison of RBOC Funding Levels from BCM2 and Hatfield  
\$30 Benchmark  
Dollars in Thousands (000)

ATTACHMENT C

	BCM2	Hatfield	Difference
<b>Ameritech</b>	\$ 377,624	\$ 272,290	\$ (105,334)
Illinois	\$68,847	\$ 92,973	\$ 24,126
Indiana	\$58,008	\$ 34,605	\$ (23,403)
Michigan	\$139,411	\$ 56,298	\$ (83,113)
Ohio	\$74,177	\$ 33,863	\$ (40,314)
Wisconsin	\$37,181	\$ 54,551	\$ 17,370
			\$ -
<b>Bell Atlantic</b>	\$ 416,855	\$ 109,157	\$ (307,698)
Delaware	\$ 13,902	\$ 41	\$ (13,861)
Maryland	\$ 56,844	\$ 310	\$ (56,534)
New Jersey	\$ 49,875	\$ 256	\$ (49,619)
Pennsylvania	\$ 118,182	\$ 28,124	\$ (90,058)
Virginia	\$ 79,992	\$ 41,226	\$ (38,766)
Wash DC	\$ -	\$ -	\$ -
West Virginia	\$ 98,060	\$ 39,200	\$ (58,860)
			\$ -
<b>Bellsouth</b>	\$ 887,186	\$ 431,057	\$ (456,129)
Alabama	\$ 96,555	\$ 86,829	\$ (9,726)
Florida	\$ 98,368	\$ 43,852	\$ (54,516)
Georgia	\$ 102,450	\$ 74,185	\$ (28,265)
Kentucky	\$ 84,692	\$ 34,527	\$ (50,165)
Louisiana	\$ 118,681	\$ 30,618	\$ (88,063)
Mississippi	\$ 127,522	\$ 68,563	\$ (58,959)
North Carolina	\$ 71,940	\$ 28,359	\$ (43,581)
South Carolin	\$ 66,723	\$ 23,550	\$ (43,173)
Tennessee	\$ 120,255	\$ 40,574	\$ (79,681)
			\$ -
<b>NYNEX</b>	\$ 460,034	\$ 96,150	\$ (363,884)
Maine	\$ 77,293	\$ 17,309	\$ (59,984)
Massachusett	\$ 85,358	\$ 32	\$ (85,326)
New Hampshir	\$ 53,978	\$ 3,198	\$ (50,780)
New York	\$ 188,978	\$ 67,433	\$ (121,545)
Rhode Island	\$ 15,698	\$ -	\$ (15,698)
Vermont	\$ 38,729	\$ 7,988	\$ (30,741)
Connecticut		\$ 190	\$ 190
			\$ -
<b>Pacific</b>	\$ 193,118	\$ 249,906	\$ 56,788
California	\$ 172,568	\$ 204,207	\$ 31,639
Nevada	\$ 20,550	\$ 45,699	\$ 25,149
			\$ -
<b>SBC</b>	\$ 440,109	\$ 682,682	\$ 242,573
Arkansas	\$ 64,175	\$ 72,090	\$ 7,915
Kansas	\$ 46,665	\$ 83,710	\$ 37,045
Missouri	\$ 76,832	\$ 130,198	\$ 53,366
Oklahoma	\$ 70,690	\$ 120,934	\$ 50,244
Texas	\$ 181,747	\$ 275,750	\$ 94,003
			\$ -
<b>US West</b>	\$ 541,688	\$ 811,084	\$ 269,396
Arizona	\$ 74,830	\$ 86,660	\$ 11,830
Colorado	\$ 74,164	\$ 65,557	\$ (8,607)
Idaho	\$ 32,230	\$ 40,664	\$ 8,434
Iowa	\$ 35,018	\$ 69,714	\$ 34,696
Minnesota	\$ 58,366	\$ 94,885	\$ 36,519
Montana	\$ 21,713	\$ 59,789	\$ 38,076
Nebraska	\$ 23,282	\$ 80,360	\$ 57,078
New Mexico	\$ 47,681	\$ 75,561	\$ 27,880
North Dakota	\$ 13,754	\$ 45,322	\$ 31,568
Oregon	\$ 40,810	\$ 60,856	\$ 20,046
South Dakota	\$ 34,109	\$ 27,993	\$ (6,116)
Utah	\$ 28,828	\$ 37,573	\$ 8,745
Washington	\$ 40,469	\$ 46,673	\$ 6,204
Wyoming	\$ 16,434	\$ 19,477	\$ 3,043
<b>Total</b>	\$ 3,316,614	\$ 2,652,326	

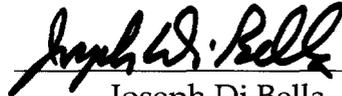
# Attachment D

BENCHMARK MUST BE INCREASED  
BY EXISTING SUBSIDY



## CERTIFICATE OF SERVICE

I hereby certify that copies of this pleading were mailed this date, first class postage prepaid, upon the persons listed on the attached service list.

  
\_\_\_\_\_  
Joseph Di Bella

Dated: January 10, 1997

Ms. Kathleen Abernathy  
Airtouch Communications, Inc.  
1818 N Street, N.W.  
Washington, DC 20036

Charles Acquard  
Attorney  
1133 15th Street, N. W.  
Suite 500  
Washington, D.C. 20005

Mr. Danny E. Adams  
Kelley Drye & Warren LLP  
1200 Nineteenth Street, NW  
Suite 500  
Washington, DC 20036

Ms. Mary Mack Adu  
Attorney  
St of CA Public Utilities  
505 Van Ness Avenue  
San Francisco, CA 94102

Ms. Veronica Ahern  
Attorney  
Nixon, Hargrave, Devans & Doyle for Guam Telephone  
Authority  
One Thomas Circle  
Suite 700  
Washington, DC 20005

Mr. Michael Altschul  
VP and General Counsel  
Cellular Telecommunications Industry Association  
1250 Connecticut Ave. N.W.  
Suite 200  
Washington, DC 20036

Mr. Matthew C. Ames  
Attorney  
Miller & Van Eaton, P.L.L.C  
1225 Nineteenth Street, N.W  
Suite 400  
Washington, DC 20036-2420

Betsy L. Anderson  
Bell Atlantic  
1133 20th Street, NW  
Washington, DC 20036

Marlin Ard  
Pacific Telesis Group  
140 Montgomery Street  
Room 1529  
San Francisco, CA 94105

Mr. Peter Arth  
People of the State of California & Public  
Utilities Commission of the State of California  
505 VanNess Avenue  
San Francisco, CA 94102

Mr. Richard Askoff  
National Exchange Carrier Association  
100 South Jefferson Road  
Whippany, NY 07981

Mr. Steven A. Augustino  
Attorney  
Kelley Drye  
1200 Nineteenth Street, N. W.  
Suite 500  
Washington, DC 20036

Ms. Penny Baker  
Attorney  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

Mr. Dave Baker  
Chairman  
Georgia Public Service Commission  
244 Washington St. SW  
Atlanta, GA 30334-5701

Mr. James Baller  
Attorney  
The Baller Law Group  
1820 Jefferson Place, N. W.  
Suite 200  
Washington, DC 20036

William B. Barfield  
Attorneys for BellSouth Corporation  
1155 Peachtree Street, NE  
Suite 1800  
Atlanta, GA 30309-3610

Mr. Leon Barwick  
Director  
Bureau of Information Services  
434 Monroe Street  
Montgomery, AL 36130-3017

Mr. Jeffrey F. Beck  
Attorney  
Beck and Ackerman  
Four Embarcadero Center  
Suite 760  
San Francisco, CA 94111

Mr. Gene Belardi  
Vice President  
MobileMedia Communications, Inc.  
2101 Wilson Blvd.  
Suite 935  
Arlington, VA 22201

Mr. Alex Belinfante  
Federal Communications Commission  
2033 M Street, NW  
Room 500  
Washington, DC 20554

Mr. Larry Belmont  
Director  
PANHANDLE HEALTH DISTRICT 1  
2195 Ironwood Court  
Coeur d' Alene, ID 83814

Mr. Raymond G. Bender  
Attorney  
Dow, Lohnes & Albertson  
1200 New Hampshire Ave.  
Suite 800  
Washington, DC 20037

Eileen Benner  
Idaho Public Utilities Commission  
P.O. Box 83720  
Boise, ID 83720-0074

Mr. John T. Benson  
State Superintendent  
Department of Public Instruction  
P. O. Box 7841  
Madison, WI 53707-7841

Mr. James D. Bentley  
Sr. Vice President for Policy  
American Hospital Association  
325 Seventh Street, N. W.  
Washington, DC 20004-2802

Mr. Stephen J. Berman  
Attorney  
Fisher Wayland Cooper Leader & Zaragoza L. L. P  
2001 Pennsylvania Avenue, N. W.  
Suite 400  
Washington, DC 20006

Ms. Cheryl Beversdorf  
Executive Vice President  
Association of State and Territorial Health Officials  
415 Second Street, N. E.  
Suite 200  
Washington, DC 20002

Mr. Ronald J. Binz  
President  
Competition Policy Institute  
1156 15th Street, N.W.  
Suite 310  
Washington, DC 20005

Ms. Sue D. Blumenfeld  
Wilkie Farr & Gallagher  
1155 21st Street, N.W.  
Suite 600  
Washington, DC 20036

Lisa Boehley  
Federal Communications Commission  
2100 M Street, NW  
Room 8605  
Washington, DC 20554

Mr. Charles Bolle  
South Dakota Public Utilities Commission  
500 East Capital Avenue  
State Capital  
Pierre, SD 57501-5070

Ms. Colleen Boothby  
Attorney  
Levine, Blaszak, Block and Boothby  
1300 Connecticut Avenue  
Suite 500  
Washington, DC 20036

Ms. Jacquelyn Brand  
Attorney  
Universal Service Alliance  
2175 East Francisco Drive  
Suite L  
San Rafael, CA 94901

Ms. Fiona Branton  
Director  
Information Technology Industry Council  
1250 Eye Street  
Washington, DC 20005

Mr. Daniel L. Brenner  
Attorney  
National Cable Television Association, Inc.  
1724 Massachusetts Avenue, N.W.  
Washington, DC 20554

Ms. Kathy Brown  
NTIA  
14th & Constitution, NW  
Room 4898  
Washington, DC 20230

Deonne Bruning  
Nebraska Public Service Commission  
300 The Atrium  
1200 N Street, P.O. Box 94927  
Lincoln, NE 68509-4927

Mr. Kenneth T. Burchett  
Vice President  
GVNW  
7125 SW Hampton  
Portland, OR 97223

Ms. Jody B. Burton  
Assistant General Counsel  
General Service Administration  
18th and F. Street, N.W.  
Room 4002  
Washington, DC 20405

Gregory M. Casey  
Senior Vice President  
Attorney for Telemation International, Inc.  
6707 Democracy Blvd.  
Bethesda, MD 20817

James Casserly  
Federal Communications Commission  
Office of Commissioner Ness  
1919 M Street, NW, Room 8619  
Washington, DC 20554

The Honorable Rachelle Chong  
Commissioner  
Federal Communications Commission  
1919 M Street, N.W.  
Room 844  
Washington, DC 20554

John Clark  
Federal Communications Commission  
2100 M Street, NW  
Room 8619  
Washington, DC 20554

Bryan Clopton  
Federal Communications Commission  
2100 M Street, NW  
Room 8615  
Washington, DC 20554

Francis Collins  
Consultants to California Cable Television  
CCL Corporation  
Box 272  
Newton, MA 02159

Mr. Tom Cook  
Director  
Oregon Public Education Network  
P. O. Box 216  
Marylhurst, OR 97036-0216

Mr. David Cosson  
Attorney  
National Telephone Cooperative Association  
The Rural Telephone Coalition  
2626 Pennsylvania Avenue, NW  
Washington, DC 20037

Ms. Regina Costa  
Joint Consumer Advocates  
Toward Utility Rate Normalization  
625 Polk Street  
Suite 403  
San Francisco, CA 94102

Mr. Sam Cotten  
Commissioner  
Chairman of the Alaska Public Utilities Commission  
1016 West Sixth Avenue  
Suite 400  
Anchorage, AL 99501-1963

Mr. Lawrence D. Crocker, III  
Acting General Counsel  
DeSoto County, Mississippi Economic Council  
District of Columbia Public Service Commission  
717 14th Street, N. W.  
Washington, DC 20005

Mr. Mark E. Crosby  
President & CEO  
Industrial Telecommunications Assoc., INC.  
1110 N. Glebe Road  
Suite 500  
Arlington, VA 22201

Mr. Thomas Crowe  
Counsel  
Commonwealth of the Northern Mariana Islands  
2300 M St. NW  
Suite 800  
Washington, DC 20037

Mr. Frederick J. Day  
Executive director  
Industrial Telecommunications  
1110 N. Glebe Road  
Suite 500  
Arlington, VA 22201

Ms. Andrea De Vries  
Program Manager  
University of Minnesota  
420 Delaware Street, S. E.  
Box 734  
Minneapolis, MN 55455

Mr. Benjamin H. Dickens  
Blooston, Mordkofsky, Jackson and Dickens  
2120 L. Street, N.W.  
Suite 300  
Washington, DC 20037

Mr. Kevin S. DiLallo  
Attorney  
Levine, Blaszak, Block & Boothby  
1300 Connecticut Avenue, N. W.  
Suite 500  
Washington, DC 20036-1703

Ms. Amy Dougherty  
Attorney  
Kentucky Public Service Commission  
PO Box 615  
Frankfort, KY 40602

Ms. Patricia A. Dowlin  
BSN, N  
Mitchell County Health Department  
400 West 8th  
Box 217  
Beloit, KS 67420

Mr. Ron Eachus  
Commissioner  
Oregon Public Utility Commission  
550 Capitol Street, NE  
Salem, OR 97310-1380

Mr. Joe D. Edge  
Attorney  
Drinker, Biddle and Reath  
901 15th Street, N.W.  
Washington, DC 20005

Steve Ellenbecker  
Secretary and Chief Counsel  
Wyoming Public Service Commission  
700 West 21st Street  
Cheyenne, WY 82002

Mr. Gary Epstein  
Attorney  
Latham and Watkins  
1001 Pennsylvania Avenue, N.W.  
Suite 1300  
Washington, DC 20004

Mr. Michael J. Ettner  
General Services Administration  
18th and F Streets, N.W.  
Room 4002  
Washington, DC 20405

Mr. Paul Feldman  
Roseville Telephone Company  
1300 North 17th Street  
11th Floor  
Rosslyn, VA 22209

Irene Flannery  
Federal Communications Commission  
2100 M Street, NW  
Room 8922  
Washington, DC 20554

Ms. Marla Florence  
Administrator  
Grant County Health Department  
105 South Glenn  
Ulysses, KS 67880

Mr. Daniel Fly  
Director  
REMEC  
1105 Sixth Street  
Traverse City, MI 49684-2386

Robert S. Foosner  
Senior Vice President Gov. Affairs  
Nextel Communications, Inc.  
800 Connecticut Avenue, NW  
Suite 1001  
Washington, DC 20006

Mr. Michael Fox  
Director  
John Staurulakis, Inc.  
6315 Seabrook Rd.  
Seabrook, MD 20706

Dana Frix  
Attorney  
Swidler & Berlin, Chartered  
3000 K Street, N. W.  
Suite 300  
Washington, DC 20007

Ms. Pamela Fusting  
Attorney  
NTCA  
2626 Pennsylvania Avenue, N. W.  
Washington, DC 20037

Loretta J. Garcia  
Attorneys for MCI Telecommunications  
1801 Pennsylvania Avenue, NW  
Washington, DC 20006

Alan Gardner  
California Cable Television Assn.  
4341 Piedmont Avenue  
Oakland, CA 94611

Mr. Jim Gay  
President  
NASTD  
P. O. Box 3155  
Little Rock, Ar 72203

Mr. Robert Gee  
Commissioner  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
P. O. Box 13326  
Austin, TX 78711-3326

Mr. William R. Gillis  
Commissioner  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive S. W.  
P. O. Box 47250  
Olympia, WA 98504-7250

Mr. Paul Glist  
Attorney  
Cole, Raywid, and Braverman, L.L.P.  
1919 Pennsylvania Avenue, N.W.  
Suite 200  
Washington, DC 20006

Mr. Jere W. Glover  
Chief Counsel  
United States Small Business Administration  
409 Third Street, S.W.  
Suite 7800  
Washington, DC 20416

Mr. Neal Goldberg  
Attorney  
National Cable Television Association, Inc.  
1724 Massachusetts Avenue, NW  
Washington, DC 20036

Mr. Mark J. Golden  
Vice President of Industry Affairs  
Personal Communications Industry Association  
500 Montgomery St.  
Suite 700  
Alexandria, VA 22314-1561

Ms. Anna Gomez  
Federal Staff Chair of the Universal Services Joint Board  
Federal Communications Commission  
2100 M Street  
Room 8617  
Washington, DC 20554

Daniel Gonzalez  
Federal Communications Commission  
Office of Commissioner Chong  
1919 M Street, NW, Room 844  
Washington, DC 20554

Mr. Ronald Greenhalgh  
Chief Engineer  
National Rural Electric Cooperative Association  
4301 Wilson Blvd.  
Arlington, VA 22203-1860

Mr. David J. Gudino  
1850 M. Street, N.W.  
Suite 1200  
Washington, DC 20036

Ms. L. Marie Guillory  
Attorney  
NTCA  
2626 Pennsylvania Avenue, N. W.  
Washington, DC 20037

Robert M. Gurs  
Attorney for Association of Public-Safety  
Wilkes, Artis, Hedrick & Lane, Chartered  
1666 K Street, NW  
Suite 1100  
Washington, DC 20006

Mr. Carl T.C. Gutierrez  
Governor  
Territory of Guam  
P. O Box 2950  
Agana, Guam 96910

Mr. Bruce Hagen  
Commissioner  
Public Service Commission of North Dakota  
State Capitol  
600 E. Blvd.  
Bismarck, ND 58505-0480

Mr. David Haid  
Wyoming Medical Center Telemedicine Department  
1233 East 2nd Street  
Casper, WY 82601

Albert Halprin  
Attorneys for the Yellow Pages Publishers  
Halprin, Temple, Goodman & Sugrue  
1100 New York Avenue, NW  
Suite 650, East Tower  
Washington, DC 20005

Mr. Roger Hamilton  
Chairman  
Oregon Public Utility Commission  
550 Capitol St. NE  
Salam, OR 97310-1380

Ms. Melanie Haratunian  
Attorneys for Northern Telecom, Inc.  
Halprin, Temple, Goodman & Sugrue  
1100 New York Avenue, NW  
Suite 650, East Tower  
Washington, DC 20005

Mr. Jack B. Harrison  
Cincinnati Bell Telephone Company  
2500 PNC Center  
201 East Fifth Street  
Cincinnati, OH 45202

Mr. Robert A. Hart  
Hart Engineers  
4615 N. Blvd.  
Baton Rouge, LA 70806

Mr. Werner K. Hartenberger  
Dow, Lohnes & Albertson  
1255 Twenty-third Street, N.W.  
Suite 500  
Washington, DC 20037

Mr. Charles H. Helein  
General Counsel  
Helein, Waysdorf & Mandigo, PC  
8180 Greensboro Dr.  
Suite 700  
McLean, VA 22102

Ms. Maureen Helmer  
General Counsel  
New York State Department of Public Service  
Three Empire State Plaza  
Albany, NY 12223-1350

Mr. Richard Hemstad  
Commissioner  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

Ms. Carol Henderson  
Executive Director  
ALA Washington Office  
1301 Pennsylvania Ave.  
NW Suite 403  
Washington, DC 20004

Ann E. Henekener  
Public Utilities Section  
180 East Broad St.  
Columbus, OH 43266-0573

Ms. Carolyn C. Hill  
Alltel Corporate Services  
655 15th Street, N.W.  
Suite 220  
Washington, DC 20005

Mr. James R. Hobson  
Attorney  
Donelan, Cleary, Wood & Maser, PC  
National Emergency Number Association  
1100 New York Avenue, NW, Suite 750  
Washington, DC 20005-3934

Emily Hoffnar  
Federal Communications Commission  
2100 M Street, NW  
Room 8623  
Washington, DC 20554

Ms. Martha Hogerty  
Joint Consumer Advocates  
Public Counsel for the State of Missouri  
P.O. Box 7800  
Harry S. Truman Building, Room 250  
Jefferson City, MO 65102

Mr. Robert L. Hoggarth  
Attorney  
Personal Communications Industry Association  
500 Montgomery Street  
Suite 700  
Alexandria, VA 22314-1561

Laura L. Holloway  
General Attorney  
Nextel Communications, Inc.  
800 Connecticut Avenue, NW  
Suite 1001  
Washington, DC 20006

Jeffrey S. Hops  
Director, Government Relations  
Alliance for Community Media  
666 11th Street, NW  
Suite 806  
Washington, DC 20001

Ms. Margot Smiley Humphrey  
Attorney  
Century Telephone Enterprises, Inc. & TDS  
Telecommunications Corporation & Rural Telephone  
Coalition  
1150 Connecticut Avenue, N.W.  
Suite 1000  
Washington, DC 20036

The Honorable Reed Hundt  
Chairman  
Federal Communications Commission  
1919 M Street NW  
Room 814  
Washington, DC 20554

Mr. Charles Hunter  
Hunter & Mow, PC for Telecommunications Resellers  
Association  
1620 I Street, NW  
Suite 701  
Washington, DC 20006

Jim Hurt  
Director  
Consumers' Utility Counsel Division  
#2 Dr. M.L. King, Jr. Drive  
Plaza Level, East Tower  
Atlanta, GA 30334

Mr. David A. Irwin  
Attorney  
Irwin, Campbell and Tannenwald, P.C.  
1730 Rhode Island Ave., N.W.  
Washington, DC 20036

Mr. Ellis Jacobs  
Council for the Edgemont Neighborhood Coalition  
Legal Aid Society of Dayton, Inc.  
333 West First St.  
Suite 500  
Dayton, OH 45402-3031

Paula A. Jameson  
Sr. VP, General Counsel  
Public Broadcasting Service  
1320 Braddock Place  
Alexandria, VA 22314-1698

David C. Jatlow  
Attorney for The Ericsson Corporation  
Young & Jatlow  
2300 N Street, NW  
Suite 600  
Washington, DC 20037

Mr. Ken Johnson  
Attorney  
OPASTCO  
21 Dupont Circle, NW  
Suite 700  
Washington, DC 20036

The Honorable Julia Johnson  
Commissioner  
Florida Public Service Commission  
Capital Circle Office Center  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Mr. Randall Johnson  
Director  
Marquette County Health Department  
184 U. S. 41 Highway  
Negaunee, MI 49866-9671

Mr. Richard Johnson  
Moss & Barnett  
4800 Norwest Center  
90 South Seventh St.  
Mineapolis, MN 55402-4129

Mr. Thomas Jones  
Attorney  
WILLKIE, FARR & GALLAGHER  
1155 21st Street, N. W.  
Three Lafayette Centre  
Washington, DC 20036

Mr. Frederick M. Joyce  
Attorney  
Joyce & Jacobs, Attorneys for Celpage, Inc.  
1019 19th Street, NW  
14th Floor, PH-2  
Washington, DC 20036

David L. Kahn  
c/o Bellatrix International  
4055 Wilshire Blvd.  
Suite 415  
Los Angeles, CA 90010

Ms. Myra L. Karegianes  
General Counsel  
Illinois Commerce Commission  
160 N. LaSalle Street  
Suite C-800  
Chicago, IL 60601

Mr. James C. Keithley  
United and Central Telephone Companies  
1850 M. Street, N.W.  
Suite 1100  
Washington, DC 20036

Mr. Thomas Keller  
Attorney  
Verner, Liipfert, Bernard, McPherson & Hand, Chtd.  
901-15th Street, N. W  
Suite 700  
Washington, DC 20005

Mr. Lawrence Keller  
Director - Federal Regulatory Services  
Cathey, Hutton and Associates  
3300 Holcomb Bridge Road  
Suite 286  
Norcross, GA 30092

Mr. Leonard J. Kennedy  
Dow, Lohnes & Albertson  
1200 New Hampshire Ave.  
Suite 800  
Washington, DC 20036-6802

Lori Kenyon  
Alaska Public Utilities Commission  
1016 West Sixth Avenue  
Suite 400  
Anchorage, AK 99501

Ms. Patricia E. Klinck  
State Librarian  
St of Vermont Public Service Board  
112 State Street  
4th Floor, Drawer 20  
Montpelier, VT 0562-2701

Mr. William C. Kling  
General Counsel  
Waubonsee Community College  
Route 47 at Harter Road  
Sugar Grove, IL 60554