

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Changes to the Board of) CC Docket No. 97-21
Directors of the National Exchange)
Carrier Association, Inc.)

REPLY COMMENTS OF THE ASSOCIATIONS

The Rural Telephone Coalition and the United States Telephone Association (the Associations) file these reply comments to the comments of other parties filed January 27, 1997.

The Associations filed comments generally supporting the NECA January 10, 1997 proposal to create a separate subsidiary to act as interim administrator of the new universal service support program. The Associations urged the Commission to act quickly to provide the highest probability that the new program can be operational in time to benefit the 1997-98 school year.¹

Generally, other parties comments, to the extent they discussed the NECA January 10 proposal, expressed the view that it properly addressed the concerns expressed by the Joint Board.² PCIA, for example, commends NECA for recognition of the existing concerns and states that the January proposal is a "useful starting place.", and recognizes that non-LEC

¹ Comments of the Associations, January 27, 1997 at 6. See, Letter to Chairman Hundt from the Associations, January 7, 1997.

² Some parties criticized the October 1996 NECA proposal, as reflected in the NPRM, and did not address whether the January proposal was adequate. See, e.g. comments of AT&T, MCI

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representatives should not have control over LEC tariffing and pooling.³ Ameritech recognizes that putting non-LECs on the pooling board would raise “thorny legal issues.”⁴

Only MCI seems opposed to NECA in any form as interim administrator, claiming that the job will not be difficult, and that NECA’s experience is not particularly relevant.⁵ MCI seriously misjudges the amount and complexity of the work to be done before school opens next fall, and the kinds of experience needed to make the program successful. NECA’s experience as both LEC pool administrator and TRS administrator is directly relevant to the functions required. No other entity has been credibly identified as being able to hit the ground running with this important program. MCI would have the Commission place at risk the program intended by Congress to move K-12 education rapidly into the information age on the basis of its glib: “trust me, any body can do it.”

³ PCIA at pp.2, 3, 8 and n.16.

⁴ Ameritech at 5 and 6.

⁵ MCI at 2.

The lack of any serious, satisfactory and workable alternative proposals makes clear that the Commission should move quickly to allow work to begin. Interim appointment will in no way prejudice the selection of a permanent administrator. In the meantime, the Commission will have acted on recommendation of the Joint Board and resolved those issues it left open, providing a more meaningful basis for addressing the selection of permanent administrator.

Respectfully submitted,

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