

FEB 14 1997

U.S. DEPARTMENT OF COMMERCE
Office of Secretary

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

In the Matter of

Access Charge Reform

Price Cap Performance Review
for Local Exchange Carriers

Transport Rate Structure
and Pricing

Usage of the Public Switched
Network by Information Service
and Internet Access Providers

CC Docket No. 96-262

CC Docket No. 94-1

CC Docket No. 91-213

CC Docket No. 96-263

REPLY COMMENTS OF THE STATE OF HAWAII

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February 14, 1997

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SUMMARY

The State of Hawaii (the "State") submits that Section 254(g) prohibits the deaveraging of any subscriber rates based on interexchange services (including subscriber line charges), regardless of whether carrier access charges are deaveraged. The few parties filing initial comments that address this issue fail to grasp the simple premise that underlies Section 254(g) -- geographic rate averaging mandates uniform subscriber rates for geographical locations with disparate cost structures, including disparate access charge cost structures.

The Commission should reject WorldCom's full-scale attack against the geographic rate averaging requirement of Section 254(g). WorldCom's argument that unreasonably high interexchange rates caused by geographic deaveraging can be corrected through Section 254's universal service fund fails to realize that Congress expressly codified geographic rate averaging and rate integration into the Communications Act. Congress would not have codified a geographic rate averaging requirement if it had intended to rely solely on the universal service fund to ensure nationwide, affordable rates.

In urging the deaveraging of subscriber charges, WorldCom makes previously rejected arguments regarding the dangers of regional competition that the Commission has considered and consistently rejected, both in its August 7, 1996 Order in CC Docket 96-61, as well as in its recent rejection of AT&T's waiver petition. In fact, regional competition and access charge deaveraging actually make it easier for IXC's to comply with Section 254(g) because they help move carrier access charges closer to cost. With cost-based rates, IXC's

overall costs should decrease, thus making geographic rate averaging and rate integration requirements less burdensome.

Access charges, like wage rates and infrastructure costs, are just one of many types of costs incurred by IXCs in providing interexchange service. As the Commission noted in its August 7, 1996 Order in CC Docket 96-61, Congress was "fully aware of geographic differences in access charges when it adopted Section 254(g), and intended us to require geographic rate averaging even under these conditions." Congress codified the Commission's rate averaging and integration policies for the express purpose of ameliorating the adverse impact on subscribers of geographic variations in access costs and assuring that all Americans benefit from the advent of increased competition.

The State also opposes the comments of GTE and Sprint, which argue that the subscriber line charge ("SLC") should be deaveraged. The SLC is a rate charged directly to subscribers for an interexchange service and thus is subject to Section 254(g)'s geographic rate averaging and rate integration requirements. A geographically averaged SLC is important to preserving affordable local rates for all Americans.

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REPLY COMMENTS OF THE STATE OF HAWAII

The State of Hawaii (the "State"),¹ by its attorneys, hereby replies to the comments filed on January 29, 1997, with regard to Paragraphs 63 and 186 of the Commission's Notice of Proposed Rulemaking concerning access charges.² In Paragraph 63 of the Notice, the Commission seeks comment on whether, given the geographical rate averaging and rate integration requirements of Section 254(g), interexchange carriers ("IXCs") are permitted to

¹ This opposition is submitted by the State of Hawaii acting through its Department of Commerce and Consumer Affairs.

² Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure and Pricing, Usage of the Public Switched Network by Information Service and Internet Access Providers, Notice of Proposed Rulemaking, Third Report and Order, and Notice of Inquiry, CC Docket Nos. 96-262, 94-1, 91-213, 96-263, FCC 96-488 (rel. Dec. 24, 1996) ("Notice").

deaverage end-user subscriber charges that are based on a passthrough of geographically deaveraged carrier common line ("CCL") charges. More generally, in Paragraph 186, the Commission asks how IXC's would be affected if incumbent LEC's are allowed to geographically deaverage their rates for access elements.

The State submits that Section 254(g) prohibits the deaveraging of any subscriber rates based on interexchange service (including subscriber line charges), regardless of whether carrier access charges are deaveraged. Deaveraging of access charges should actually make it easier for IXC's to comply with the rate averaging and integration requirements of Section 254(g). Because competition and deaveraging help move carrier access charges closer to cost, IXC's' overall costs should actually decrease, thus reducing the burden of compliance.

The few parties filing initial comments that address this issue³ fail to grasp the simple premise that underlies Section 254(g) -- geographic rate averaging mandates uniform subscriber rates for geographical locations with disparate cost structures, including disparate access charge cost structures. However, WorldCom alone appears to launch a full-scale attack against the geographic rate averaging requirement of Section 254(g) with respect to a multitude of carrier access charges that IXC's subsequently pass through and recover from end users (i.e., subscribers). In urging the deaveraging of these subscriber charges, WorldCom makes previously rejected arguments regarding the dangers of regional competition that the Commission

³ See AT&T Comments at 79-80; GTE Comments at 30-31; MCI Comments at 74-75; Sprint Comments at 41-42; WorldCom Comments at 34-37, 39, 46, 66.

has considered and consistently rejected, both in its August 7, 1996 Order in CC Docket 96-61,⁴ as well as in its recent rejection of AT&T's waiver petition.⁵ The Commission should reject WorldCom's attempt to circumvent the clear mandate of Section 254(g).

The State also opposes the comments of GTE and Sprint, which argue that the subscriber line charge ("SLC") should be deaveraged. The SLC is a rate charged directly to subscribers for an interexchange service and thus is subject to Section 254(g)'s geographic rate averaging and rate integration requirements. A geographically averaged SLC is important to preserving affordable local rates for all Americans.

The legislative history of Section 254(g) makes clear that the Commission is permitted to authorize forbearance of the geographic rate averaging only for "limited exceptions."⁶ The types of rate deaveraging proposed by WorldCom, GTE, and Sprint, however, do not constitute such "limited exceptions," but rather involve the deaveraging on a nationwide scale of subscriber charges paid by all Americans.

Finally, if the Commission decides to deaverage any access charges assessed on carriers, the Commission should make it very clear to carriers that Section 254(g) still requires them to charge geographically averaged rates to their subscribers.

⁴ Policy and Rules Concerning the Interstate, Interexchange Marketplace -- Implementation of Section 254(g) of the Communications Act of 1934, as amended, 11 FCC Rcd 9564, 9582-83 (1996) ("Rate Averaging Order").

⁵ AT&T's Corp.'s Petition for Waiver and Request for Expedited Consideration, Order, CC Docket No. 96-61, DA 97-129 (rel. Jan. 17, 1997) ("Petition Rejection Order").

⁶ Of course, there is no statutory authority to forbear from the rate integration requirement. See H.R. Conf. Rep. No. 458, 104th Cong., 2d Sess., at 132 (1996) ("Conference Report").

INTRODUCTION

The State takes no position on whether LECs should be able to deaverage access elements charged to carriers. However, Section 254(g) requires that any interexchange rate charged to end users must be geographically averaged and rate integrated. When it comes to end users, the breadth of Section 254(g)'s mandate is unambiguous:

SEC. 254. UNIVERSAL SERVICE. . . . (g) INTEREXCHANGE AND INTERSTATE SERVICES. . . the Commission shall adopt rules to require that the rates charged by providers of interexchange telecommunications services to subscribers in rural and high cost areas shall be no higher than the rates charged by each such provider to its subscribers in urban areas. Such rules shall also require that a provider of interstate interexchange telecommunications services shall provide such services to its subscribers in each State at rates no higher than the rates charged to its subscribers in any other State.⁷

Section 254(g) makes no exceptions. It plainly covers all interexchange services provided to "subscribers." Congress used expansive language in drafting Section 254(g) to codify its universal service policies, which guarantee that all Americans -- wherever located -- receive the benefits of increased telecommunications competition. The legislative intent is clear from the Conference Report adopting Section 254(g):

New section 254(g) is intended to incorporate the policies of geographic rate averaging and rate integration of interexchange services in order to ensure that subscribers in rural and high cost areas throughout the Nation are able to continue to receive both intrastate and interstate interexchange services at rates no higher than those paid by urban subscribers. The conferees intend the

⁷ 47 U.S.C. § 254(g) (emphasis added).

Commission's rules to require geographic rate averaging and rate integration⁸

Although the Commission is authorized to forbear from the geographic rate averaging requirement in certain situations, Congress made it clear that such forbearance authority should be used sparingly and only for "limited exceptions":

The conferees are aware that the Commission has permitted interexchange providers to offer non-averaged rates for specific services in limited circumstances (such as services offered under Tariff 12 contracts), and intend that the Commission, where appropriate, could continue to authorize limited exceptions to the general geographic rate averaging policy using the authority provided by new section 10 of the Communications Act.⁹

Thus, the limited forbearance authority was never intended to be applied to any residential rates, but only to certain business services based on individually negotiated contract tariffs. Yet, deaveraging of residential rates is exactly what WorldCom, GTE, and Sprint propose. The Commission should clarify that any end user charges based on interexchange services are subject to Section 254(g), including end user charges that constitute a passthrough of carrier access charges.

⁸ Conference Report at 132 (emphasis added).

⁹ Id. (emphasis added). There may be limited exceptions to the geographic rate averaging requirement. No such exceptions, however, are permitted to the rate integration requirement of Section 254(g).

I. DEAVERAGED ACCESS RATES PAID BY CARRIERS HAVE NO BEARING ON SECTION 254(g)'S REQUIREMENT THAT SUBSCRIBER CHARGES BE GEOGRAPHICALLY AVERAGED

WorldCom argues that the Commission should exercise its authority under Section 10 of the Communications Act¹⁰ to forbear enforcement of the geographic rate averaging requirement of Section 254(g) with respect to end-user charges that are based on the passthrough of carrier costs associated with carrier common line ("CCL"),¹¹ line-side local switch ports,¹² information surcharges,¹³ and the transport interconnect charge ("TIC").¹⁴ The State submits that the deaveraging of access charges provides the Commission with no justification for utilizing its "limited exception" forbearance authority; the geographic averaging of subscriber rates promotes universal service and nothing should be done to jeopardize this important public policy objective.

¹⁰ Pursuant to Section 10 of the Communications Act, the Commission may only forbear from applying any provision of the Act if it determines that forbearance for specific services: (1) will not jeopardize the reasonableness and nondiscriminatory nature of carriers' rates and practices; (2) will not undermine consumer protection; and (3) is otherwise in the public interest. See 47 U.S.C. § 160(a).

¹¹ WorldCom Comments at 34-37.

¹² Id. at 39.

¹³ Id. at 46.

¹⁴ Id. at 66.

A. Geographic Rate Averaging, By Definition, Is Intended to Ensure Uniform Rates For Geographical Locations With Disparate Access Cost Structures

WorldCom argues that forbearance is necessary in order "to prevent IXCs that operate nationally from forcing their customers connected through low-cost LECs to subsidize the subscriber loop costs of customers of high-cost LECs through long-distance charges."¹⁵ That WorldCom views such cross-subsidization as a problem confirms that WorldCom does not acknowledge the public policy rationale for geographic rate averaging. The very purpose of geographic rate averaging is to promote universal service by, if necessary, subsidizing the high costs of providing telephone service in rural areas with revenues from low-cost urban areas. Such cross-subsidies ameliorate the impact which regionally disparate costs -- including access costs -- otherwise impose on consumers in different parts of the country.

WorldCom's argument that unreasonably high interexchange rates caused by geographic deaveraging can be corrected through Section 254's universal service fund¹⁶ fails to realize that Congress expressly codified geographic rate averaging and rate integration into the Communications Act. Congress would not have codified a geographic rate averaging requirement if it had intended to rely solely on the universal service fund to ensure nationwide, affordable rates.

¹⁵ Id. at 35.

¹⁶ Id. at 35 n.42.

B. Access Costs are Just One of Many Types of Costs Incurred by IXCs

Access charges, like wage rates and infrastructure costs, are just one of many types of costs incurred by IXCs in providing interexchange service. As the Commission noted in the Rate Averaging Order, Congress was "fully aware of geographic differences in access charges when it adopted Section 254(g), and intended us to require geographic rate averaging even under these conditions."¹⁷ Congress codified the Commission's rate averaging and integration policies for the express purpose of ameliorating the adverse impact on subscribers of geographic variations in access costs and assuring that all Americans benefit from the advent of increased competition. Indeed, just recently the Commission acknowledged the regulatory distinction between access costs and subscriber charges. In particular, the Commission determined that LECs may deaverage access-like charges to IXCs but that Section 254(g) requires IXCs to continue to geographically average subscriber charges.¹⁸

It is ironic that WorldCom is using the reform of access charges as a basis for seeking forbearance of Section 254(g) because cost-based access charges actually reduce the costs incurred by nationwide IXCs and improve their competitiveness vis a vis regional carriers in low-cost areas, thus making it easier for them to comply with Section 254(g)'s geographic rate

¹⁷ Rate Averaging Order, 11 FCC Rcd at 9583.

¹⁸ See Alascom, Inc., Cost Allocation Plan for the Separation of Bush and Non-Bush Costs, Memorandum Opinion and Order on Reconsideration and Order Approving Cost Allocation Plan, AAD 94-119, DA 97-320, at ¶ 43 (Com. Car. Bur., Feb. 10, 1997) ("For IXCs, [access] rates are business costs which in addition to other costs are recovered from their subscribers through averaged rates.").

averaging requirement. Deaveraging of carrier access charges, therefore, provides no rational basis for deaveraging subscriber rates.

C. WorldCom Has Not Satisfied the Forbearance Standard in Section 10 of the Communications Act

WorldCom's petition for forbearance is simply a rehash of previously rejected forbearance arguments made by IXCs in CC Docket 96-61, as well as by AT&T in its unsuccessful waiver petition. Curiously, WorldCom alleges that the Commission did not address the issue of regulatory forbearance of Section 254(g)'s rate averaging requirement in its August 7, 1996 Rate Averaging Order.¹⁹ In fact, the Commission expressly rejected arguments virtually identical to those now proffered by WorldCom, concluding that forbearance of Section 254(g) would harm the very people the statute was intended to protect (i.e., telephone subscribers living in high-cost and rural areas):

With respect to the first prong of the forbearance test, we believe that establishing a broad exception to Section 254(g) for low-cost regions entails a substantial risk that many subscribers in rural and high cost areas may be charged more than subscribers in other areas. Accordingly, we cannot conclude that enforcing our rate averaging requirements is unnecessary to ensure just and reasonable and nondiscriminatory charges for subscribers. We also see no basis in the record to conclude that it is unnecessary to enforce Section 254(g) to ensure protection of consumers. We are concerned that widespread deaveraged rates for interexchange services could produce unreasonably high rates for some subscribers.²⁰

¹⁹ WorldCom Comments at 34 n.42.

²⁰ Rate Averaging Order, 11 FCC Rcd at 9583. WorldCom concedes the weakness of its argument by stating that the conclusions in the Rate Averaging Order possibly cannot be

Similarly, in its January 17, 1997 Petition Rejection Order, the Commission rejected AT&T's petition for waiver of Section 254(g), concluding that AT&T had "demonstrated no circumstances significantly different from those contemplated by the Commission in considering its requests for exceptions to the rate averaging requirements."²¹ AT&T had argued, as WorldCom does now,²² that national long distance carriers need the flexibility to deaverage their rates in order compete with regional carriers that offer service only in areas with low access costs. The Commission expressly rejected AT&T's argument, concluding that any increased regional competition that deaveraging would promote does not "outweigh the benefits of the national policy of geographic averaging embodied in section 254(g) of the Act and our implementing regulations."²³

Furthermore, as the State has pointed out in its past pleadings in CC Docket No. 96-61, the parade of evils alleged to result from regional competition are unrealistic, given the likelihood that the BOCs, pursuant to Section 271, will soon be permitted to offer nationwide

distinguished from the forbearance it seeks. WorldCom therefore asks the Commission to overrule its Rate Averaging Order on the forbearance issue. See WorldCom Comments at 35 n.42. WorldCom's request is, in effect, an out-of-time petition for reconsideration of the Commission's Rate Averaging Order. The deadline for filing petitions for reconsideration of the Rate Averaging Order was September 16, 1996.

²¹ Petition Rejection Order at ¶ 10.

²² See WorldCom Comments at 36.

²³ Petition Rejection Order at ¶ 10.

interexchange services.²⁴ Significant independent LECs, like GTE, will also seek to offer interexchange services nationally and internationally. Historically, AT&T's principal interexchange competitors have rushed to offer services nationally. One can realistically expect the major regional players, and in particular the BOCs and GTE, to rapidly become providers of nationwide and global service.²⁵

Similar to AT&T's petition, WorldCom's petition should be rejected because it has failed to demonstrate any circumstances significantly different from those contemplated by the Commission in its Rate Averaging Order. Congress expressly stated that the forbearance authority should be used sparingly and only to grant "limited exceptions" to the general geographic rate averaging policy.²⁶ AT&T's waiver petition only asked for forbearance within the New Jersey-New York and Camden-Philadelphia corridors served by Bell Atlantic. In contrast, WorldCom asks for nationwide forbearance from rate averaging for a multitude of interstate access charge elements recovered from end users. Given that the Commission found AT&T's petition for forbearance from Section 254(g) not to be justified for a limited geographical area such as Bell Atlantic's interLATA corridors, a fortiori is WorldCom's petition

²⁴ See, e.g., Reply Comments of the State of Hawaii, CC Docket No. 96-61, at 14-15 (filed May 3, 1996); Comments of the State of Hawaii, AT&T Petition for Waiver of Section 64.1701 of the Commission's Rules, CCB/CPD 96-26, at 3 (filed Nov. 18, 1996).

²⁵ See, e.g., Leslie Cauley, Long Distance Alliance Set By Three Bells, Wall Street Journal, May 2, 1996, at A3 (discussing the plans of Ameritech, Bell Atlantic, NYNEX, BellSouth, Pacific Telesis, and SBC Communications to offer long distance service outside their regions, including internationally; the latter three "recently asked the nation's long-distance carriers to submit bids for handling calls that originate in their respective territories," and this is expected to be a major opportunity for AT&T).

²⁶ Conference Report at 132.

for nationwide forbearance not justified. There is nothing "limited" about WorldCom's proposed exception. As the State has argued in prior pleadings, the Commission should not grant waivers that, in effect, "eviscerate" the underlying purpose of the rule.²⁷ Granting forbearance on a nationwide scale would completely eviscerate Section 254(g).

II. THE SUBSCRIBER LINE CHARGE IS A RATE CHARGED DIRECTLY TO SUBSCRIBERS FOR AN INTEREXCHANGE SERVICE AND THUS CANNOT BE DEAVERAGED WITHOUT VIOLATING SECTION 254(g)

GTE and Sprint argue that the subscriber line charge ("SLC") should be deaveraged.²⁸ As GTE concedes, the SLC is used to recover from end users the portion of local loop costs assigned to the interstate jurisdiction.²⁹ Thus, SLC constitutes a charge for interexchange service that is provided to "subscribers" and consequently is subject to the geographic rate averaging and rate integration requirements of Section 254(g). Any deviation from geographic rate averaging of SLC must be based on a Section 10 forbearance analysis. Neither GTE nor Sprint provides such an analysis; indeed, they could not. Once again, the SLC does not constitute a "limited exception." The Commission should, therefore, adhere to the mandate of Section 254(g) and continue to require that SLC be geographically averaged.

Deaveraging SLC could cause a great hardship to customers living in high-cost areas. The Federal-State Joint Board on Universal Service recently recommended to the

²⁷ See Comments of the State of Hawaii, AT&T Petition for Waiver of Section 64.1701 of the Commission's Rules, CCB/CPD 96-26, at 3 (filed Nov. 18, 1996).

²⁸ See GTE Comments at 30-31; Sprint Comments at 42.

²⁹ GTE Comments at 32. See also 47 C.F.R. § 69.4(a) (SLC is an end user charge for interstate access service).

Commission that the current \$3.50 SLC cap on single-line subscribers not be increased because an increase could jeopardize universal service.³⁰ In fact, the Joint Board recommended that the SLC be reduced if carriers are required to contribute a portion of their intrastate revenues to the Universal Service Fund in order to mitigate the impact such contributions may have on the price of local service.³¹ Historically, the Commission has also recognized the need to maintain an averaged SLC.³² Given the critical role the SLC cap plays in maintaining universally affordable local rates, deaveraging SLC -- thus increasing it for subscribers in high-cost areas -- would jeopardize the very public policy of universal service that Congress intended to protect by enacting Section 254(g).

³⁰ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Recommended Decision, FCC 96J-3, at ¶ 754 (rel. Nov. 8, 1996). See also id. at ¶ 769 ("[T]he SLC, as a charge assessed directly on local telephone subscribers, has an impact on universal service concerns such as affordability.").

³¹ Id. at ¶ 11.

³² See MTS and WATS Market Structure, 101 FCC.2d 1222 (1985) (determining that all single-line subscribers, whether residential or business, should pay the same SLC).

CONCLUSION

Section 254(g) requires that all end-user charges remain geographically averaged and rate integrated. The very purpose of geographic rate averaging is to promote universal service -- to ensure that all Americans have affordable rates despite the fact that the costs of providing service (including access costs) vary significantly from one geographic location to another. The Commission should, therefore, reject those portions of WorldCom's comments that advocate the deaveraging of end-user (subscriber) charges based on the passthrough of carrier costs associated with deaveraged carrier common line charges, line-side local switch port charges, information surcharges, and transport interconnect charges. The Commission should also reject those portions of GTE's and Sprint's comments that advocate the deaveraging of the subscriber line charge, which constitutes an interstate end-user charge.

Respectfully submitted,

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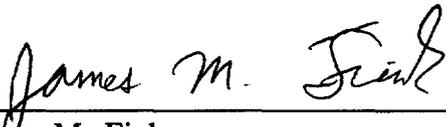
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February 14, 1997

CERTIFICATE OF SERVICE

I, James M. Fink, do hereby certify that on this 14th day of February, 1997, I have caused a copy of the foregoing "Reply Comments of the State of Hawaii" in CC Docket No. 96-262 to be served by hand to the persons listed below.



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