

STATE OF ALASKA

DEPARTMENT OF COMMERCE AND
ECONOMIC DEVELOPMENT

ALASKA PUBLIC UTILITIES COMMISSION
July 15, 1997

TONY KNOWLES, GOVERNOR

1016 WEST SIXTH AVENUE, SUITE 400
ANCHORAGE, ALASKA 99501-1963
PHONE: (907) 276-6222
FAX: (907) 276-0160
TTY: (907) 276-4533
EMail: apuc@apuc.ak.net

DOCKET FILE COPY ORIGINAL

RECEIVED

JUL 17 1997

FCC MAIL ROOM

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

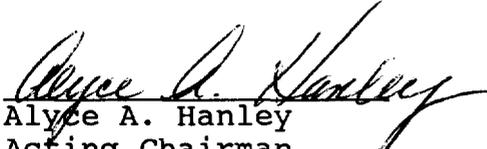
Re: CC Docket No. 96-45

Dear Mr. Caton:

Enclosed are an original and nine copies of the Petition for Reconsideration and Clarification of the Alaska Public Utilities Commission regarding CC Docket No. 96-45, Report and Order, FCC97-157, released May 8, 1997.

Sincerely,

ALASKA PUBLIC UTILITIES COMMISSION


Alyce A. Hanley
Acting Chairman

Enclosures

No. of Copies rec'd
Listed Below

0+10

.....

DOCKET FILE COPY ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20554

RECEIVED
JUL 17 1997
FCC

In the Matter of)
Federal-State Joint Board on) CC Docket No. 96-45
Universal Service)

PETITION FOR RECONSIDERATION
AND
REQUEST FOR CLARIFICATION

Date: July 15, 1997

Alyce A. Hanley, Acting Chairman
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 300
Anchorage, Alaska 99501

Summary

In general, the Alaska Public Utilities Commission (APUC) supports the Report and Order of the Federal Communications Commission (FCC) regarding universal service issues in CC Docket No. 96-45, as released on May 8, 1997. There are several points regarding the decision, however, on which the APUC respectfully requests that the FCC reconsider or clarify its decision:

a) The FCC should not set a deadline for states to declare and submit a forward-looking cost study to be used under the federal universal service mechanism.

b) The FCC should clarify if and how such state developed studies will be updated.

c) The FCC should not require a state-submitted federal study to mirror a state's intrastate universal service study.

d) The FCC should not limit federal funding to 25 percent of the net forward-looking cost study results less revenue benchmark.

e) The FCC should broaden which carriers may receive support for health-care services to allow Alaska rural health-care providers benefits comparable to those in other states.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

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

In the Matter of)
Federal-State Joint Board on) CC Docket No. 96-45
Universal Service)

**PETITION FOR RECONSIDERATION AND
REQUEST FOR CLARIFICATION BY THE
ALASKA PUBLIC UTILITIES COMMISSION**

The Alaska Public Utilities Commission (APUC) respectfully requests that the Federal Communications Commission (FCC) reconsider and clarify its Report and Order,¹ in CC Docket No. 96-45, released May 8, 1997. Overall the APUC supports the decision of the FCC and believes that the findings of the FCC will encourage universal service and be of immense value in fulfilling the telecommunications needs of the general public, schools, libraries, and rural health care providers. There are, however, several matters in the Report and Order for which the APUC seeks clarification or reconsideration.

¹CC Docket No. 96-45, Report and Order, FCC 97-157 (May 8, 1997).

1 **I. State Cost Models**

2 The APUC appreciates and may take advantage of the
3 opportunity to develop an Alaska-based, forward-looking
4 cost study for determining federal universal service
5 support. At this time, however, APUC requests
6 reconsideration of some of the procedural points identified
7 in the Report and Order regarding state studies.

8 Briefly, the APUC requests that the FCC not set a
9 deadline for states to declare an intent to file or submit
10 a forward-looking cost study for purposes of determining
11 federal universal service support for nonrural companies.
12 The APUC requests that the FCC clarify the details and
13 procedures to allow update of such state developed studies.
14 The APUC further asks the FCC to allow federal and state
15 universal-service cost studies to differ from one another
16 when a state submits a universal-service cost study for
17 federal purposes.

18 a. *The FCC should not limit the time for a*
19 *state to develop a model that best represents the*
20 *cost characteristics in that state.*

21 Currently the FCC requires states to declare by
22 August 15, 1997, whether they will either develop a
23 forward-looking cost study for use in setting federal
24 support for nonrural companies or choose the FCC's model.

1 The APUC believes that until the FCC model is available, an
2 informed choice among these two alternatives cannot occur.

3 Secondly, the FCC has set February 6, 1998, as the
4 deadline for state development of a forward-looking cost
5 model for nonrural companies. The experience at the
6 federal level suggests that it will be a long and difficult
7 process for states to develop an accurate and appropriate
8 forward-looking cost model. It is likely that some states
9 will be unable to develop a new study by that February
10 deadline. The APUC suggests that the FCC apply its federal
11 model to nonrural carriers while a state continues its work
12 on a state model.

13 Given the above, the APUC requests that the FCC
14 eliminate the August 15, 1997, and the February 6, 1998,
15 deadlines for states to declare and submit cost models for
16 federal universal service support for nonrural companies.

17
18 *b. Clarification is needed for opportunity*
19 *to update of state developed, forward-looking*
20 *cost model.*

21 A forward-looking cost model developed today must be
22 periodically reevaluated and updated to recognize changing
23 circumstances (e.g., new technologies, change in cost
24 characteristics). The APUC seeks guidance from the FCC as
25 to whether and under what conditions it would allow update
26 of state models used for federal purposes and what

1 procedural steps would be involved. For example, would
2 updates be allowed; and, if so, who may submit revisions to
3 the FCC regarding a state-developed study? Would a state
4 be obligated to mirror the interstate updates in its
5 intrastate cost study or vice versa?

6
7 *c. The FCC should allow states to submit a*
8 *cost model to the federal system that differs*
9 *from models used for intrastate universal service*
10 *fund purposes.*

11 States may be in the key position to develop forward-
12 looking cost studies that best meet the states' cost
13 characteristics. As a result, the APUC supports the idea
14 of voluntary development of a federal cost study by the
15 individual states as presented in the Report and Order. At
16 the same time, the FCC should not require that a state's
17 federal cost model mirror its existing intrastate model.²

18 Linking the state and federal studies together unduly
19 and unnecessarily restricts flexibility in a state's own
20 universal service program and may limit technological
21 advances in that state. For example, a state may have a
22 definition of universal service that leads it to develop a
23 forward-looking cost model supporting more advanced
24 telecommunications services than allowed under the federal
25 model. Under this circumstance, the state and federal

26 ²See Report and Order at ¶ 251.

1 models could look quite different and may not even share a
2 common network architecture or technology base, contrary to
3 the "mirroring" rule of the Report and Order. The APUC
4 believes that the "mirroring" requirement may prevent a
5 state from submitting an interstate cost study as such
6 study might interfere with the state's intrastate universal
7 service objectives.

8 The APUC recognizes that the FCC desires to ensure
9 that states do not manipulate the system to artificially
10 inflate federal subsidies. The FCC could meet this goal by
11 requiring each state to explain differences between the
12 study it submits for interstate purposes and the study its
13 uses for intrastate universal service. It should be
14 recognized that the FCC may question or reject an
15 interstate proposal when a state chooses a different
16 approach for intrastate purposes.

17 Given the above, the APUC requests that the FCC
18 reconsider the "mirroring" requirement of ¶251 of the
19 Report and Order.

20
21 **II. The APUC requests the FCC to reconsider its
22 selection of a 25 percent interstate allocator
23 for federal support.**

24 In its Report and Order the FCC concluded that it
25 would fund only 25 percent³ of the costs of universal

26 ³See Report and Order, ¶ 835.

1 service under its new "proxy" model based system.⁴ The APUC
2 requests that the FCC reconsider this matter as the 25 per-
3 cent factor is discriminatory, will compromise universal
4 service objectives, and is contrary to the fund sufficiency
5 requirements of the Telecommunications Act of 1996 (The
6 Act).

7 Universal service is a national goal, and the people
8 in one state or region should not bear a disproportionate
9 burden to meet that goal. Yet under the FCC Report and
10 Order states with low population and high costs will likely
11 pay more per capita for universal service than other states
12 in order to cover the 75 percent residual costs. The
13 25 percent factor is discriminatory to rural and low
14 population states and to Insular areas.

21
22 ⁴Under the new system, the total needed universal
23 service support is defined as the difference between the
24 forward-looking economic cost of providing the supported
25 services (based on a proxy model) and a set revenue
26 benchmark. While in the short term the new system applies
only to nonrural companies, the FCC has indicated its
desire to apply the new system throughout the nation, if
possible.

1 As an analogy, if existing universal service support
2 for the local loop were paid 25 percent by the interstate
3 jurisdiction with the remainder coming from the state,
4 Alaska would need to recover \$33 million from about 350,000
5 access lines statewide. This amounts to approximately \$8
6 per access line per month additional assessment from all
7 Alaskans in order for pay for Alaska's 75 percent residual
8 contribution to the universal service mechanism. Alaskans
9 overall would pay about \$100 per year out of their average
10 per capita income of \$17,610 in order to fund universal
11 service.⁵ No other state experiences a comparable per
12 capita assessment, though some Insular areas pay over
13 \$144/line/year and some high-cost states would pay over
14 \$24/line/year. In comparison, the 75 percent per capita
15 payment for all of the states on average would be \$.38 per
16 access line per month.

17 Clearly, the 25 percent/75 percent split in funding
18 responsibility between interstate and intrastate sources
19 leads to inequities between states and will be counter-
20 productive. It will create rate increases that compromise
21 the goal of universal service. Ultimately the public in
22 some areas of the nation will be left worse off and with
23 higher rates than before The Act went into effect.

24
25 ⁵The actual costs to Alaskans would be even higher if
26 weighted DEM support were included.

1 By funding only 25 percent, the FCC will fail to meet
2 the requirement under the Act that funding be sufficient.
3 The above example regarding possible per-capita effects of
4 the FCC's decision in Alaska illustrates this failure. The
5 APUC believes that its analysis of the effects of the
6 25 percent factor when applied to the existing system
7 provides a strong indication of consequences under the new
8 system. The APUC's estimate may even underestimate the
9 ultimate effects of the 25 percent factor if more total
10 support is needed under the new FCC universal service
11 system than under the current one.

12 Furthermore, historically the FCC determined that it
13 was necessary for the federal system to pay more than
14 25 percent of the support needed to preserve universal
15 service. For example, smaller companies under the current
16 federal system are paid 100 percent of the high costs for
17 local loop that are above 150 percent of the national
18 average loop costs. To change this philosophy and now fund
19 only 25 percent of the needed support suggests that the FCC
20 either excessively and unnecessarily overpaid support in
21 the past or will provide an insufficient contribution to
22 support in the future.⁶

23 ⁶The FCC's past policy on this matter states:

24 The federal Universal Service Fund will ensure
25 (continued...)

1 The APUC therefore respectfully requests that the FCC
2 reverse its decision to fund only 25 percent of forward-
3 looking cost-model results net the revenue benchmark.

4 On a related point, as the FCC has determined that
5 states should exercise primary responsibility for
6 determining the affordability of rates, the states may be
7 in the best position to assess how scarce funding dollars
8 may best achieve universal service objectives. The FCC
9 should not dictate that a portion of the fund be used to
10 reduce interstate access charges when states may find a
11 better use for the fund.

12 **III. The provisions of Section 54.201(a)(2) should be**
13 **modified to recognize that toll services may be**
14 **provided by non-eligible carriers.**

15 Section 54.601(C) states that "Any telecommunications
16 service of a bandwidth up to and including 1.544 Mbps that
17 is the subject of a properly completed bona fide request by
18 a rural health care provider shall be eligible for
19 universal service support," subject to some limitations.
20 In Alaska, health-care providers in rural areas will need

21 _____
22 ⁶(...continued)
23 that telephone rates are within the means of the
24 average subscriber in all areas of the country,
thus providing a foundation on which states can
build to develop programs tailored to their
individual needs.

25 CC Docket No. 80-286, FCC 83-564, at ¶30 (March 2, 1984).

1 toll services that are eligible for support under the
2 Section 54.601(C) definition. These services, however, may
3 not be funded due to the nature of the Alaska network.

4 Unlike other states, Alaska intraLata toll services
5 and local services are not provided by a single carrier.
6 There are no Bell Operating Companies in Alaska providing
7 joint toll/local services.

8 In Alaska, the only carriers that currently could
9 provide a 1.544 Mbps toll link eligible for support under
10 Section 54.601(C) will not be able to receive support.
11 These carriers are ineligible under Sections 54.201(a)(2)
12 and 54.201(d) as they do not provide all universal services
13 supported by the federal mechanism.⁷ Other states, where
14 the major incumbent local carrier provides intraLata toll
15 and universal services, do not have this limitation. It
16 also appears unusual that Alaska toll carriers would be
17 eligible to receive support for services provided to
18 schools and libraries but not for eligible services
19 provided to health-care providers.

20 Based on the above, the Commission asks the FCC to
21 clarify its policy on this issue and revise its regulations
22 to allow broader carrier eligibility to receive support for
23 services to health-care providers.

24 _____
25 ⁷For example, Alaska toll carriers do not provide
26 voice-grade local service statewide.

1
2 Conclusion

3 The APUC generally believes that the FCC's Report and
4 Order regarding universal service will benefit the public,
5 schools, libraries, and health-care providers throughout
6 the nation. The APUC respectfully requests reconsideration
7 or clarification of that Report and Order as discussed
8 herein.

9 RESPECTFULLY SUBMITTED this 15th day of July, 1997.

10 BY DIRECTION OF THE COMMISSION

11
12 
13 By: Commissioner Alyce H. Hanley
14 Acting Chairman, Alaska Public
15 Utilities Commission
16
17
18
19
20
21
22
23
24
25

26
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, Alaska 99501
(907) 276-6222; TTY (907) 276-4533

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
Federal-State Joint Board on) CC Docket No. 96-45
Universal Service)

CERTIFICATION OF MAILING

I, Barbara J. Miller, certify as follows:

I am an Administrative Supervisor in the offices of the
Alaska Public Utilities Commission, 1016 West Sixth Avenue,
Suite 400, Anchorage, Alaska 99501.

On July 15, 1997, I mailed copies of

**PETITION FOR RECONSIDERATION
AND
REQUEST FOR CLARIFICATION
(Issued July 15, 1997)**

in the proceeding identified above to the persons indicated on the
attached service list.

DATED at Anchorage, Alaska, this 15th day of July, 1997.

Barbara J. Miller

Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, Alaska 99501
(907) 276-6222; TTY (907) 276-4533

Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, Alaska 99501
(907) 276-6222; TTY (907) 276-4533

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Inasmuch as this filing includes mailings to all known interested persons and the list is 53 pages in length, in order to minimize copying and mailing costs, the service list herein is not included as part of this mailing. That list is a public record on file with the Commission. Persons interested in obtaining the list should contact the Commission at 1016 West Sixth Avenue, Suite 400, Anchorage, Alaska, 99501 or by calling 1-907-276-6222.

American Public Health Association
1015 Fifteenth Street NW
Washington, DC 20005-2605

Judy Sello, Esq.
Attorney for AT&T Corporation
Room 3244J1
295 North Maple Avenue
Basking Ridge, NJ 07920

Richard M. Sbaratta, Esq.
Attorney for Bellsouth Corporation
Suite 1700
1155 Peachtree Street, N.E.
Atlanta, GA 30309-3610

Richard Hutchinson d/b/a
Circle Telephone
P. O. Box 1
Circle, AK 99733

Robert E. Stoller, Esq.
Suite 3-640
800 East Dimond Boulevard
Anchorage, AK 99515

International Transcription
Services
Room 640
1990 M Street, N.W.
Washington, DC 20036

Honchen & Uhlenkott, Inc.
Consultants
Suite 3-640
800 East Dimond Boulevard
Anchorage, AK 99515

Virginia J. Taylor, Esq.
Attorney for California
Department of Consumer Affairs
400 R Street, Suite 3090
Sacramento, CA 95814-6200

J. Scott Nicholls
Sr. Manager, Government and
External Affairs
US One Communications
Suite 350
1320 Chain Bridge Road
McLean, VA 22101

Bradley C. Stillman, Esq.
Director, Telecommunications
Policy
Consumer Federation of America
1424 16th Street, N.W., Suite 604
Washington, DC 20036

Donald H. Conkle, Jr.
Director of Legal and
Regulatory Affairs
Quest Group International
242 Falcon Drive
Forest Park, GA 30050

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

Steven A. Augustino, Esq.
Attorney for Competitive
Telecommunications Association
Kelley Drye & Warren
1200 19th Street, N.W., Suite 500
Washington, DC 20036

Kevin J. Donnellan
Acting Director, Legislation
and Public Policy
American Association of
Retired Persons
601 E Street, N.W.
Washington, DC 20049

Matthew C. Ames, Esq.
Miller, Canfield, Paddock
and Stone, P.L.C.
Attorney for the Joint Commenters
Suite 400
1225 Nineteenth Street, N.W.
Washington, DC 20036-2420

Melphine Evans
Secretary/Treasurer
ATU Long Distance, Inc.
Suite 602
301 West Northern Lights Boulevard
Anchorage, AK 99503

John Morabito
Deputy Division Chief
Accounting and Audits
Federal Communications Commission
2000 L Street, N.W., Suite 812
Washington, DC 20554

Mark J. Vasconi
Regulatory Affairs Director
Alascom, Inc. d/b/a AT&T Alascom
210 East Bluff Drive
Anchorage, AK 99501-1100

Judith Colbert
Executive Director
Alaska Exchange Carriers
Association, Inc.
3380 C Street, Suite 201
Anchorage, AK 99503

Steve Sobetsky
Director of Communication
Alaska Native Medical Center
255 Gambell
Anchorage, AK 99501

Ron Zobel, Esq.
Assistant Attorney General
Alaska Public Utilities Commission
1031 West Fourth Avenue, Suite 200
Anchorage, AK 99501

Kathe Boucha-Roberts
Coordinator
Alaska Telemedicine Workgroup
Providence Hospital
3200 Providence Drive
Anchorage, AK 99508

James Rowe
Director
Alaska Telephone Association
4341 B Street, Suite 304
Anchorage, AK 99503

Michael Garrett
President
Alaska Telephone Company, et al.
P. O. Box 222
Port Townsend, WA 98368

John R. Summers
Senior Vice President
AmeriTel Pay Phones, Inc.
611 S.W. Third Street
Lee's Summit, MO 64063

Lance J. M. Steinhart, Esq.
Attorney
American Express Telecom, Inc.
Suite 285
6455 East Johns Crossing
Duluth, GA 30155

Carl E. Worboys
Vice President - Administration
American Telecommunications
Enterprise, Inc.
7323 Oswego road
Liverpool, NY 13090

Michael J. Karson
Attorney
Ameritech
Room 4H88
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

Jeffrey R. Lowe
Director - Regulatory Affairs
Ameritech Communications
International, Inc.
Loc. 4G58
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196

Glenn S. Richards, Esq.
Fisher Wayland Cooper Leader
& Zaragoza L.L.P.
Counsel for Ameritech
Communications International,
Inc.
Suite 400
2001 Pennsylvania Avenue, N. W.
Washington, DC 20006-1851

Robert L. Vasquez, Esq.
General Counsel
Anchorage Telephone Utility,
a/k/a ATU Telecommunications,
Municipality of Anchorage d/b/a
600 Telephone Avenue
Anchorage, AK 99503-6091

David S. Fauske
General Manager
Arctic Slope Telephone Association
Cooperative, Inc.
4300 B Street, Suite 501
Anchorage, AK 99503-5900

Sam Loudenslager
Arkansas Public Service Commission
1000 Center Street
P. O. Box C-400
Little Rock, AR 72203

A. William Saupe, Esq.
Ashburn & Mason
1130 West Sixth Avenue, Suite 100
Anchorage, AK 99501

Steven Kraskin
Sylvia Lessee
Attorneys for Rural Alliance
2120 L Street NW, Suite 520
Washington, DC 20037

M. Robert Sutherland
Richard M. Sbaratta
Bellsouth Corporation
Bellsouth Telecommunications Inc.
Suite 1700
1155 Peachtree Street NE
Atlanta, GA 30309-3610

Ben Johnson
Ben Johnson and Associates
1234 Timberlane Road
Tallahassee, FL 32312

Robert Sternberg
President
Bottom Line Telecommunications,
Inc.
610 Esther Street, Suite 1000
Vancouver, WA 98660

Robin O. Brena, Esq.
Brena & McLaughlin, P. C.
310 K Street, Suite 601
Anchorage, AK 99501

Robert J. Clark
Chief Executive Officer
Bristol Bay Area Health
Corporation
P. O. Box 130
Dillingham, AK 99576

Duane C. Durand
General Manager
Bristol Bay Telephone
Cooperative, Inc.
P. O. Box 259
King Salmon, AK 99613

Harry F. Colliver, Jr.
President/General Manager
Bush-Tell, Incorporated
P. O. Box 109
Aniak, AK 99557

Dorota A. Smith
Tariff and Regulatory Supervisor
Cable & Wireless, Inc.
8219 Leesburg Pike
Vienna, VA 22182

Brian Roberts
California Public Utilities
Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Michael F. Altschul
Randall S. Coleman
Cellular Telecommunications
Industry Association
Suite 200
1250 Connecticut Avenue NW
Washington, DC 20036

Margot Smiley Humphrey
Attorney
Century Telephone Enterprises Inc.
and TDS Telecommunications Corp
Koteen & Naftalin
Suite 1000
1150 Connecticut Avenue
Washington, DC 20036

Wayne A. Leighton PHD
James L. Gattuso
Citizens for a Sound Economy
Foundation
1250 H. Street N.W., Suite 700
Washington, DC 20005

Charles S. Isdell
Vice President
Comdata Telecommunications
Services, Inc.
5301 Maryland Way
Brentwood, TN 37027

Tim Rennie
General Manager
Copper Valley Telephone
Cooperative, Inc.
P. O. Box 337
Valdez, AK 99686

Ruth A. Steele
General Manager
Cordova Telephone Cooperative,
Inc.
P. O. Box 459
Cordova, AK 99574-0459

Robert M. Halperin, Esq.
Attorney for the State of Alaska
Crowell & Moring
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004-2595

Daniel L. Brenner
Neal M. Goldberg
David L. Nicoll
Counsel for the National Cable
Television Association, Inc.
1724 Massachusetts Avenue NW
Washington, DC 20036

Joseph M. Moran, Esq.
DeLisio, Moran, Geraghty & Zobel
943 West Sixth Avenue
Anchorage, AK 99501

Lois Steigmeier
Department of Education
Education Program Support
801 West Tenth Street, Suite 200
Juneau, AK 99801-1894

Department of Health and
Environment
Bureau of Local and Rural Health
Systems
900 SW Jackson Room 665
Topeka, KS 66612-1290

Roberta Ward
Coordinator
Distance Delivery Consortium
P. O. Box 2401
Bethel, AK 99559-2401

Jim Butler
Director, Regulatory Affairs
EXCEL Telecommunications, Inc.
8750 North Central Expressway
Lockbox 546
Dallas, TX 75231

Frank J. Biondi
Utility General Manager
Fairbanks Municipal Utilities
System, City of Fairbanks d/b/a
P. O. Box 72215
Fairbanks, AK 99707-2215

Lisa Boehley
Federal Communications Commission
2100 M Street, N.W., Room 8605
Washington, DC 20554

Alex Belinfante
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Andrew Mulitz
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, DC 20036

Bryan Clopton
Federal Communications Commission
2100 M Street, N.W., Room 8615
Washington, DC 20554

Clara Kuehn
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, DC 20036

David Krech
Federal Communications Commission
2025 M Street, N.W., Room 7130
Washington, DC 20554

Diane Law
Federal Communications Commission
2100 M Street, N.W., Room 8920
Washington, DC 20554

Emily Hoffnar
Federal Communications Commission
2100 M Street, N.W., Room 8623
Washington, DC 20554

Gary Oddi
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, DC 20036

Irene Flannery
Federal Communications Commission
2100 M Street, N.W., Room 8922
Washington, DC 20554

James Casserly
Federal Communications Commission
Office of Commissioner Ness
1919 M Street, Room 832
Washington, DC 20554

Jeanine Poltronieri
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, DC 20036

John Clark
Federal Communications Commission
2100 M Street, N.W., Room 8619
Washington, DC 20554

Kimberly Parker
Federal Communications Commission
2100 M Street, N.W., Room 8609
Washington, DC 20554