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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
	)	
Attention: Common Carrier Bureau	)	

REQUEST FOR PARTIAL WAIVER OF DATA SUBMISSION

On July 9, 1997, the Federal Communications Commission (the "Commission") released an Order in the above-captioned proceeding requesting data on 46 separate items (including subparts) from the Regional Holding Companies ("RBOCs"), GTE, Sprint Corporation, Puerto Rico Telephone Company ("PRTC") and Anchorage Telephone Utility ("ATU"). The Commission has requested this data to assist it in adopting a model to estimate the forward-looking economic costs that non-rural LECs would incur to provide universal service in rural, insular and high cost areas.

ATU is owned by the Municipality of Anchorage and is significantly smaller than each of the other local exchange carriers ("LECs") ordered to provide data to the Commission. Each of the RBOCs, GTE and Sprint serves millions of access lines and has annual operating revenues in the billions of dollars. ATU, by contrast, serves approximately 160,000 access lines and has annual operating revenues of a little over a hundred million dollars. ATU does not have access to the sophisticated data systems and resources available to these other LECs. As a result, the information requested in four of the 46 items is not readily ascertainable from ATU's records. To respond to the Commission's data request for these four items, ATU would have to spend an inordinate

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amount of resources reviewing records one-by-one. Accordingly, ATU hereby requests that the Commission waive the requirement that ATU submit data for these four items to the extent identified below.

ATU requests that the Commission waive its data request with regard to the following items only:

- **Item (2) -- Loop length studies.** ATU has never performed a loop length study, and accordingly cannot provide the Commission with a recent one. Currently, when loop length requirements are needed, ATU performs a transmission study on a per-line basis, which identifies loop length limitations. Although this provides loop length information, the study is usually for one line or a small group of lines, is done on a case-by-case basis, and quickly becomes dated. To perform a statistically valid loop length study at this time would require a sample size up to 1,200 loops, depending on the stratification. This would utilize considerable resources and pose an unreasonable financial burden on the company. ATU requests that the Commission waive the request for a loop length study at this time. In connection with requests for interconnection, ATU may do a loop length study in the future and would gladly provide the Commission loop length information at that time.

- **Item (8) -- Structure-sharing percentages.** ATU is not able to identify the percentage of its structures that support its outside plant that are shared with other companies. Being a municipally owned utility, ATU has historically been encouraged to share trenching costs with other utilities. Currently, ATU has an agreement with the two local electric companies in Anchorage whereby, if a trench is open, ATU is invited to lay facilities in the trench. Each electric company bills ATU for 45 percent of the total cost of the shared trenches. ATU also utilizes trenches in which ATU has borne the full cost. ATU provides all of its own conduit and has not entered into sharing arrangements for its conduit. Although ATU owns some poles, the overwhelming majority of the poles used by ATU are owned by the electric utility companies. ATU is charged rent for its use of these poles, and the amount of that rent is dependent on the number of poles ATU uses.

  In order to identify the percentage of trenches or poles shared with other companies, ATU would have to review manually every work order to identify whether any sharing of facilities occurred. ATU would then have to request that the electric utility provide ATU with the total cost of each

shared pole or ATU's percentage of the cost. This would be burdensome for both ATU and the electric utilities. Accordingly, ATU asks that the Commission waive its request for the percentage of shared poles and trenches.

- **Item (11)(b) -- Detailed continuing property records.** ATU's Continuing Property Records ("CPR") do not separately identify installation cost and material cost. Once a work order is complete, the installation labor and material costs are aggregated and entered in ATU's CPR. In order to separate the installation and material costs for the Commission's data request, ATU would have to review manually every work order and record the pre-close allocation between labor and material. This would entail reviewing hundreds of work orders. ATU asks that the Commission waive its request for data in Item 11(b).

- **Item (18) -- Residential, single-line business, and multi-line business customers.** ATU is able provide the Commission with total revenue figures for categories such as local information charges and optional services, but it cannot correlate those revenues to residential, single line business or multi-line business customers. Revenues by service category and function are aggregated into single accounts because identification with a class of customer is not feasible at this time. In order to assign ATU's revenues to residential, single line business, and multi-line business, ATU would have to develop and implement new systems software programs. ATU does not have the resources or personnel at this time to devote to such a project. ATU requests that the Commission waive the requirement in Item 18 that it break down revenues by residential, single-line business, and multi-line business customers.

ATU's data systems do not aggregate information in the manner requested by the Commission in the above items. To obtain this information in the format requested by the Commission, ATU would have to review manually hundreds of documents. ATU does not have the personnel or resources to perform this manual review. ATU has entered into interconnection, unbundling and resale agreements with the two incumbent interexchange carriers -- General Communication, Inc. ("GCI") and AT&T/Alascom. Both carriers are significantly larger than ATU. GCI, which is also the monopoly cable television provider, has already begun offering local exchange service to

residents of Anchorage and AT&T/Alascom should soon follow. To remain competitive in the local exchange market, ATU is streamlining its resources and overhead. At this time, ATU can ill afford to hire additional personnel or incur significant costs to develop and implement new data systems to comply with the Commission's data request.

Accordingly, ATU requests that the Commission waive its data request to the extent discussed above. ATU will submit to the Commission by August 15, 1997, the remaining data requested in the Order. This information is available from ATU's data systems and records and should assist the Commission in developing a cost model.

Respectfully submitted,

ANCHORAGE TELEPHONE UTILITY

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