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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
	)	
	)	
Forward-Looking Mechanism for High Cost Support for Non-Rural LECs	)	CC Docket No. 97-160
	)	
	)	

COMMENTS OF
ALIANT COMMUNICATIONS CO.

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August 8, 1997

COMMENTS OF
ALIANT COMMUNICATIONS CO.

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COMMENTS OF
ALIANT COMMUNICATIONS CO.

Aliant Communications Company ("Aliant"), by its attorneys, hereby submits its comments in the above-captioned proceedings. These comments address the switching, interoffice trunking, signaling and local tandem component platform design (III.C.3. & 4. Platform) of forward looking economic cost models as requested in the comment submission schedule of the Commission's Further Notice of Proposed Rulemaking ("FNPRM").[1] In order to facilitate the Commission's consideration of these comments, Aliant references the particular paragraphs of the Commission's FNPRM to which they relate.

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[1] *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45 and *Forward-Looking Mechanism for High Cost Support for Non-Rural LECs*, CC Docket No. 97-160, FCC No. 97-256, *Further Notice of Proposed Rulemaking* (July 18, 1997).

III.C.3.a. Mix of Host, Stand-Alone, and Remote Switches

Aliant agrees with the Commission[2] that host-remote arrangements are more cost effective in many cases than stand-alone switches, and they are widely deployed throughout Aliant's and other LEC's networks. Algorithms to predict the deployment of host and remote switches should be based on limits, including one that determines the line count in a wire center under which a remote would be assumed and another that determines the maximum switching complex line count that a host could support. Aliant believes, that these limits should be modifiable input values so that non-rural LECs that have significant rural service territory (such as Aliant) could be accurately represented by the model. This would allow for forward-looking economic solutions targeted for low-density areas and special concerns related to network reliability and the availability of specific service types over a wide area. Data contained in the Local Exchange Routing Guide ("LERG") with respect to the placement of hosts and remotes reflects current LEC experience and expertise with an actual network and would prove valuable as a starting point or point of validation. Bellcore's Switching Cost Information System (SCIS) contains the algorithms and flexibility to accommodate the cost differences and configurations of host and remote switches. The SCIS model is the industry standard with respect to switching and has stood through the ONA proceeding and the scrutiny of an outside audit.

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[2] *See* FNMPR at Paragraph 122.

III.C.3.d. Percent of Switch Assigned to Port and the Provision of Universal Service

Aliant agrees that switch costs should be divided between line-side port (line termination) and usage costs[3] and that all the port and part of the usage are costs of providing universal service[4] (paragraph 137). Aliant believes that Bellcore's SCIS contains the vendor specific algorithms to segregate the port (line termination) and usage costs and that LEC specific usage data (such as local DEM) should be used to determine the cost of local usage included in universal service.

III.C.4. Interoffice Trunking, Signaling and Local Tandem Investment

Aliant believes that the interoffice trunking, signaling and local tandem facilities and funtionalities developed by any model should reflect the reality of a workable and reliable network. The method used by Hatfield 3.1 to compute the effective distance on an optical fiber ring is not correct when applied to a largely rural territory such as Aliant's. One and a half times the side of a squared area may provide an adequate connection in metropolitan wire centers (Aliant's is not situated to prove or disprove accuracy in a large metropolitan area), but falls short in rural territory where there are many wire centers between ones that qualify (over 5,000 lines) for a ring connection. It is Aliant's position that all distances should be based on LERG data, that an appropriate ring topology building method is used and that any network designed by a proxy model be able to be audited and corrected prior to costing

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[3] *See id.* at Paragraph 135.

[4] *See id.* at Paragraph 137.

Aliant urges the Commission to adopt the suggestions contained herein.

Respectfully submitted,

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August 8, 1997

CERTIFICATE OF SERVICE

I hereby certify that a copy of the attached comments of Aliant Communications, Co. was served U.S. Mail on the parties of record in this proceeding.