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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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September 2, 1997

COMMENTS OF
ALIANT COMMUNICATIONS CO.

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COMMENTS
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ALIANT COMMUNICATIONS CO.

Aliant Communications Co. ("Aliant"), by its attorneys, hereby submits additional comments in the above-captioned proceedings. These comments address the design of the customer location component (III.C.1. 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 sections 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.1.a. Geographic Unit

It is Aliant's position that the use of Census Block Groups (CBGs), especially in rural areas, is inappropriate. CBGs can be so large in sparsely populated areas and incongruent with wire center boundaries that their use may leading to significant errors in estimating loop length. Aliant submits that data is available to reduce the size of the geographic unit to the Census Block level. Aliant is aware of at least one database provider, BLR Data, that has databases that relate Census Blocks to wire centers.

Furthermore, it is possible to determine with a 90% accuracy the latitude and longitude of households and businesses. This data would be used to relate each location to a wire center and provide latitude and longitude so that exact loop lengths could be calculated. BLR Data has informed Aliant that it can provide this data at a reasonable cost. This data is generated using address information and telephone numbers as an intermediary step. Data provided for running the model could have address information and telephone number deleted to accommodate any concerns about propriety information. With the use of geo-coded data, errors can be virtually eliminated relative to loop lengths.

III.C.1. b. Distribution of Customers

The underlying principle for having a network model accurately reflect the cost of delivering basic service is to accurately locate the individual users. This is particularly true in the higher cost rural areas. Aliant agrees that population clustering actually occurs. However, there must be a

mechanism within the model to calculate with more precision a population cluster's proximity to wire centers. Because there is a difference between an "urban" and a "rural" population cluster (*i.e.*, the number of customers located within a small rural town vs. the number distributed evenly on farms over an entire CB), Aliant believes that the model should have the capability to adjust a "clustering factor" by individual wire centers. Clustering is a non-issue if reliable data and support software is available to geo-code all households within a wire center.

Aliant believes that actual loop statistics should be used to validate the model's loop lengths if any kind of assumption is made that defines the customer location. Aliant also believes that any method that utilizes a combination of actual geographic maps, census data and the actual location of serving wire centers would provide a more accurate "cost" of providing service.

III.C. 1. c. Line Count

It is Aliant's view that the adopted model should explicitly disclose any "closing factor" with respect to line counts and that this factor should be 10% or less. A line count derived by a model that is not within 10% of the actual line count is not acceptable in developing reliable costs. Aliant also believes that this closing factor should be applied on a wire center basis to prevent an averaging effect and resultant distortion of costs between high and low cost wire centers. Aliant believes that fairly accurate line counts per wire center are available from commercial sources and that this information should be incorporated into any algorithm which calculates line counts for both residential and business users. Commercial data is typically available in a standardized format, and this format should be used by the adopted model. By adopting a standardized format, data from

these sources can be used to either determine corrected line counts or to test the accuracy of available data.

Aliant urges the Commission to adopt the suggestions contained herein.

Respectfully submitted,

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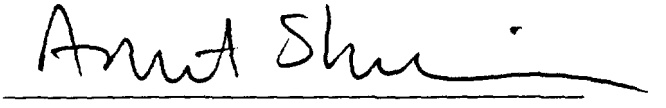
I hereby certify that a copy of the attached comments of Aliant Communications Co. was served by first class U.S. mail, postage prepaid, on the parties of record in this proceeding.