

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Changes to the Board of Directors of the National Exchange Carrier Association, Inc.)	CC Docket No. 97-21 ✓
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	

REPLY COMMENTS

The National Exchange Carrier Association, Inc. (NECA) herein replies to comments filed in response to the Commission's Further Notice of Proposed Rulemaking (FNPRM) in the above-captioned matter.¹

In the FNPRM, the Commission proposed to amend its rules specifically to permit the use of Telecommunications Relay Service (TRS) Fund revenue data by the Universal Service Administrative Company (USAC) or NECA, and the permanent Administrator, solely for purposes of verifying revenue information reported on the Universal Service Worksheet.² The Commission further proposed to amend its rules to clarify that these entities would otherwise keep confidential all data obtained from universal service contributors and the TRS Fund data.³

The record supports the Commission's proposals. As NECA stated in its comments,

¹ Changes to the Board of Directors of the National Exchange Carrier Association, Inc., Federal-State Joint Board on Universal Service, *Order on Reconsideration, Second Report and Order, and Further Notice of Proposed Rulemaking*, FCC 97-292, CC Docket Nos. 97-21 and 96-45 (rel. Aug. 15, 1997).

² FNPRM at ¶ 23.

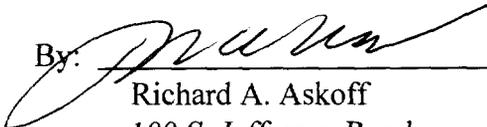
³ *Id* at ¶ 24.

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allowing USAC use of the TRS data will help to ensure the integrity of the new universal service funds and will also be more efficient than relying on audits only.⁴ MCI also supports the Commission's proposals and BellSouth does not object to them.⁵ Therefore, the Commission should adopt the rule changes proposed in the FNPRM.

Respectfully Submitted,
National Exchange Carrier Association, Inc.

By: 

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By: 

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September 26, 1997

⁴ NECA Comments at 2.

⁵ MCI Comments at 3-4, BellSouth Comments at 1. MCI's comments also incorporated a petition for reconsideration which argues against too closely involving NECA with USAC or the Schools & Libraries and Rural Health Care Corporations. NECA notes that parties wishing to oppose MCI's petition for reconsideration, or any others filed by the October 9 deadline, have until 15 days following public notice of such petition(s) in the Federal Register. *See* 47 C.F.R. § 1.429. The only other party that filed comments was WorldCom, which suggested one deadline for the USAC Board to begin operations and another deadline beyond which NECA could no longer provide "direct assistance" to USAC, as well as close monitoring of NECA to ensure the transition. These issues are outside the scope of the FNPRM.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments was served this 26th day of September 1997, by mailing copies thereof by United States Mail, first class postage paid or by hand delivery, to the persons listed below.

By:


Perry S. Goldschein

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