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MAY 15 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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

In the Matter of	)	
	)	
Proposals to Revise the Methodology for	)	CC Docket No. <u>96-45</u>
Determining Universal Service Support	)	CC Docket No. 97-160

**COMMENTS  
OF THE  
UNITED STATES TELEPHONE ASSOCIATION**

The United States Telephone Association (USTA) respectfully submits its comments in the above-referenced proceeding. USTA is the principal trade association of the local exchange carrier (LEC) industry. Its members provide over 95 percent of the incumbent LEC-provided access lines in the U.S and traditionally have been the sole providers of universal service.

On April 15, the Common Carrier Bureau released a *Public Notice* seeking additional comments on proposals to modify the Commission's approach to determining universal service support for non-rural and rural carriers. USTA's comments focus solely on the proposals affecting rural carriers.

In August, 1997, USTA President and CEO Roy Neel wrote a letter to then-Chairman Reed Hundt which explained that the Commission's decision to fund only 25 percent of the difference between forward-looking economic costs (based on a proxy model which has yet to be adopted) and a revenue benchmark (which also has not yet been determined) would be disastrous for rural carriers. The formula represents a significant departure from the current universal service mechanisms which ensure that customers in rural areas receive affordable, high quality

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service. USTA explained that the circumstances typically faced by rural carriers, including greater dependence upon access revenues, smaller calling scopes, lower number of subscribers per square mile and a much smaller percentage of business customers, necessitate a greater reliance on federal universal service support.<sup>1</sup> Costs in rural areas are typically much higher than in urban areas and are spread across a small customer base. None of the proxy models currently under consideration by the Commission accurately reflect the costs incurred by rural carriers to provide service.<sup>2</sup>

Given these circumstances, there is no margin for error in determining the appropriate system of universal service support for rural carriers. Rural carriers are especially vulnerable to the loss of even one large customer to competition. The loss in access revenues would be devastating for a rural telephone company trying to continue serving its high cost, low volume customer particularly if the actual costs of serving those customers are not supported through a universal service mechanism. Arbitrarily reducing universal service support will threaten the ability of rural carriers to provide affordable rates to their high cost customers or to provide the network upgrades necessary to maintain high quality service or to provide access to advanced services as required by the Telecommunications Act of 1996.

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<sup>1</sup>Chairman Kennard accurately articulated these circumstances in his speech delivered to the Organization for the Promotion and Advancement of Small Telecommunications Companies on January 12, 1998 in Fort Lauderdale, Florida.

<sup>2</sup>In that letter, USTA also noted that a revenue-based benchmark, particularly one that includes revenues from access and discretionary services, would not be appropriate for rural carriers.

In its Order on universal service, the Commission adopted a transition plan for rural carriers proposed by USTA, the National Telephone Cooperative Association, the National Rural Telecom Association and the Organization for the Promotion and Advancement of Small Telecommunications Companies and which was also supported by the state members of the Federal-State Joint Board. The transition plan transferred the weighted portion of the Dial Equipment Minute (DEM) allocation, high cost support and long term support to the new universal service funding mechanism. This ensured that the explicit universal service support for rural carriers would be portable and would be calculated in a manner consistent with the Telecommunications Act. The plan properly reflects the fact that a forward-looking cost proxy model is not suitable for rural carriers. Equally important, the plan preserves incentives to invest in the network, protects small businesses located in rural areas and avoids unnecessary administrative burdens. While the transition plan meets the needs of rural carriers and adheres to the universal service principles articulated in the Act, future treatment of rural carriers remains uncertain.

In the Order, the Commission states that rural carriers will begin receiving support based on forward-looking economic costs “only when we have sufficient validation that forward-looking support mechanisms for rural carriers produce results that are sufficient and predictable.”<sup>3</sup> Of course such validation does not exist. USTA was particularly heartened by Chairman Kennard’s recent remarks at the USTA Inside Washington Telecom Luncheon.

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<sup>3</sup>Federal State Joint Board on Universal Service, *Report and Order*, CC Docket No. 96-45, 12 FCC Red 8776 (1997), *Errata*, FCC 97-157 (rel. June 4, 1997), *appeal pending*, *Texas Office of Public Utility Counsel v. FCC*, No. 97-60421 (5th Cir. Filed June 25, 1997), at ¶ 252.

Chairman Kennard stated:

When it comes to our country's smaller, rural telephone companies -- companies that serve one-third of the nation's geography but only about 5% of the population -- if it ain't broke, don't fix it. That may not be the way common carrier lawyers are supposed to talk, but that's really the way I feel. I visited a small rural telco not too long ago and what I saw was a first-rate telecommunications operation. I didn't see anything that was broken and I had no desire to offer any fixes. The Commission has already taken explicit small company support, changed the way that support is collected to be consistent with the 1996 Act and made that support portable between competing carriers. That's a lot of change for companies that are geographically very targeted and undiversified. My bottom line is that universal service reform is something the Commission should do with the small rural carriers, not to them. The Joint Board will soon appoint the Rural Task Force, which I fully support as a means of developing a greater consensus on what further actions, if any, must be taken for universal service support to high cost areas served by small companies. But I also want to be clear on this point -- I see no reason why further small company reform must begin in 2001. We should make changes only when it is right to make changes, and not before.<sup>4</sup>

USTA wholeheartedly supports Chairman Kennard's statements regarding universal service support for rural carriers. Therefore, USTA recommends that the Commission take the following actions to provide certainty regarding universal service support for rural carriers. First, the Commission should maintain the transition plan indefinitely or at least until rural carriers working with the Rural Task Force agree on revisions which would better serve rural customers. Rural carriers are committed to the principles of the Act which require that consumers in all regions of the Nation, including rural areas, have access to telecommunications and information services as well as advanced telecommunications and information services that are reasonably comparable to those services provided in urban areas, at rates that are reasonably comparable to

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<sup>4</sup>Remarks by Chairman William Kennard to USTA Inside Washington Telecom on April 27, 1998.

rates charged for similar services in urban areas. The transition plan furthers those principles.

Second, the Commission should remain vigilant in ensuring that nothing in its upcoming decisions to adopt a universal service mechanism for the non-rural carriers will arbitrarily apply to the rural carriers or will impact the current transition plan for the rural carriers unless the Commission makes a definitive finding supported in the public record that any such action is in the best interests of rural carriers and their customers. "Do no harm" to rural carriers should be the Commission's guiding principle.

Third, the Commission should exercise its oversight authority to ensure that the administration of the Schools and Libraries Corporation is conducted in a neutral and unbiased manner and does not in any way advantage the competitors of incumbent LECs.<sup>5</sup>

Fourth, the Commission should consider the concerns of rural carriers in resolving issues affecting these carriers which are pending on reconsideration. Specifically, USTA urges the Commission not to permit non common carriers to receive support under the schools and libraries mechanism in violation of the Act; not to limit universal service support for exchanges acquired after May 7, 1997; and to eliminate the cap on support.

Finally, USTA strongly supports the proposal of the Puerto Rico Telephone Company to maintain its 1998 level of support and not to force it to utilize a cost proxy model until the Commission is able to confirm that the model accurately reflects the costs of providing service in Puerto Rico. As evidenced by Puerto Rico in its proposal submitted April 27, 1998, both the

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<sup>5</sup>See, for example, remarks of Ira Fishman, Chief Executive Officer, Schools and Libraries Corporations, before the Association of Local Telecommunications Services, May 5, 1998, in Hilton Head, South Carolina.

Hatfield and BCPM proxy models severely limit the amount of universal service support which would be available for Puerto Rico.<sup>6</sup> Given that subscribership in Puerto Rico is only about 76 percent, compared to the 94 percent penetration in the U.S., it would be impossible for Puerto Rico to increase subscribership without universal service support.

In conclusion, USTA urges the Commission to maintain the transition plan for rural carriers, to consider the concerns of rural carriers in addressing the implementation of universal service mechanisms and to address the unique circumstances facing the Puerto Rico Telephone Company.

Respectfully submitted,

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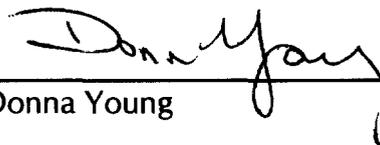
May 15, 1998

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<sup>6</sup>The uncapped BCPM reduces Puerto Rico's universal service support to less than one-tenth of its 1997 amount; the Hatfield model reduces support for Puerto Rico to slightly more than one-thousandth of its previous amount.

**CERTIFICATE OF SERVICE**

I, Donna Young, do certify that on May 15, 1998, copies of the accompanying comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.

  
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