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May 26, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

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MAY 26 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Corrected Filing
CC Docket No. 96-45

Dear Ms. Salas:

On May 22, 1998, the United States Telephone Association (USTA) filed comments in the above-referenced docket. However, the attachment to the comments was inadvertently omitted from the filing. Enclosed is a copy of USTA's comments which includes the attachment. Please include the corrected version in the public record of this proceeding. USTA will send a complete version to the parties on the service list of this proceeding.

Thank you for your assistance in this matter.

Respectfully submitted,

Linda Kent
Associate General Counsel

cc: Sheryl Todd (3 copies)
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Before the
Federal Communications Commission
Washington, D.C. 20554

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MAY 26 1998

FEDERAL COMMUNICATIONS COMMISSION
WASH DC 20554

In the Matter of)
)
Proposed Revision of Maximum Collection) CC Docket No. 96-45
Amounts for Schools and Libraries and) DA 98-872
Rural Health Care Providers)

**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. USTA's member companies traditionally were the sole providers of high quality, affordable service to all customers and continue to provide universal service today.

In a Public Notice released May 13, 1998, the Common Carrier Bureau seeks comment on its proposal to direct the Universal Service Administrative Company (USAC) to collect no more than \$25 million per quarter for the third and fourth quarters of 1998 to fund the rural health care universal service support mechanism and to collect no more than \$524 million per quarter for the third and fourth quarters of 1998 to support the schools and libraries universal service support mechanism. The Public Notice states that the Bureau proposal will "implement a gradual phase-in of the schools, libraries and rural health care universal service support

mechanisms that takes advantage and reflects the timing of access charge reductions...” Further, the Notice requests comment on “adjusting the maximum amounts that may be collected and spent during the initial year of implementation in order to ensure that collection rates do not exceed access charge reductions and to prevent rate churn for subscribers.” USTA is concerned about the linkage of universal service contributions and access charge reductions and will address that issue and several other issues of concern regarding these universal service support mechanisms.

The Commission has the authority under Section 201 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, to ensure that interstate access charges are just and reasonable. There is no indication in that or any other section of the Act that interstate access charges must relate to the level of contribution to universal service. Section 254 of the Act creates the new universal service mechanisms. Section 254(d) requires all telecommunications carriers to contribute to the universal service mechanisms. There is nothing in that section which in any way relates a carrier’s contribution to universal service to a reduction in access charges. Access charges recover the legitimate costs of providing access services. There is no legal basis for the Commission to arbitrarily reduce access charges in order to reflect contributions to universal service or to determine the appropriate level of funding for the schools, libraries and rural health care programs based on the level of access charge reductions.

Reductions in access charges are based on the operation of the price cap formulae which the Commission has found produces lower access rates by forcing carriers to be more productive

than the economy as a whole.¹ Indeed, price cap regulation has created approximately \$11 billion in access charge reductions since it was implemented in 1990.

Funding for the schools and libraries and rural health care mechanisms is to be determined pursuant to Section 254(h) of the Act which provides for discounts to schools, libraries and rural health care providers for telecommunications services. As Commissioner Furtchgott-Roth states in his separate opinion and as USTA has consistently pointed out internal connections and Internet access are not telecommunications services. Funding for these programs should reflect the requirements of the Act. Funding for these programs should not be dependent upon or have any relationship to the level of access charge reductions.

When the Commission was considering the implementation of the new universal service fund as well as much-needed access charge restructuring, a connection between access charge reductions and universal service contributions was reflected in the attached May 3, 1997 ex parte letter from Mr. Gerald M. Lowrie, Senior Vice President, AT&T to former Commission Chairman Reed Hundt. The new universal service mechanisms as well as the expansion of the low income universal service mechanism adopted by the Commission increased the amount of contributions needed to fund all of the universal service mechanisms. There was great concern that these contributions be collected without providing incentives for contributing carriers to increase rates to customers due to the expectation that passage of the Telecommunications Act of 1996 would result in lower rates for all customers for all services from all providers. In the

¹Policy and Rules Concerning Rates for Dominant Carriers, *Second Report and Order*, CC Docket No. 87-313, 5 Rcd 6786, 6796, 6816 (1990).

letter, AT&T agreed to flow through all access savings proportionately to consumer and business services and, if net switched access reductions equal at least \$1.7 billion effective July 1, 1997, AT&T also promised that the flow through will equal a certain percentage for consumers and that further access savings will also flow through to consumers in the proportion attributable to consumer call volumes. Finally, AT&T agreed that if flat charges for universal service contributions and for an access charge restructure did not exceed current amounts, AT&T would not reflect such charges on customer bills until July 1, 1998. In an Order adopted May 7, 1998, the Commission prescribed an increase to the price cap productivity factor requiring an immediate reduction in access charges totaling \$1.7 billion.²

This linkage has not produced the desired results. As USTA pointed out in two letters dated February 11, 1998 and March 18, 1998 from President and CEO Roy Neel to Chairman Kennard, the interexchange carriers are pocketing the mandated reductions in access charges and are billing their customers for both the universal service contribution as well as the presubscribed interexchange carrier charge without reducing their per minute toll rates. USTA estimated that IXCs have increased charges to customers by over \$2 billion with no offsetting long distance decreases. As Commissioner Furtchgott-Roth points out, there is no assurance that the consumers who benefit from access charge reductions will be the same consumers who will bear the universal service burden. Targeting access charge reductions to funding the schools, libraries

²Price Cap Performance Review for Local Exchange Carriers and Access Charge Reform, *Fourth Report and Order in CC Docket No. 94-1 and Second Report and Order in CC Docket No. 96-262*, 12 FCC Rcd 16642 (1997) *appeal pending sub. nom. USTA v. FCC*, No. 97-1469 (D.C. Cir 1997).

and rural health care programs will eliminate any possibility that customers will benefit from access charge reductions. It also does not ensure that contributions are competitively neutral as the Commission originally intended. USTA shares Commissioner Furtchgott-Roth's concern that the Bureau's proposal may endanger the ability to provide adequate funding for the high-cost program which USTA's members rely heavily upon in order to provide affordable, high quality service in rural areas.

USTA is also concerned about several other aspects of the schools and libraries program. First, USTA urges the Commission to exercise its oversight authority over the administration of the Schools and Libraries Corporation to ensure that it is conducted in a neutral and unbiased manner and does not in any way advantage the competitors of incumbent LECs.³ Further, USTA shares Commissioner Furtchgott-Roth's concerns regarding the administrative expenses for the Schools and Libraries Corporation. Second, the Commission should ensure that, pursuant to the exact wording of the Act, only telecommunications carriers are permitted to receive support under the schools and libraries program. Telecommunications carriers, as defined in the Act, do not include entities which do not provide telecommunications service on a common carrier basis.⁴

³See, remarks of Ira Fishman, Chief Executive Officer, Schools and Libraries Corporation, before the Association of Local Telecommunications Services, May 5, 1998, Hilton Head, South Carolina.

⁴Iowa Telecommunications and Technology Commission Request for Determination that the Iowa Communications Network is a Provider of Telecommunications Services to Schools, Libraries and Rural Health Care Providers, CC Docket No. 96-45, AAD/USB File No. 98-37, Comments of USTA, March 4, 1998, Reply Comments of USTA, March 16, 1998, and USTA
(continued...)

The funding proposal for the third and fourth quarters of 1998 doubles the amount collected in the first two quarters of this year. USTA urges the Bureau to consider the issues raised in these comments and to ensure that the overall size of the funding for schools, libraries and rural health care providers does not adversely impact customers, will not undermine the Commission's ability to adequately fund the high cost program and properly reflects statutory authority.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

By  _____

Its Attorneys:

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May 22, 1998

⁴(...continued)
Ex Parte, April 21, 1998.

*Comments of the
United States Telephone Association
May 22, 1998*



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Senior Vice President

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May 3, 1997

The Honorable Reed E. Hundt
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Dear Chairman Hundt:

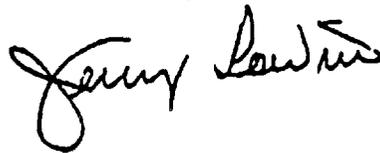
This letter is intended to further articulate AT&T's commitment to flow through access reductions. AT&T will flow through all access savings it receives as a result of the actions that the Commission takes in its Access Reform Rulemaking and related proceedings¹ proportionately to consumer and business services. In the event that net switched access reductions to the interexchange industry equal at least \$1.7 billion effective July 1, 1997, AT&T also will make the following commitments:

1. AT&T's access flow through will include reductions to AT&T's consumer basic schedule prices of 5 percent to the day schedule, 5 percent to the evening schedule and 15 percent to the night/weekend schedule effective with the date of such access reductions.
2. AT&T will flow through any further access savings resulting from these access reform related proceedings to its basic schedule consumer prices in the proportion attributable to its basic consumer call volumes effective with the date of such access reductions.
3. Under the current universal service system AT&T and other interexchange carriers today make a universal service contribution that is calculated as a monthly flat charge per presubscribed access line. This charge today ranges between 50 and 60 cents per line, per month. AT&T and other interexchange carriers do not reflect this charge as a specific line item on any residential customer's bill. Rather, this universal service contribution is recovered through other charges for interstate service, including the per-minute charges for interstate long distance calls. The Commission reportedly is considering

¹ Access charge related decisions adopted during May 1997.

reforms to the existing universal service programs that would modify the above-described practices. The Commission also reportedly is considering reforms to the interstate access charge rules that may include the assessment of flat charges per line, per month, to interexchange carriers. As long as such flat charges are not in excess of the above-referenced current flat charges, AT&T commits that it will not reflect any such flat charges as specific line items or other flat charges on any interstate basic schedule residential customer's bill at least until July 1, 1998. For the six month period thereafter, AT&T makes the same commitment, provided, however, that it has not incurred prior to July 1, 1998, a significant and material loss of revenue from its basic schedule residential customers to dial around services. In the event that AT&T has reason to believe that such a loss has occurred, AT&T shall inform the Commission in writing not later than May 1, 1998. If such loss occurs after May 1, 1998 AT&T shall inform the Commission in writing sixty days prior to taking such action.

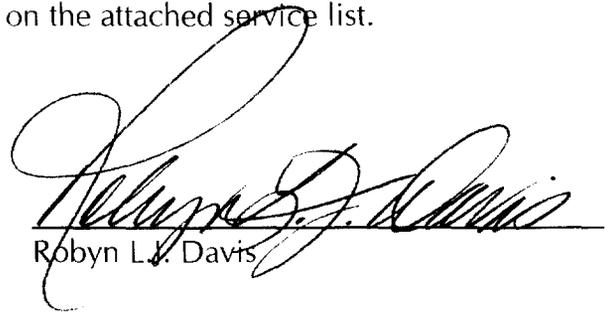
Sincerely,

A handwritten signature in cursive script, appearing to read "Jerry Lawler".

Copy to: **The Honorable James H Quello**
The Honorable Susan Ness
The Honorable Rachelle B. Chong
Ms. Regina M. Kecney

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on May 26, 1998 copies of the 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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