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

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In the Matter of)	CC Docket No. 96-45
)	
Federal-State Joint Board on)	CC Docket No. 97-160
Universal Service)	
)	DA 98-715
)	

COMMENTS

The National Exchange Carrier Association, Inc. (NECA)¹ submits its comments in response to the Commission's May 4, 1998 *Public Notice*.² The *Public Notice* invites comment on a wide range of issues related to the creation of a forward-looking economic cost mechanism as well as the level of a revenue benchmark.³ Specifically the Commission requests comments regarding the input values that should be used in the federal mechanism and in setting the level of the revenue benchmark.⁴

¹ Under the Commission's rules, NECA is the responsible entity for the preparation of access charge tariffs on behalf of telephone companies that do not file separate tariffs; and for the collection and distribution of access charge revenues. The Commission's actions in this docket will directly impact the preparation of the access charge tariffs, and the members of the NECA pools. *See* 47 C.F.R. §§ 69.603 and 64.604.

² Common Carrier Bureau Requests Further Comment on Selected Issues Regarding the Forward-Looking Economic Cost Mechanism for Universal Service Support, CC Docket Nos. 96-45 and 97-160, *Public Notice*, DA 98-848 (May 4, 1998)(*Public Notice*). *See also* Federal State Joint Board on Universal Service Forward-Looking Mechanism for High Cost Support for Non-Rural LECs, CC Docket Nos 96-45 and 97-160, *Order*, DA 98-990 (May 22, 1998)(extending comment and reply dates).

³ *Public Notice* at 1.

⁴ *Id.* at 2.

In the *Public Notice*, the Commission explains that federal high cost support for eligible non-rural telecommunications carriers will equal 25 percent of the difference between the estimated forward-looking cost of providing the supported services and a revenue-based benchmark.⁵ The Commission intends to include at least a portion of access revenues and intraLATA toll revenues in the benchmark “unless and until both interstate and intrastate access charges have been reduced to recover only per-minute switch and transport costs, access revenues should be included in the benchmark.”⁶ The Commission notes that rural carriers, the vast majority of NECA’s Common Line (CL) and Traffic Sensitive (TS) pool members, may also transition to a similar mechanism, but no sooner than 2001.⁷

Rural local exchange carriers (LECs) have expressed concern regarding the effects a revenue-based benchmark might have on universal service support and NECA pool rates. Rural LECs usually serve sparsely populated areas where providing service is considerably more costly than in highly dense areas. Access rates of small, rural carriers reflect these conditions, and are substantially higher than those of non-rural carriers. For example, even with elimination of dial equipment minute (DEM) weighting from access charges, and introduction of the explicit local

⁵ *Id.* at 8. NECA recently addressed concerns regarding the 25 percent support methodology. See NECA Comments (May 15, 1998) on Common Carrier Bureau Seeks Comment on Proposals to Revise the Methodology for Determining Universal Service Support, CC Docket Nos. 96-45 and 97-160, *Public Notice*, DA 98-715 (April 15, 1998)(*April 15, 1998 Public Notice*).

⁶ *Universal Service Order* at ¶ 262 and *Public Notice* at 9.

⁷ *Public Notice* at 2.

switching support (LSS) program, NECA's local switching rates still remain high, reflecting costs that are substantially higher than those of non-rural carriers.

There is significant concern that federal universal service support levels calculated through the use of a revenue-based benchmark based on access and intraLATA revenues will not provide sufficient support to fund basic service in rural areas. As the Commission moves forward with its evaluation of new universal service mechanisms, it should keep in clear view the pronounced difference in circumstances faced by small, rural telephone companies as compared to larger carriers. Rural LECs depend heavily on federal universal service support, and any mechanism that substantially decreases such support could put upward pressure on interstate access and end user rates in rural areas.⁸ Rural customers have been served well by current mechanisms, which have enabled small, rural LECs to furnish affordable and up-to-date services and network capabilities. In its comments and reply comments in response to the Commission's *April 15 Public Notice* in this proceeding, NECA explained how the application of new universal service mechanisms even to the few non-rural carriers in NECA's pools could have adverse effects on access rates. As the Commission moves forward with application of new universal service mechanisms to non-rural and rural LECs, it should fully consider the public interest

⁸ For example, two federal universal service support programs are direct offsets to NECA pool access rates. The terminating Carrier Common line rate would be 300 percent higher without long term support (\$471.1 million). The NECA traffic sensitive rates would be 40 percent higher without local switching support (\$295.9 million).

implications of any mechanisms that would decrease rural carrier support or otherwise cause increases in access tariff rates.

Respectfully submitted,

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I hereby certify that a copy of the foregoing Comments was served this 1st day of June 1998, by hand delivery or first class mail, to the persons listed below.

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