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June 22, 1998

Magalie Roman Salas, Esq., Secretary  
Federal Communications Commission  
1919 M Street, NW Room 200  
Washington, DC 20554

**RE:** *In Re Federal-State Joint Board on Universal Service* (CC Docket No. 96-45) ✓

*In Re Changes to the Board of Directors of the National Exchange Carrier Association, Inc.* (CC Docket No. 97-21)

*In Re FCC Form 457, Universal Service Worksheet, Extension of a Currently Approved Collection Under the Paperwork Reduction Act of 1995*, OMB Control No. 3060-0768, 62 Fed. Reg. 44966

Dear Ms. Salas:

On June 19, 1998, Mary McDermott of the Personal Communications Industry Association ("PCIA") had a telephone conversation with Lori Wright of the Common Carrier Bureau's Accounting Policy Division. The discussion included issues related to the above-referenced proceedings.

Ms. McDermott and Ms. Wright discussed whether the FCC should issue any type of interim guidance to wireless carriers on procedures for separating intrastate and interstate revenues for universal service reporting purposes. (Such guidance would be considered interim because the Commission intends soon to adopt an FNPRM on this and related issues.) Specifically, they discussed the idea of the FCC establishing a "safe harbor" percentage for each type of wireless carrier for use if that carrier did not wish to calculate a carrier-specific percentage of interstate revenues.

Ms. McDermott indicated that "safe harbor" percentages would be difficult to calculate because, even among wireless carriers of the same type, the ratio of interstate revenues varies from carrier to carrier. For example, among broadband PCS providers, that percentage is often dependent on the specific MTA where a carrier offers service.

Ms. McDermott re-emphasized the position that PCIA has taken on this matter in the past -- flexibility for carriers and minimizing administrative burdens should guide the FCC's approach. She indicated that PCIA's members opposed the idea of interim guidance and would urge the

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Commission instead to promptly issue the NPRM. In any event, Ms. McDermott indicated that the FCC should delay offering any interim guidance until it has the benefit of interested parties' views via the comment process on the FNPRM.

Pursuant to §1.1206(b) of the Commission's rules, two copies of this letter are hereby filed with the Secretary's office and a copy of this filing is being sent today to Ms. Wright. Kindly refer questions in connection with this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mary McDermott". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mary McDermott  
Chief of Staff and Senior Vice President for Government Relations  
Personal Communications Industry Association

cc: Lori Wright