



Marlene S. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

December 22, 2014

Re: Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) from ILEC
Regulatory Obligations, GN Docket No. 14-192 CORRECTED REPLY COMMENTS

Dear Ms. Dortch:

Please accept this brief filing as the Reply Comments of the National Association of State Utility Consumer Advocates (“NASUCA”). In this proceeding, the Federal Communications Commission (“FCC” or “Commission”) is considering the United States Telecom Association (“USTelecom”) petition under section 10 of the Communications Act of 1934, as amended,¹ requesting that the Commission forbear from enforcing “various outdated regulatory requirements applicable to incumbent local exchange carriers....”² On behalf of consumers of telecommunications and information services, NASUCA opposed USTelecom’s requests in all seven categories, but focused particularly on the request for forbearance from the universal

¹ 47 U.S.C. § 160.

² USTelecom Petition at 1.

service requirements of 47 U.S.C. § 214(e).³ NASUCA still opposes the Petition. NASUCA will rely on the arguments in its initial comments.⁴

NASUCA continues to oppose forbearance from § 214(e),⁵ and urges the FCC not to grant USTelecom's § 214(e) request made in this proceeding, or in the other six categories.

Respectfully submitted,

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Executive Director

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³ See NASUCA Comments at 9-16.

⁴ NASUCA Comments at 9-16.

⁵ See also NARUC ex parte (December 12, 2014).