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APPENDIX E

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October 15, 1998 OCT 15 1998

FEDERAL COMMUNICATIONS COMMISSION
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**Re: Western Wireless Corporation Petition for Clarification
or Rulemaking; Federal-State Joint Board on Universal
Service, CC Docket No. 96-45**

Dear Ms. Salas:

On behalf of Western Wireless Corporation, I am enclosing for filing a Petition for Clarification or Rulemaking in the proceeding referred to above. This petition asks the Commission to clarify and/or revise its rules regarding the distribution of federal high-cost universal service support to competitive eligible telecommunications carriers, to ensure that the universal service program is competitively neutral.

If you have any questions regarding this matter, please contact me.

Respectfully submitted,



David L. Sieradzki
Counsel for Western Wireless Corp.

Enclosures

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

In the Matter Of)	
)	
Federal-State Joint Board)	CC Docket No. 96-45
on Universal Service)	
)	

**WESTERN WIRELESS CORPORATION
PETITION FOR CLARIFICATION OR RULEMAKING**

Western Wireless Corporation ("Western Wireless"), by its attorneys, hereby submits this Petition to seek a clarification or change in the Commission's policy regarding the distribution of federal universal service high-cost support to carriers other than incumbent local exchange carriers ("ILECs") that have been designated as Eligible Telecommunications Carriers ("ETCs") pursuant to Section 214(e) of the Communications Act of 1934, as amended ("Act").

Specifically, Western Wireless has discovered that certain rules regarding the distribution of high cost support appear to establish a formula that favors ILECs and disadvantages competitive ETCs that are not ILECs. First, competitive ETCs may have to wait as long as two years after entering a market before receiving support. This delay is particularly burdensome for new entrants, and has anti-competitive consequences. Moreover, competitive ETCs' high cost support apparently is to be based on data as much as 24 months out of date, with no apparent opportunity to provide updated information, while ILECs can update their data quarterly.

Western Wireless requests that the Commission issue a clarification that a competitively neutral approach was intended, and that its current rule authorizes both ILECs and competitive ETCs to submit updated information. In the alternative (or in addition), Western Wireless respectfully requests that the Commission change these rules, which do not appear consistent with the Commission's commitment to competitive neutrality in the universal service program. ^{1/}

Western Wireless has a serious interest in providing supported services: it has filed for certification as an ETC in 13 states and is actively participating in universal service proceedings. Western Wireless has argued that, to achieve the goal of *technological and competitive neutrality*, policymakers must ensure that consumers in high-cost and rural areas have the right to choose to obtain supported services from CMRS providers and other new entrants as well as from ILECs. To that end, there must be parity between the revenue support available to all ETCs, regardless of those carriers' technologies, rate structures, or regulatory status. And support must be available for mobile, as well as stationary, services that meet the Commission's definitions of supported universal service, and for wireless as well as wireline local loops.

^{1/} This alternative request could be treated as a Petition for Rulemaking pursuant to Section 1.401 of the Commission's Rules, 47 C.F.R. § 1.401. The Commission could also treat this filing as an *ex parte* presentation and could address the problem described herein in an order responding to pending reconsideration petitions.

Background

The Commission has established firmly that competitive neutrality is one of the cornerstone values of the federal universal service program. / In particular, competitive neutrality is a central objective in the design of the high-cost support mechanism. Specifically, the Commission decided that it would make high-cost “support *portable*, or transferable, to competing eligible telecommunications carriers when they win customers from ILECs or serve previously unserved customers.” / It concluded:

In order not to discourage competition in high cost areas, we adopt the Joint Board’s recommendation to make carriers’ support payments portable to other eligible telecommunications carriers prior to the effective date of the forward-looking mechanism. . . . During the period in which the existing mechanisms are still defining high cost support for non-rural carriers, we find that the least burdensome way to administer the support mechanism will be to calculate an ILEC’s per-line support by dividing the ILEC’s universal service support payment under the existing mechanisms by the number of loops served by that ILEC. That amount will be the support for all other eligible telecommunications carriers serving customers within that ILEC’s study area.” /

/ *Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd 8776, 8858, 8932, ¶¶ 145, 287 (1997) (“Universal Service Order”), pet. for review pending.*

/ *Id.*, ¶ 273 (emphasis added).

/ *Id.*, ¶¶ 287-88.

The Commission adopted the same portability approach for rural as well as non-rural ILECs. ^{5/}

The Problem

In theory, the Commission's decision to make universal service support portable should ensure competitive neutrality. But this may not work in practice under the existing high-cost support mechanism, which is planned to remain in place for non-rural ILECs until July 1999, and for rural ILECs until 2001 or later. A key issue in the methodology for distributing portable support both to ILECs and to competitive ETCs is the calculation of the *number of customer lines* that a carrier serves in a given study area. The amount of support provided to each ILEC currently is computed based on complex formulas in the Part 36 rules (the same rules, for the most part, that were in place before the enactment of the Telecommunications Act of 1996), in which an important factor is the number of customer lines ("working loops") an ILEC serves in each study area. The Part 54 rules determine the amount of support revenue flowing to a competitive ETC in a given study area by: (1) taking the total amount of support that the ILEC receives in that study area; (2) dividing by the number of lines served by the ILEC; and (3) multiplying by the number of lines served by the competitive ETC.

The problem is that the Commission's rules appear to use different methodologies to derive the number of lines for ILECs and competing ETCs,

^{5/} *Id.*, ¶¶ 311-13.

respectively -- and the divergent methodologies appear to severely harm competitive ETCs. Specifically, the Commission's Part 36 rules require ILECs to report to the National Exchange Carrier Association ("NECA") on July 31 of each year their "number of working loops for each study area" as of December 31 of the preceding calendar year. ^{2/} This report forms the basis of the universal service high-cost support that the ILEC receives during the following calendar year. In other words, an ILEC's support during calendar year 1999 is computed based on a report filed on July 31, 1998 regarding the number of working loops on December 31, 1997. Recognizing that this formula would build in a lag of up to two years, however, Section 36.612 of the Commission's rules provide for ILECs to provide updated information regularly and for that information to be factored into the computation of high-cost support. ^{3/} Updated data for each calendar quarter may be provided immediately, and up to the date six months after the end of the quarter.

The Part 54 rules require competitive ETCs, like ILECs, to report to the Universal Service Administrative Corp. ("USAC") on July 31 of each year the number of working loops they serve in each study area as of December 31 of the preceding calendar year. ^{4/} This report forms the basis of the support they receive

^{2/} 47 C.F.R. § 36.611.

^{3/} 47 C.F.R. § 36.612.

^{4/} 47 C.F.R. § 54.307(b). It is patently clear that Section 54.307(b) was drafted based on the pre-existing Section 36.611. The Part 54 rule even refers to an antiquated service, "TWX," ("Teletypewriter Exchange Service"), in its definitions, showing that the rule was drafted by copying the earlier Part 36 rule by rote. But

[Footnote continued]

during the following calendar year. ***But unlike the ILECs, competitive ETCs apparently have no opportunity to provide updated information.*** Thus, while ILECs can receive an increased amount of support based on an increased number of lines served, competitive carriers' support is frozen based on data that may be up to 24 months out of date. This is particularly problematic for rapidly growing new entrants, who may double or triple the number of lines they serve over a 24 month period. /

An even more pernicious consequence is that, while ILECs can receive support immediately, **new entrants may have to wait as long as two years before they can receive any universal service support.** Consider a carrier that enters a new local market during 1998. The carrier had zero lines in the study area as of December 31, 1997, so it has nothing to report on July 31, 1998. But the next possible time for the carrier to report is July 31, 1999, and the carrier cannot receive support based on that report until the year 2000. And by the time the support revenues become available, the new entrant is likely to serve many times the number of lines that it served at the end of its first calendar year in business in

[Footnote continued]

there is no analog in the Part 54 rules to Section 36.612, which allows carriers to submit updated information.

/ We note that, on September 30, 1998, Centennial Cellular Corp. requested a waiver of the July 31 deadline for submitting to USAC the loop count data required under Section 54.307(b). See Public Notice, DA 98-2074 (released Oct. 15, 1998).

that study area. But it apparently has no opportunity to provide updated information as the basis for the support it receives.

The result is that the Commission's own rules appear not to be competitively neutral, and may have the effect of deterring competitive entry -- just the opposite of the effect the Commission apparently intended.

Recommended Solutions

Western Wireless respectfully submits several possible steps the Commission could adopt to remedy this problem. First, to remedy the apparent inequality between the ILECs' opportunity to submit updated information and the competitive ETCs lack of a comparable opportunity, the Commission could issue a clarification of the existing rules (or possibly an erratum). While Section 36.611 (the basic reporting requirement) by its terms applies to "incumbent local exchange carrier[s]," Section 36.612 (which permits filing of updated information) applies to "any telecommunications company." The Commission could clarify that Section 36.612 authorizes competitive ETCs to submit updated Section 54.307 information to USAC, as well as authorizing ILECs to submit updated Section 36.611 information to NECA.

More straightforwardly, the Commission could revise its rules by adopting a new rule provision explicitly allowing competitive ETCs to provide updated information on a rolling basis, or each calendar quarter, just as ILECs

can. ¹⁰/ Such a provision also should make it easy for new entrants to start receiving high-cost support within a relatively short period after entering a market and becoming certified as ETCs -- and should ensure that such support will be based on relatively current data regarding the number of customers they serve.

In addition, the Commission should remedy the anti-competitive effect of the existing rules' apparent delay of up to three years after a new competitive carrier enters a market before it may receive support. The Commission should revise its rules to enable new entrants to enter the Universal Service high-cost support funding system much more frequently -- *e.g.*, at least quarterly. ¹¹/ In addition, new entrants should be able to receive universal service high-cost support once they enter the system based on their current number of customer lines, or on a recent count. Such a rule change is critical to transform the Commission's commitment to competitive neutrality from lip-service to reality.

¹⁰/ This could take the form of a new Section 54.307(c) that mirrors Section 36.612, just as existing Section 54.307(b) mirrors Section 36.611.

¹¹/ A quarterly opportunity for competitive ETCs to begin receiving support and to submit updated line count information would be consistent with USAC's need to update of the amount collected from all carriers every quarter. *See Appendix A.*

Conclusion

For the foregoing reasons, Western Wireless respectfully requests that the Commission clarify and/or revise its rules to ensure a federal high-cost universal service support program that is truly competitively neutral.

Respectfully submitted,

WESTERN WIRELESS CORPORATION

By: _____

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Dated: October 15, 1998

APPENDIX A

This Appendix contains possible changes to the Commission's rules that would remedy the problems discussed in the body of this Petition. (These changes also would revise the definition of working loops to recognize that competitive ETCs' networks differ from those of ILECs and may not include identical facilities, and that competitive ETCs are not required to, and generally do not, classify their facilities pursuant to the Part 32 and Part 36 rules.) Proposed additions are shown in **bold and underline font**; proposed deletions are shown in ~~strikeout font~~. Note that proposed new paragraph (c) is based on the first sentence of existing Section 36.612 of the rules.

1. Section 54.307 is amended by revising paragraph (b) and adding paragraph (c), to read as follows:

§54.307 Support to a competitive eligible telecommunications carrier.

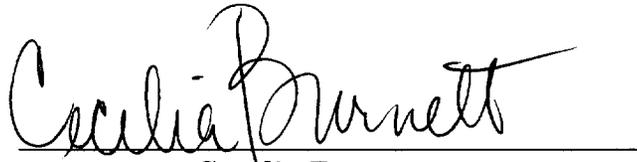
* * * * *

(b) *Submission of information to the Administrator.* In order to receive universal service support **in any given calendar quarter**, a competitive eligible telecommunications carrier must provide the Administrator on or before ~~July 31st of each year~~ **the date 90 days before the first day of that calendar quarter** the number of working loops it serves in a service area. For universal service support purposes, working loops are defined as: **(1) the number of working Exchange Line C&WF loops used jointly for exchange and message telecommunications service, including C&WF subscriber lines associated with pay telephones in C&WF Category 1, but excluding WATS closed end access and TWX service; or (2) the equivalent on the network of a carrier other than an ILEC.** This figure shall be calculated as of ~~December 31st of the year preceding each July 31st~~ **the date of such filing, or based on the most recent available data.**

(c) Updating information submitted to the Administrator. A competitive eligible telecommunications carrier may update the information submitted to the Administrator pursuant to paragraphs (a) and (b) of this section one or more times annually on a rolling year basis.

CERTIFICATE OF SERVICE

I, Cecelia Burnett, hereby certify that on this 11th day of January, 1999, copies of the Western Wireless Corporation Reply Comments on the Second Recommended Decision of the Joint Board on Universal Service were served on the parties listed below by hand delivery or first class mail.


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