

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

RECEIVED

JAN 13 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
Federal-State Joint Board on )  
Universal Service ) CC Docket No. 96-45  
DA 98-2410

**REPLY COMMENTS OF AMERITECH ON  
THE SECOND RECOMMENDED DECISION  
OF THE FEDERAL-STATE JOINT BOARD**

Ameritech submits these reply comments on the Second Recommended Decision of the Federal-State Joint Board on universal service.<sup>1</sup>

In its comments, Ameritech pointed out that the Second Recommended Decision would result in a substantial increase in the amount of federal high cost support for non-rural carriers; that the "hold harmless" provision would ensure that result and that, therefore, it should be phased out; that there has been no showing that such a dramatic increase in the amount of federal high cost support is necessary; and that a combined (interstate/intrastate) fund should be avoided because it would necessitate Commission intrusion into state matters.

While there is some support for the Second Recommended Decision -- especially from the states and carriers that would benefit from a dramatic increase in federal high cost support,<sup>2</sup> a number of other regulatory commissions have expressed concerns similar to Ameritech's. Several

---

<sup>1</sup> *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Second Recommended Decision, FCC 98J-7 (released November 25, 1998) ("Second Recommended Decision").

<sup>2</sup> See comments of U.S. West, BellSouth, GTE, Puerto Rico Telephone Co., Virgin Island Telephone Corp., Rural State Commissions (Arkansas, Kansas, Maine, Montana, New Hampshire, New Mexico, Vermont, and West Virginia).

No. of Copies rec'd \_\_\_\_\_  
List ABCDE

079

such commenters have expressed concern that the Second Recommended Decision would result in a substantial increase in the size of the federal fund.<sup>3</sup> In that regard, these parties also agree that a permanent “hold harmless” provision would necessarily contribute to that increase (even the Rural State Commissions (at 4) admit that the provision would cost “tens, perhaps hundreds, of millions of dollars”) and is unjustified because it could potentially reward carriers’ inefficiency.<sup>4</sup>

Commenters also agree that there has been no showing that such a dramatic increase in support for non-rural carriers is necessary since current rates are generally affordable.<sup>5</sup> In fact, the Commission’s latest (December 30, 1998) telephone subscribership report shows telephone penetration levels at an all time high (94.1% nationally as opposed to 91.4% in November, 1983).

As to the Joint Board’s view that the high cost fund should serve to assure the “reasonable comparability” of rates, California shows that the Joint Board’s “nationwide standard”<sup>6</sup> expands the scope of Section 254 (b)(3) of the Act in a manner inconsistent with the Commission’s own interpretation of that provision as reflected in the Commission’s brief before the Fifth Circuit Court of Appeals:

The FCC, however, made clear that reasonable comparability in Section 254 (b)(3) of the 1996 Act did not mean that rates between rural and urban areas had to be identical. The FCC further made clear that rates between rural and urban areas should be reasonably comparable “within a State” and “Section 245 (b)(3) does

---

<sup>3</sup> Joint States (Maryland, Connecticut, Delaware, Illinois, Massachusetts) at 1, District of Columbia PSC (“DCPSC”) at 2, California at 3.

<sup>4</sup> Joint States at 7-8; DCPSC at 5; California at 3, 6; New York State Department of Public Service (“NYDPS”) at 4; Public Utilities Commission of Ohio. (“PUCO”) at 5. See also Iowa Utilities Board (“IUB”) at 9-10.

<sup>5</sup> See Joint States at 5.

<sup>6</sup> Second Recommended Decision at ¶¶15, 18.

not require the [FCC] to ensure that rural and urban rates in one State are no higher or lower than rural and urban rates in another State.”<sup>7</sup>

Moreover, DCPSC points out that it makes no sense, from a policy prospective, to provide additional support to high cost areas that also have high average incomes, since some of that support will come from low cost areas that have a large percentage of low income subscribers.<sup>8</sup> In that regard, the Joint States suggest that the FCC should specifically restrict high cost funding to only those households with incomes below the 70<sup>th</sup> income percentile.<sup>9</sup> As they note:

While in some cases the social basis of subsidies justify the inefficiencies they cause, this is clearly not the case with regard to high cost funding for the wealthy. Wealth transfers to consumers with relatively high incomes advance absolutely no identifiable social goals.<sup>10</sup>

Thus it may be appropriate to consider household income levels in determining at what level, if any, to provide high cost support.

Finally, as to the issue of whether intrastate revenues should be included in the base for contributions to the federal high cost fund, the Illinois Commerce Commission (“ICC”) shows that that would be contrary to the language of the Act which provides separately for federal programs funded by carriers that provide interstate telecommunication services and state programs funded by carriers that provide intrastate telecommunication services.<sup>11</sup> In addition,

---

<sup>7</sup> California at 3-4.

<sup>8</sup> DCPCS at 9.

<sup>9</sup> Joint States at 11-13.

<sup>10</sup> *Id.*

<sup>11</sup> ICC at 5.

contribution assessments based on combined revenues could negatively impact state programs by reducing the funding base for those programs.<sup>12</sup> Moreover, such a mechanism would not be competitively neutral since it could affect carriers differently depending on their proportion of interstate and intrastate revenues.<sup>13</sup>

In light of the foregoing, Commission should be reluctant to adopt those aspects of the Second Recommended Decision that would result in a substantial increase in the size of the federal high cost support fund for non-rural carriers and which would inevitably and

---

<sup>12</sup> *Id.* at 6.

<sup>13</sup> *Id.* at 5-6.

unnecessarily intrude upon states' responsibility and ability to address their universal service needs. In addition, as several parties have noted,<sup>14</sup> the ultimate size of the fund will be unknown until questions about the Commission's cost model are resolved. The Commission should not hesitate to continue to use the current support mechanism beyond its revised July 1 deadline as necessary to permit an adequate resolution of those issues.<sup>15</sup>

Respectfully submitted,

 (dx)

Michael S. Pabian  
Counsel for Ameritech  
Room 4H82  
2000 West Ameritech Center Drive  
Hoffman Estates, IL 60196-1025  
(847) 248-6044

Dated: January 13, 1998  
[MSP0193.doc]

---

<sup>14</sup> See, e.g., Joint States at 14-15.

<sup>15</sup> See also Second Recommended Decision at ¶29.

CERTIFICATE OF SERVICE

I, Grace Germain, do hereby certify that a copy of the foregoing Reply Comments of Ameritech on the Second Recommended Decision of the Federal-State Joint Board has been served on the parties listed on the attached service list, via first class mail, postage prepaid, on this 13<sup>th</sup> day of January, 1999.

By: Grace Germain   
Grace Germain

ANNE U MAC CLINTOCK  
VICE PRESIDENT  
REGULATORY AFFAIRS & PUBLIC POLICY  
THE SOUTHERN NEW ENGLAND TELEPHONE  
COMPANY  
227 CHURCH STREET  
NEW HAVEN CT 06510

PAUL H KUZIA VICE PRESIDENT  
ENGINEERING AND REGULATORY  
ARCH COMMUNICATIONS GROUP INC  
1800 WEST PARK DRIVE SUITE 350  
WESTBOROUGH MA 01581

KATHY L SHOBERT  
DIRECTOR FEDERAL AFFAIRS  
GENERAL COMMUNICATIONS INC  
901 15TH STREET NW SUITE 900  
WASHINGTON DC 20005

RANDY ZACH  
TCA INC  
3617 BETTY DRIVE SUITE I  
COLORADO SPRINGS CO 80917

CHARLES C HUNTER  
CATHERINE M HANNAN  
ATTORNEYS FOR  
TELECOMMUNICATIONS RESELLERS  
ASSOCIATION  
1620 I STREET NW SUITE 701  
WASHINGTON DC 20006

ROBERT HOGGARTH  
PERSONAL COMMUNICATIONS INDUSTRY  
ASSOCIATION  
500 MONTGOMERY STREET SUITE 700  
ALEXANDRIA VA 22314-1561

JOSEPH A GODLES  
ATTORNEY FOR  
PANAMSAT CORPORATION  
1229 19TH STREET NW  
WASHINGTON DC 20554

PHILIP V OTERO  
VICE PRESIDENT AND GENERAL COUNSEL  
GE AMERICAN COMMUNICATIONS INC  
FOUR RESEARCH WAY  
PRINCETON NJ 08540

RICHARD MCKENNA HQE03J36  
ATTORNEY FOR  
GTE SERVICE CORPORATION  
P O BOX 152092  
IRVING TX 75015-2092

GAIL L POLIVY  
ATTORNEY FOR  
GTE SERVICE CORPORATION  
1850 M STREET NW SUITE 1200  
WASHINGTON DC 20036

LON C LEVIN  
VICE PRESIDENT AND REGULATORY  
COUNSEL  
AMSC SUBSIDIARY CORPORATION  
10802 PARK RIDGE BOULEVARD  
RESTON VA 22091

ROBERT A MANSBACH  
ATTORNEY FOR  
COMCAST CORPORATION  
6560 ROCK SPRING DRIVE  
BETHESDA MD 20817

RAYMOND G BENDER JR  
J G HARRINGTON  
ATTORNEYS FOR  
VANGUARD CELLULAR SYSTEMS INC  
SUITE 800  
1200 NEW HAMPSHIRE AVENUE NW  
WASHINGTON DC 20037

CHRIS FREINTRUP  
SENIOR REGULATORY ANALYST  
MCI TELECOMMUNICATIONS CORP  
1801 PENNSYLVANIA AVENUE NW  
WASHINGTON DC 20036

DAVID R POE  
YVONNE M COVIELLO  
ATTORNEYS FOR  
TIME WARNER COMMUNICATIONS HOLDING INC  
1875 CONNECTICUT AVE NW SUITE 1200  
WASHINGTON DC 20009

MARY MC DERMOTT  
LINDA KENT  
CHARLES D COSSON  
ATTORNEYS FOR  
THE UNITED STATES TELEPHONE ASSOC  
1401 H STREET NW SUITE 600  
WASHINGTON DC 20005

PAMELA J. RILEY  
KATHLEEN Q ABERNATHY  
DAVID A GROSS  
ATTORNEYS FOR  
AIRTOUCH COMMUNICATIONS INC  
1818 N STREET NW  
WASHINGTON DC 20036

JAMES R FORCIER  
AIRTOUCH COMMUNICATIONS INC  
ONE CALIFORNIA STREET 9TH FLOOR  
SAN FRANCISCO CA 94111

RACHEL B FERBER  
VICE PRESIDENT ASSISTANT GENERAL  
COUNSEL  
360 COMMUNICATIONS COMPANY  
8725 HIGGINS ROAD  
CHICAGO IL 60631

ROBERT MC KENNA  
KATHRYN MARIE KRAUSE  
ATTORNEY FOR  
US WEST INC  
SUITE 700  
1020 19TH STREET NW  
WASHINGTON DC 20036

JAY C KEITHLEY  
LEON M KESTENBAUM  
H RICHARD JUHNKE  
ATTORNEYS FOR  
SPRINT CORPORATION  
1850 M STREET NW SUITE 1100  
WASHINGTON DC 20036

CRAIG T SMITH  
ATTORNEY FOR  
SPRINT CORPORATION  
P O BOX 11315  
KANSAS CITY MO 64112

THE HONORABLE JULIA JOHNSON  
COMMISSIONER  
FLORIDA PUBLIC SERVICE COMMISSION  
CAPITAL CIRCLE OFFICE CENTER  
2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE FL 32399-0850

STEVE ELLENBECKER CHAIRMAN  
DOUG DOUGHTY DEPUTY CHAIRMAN  
KRISTIN H LEE COMMISSIONER  
WYOMING PUBLIC SERVICE COMMISSION  
700 WEST 21ST STREET  
CHEYENNE WYOMING 82002

PAT WOOD III  
ROBERT W GEE  
JUDY WALSH  
PUBLIC UTILITY COMMISSION OF TEXAS  
1701N CONGRESS AVE  
AUSTIN TX 78711-3326

DAVID A BECKER ESQ  
ASSISTANT ATTORNEY GENERAL  
COLORADO PUBLIC UTILITIES  
COMMISSION  
1580 LOGAN STREET OFFICE LEVEL 2  
DENVER CO 80203

RICHARD M SBARATTA REBECCA LOUGH  
M ROBERT SUTHERLAND  
ATTYS FOR BELLSOUTH CORPORATION  
BELLSOUTH TELECOMMUNICATIONS INC  
1155 PEACHTREE STREET NE STE 1700  
ALTANTA GA 30309-3610

LAWRENCE W KATZ  
ATTORNEY FOR  
THE BELL ATLANTIC TELEPHONE CO  
EIGHTH FLOOR  
1320 NORTH COURT HOUSE ROAD  
ARLINGTON VA 22201

DAVID KAUFMAN ESQ  
NEW MEXICO STATE CORPORATION  
COMMISSION  
P O BOX 1269  
SANTA FE NM 87504-1269

MARK C ROSENBLUM  
PETER H JACOBY  
JUDY SELL  
ATTORNEYS FOR AT&T  
ROOM 3244J1  
295 NORTH MAPLE AVENUE  
BASKING RIDGE NJ 07920

MICHAEL F ALTSCHUL VICE PRESIDENT  
GENERAL COUNSEL  
RANDALL S COLEMAN VP REGULATORY  
CELLULAR TELECOMMUNICATIONS  
INDUSTRY ASSOCIATION  
1250 CONNECTICUT AVE NW SUITE 200  
WASHINGTON DC 20036

JAMES S BLASZAK  
KEVIN S DI LALLO  
ATTORNEYS FOR  
AD HOC TELECOMMUNICATIONS USERS  
COMMITTEE  
1300 CONNECTICUT AVE NW SUITE 500  
WASHINGTON DC 20036-1703

DAVID A IRWIN  
ATTORNEY FOR  
ITCS INC  
1730 RHODE ISLAND AVENUE NW  
WASHINGTON DC 20036

PETER A ROHRBACH  
DAVID L SIERADZKI  
ATTORNEYS FOR  
GE AMERICAN COMMUNICATIONS INC  
555 THIRTEENTH STREET NW  
WASHINGTON DC 20004

LEONARD J KENNEDY  
RICHARD S DENNING  
COUNSEL FOR  
NEXTEL COMMUNICATIONS INC  
SUITE 800  
1200 NEW HAMPSHIRE AVE NW  
WASHINGTON DC 20036-6802

JOE D EDGE  
RICHARD J ARSENAULT  
ATTORNEYS FOR  
PUERTO RICO TELEPHONE COMPANY  
901 FIFTEENTH STREET NW  
WASHINGTON DC 20005

JAMES VOLZ ESQ  
PETER M BLUHM ESQ  
VERMONT DEPARTMENT OF PUBLIC  
SERVICE  
DRAWER 20  
MONTPELIER VT 05620-2601

RICHARD A ASKOFF  
ATTORNEY FOR  
NATIONAL EXCHANGE CARRIER ASSOC  
100 SOUTH JEFFERSON ROAD  
WHIPPANY NJ 07981

JAMES ROWE  
ALASKA TELEPHONE ASSOCIATION  
4341 B STREET SUITE 304  
ANCHORAGE AK 99503

DR BARBARA O'CONNOR CHAIRWOMAN  
MARY GARDINER JONES PRESIDENT  
ALLIANCE FOR PUBLIC TECHNOLOGY  
901 15TH STREET NW SUITE 230  
WASHINGTON DC 20005

SAMUEL LOUDENSLAGER  
ARKANSAS PUBLIC SERVICE COMMISSION  
P O BOX 400  
LITTLE ROCK AR 72203-0400

HEIKKI LEESMENT ESQ  
DEPUTY RATEPAYER ADVOCATE  
STATE OF NJ DIVISION OF THE RATEPAYER  
ADVOCATE  
31 CLINTO ST 11TH FLOOR  
P O BOX 46005  
NEWARK NJ 07101

PAUL B JONES  
JANIS A STAHLHUT  
DONALD SHEPHEARD  
TIME WARNER COMMUNICATIONS HOLDING  
INC  
300 FIRST STAMFORD PLACE  
STAMFORD CT 06902-6732

ANGELA J CAMPBELL ILENE R PENN  
JOHN PODESTA  
INSTITUTE FOR PUBLIC REPRESENTATION  
GEORGETOWN UNIVERSITY LAW CTR  
600 NEW JERSEY AVE NW  
WASHINGTON DC 20001

LINDA KENT  
ASSOCIATE GENERAL COUNSEL  
UNITED STATES TELEPHONE ASSOC  
1401 H STREET NW SUITE 600  
WASHINGTON DC 20005-2164

KATHERINE GRINCEWHICH  
OFFICE OF THE GENERAL COUNSEL  
UNITED STATES CATHOLIC CONFERENCE  
3211 4TH STREET NE  
WASHINGTON DC 20017-1194

KEVIN TAGLANG  
BENTON FOUNDATION  
1634 EYE STREET NW  
WASHINGTON DC 20006

SAM COTTEN  
ALASKA PUBLIC UTILITIES COMMISSION  
1016 WEST SIXTH AVENUE SUITE 400  
ANCHORAGE AK 99501

KENNETH BURCHETT  
VICE PRESIDENT  
GVNW INC/MANAGEMENT  
P O BOX 230399  
PORTLAND OR

DAVID L SHARP  
CEO  
PRESIDENT  
VIRGIN ISLANDS TELEPHONE CORP  
P O BOX 6100  
ST THOMAS US VIRGIN ISLANDS 00801

ROBERT M HALPERIN  
ATTORNEY FOR  
THE STATE OF ALASKA  
1001 PENNSYLVANIA AVENUE NW  
WASHINGTON DC 20004

MARGOT SMILEY HUMPHREY  
ATTORNEY FOR  
THE RURAL TELEPHONE COALITION  
1150 CONNECTICUT AVE NW SUITE 1000  
WASHINGTON DC 20036

LISA M ZAINA  
STUART POLIKOFF  
OPASTCO  
21 DUPONT CIRCLE NW SUITE 700  
WASHINGTON DC 20036

DAVID COSSON  
L MARIE GUILLORY  
NCTA  
2626 PENNSYLVANIA AVE NW  
WASHINGTON DC 20037

HERBERT E. MARKS  
JAMES M FINK  
ATTORNEYS FOR  
THE STATE OF HAWAII  
1201 PENNSYLVANIA AVENUE NW  
WASHINGTON DC 20044

SUE D BLUMENFELD MICHAEL G JONES  
JENNIFER DESMOND MC CARTHY  
ATTYS FOR LORAL SPACE &  
COMMUNICATIONS  
THREE LAFAYETTE CENTRE  
1155 21ST STREET NW  
WASHINGTON DC 20036

CHRISTOPHER W SAVAGE  
ATTORNEY FOR  
CENTENNIAL CELLULAR CORP  
1919 PENNSYLVANIA AVE NW SUITE 200  
WASHINGTON DC 20006

HENRY D LEVINE  
LAURA F H MC DONALD  
ATTORNEYS FOR  
NYCHA MASTERCARD AND VISA  
1300 CONNECTICUT AVENUE NW  
WASHINGTON DC 20036

JAMES S BLASZAK  
JANINE F GOODMAN  
ATTORNEYS FOR  
IBM  
1300 CONNECTICUT AVE NW SUITE 500  
WASHINGTON DC 20033-1703

ALAN R SHARK  
PRESIDENT  
AMERICAN MOBILE TELECOMMUNICATIONS  
ASSOCIATION  
1150 18TH STREET NW SUITE 250  
WASHINGTON DC 20036

STEVE HAMLEN  
PRESIDENT  
UNITED UTILITIES INC  
5450 A STREET  
ANCHORAGE AK 99518-1291

RAUL R RODRIGUEZ  
DAVID S KEIR  
ATTORNEYS FOR  
COLUMBIA COMMUNICATIONS CORP  
2000 K STREET NW SUITE 600  
WASHINGTON DC 20554

ELISABETH H ROSS  
ATTORNEY FOR  
THE VERMONT PUBLIC SERVICE BOARD  
AND THE VERMONT DEPT OF PS  
1155 CONNECTICUT AVE NW SUITE 1200  
WASHINGTON DC 20036-4308

BENJAMIN H DICKENS JR  
GERARD J DUFFY  
COUNSEL FOR THE WESTERN ALLIANCE  
2120 L STREET NW  
WASHINGTON DC 20037

MARIANNE DEAGLE  
ASSISTANT GENERAL COUNSEL  
KANSAS CORPORATION COMMISSION  
1500 SW ARROWHEAD ROAD  
TOPEKA KS 66604-4027

DAVID HIGGINBOTHAM  
PRESIDENT  
TELETOUCH LICENSES INC  
P O BOX 7370  
TYLER TX 75711

KENNETH D SALOMON  
J G HARRINGTON  
ATTORNEYS FOR  
IOWA TELECOMMUNICATIONS AND  
TECHNOLOGY COMMISSION  
1200 NEW HAMPSHIRE AVE NW STE 800  
WASHINGTON DC 20036

DAVID W DANNER  
SENIOR POLICY ADVISOR  
WASHINGTON STATE DEPARTMENT OF  
INFORMATION SERVICES  
P O BOX 42445  
OLYMPIA WA 98504-2445

FREDERICK M JOYCE  
RONALD E QUIRK JR  
ATTORNEYS FOR  
OZARK TELECOM INC  
1019 19TH STREET PH-2  
WASHINGTON DC 20036

SANDRA ANN Y H WONG  
ATTORNEY FOR  
SANDWICH ISLES COMMUNICATIONS INC  
PAUAAHI TOWER SUITE 2750  
1001 BISHOP STREET  
HONOLULU HAWAII 96813

MICHAEL H OLENICK  
GENERAL COUNSEL  
FLORIDA DEPARTMENT OF EDUCATION  
THE CAPITOL SUITE 1701  
325 W GAINES STREET  
TALLAHASSEE FL 32399-0400

SUSAN LEHMAN KEITEL  
EXECUTIVE DIRECTOR  
NEW YORK LIBRARY ASSOC  
252 HUDSON AVE  
ALBANY NY 12210-1802

JIM GAY  
PRESIDENT  
NATIONAL ASSOCIATION OF STATE  
TELECOMMUNICATIONS DIRECTORS  
IRON WORKS PIKE  
P O BOX 11910  
LEXINGTON KY 40578-1910

PAUL J BERMAN  
ALANE C WEIXEL  
ATTORNEYS FOR  
FIDELITY TELEPHONE COMPANY  
P O BOX 7566  
1201 PENNSYLVANIA AVE  
WASHINGTON DC 20044-7566

ALBERT H KRAMER  
ROBERT F ALDRICH  
ATTORNEYS FOR  
AMERICAN PUBLIC COMMUNICATIONS  
COUNCIL  
2101 L STREET NW  
WASHINGTON DC 20037-1526

JEROME K BLASK  
DANIEL E SMITH  
ATTORNEYS FOR  
PRONET  
1400 16TH STREET NW SUITE 500  
WASHINGTON DC 20036

KATH L SHOBERT  
DIRECTOR  
FEDERAL AFFAIRS  
GENERAL COMMUNICATIONS  
SUITE 900  
901 15TH STREET NW  
WASHINGTON DC 20005

CAROLYN C HILL  
ATTORNEY FOR  
ALLTEL TELEPHONE SERVICES CORP  
655 15TH STREET NW SUITE 220  
WASHINGTON DC 20005

MICHAEL S WROBLEWSKI  
ATTORNEY FOR  
TELHAWAII INC  
SUITE 1300  
1001 PENNSYLVANIA AVENUE NW  
WASHINGTON DC 20004

CHERYL A TRITT  
CHARLES H KENNEDY  
ATTORNEYS FOR SPRINT SPECTRUM  
2000 PENNSYLVANIA AVE NW STE 5500  
WASHINGTON DC 20006-1888

LAWRENCE G. MALONE  
GENERAL COUNSEL  
PUBLIC SERVICE COMMISSION  
OF THE STATE OF NEW YORK  
THREE EMPIRE STATE PLAZA  
ALBANY, NEW YORK 12223-1350

PETER ARTH, JR.  
LIONEL B. WILSON  
ELLEN S. LEVINE  
ATTORNEYS FOR THE STATE OF CALIFORNIA AND  
THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA  
505 VAN NESS AVE  
SAN FRANCISCO, CA 94102

STEVEN T. NOURSE  
ASSISTANT ATTORNEY GENERAL  
PUBLIC UTILITIES SECTION  
180 E. BROAD ST.  
COLUMBUS, OH 43215

RICHARD A. BEVERLY  
GENERAL COUNSEL  
DISTRICT OF COLUMBIA PUBLIC SERVICE  
COMMISSION  
717 FOURTEENTH STREET, N.W.  
WASHINGTON, D.C. 20005

MYRA L. KAREGAINES  
GENERAL COUNSEL  
OFFICE OF GENERAL COUNSEL  
ILLINOIS COMMERCE COMMISSION  
160 N. LASALLE, SUITE C-800  
CHICAGO, IL 60601

AMY E. DOUGHERTY  
COUNSEL FOR KENTUCKY PUBLIC SERVICE  
COMMISSION  
730 SCHENKEL LANE  
P.O. BOX 615  
FRANKFORT, KENTUCKY 40602

WILLIAM H. SMITH, JR  
FEDERAL AND LEGISLATIVE PROGRAMS  
COORDINATOR  
IOWA UTILITIES BOARD  
350 MAPLE STREET  
DES MOINES, IOWA 50319

MICHAEL T. SKRIVAN  
HARRIS, SKRIVAN & ASSOCIATES, LLC  
8801 S. YALE, SUITE 450  
TULSA, OK 74137

ANTHONY M. MARQUEZ  
FIRST ASSISTANT ATTORNEY GENERAL  
OFFICE OF THE ATTORNEY GENERAL  
COLORADO PUBLIC UTILITIES COMMISSION  
1525 SHERMAN ST. - 6<sup>TH</sup> FLOOR  
DENVER, COLORADO 80203

ROBERT M. LYNCH  
ROGER K. TOPPINS  
HOPE THURROTT  
ATTORNEYS FOR SBC COMMUNICATIONS INC.  
ONE BELL PLAZA, ROOM 3023  
DALLAS, TEXAS 75202

SAMUEL E. EBBESEN  
PRESIDENT & CHIEF EXECUTIVE OFFICER  
VIRGIN ISLANDS TELEPHONE CORPORATION  
P.O. BOX 6100  
ST. THOMAS, USVI 00801-6100

GEORGE N. BARCLAY  
MICHAEL J. ETTNER  
ATTORNEYS FOR GENERAL SERVICES  
ADMINISTRATION  
1800 F STREET, N.W., RM 4002  
WASHINGTON, D.C. 20405

ROBERT J. AAMOTH  
KELLEY DRYE & WARREN LLP  
ATTORNEY FOR COMPETITIVE  
TELECOMMUNICATIONS ASC.  
1200 19<sup>TH</sup> STREET, N.W., SUITE 500  
WASHINGTON, D.C. 20036

CHUCK GOLDFARB  
MCI WORLDCOM, INC  
1801 PENNSYLVANIA AVE., NW  
WASHINGTON, DC 20006

RONALD L. RIPLEY  
VICE PRESIDENT AND SENIOR CORPORATE  
COUNSEL  
DOBSON COMMUNICATIONS CORPORATION  
13439 NORTH BROADWAY EXTENSION  
OKLAHOMA CITY, OK 73114

MICHELE C. FARQUHAR  
DAVID L. SIERADZKI  
RONNIE LONDON  
HOGAN & HARTSON, L.L.P.  
COLUMBIA SQUARE  
555 THIRTEENTH STREET, N.W.  
WASHINGTON, D.C. 20004-1109

MARK C. ROSENBLUM  
JUDY SELLO  
ATTORNEYS FOR AT&T CORP  
ROOM 324511  
295 NORTH MAPLE AVENUE  
BASKING RIDGE, NEW JERSEY 07920

SUSAN STEVENS MILLER  
DEPUTY GENERAL COUNSEL  
MARYLAND PUBLIC SERVICE COMMISSION 6  
SAINT PAUL STREET  
BALTIMORE, MARYLAND 21202

E. BARCLAY JACKSON, ESQ.  
HEARINGS EXAMINER  
NEW HAMPSHIRE PUBLIC UTILITIES  
COMMISSION  
8 OLD SUNCOOK ROAD  
CONCORD, NEW HAMPSHIRE 03301-7319