

Before the
FEDERAL COMMUNICATIONS COMMISSION DOCKET FILE COPY ORIGINAL
Washington, D.C. 20554

In the Matters of)
)
Changes to the Board of Directors)
Of the National Exchange Carrier)
Association, Inc.)
)
Federal-State Joint Board on)
Universal Service)

CC Docket No. 97-21

CC Docket No. 96-45

RECEIVED

JUN 30 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION

The United States Telephone Association (USTA) hereby provides these comments in response to the Commission's Further Notice of Proposed Rulemaking¹ in the above-captioned proceedings. USTA is the principal trade association of the local exchange carrier (LEC) industry. Its members provide over 95 percent of the exchange carrier provided access lines in the United States. Included in its membership are those providers who have been actively involved in the schools and libraries program.

These comments address issues regarding allocation of funds from the schools and libraries universal service support mechanism in situations where the initial denial by the Administrator of the Schools and Libraries Division (SLD) of the Universal Services Administrative Company (Administrator) of a request for support is reversed by the Administrator or the Commission. Specifically, the issues raised in the FNPRM involve

¹Fifth Order on Reconsideration in CC Docket No. 97-21 Eleventh Order on Reconsideration in CC Docket No. 96-45 and Further Notice Of Proposed Rulemaking, FCC 99-49, released May 28, 1999 (FNPRM).

No. of Copies rec'd 0114
List ABCDE

the disposition of the funds, the amount of those funds, and the timing to act on appeals. USTA is guided by principles of equity in its response to the comments raised in the FNPRM and believes that applications that are reinstated on appeal of an initial denial should be treated no differently from those applications that were granted in the first instance. Such parity of treatment should be a governing tenet of the Commission in ruling on the issues raised in the FNPRM.

I. Funding levels for appeals that are granted should be the same as were established by the fund Administrator for the original applications.

The Commission initially proposes to fund all priority one service appeals and then allocate the remaining funds to internal connection appeals at descending discount percentages if full funding is not available.² The Commission similarly proposes that funds should be allocated on a pro rata basis to priority one services if sufficient funds are not available to fund the entire category. USTA opposes both of these proposals. Alternatively, the Commission seeks comment on “alternative proposals that would enable the Administrator to distribute fairly funds for appeals in the event that sufficient funds are not available to fund all priority one service appeals.”³ USTA proposes that customers who receive funding pursuant to an appeal receive the same level of funding as would have been received had their original application been approved.

Customers should not be disadvantaged by receiving a pro rata amount for priority one services or reduced funds for internal connections.⁴ USTA proposes that all appeals should be funded in parity with the levels established for the original applications, *e.g.*, in program Year 1, full funding of all discount levels for

² FNPRM at ¶ 9.

³ *Id.* at ¶ 10.

⁴ *Id.* at ¶¶ 9 and 10.

telecommunications service and Internet access, and funding of the 70 percent and above discount levels for internal connections.

II. The Administrator should use all available Year 1 funds before using funds collected in Year 2.

If contingency funds are insufficient to fund all granted appeals, USTA proposes that the Administrator use funds returned from Year 1 followed by funds collected in Year 2.

As the Commission states, it is unlikely that contingency funds will not be sufficient to fully fund all appeals that may be granted.⁵ Based on the timing of the appeals process, there should be a point when the Administrator can assess the maximum level of funds required to fund pending appeals. If it is determined that the contingency fund is insufficient, the Administrator should calculate the level of Year 1 funds that have been returned by applicants as unused funds. The Administrator can then make a determination regarding the sufficiency of all Year 1 funds to fund the pending appeals. If these Year 1 funds are insufficient to fund all granted appeals, the Administrator should use funds collected in Year 2. USTA believes that if the Administrator needs to use funds collected in Year 2, the Commission should ensure that this is accomplished without changing the funding cap for Year 2 of the program.

III. Funds should be disbursed pursuant to an appeal at the time the decision is made to fund the services.

The Commission advances the position that the Administrator should wait until final decisions have been issued on all priority one service appeals before it allocates funds on a pro rata basis.⁶ USTA opposes this position. Instead, USTA proposes that the

⁵ *Id.* at ¶ 9 and n. 16.

⁶ *Id.* at ¶10.

Administrator disburse funds for services funded pursuant to an appeal as the funding decision is made by the SLD or the Commission. It is especially important that the Administrator not hold funds associated with funding decisions the SLD makes on appeals pending Commission decisions on other appeals. As stated above, funds should be made available to fund all appeals that are granted at the same levels established for the original applications. There should be no need for the Administrator to wait for subsequent decisions in order to allocate funds on those decisions already made by the Administrator or the Commission. Delayed disbursements of funds are problematic from a customer and service provider perspective. Delays penalize customers who have already paid in full for existing services and cause tension between customers and their service providers who ultimately provide discounts to the customer.

IV. USTA supports the six-month timeframe to complete the installation of internal connections and asks the Commission to clarify that priority one services will have the same six-month grace period.

The Commission tentatively concludes that “an applicant would be required to complete the installation of internal connections that received support pursuant to an appeal within six months from the date that the final decision on appeal is issued.”⁷

USTA supports the six-month time period to complete the installation of internal connections that receive support pursuant to an appeal. In addition, USTA believes that the six-month time period should apply to the non-recurring installation of all services that receive support pursuant to an appeal.

If an applicant obtains funding for telecommunications or Internet access services pursuant to an appeal, it should have a full six-month period to install these services. In the Commission’s Tenth Reconsideration Order in this proceeding that authorized the

grace period through September 30, 1999 for the installation of Year 1 services, the Commission used the general term “nonrecurring discounted services.”⁸ The Commission referred to internal connections as an example of nonrecurring discounted services covered by the grace period.⁹ USTA asks that the Commission clarify that it intends the grace period for non-recurring charges associated with services that receive support pursuant to an appeal, to include all categories of services: telecommunications, Internet access and internal connections.

V. The FCC should also consider issues associated with discounts on recurring charges reinstated by grant of appeal.

USTA notes that the proposed six-month grace period for use of discounts on non-recurring charges, if adopted for all eligible services, will provide successful appellants with a reasonably fair remedy regarding the installation of new services. However, USTA suggests that the Commission needs to also establish clear guidelines regarding the treatment of discounts on recurring charges (*i.e.*, monthly charges for priority one services) that are granted as a result of the appeals process.

For recurring charges on existing services, where the applicant has paid in full for the eligible services that are the subject of a successful appeal, USTA proposes that the full amount of the discount would be provided to the applicant in the form of a lump sum retroactive reimbursement similar to the program Year 1 Billed Entity Applicant Reimbursement (BEAR) process. In addition, if such an applicant did not apply for program Year 2 funding as a result of its initial denial and subsequent appeal, USTA

⁷ *Id.* at ¶ 11.

⁸ *Federal-State Joint Board on Universal Service*, Tenth Order on Reconsideration, CC Docket No. 96-45, FCC 990-46, released April 2, 1999 (Tenth Reconsideration Order) at ¶ 20.

⁹ *Id.*

proposes that the filing window be waived and the applicant be allowed to apply after the appeal has been decided.

Other applicants, however, have applied for discounts on new services and delayed installation until receipt of the funding commitment decision. Because their requests were initially denied, the service was not installed and no recurring charges were incurred. Under the Commission's current proposal, if the appeal is fully granted, the applicant would be able to take advantage of discounts on non-recurring charges. However, it appears that they would forego any benefit on the recurring charges that they applied for and would have incurred had their application been granted in the first instance and service installed as intended. In other words, the grant of appeals regarding recurring charges for uninstalled services may be essentially meaningless and without value.

USTA urges the Commission to address the issues associated with funding appeals for uninstalled services. USTA proposes that, at a minimum, if an applicant who has filed an appeal and has already submitted an application for program Year 2 discounts on the same services, that request should receive expeditious treatment. If the applicant did not apply for program Year 2 funding as a result of its initial denial and subsequent appeal, USTA proposes that the filing window be waived and the applicant be allowed to apply after the receipt of the appeal decision.

VI. USTA urges the Commission to adhere to the 90 day time period for taking action on appeals.

Finally, USTA urges the Commission to adhere to the 90 day time period established in its rules for taking action on an appeal.¹⁰ As stated above, delays in

¹⁰ 47 C.F.R. § 54.724(a) and (b).

disbursing funds to applicants are problematic from a customer and service provider perspective. Delays penalize customers and cause additional tensions between customers and their service providers who ultimately provide funds to the customer.

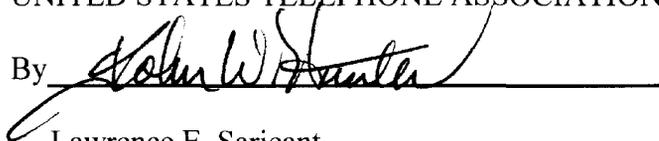
VII. Conclusion

USTA urges the Commission to treat applications reinstated by appeal in the same manner as applications that were originally granted. This includes retaining the same funding levels, the use of unused Year 1 funds and Year 2 funds if contingency and non-disbursed funds are insufficient for full funding, disbursement of funds immediately after an appeal is granted rather than waiting for all appeals to be decided, and clarification that the six-month period for installation applies to non-recurring charges associated with all eligible services. In addition, USTA proposes that the Commission address issues associated with recurring charges and, specifically, that the filing window be waived for applicants whose appeal for recurring charges is granted after the filing date for Year 2. USTA also supports adherence to the Commission's current 90-day rule for taking action on appeals.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

By



Lawrence E. Sarjeant
Linda L. Kent
Keith Townsend
John W. Hunter

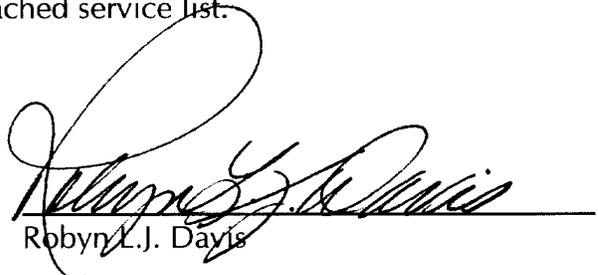
Its Attorneys:

1401 H Street, NW
Suite 600
Washington, DC 20005
(202) 326-7375

June 30, 1999

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on June 30, 1999, Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


Robyn L.J. Davis

Chairman William Kennard
Federal Communications Commission
445-12th Street, SW
Room 8-B201
Washington, DC 20554

Commissioner Susan Ness
Federal Communications Commission
445-12th Street, SW
Room 8-B115
Washington, DC 20554

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445-12th Street, SW
Room 8-B302
Washington, DC 20554

Commissioner Michael Powell
Federal Communications Commission
445-12th Street, SW
Room 8-B204
Washington, DC 20554

Commissioner Gloria Tristani
Federal Communications Commission
445-12th Street, SW
Room 8-C302
Washington, DC 20554

The Honorable David Baker
Georgia PSC
244 Washington Street, NW
Atlanta, GA 30334

Tom Boasberg
Federal Communications Commission
445-12th Street, SW
Room 8-B201
Washington, DC 20554

Ann Dean
Maryland PSC
Six Paul Street
16th Floor
Baltimore, MD 21202

Rowland Curry
Texas PUC
1701 North Congress Avenue
P.O. Box 13326
Austin, TX 78701

Bridget Duff
Florida PSC
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Emily Hoffnar
Federal Communications Commission
2100 M Street, NW
Room 8617
Washington, DC 20554

Paul Gallant
Federal Communications Commission
445-12th Street, SW
Washington, DC 20554

Timothy Peterson
Federal Communications Commission
2100 M Street, NW
Room 8613
Washington, DC 20554

Thor Nelson
Colorado Office of Consumer Counsel
1580 Logan Street
Suite 610
Denver, CO 80203

Kevin Schwenzfeier
NYDPS
Three Empire State Plaza
Albany, NY 12223

Tiane Sommer
Georgia PSC
244 Washington Street, SW
Atlanta, GA 30334

Sheryl Todd (3 copies)
Federal Communications Commission
2100 M Street, NW
Room 8611
Washington, DC 20554

The Honorable Julia Johnson
Chairman
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

The Honorable Kenneth McClure
Vice Chairman
Missouri Public Service Commission
301 W. High Street
Suite 530
Jefferson City, MO 65102

The Honorable Laska Schoenfelder
Commissioner
South Dakota Public Utilities Commission
500 E. Capital Avenue
Pierre, SD 57501

Martha S. Hogerty
Public Counsel for the State of Missouri
P.O. Box 7800
Harry S. Truman Building
Room 250
Jefferson City, MO 65102

Lisa Boehley
Federal Communications Commission
2100 M Street, NW
Room 8605
Washington, DC 20036

Deonne Bruning
Nebraska Public Service Commission
300 The Atrium
1200 N Street
Lincoln, NE 68509

Gary L. Mann
IXC Comm., Inc.
1122 S. Capital of Texas Hwy
Suite 100
Austin, TX 78746

Charles Bolle
South Dakota Public Utilities Commission
State Capital - 500 E. Capital Avenue
Pierre, SD 57501

John Clark
Federal Communications Commission
2100 M St., NW, Room 8619
Washington, DC 20554

Bryan Clopton
Federal Communications Commission
2100 M St., NW Room 8615
Washington, DC 20554

Irene Flannery
Federal Communications Commission
2100 M St., NW, Room 8922
Washington, DC 20554

L. Charles Keller
Federal Communications Commission
2100 M St., NW, Room 8918
Washington, DC 20554

Lori Kenyon
Alaska Public Utilities Commission
1016 West Sixth Avenue
Suite 400
Anchorage, AK 99501

David Krech
Federal Communications Commission
2025 M St., NW, Room 7130
Washington, DC 20554

Mark Long
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399

Robert Loube
Federal Communications Commission
2100 M St., NW, Room 8914
Washington, DC 20554

Arthur H. Stuenkel
Arkansas Public Service Commission
P.O. Box 400
Little Rock, AK 72203-0400

Sandra Makeeff
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
555 Walnut Street
Forum Place - Fifth Floor
Harrisburg, PA 17101

Kevin Martin
Federal Communications Commission
445-12th Street, SW
Room 8-B201
Washington, DC 20554

Michael A. McRae
DC Office of People's Counsel
1133 15th Street, NW
Suite 500
Washington, DC 20005

Tejal Mehtu
Federal Communications Commission
2100 M St, NW, Room 8625
Washington, DC 20554

Terry Monroe
New York Public Service Commission
Three Empire Plaza
Albany, NY 12223

Mark Nadel
Federal Communications Commission
445-12th Street, SW
Washington, DC 20554

Barry Payne
Indiana Office of Consumer Counsel
100 North Senate Ave., Room N501
Indianapolis, IN 46204-2208

Kimberly Parker

Jeanine Poltronieri
Federal Communications Commission
2000 L Street, NW
Room 257
Washington, DC 20036

James Bradford Ramsay
P.O. Box 684
Washington, DC 20044

Brian Roberts
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Gary Seigel
Federal Communications Commission
2000 L Street, NW
Room 812
Washington, DC 20036

Richard Smith
Federal Communications Commission
2100 M St., NW, Room 8605
Washington, DC 20554

Lori Wright
Federal Communications Commission
2100 M St., NW, Room 8603
Washington, DC 20554

Allen P. Stayman
U.S. Department of the Interior
Office of the Secretary
Washington, DC 20240

Paul W. Schroeder
American Foundation for the Blind
401 N. Michigan Avenue
Suite 308
Chicago, IL 60611

Kweisi Mfume
NAACP
4805 Mt. Hope Drive
Baltimore, MD 21215

Norman D. Rasmussen
Colorado Independent Telephone Association, Inc.
3236 Hiwan Drive
Evergreen, CO 80439

Robert C. Maier
Paul J. Kissman
Massachusetts Board of Library Commissioners
648 Beacon Street
Boston, MA 02215

Ted Schultz
Nebraska Association of Hospitals and Health Sys.
1640 L Street
Suite D
Lincoln, NB 68508

Thomas E. Sheldon
University of New York/Albany
The New York State Education Department
Albany, NY 12234

Joe Dudick
Pennsylvania Rural Development Council
Room 506 Finance Building
Harrisburg, PA 17120

Lawrence C. St. Blanc
Gayle T. Kellner
Louisiana PSC
P.O. Box 91154
Baton Rouge, LA 70821

Kenneth Sofferahn
James A. Burg
South Dakota PUC
500 East Capitol Avenue
Pierre, SD 57501

Karen Finstad Hammel
Montana PSC
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59601

Maggie Murphy
STAR Program
300 Centennial Building
658 Cedar Street
St. Paul, MN 55155

Governor William J. Janklow
State of South Dakota
State Capitol
500 East Capitol
Pierre, SD 57501

Jim Williams
The Federation of American Research Networks
1112 16th Street, NW
Suite 600
Washington, DC 20036

Philip L. Verveer
Brian A. Finley
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036

Adrienne G. Southgate
State of Rhode Island and Providence Plantations
Public Utilities Commission
100 Orange Street
Providence, RI 02903

Edward H. Salmon
State of New Jersey Board of Public Utilities
CN-350
Trenton, NJ 08625

Kathleen F. O'Reilly
The Michigan Consumer Federation, etal
414 A Street, SE
Washington, DC 20003

Nancy Zussy
Washington State Library
P.O. Box 42460
Olympia, WA 98504

Jeff Beck
Beck & Ackerman
Four Embarcadero Center
Suite 760
San Francisco, CA 94111

Kent Nilsson
Federal Communications Commission
2000 L Street, NW
Room 812-1600E
Washington, DC 20554

Virginia J. Taylor
Richard A. Elbrecht
California Department of Consumer Affairs
400 R Street
Suite 3090
Sacramento, CA 95814

Amy E. Dougherty
Kentucky PSC
P.O. Box 615
Frankfort, KY 40602

William B. Hill
Keystone-Arthur Telephone Company
P.O. Box 240
Keystone, NE 69144

Robert D. Carlitz
Information Renaissance
600 Gran Street
Suite 4680
Pittsburgh, PA 15219

John E. Cawthorne
National Urban League
106 Campion Hall
Boston College
Chestnut Hill, MA 02146

Albert Vann
New York State Assembly
Legislative Office Building
Suite 422
Albany, NY 12248

Stuart Blake
Kinko, Inc..
World Headquarters
255 West Stanley Avenue
Ventura, CA 93002

Ellis Jacobs
Legal Aid Society of Dayton
333 West First Street
Suite 500
Dayton, OH 45402

Gary Meissner
Oakland Unified School District
1025 Second Avenue
Oakland, CA 94606

Jeffrey P. Johnson
Library of Michigan
717 W. Allegan Street
Lansing, MI 48909

Dennis L. Bybee
International Society for Technology in Education
USA National Office
P.O. Box 4437
Alexandria, VA 22303

Kevin Starr
California State Library
Library Court Building
P.O. Box 942837
Sacramento, CA 94237

Laura L. Wilson
Florida Cable Telecommunications Association
310 North Monroe Street
Tallahassee, FL 32301

William J. Tobin
Early Childhood Development Center Legislative
Coalition
3612 Bent Branch Court
Falls Church, VA 22041

Patrice McDermott
Information Policy Analyst
OMB WATCH
1742 Connecticut Avenue, NW
Washington, DC 20009

Fiona Branton
Information Technology Industry Council
1250 Eye Street, NW
Washington, DC 20005

Alison M. Hughes
The University of Arizona Health Sciences Center
2501 East Elm Street
Tucson, AZ 85716

P. Kenneth Komoski
The LINCT Coalition
466 Pleasant Street
Melrose, MA 02176

David J. Strom
American Federation of Teachers
555 New Jersey Avenue, NW
Washington, DC 20001

Mary Ellen Emmons
Alaska Library Association
P.O. Box 81084
Fairbanks, AK 99708

Missouri State Library
P.O. Box 387
Jefferson City, MO 65102

Robert C. Heterick, Jr.
Educom
1112 16th Street, NW
Suite 600
Washington, DC 20036

Robert Bocher
Wisconsin Department of Public Instruction
125 South Webster Street
Madison, WI 53702

B. Robert Piller
Gerald A. Norlander
Public Utility Law Project of New York, Inc..
90 State Street
Suite 601
Albany, NY 12207

Benjamin Perez
Gerald M. Zuckerman
Mark J. Becker
Abacus Communications Co.
1801 Columbia Road, NW - Suite 101
Washington, DC 20009

Robert R. Katz
Peter F. Harter
Netscape Communications Corp.
487 East Middlefield Road
Mountain View, CA 94043

Jeffrey C. Ogden
Merit Network
4251 Plymouth Road
Ann Arbor, MI 48105

Tom Udall
Richard Weiner
New Mexico Attorney General's Office
P.O. Box Drawer 1508
Santa Fe, NM 87504

Ronald L. Plesser
James H. Halpert
Mark J. O'Connor
Piper & Marbury, LLP
1200 19th Street, NW - Seventh Floor
Washington, DC 20036

Carol C. Henderson
American Library Association
1301 Pennsylvania Avenue, NW
Suite 403
Washington, DC 20004

Richard W. Riley
U.S. Secretary of Education
600 Independence Avenue, SW
Washington, DC 20202

David Price
California Library Association
717 K Street
Suite 300
Sacramento, CA 95814

Joseph A. Spagnolo
Illinois State Board of Education
100 N. First St.
Springfield, IL 62777

David Pierce
American Association of Community College
One Dupont Circle, NW
Suite 410
Washington, DC 20036

Ray Taylor
Association of Community College Trustees
1740 N Street, NW
Washington, DC 20036

Martin Avery
Navajo Nation
1101 17th Street, NW
Suite 250
Washington, DC 20036

J.D. Williams
Cheyenne River Sioux Telephone Authority
100 Main Street
Eagle Butte, SD 57625

L. Jerry Mitchell
Blountsville Telephone Co., Inc..
P.O. Box 1049
Blountsville, AL 35031

Ronald K. Greenhalgh
National Rural Electric Cooperative Association
4301 Wilson Boulevard
Arlington, VA 22203

Margo Crist
Michigan Library Association
University of Michigan
818 Hatcher South
Ann Arbor, MI 48109

Anne Wendler
Lincoln Trail Libraries System
1724 W. Interstate Drive
Champaign, IL 61821

Richard A. Finnigan
Oregon Independent Telephone Association
2405 Evergreen Park Drive, SW
Suite B-01
Olympia, WA 98502

Donald L. Howell, II
Idaho PUC
P.O. Box 83720
Boise, ID 83720

Mary J. Sisak
Mary L. Brown
MCI TeleComm., Inc.
1801 Pennsylvania Avenue, NW
Washington, DC 20006

James T. Coyle
Shawnee Telephone Co.
P.O. Box 69
Equality, IL 62934

Ronald A. Gagon
NOBLE
26 Cherry Hill
Danver, MA 01923

Mitchell Sprague
Kenneth Matheson
Doris Hammer
Mendocino Unified School District
P.O. Box 1154
Mendocino, CA 95460

Dena S. Puskin
Office of Rural Health Policy
5600 Fishers Lane
Room 9-05
Rockville, MD 20857

John G. Strand
John C. Shea
State of Michigan PSC
6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909

Encarnita Catalan-Marchan
Maria Pizarro-Figueroa
Telefonica Larga Distancia de Puerto Rico, Inc..
Metro Office Park
Building No. 8 - Street No. 1
Guaynabo, PR 00922

U.S. National Commission on Libraries and
Information Science
1110 Vermont Avenue, NW
Suite 820
Washington, DC 20005

Adam Truner
Commonwealth of Northern Marianas
2121 R Street, NW
Washington, DC 20006

David F. Hemmings
Brite Voice Systems, Inc..
7309 East 21st Street North
Wichita, KS 67206

Jeffrey P. Folsom
Southwest Montana Telepsychiatry Network
2475 E. Broadway Street
Helena, MT 59601

David A. Kennedy
Dennis Small
Instructional Resources
Old Capitol Building
P.O. Box 47200
Olympia, WA 98504

Blossom A. Peretz
NJ Department of Treasury
31 Clinton Street - 11th Floor
P.O. Box 46005
Newark, NJ 07101

Chris Dalziel
Instructional Telecommunications Council
One Dupont Circle, NW
Suite 410
Washington, DC 20036

Gayle T. Killner
Louisiana PSC
P.O. Box 91154
Baton Rouge, LA 70821

Monroe E. Price
Benjamin N. Cardozo School of Law
Brookdale Center
55 Fifth Avenue
New York, NY 10003

Kevin Taglang
Benton Foundation
1634 Eye Street, NW
Washington, DC 20006

Mark D. Wilkerson
Brantley & Wilkerson, PC
P.O. Box 830
Montgomery, AL 36101

Harold M. Thompson
Iowa Communications Network
P.O. Box 587
Johnston, IA 50131

Jim Williams
FARNET
1112 16th Street, NW
Suite 600
Washington, DC 20036

Mark Savage
Stevan Rosenzweig
Carmela Castellano
Public Advocates, Inc..
1535 Mission Street
San Francisco, CA 94103

Carolyn Pucell
Department of Information Resources
P.O. Box 13564
Austin, TX 78711

Bonnie Price
7027 Haverhill Park Road
Whittier, CA 90602

Lee Green
High Plains Rural Health Network
218 East Kiowa Avenue
P.O. Box 575
Fort Morgan, CO 80701

Curtis T. White
Allied Communications Group, Inc..
4201 Connecticut Avenue, NW
Suite 402
Washington, DC 20008

Danny E. Adams
Steven A. Augustino
Kelley Drye & Warren
1200 19th Street, NW
Suite 500
Washington, DC 20036

Brad E. Mutschelknaus
John J. Heitmann
Kelley Drye & Warren
1200 19th Street, NW
Suite 500
Washington, DC 20036

Robert A. Hart IV
Hart Engineers & CEO of 21st Century Telesis, Inc..
4615 North Boulevard
Baton Rouge, LA 70806

Catherine R. Sloan
Richard L. Fruchterman
Richard S. Whitt
Worldcom, Inc..
1120 Connecticut Avenue, NW - Suite 400
Washington, DC 20036

Robert F. Kelley, Jr.
Office of the Governor
P.O. Box 2950
Agana, Guam 96910

Howard Hunt
RIITA
P.O. Box 10
Dixon, IA 52745

Paul Hoff
Park Region Mutual Telephone Co.
P.O. Box 277
100 Main Street
Underwood, MN 56586

Scott L. Smith
Matanuska Telephone Assn.
1740 South Chugach Street
Palmer, AK 99645

L. Jerry Mitchell
P.O. Box 452
New Hope, AL 35760

Robert Clemons
Bledsoe Telephone Coop.
P.O. Box 609
203 Cumberland Avenue
Pikeville, TN 37367

Charles D. Cosson
AirTouch Communications, Inc..
One California Street - 29th Floor
San Francisco, CA 94105

Frank C. Torress, III
Washington Liasion Office of the Governor of Guam
444 North Capital Street
Washington, DC 20001

Norman Rasmussen
Colorado Independent Telephone Association
3236 Hiwan Drive
Evergreen, CO 80439

Charles H. Helein
Helein & Associates, PC
8180 Greensboro Drive
Suite 700
McLean, VA 22102

J. Scott Searl
Baird, Holm, McEachen, Pedersen, Hamann &
Strasheim
1500 Woodmen Tower
Omaha, NE 68102

O. Lee Darrington
Rhonda R. Maun
Larry D. Brennan
Telec Consulting Resources, Inc..
909 North 98th Street - Suite 203
Omaha, NE 68114

Frank D. Richter
Fort Mojave Telecommunications, Inc..
P.O. Box 9879
4558 Highway 95
Suite 4
For Mojave, AZ 86427

Cynthia B. Miller
State of Florida PSC
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Richard B. Bulman
Rural Telephone Finance Coop.
2201 Cooperative Way
Herndon, VA 22071

Boyd D. Spiker
Rock Port Telephone Company
107 Opp Street
Rock Port, MO 64482

Jill A. Lesser
People for the American Way
2000 M Street, NW
Washington, DC 20036

Angela J. Campbell
Ilene R. Penn
Georgetown University Law Center
600 NJ Avenue, NW
Washington, DC 20001

Charles C. Hunter
Hunter & Mow, PC
1620 Eye Street, NW
Suite 701
Washington, DC 20006

Bruce D. Jacobs
Glenn S. Richards
Theodore N. Stern
Fisher Wayland Cooper Leader and Zaragoza, LLP
2001 Pennsylvania Avenue, NW - Suite 400
Washington, DC 20006

Mel Engle
Fisher Wayland Cooper Leader and Zaragoza, LLP
2001 Pennsylvania Avenue, NW - Suite 400
Washington, DC 20006

Stephen G. Oxley
Wyoming PSC
700 West 21st Street
Cheyenne, WY 82002

James Rowe
Alaska Telephone Assn.
201 E. 56th Avenue #114
Anchorage, AK 99518

Steve Hamlen
United Utilities, Inc..
P.O. Box 9-2730
Anchorage, AK 99509

Richard M. Tettelbaum
Citizens Utilities Company
Eastern Region Telephone Operations
1400 16th Street, NW
Suite 500
Washington, DC 20036

Rachel B. Ferber
360 Communications Company
8725 Higgins Road
Chicago, IL 60631

Gene DeJordy
Christopher Johnson
Western Wireless Corporation
2001 NW Sammamish Road #100
Issaquah, WA 98027

Philip L. Malet
Alfred Mamlet
Steptoe & Johnson
1330 Connecticut Avenue, NW
Washington, DC 20036

Marc A. Paul
Steptoe & Johnson
1330 Connecticut Avenue, NW
Washington, DC 20036

Kenneth Lein
Winnebago Cooperative Telephone Assn.
704 East Main
Lake Mills, IA 50450

Joel B. Shifman
Maine PSC
242 State Street
Augusta, ME 04333

Michael Gallagher
New Jersey Board of Public Utilities
Two Gateway Center
Newark, NJ 07120

Emily M. Williams
Association for Local Telecommunications
Services
888-17th Street, NW
Suite 900
Washington, DC 20006

Gene P. Belardi
Mobilemedia Communications
2101 Wilson Blvd.
Suite 935
Arlington, VA 22201

Jeffrey Blumenfeld
Glenn B. Manishin
Blumenfeld & Cohen
1615 M Street, NW
Suite 700
Washington, DC 20036

Christy C. Kunin
Christine A. Mailloux
Blumenfeld & Cohen
1615 M Street, NW
Suite 700
Washington, DC 20036

Richard McKenna, **HQE03J36**
GTE
P.O. Box 152092
Irving, TX 75015

Lon C. Levin
AMSC Subsidiary Corp.
10802 Park Ridge Boulevard
Reston, VA 22091

Howard J. Symons
Jennifer A. Purvis
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, PC
701 Pennsylvania Avenue, NW
Suite 900
Washington, DC 20004

Dan Morales
Jorge Vega
Thomas P. Perkins
Consumer Protection Division
P.O. Box 12548, Capitol Station
Austin, TX 78711

Alyce H. Hanley
Alaska PUC
1016 West 6th Avenue
Suite 400
Anchorage, AK 99501

Joel Blau
Ann Kutter
NYS Consumer Protection Board
Five Empire State Plaza
Suite 2101
Albany, NY 12223

Joe D. Edge
Richard J. Arsenault
Drinker Biddle & Reath
901 15th Street, NW
Suite 900
Washington, DC 20005

Robert A. Mansbach
COMSAT Corp.
6560 Rock Spring Drive
Bethesda, MD 20817

Billy Jack Gregg
Terry D. Blackwood
West Virginia PSC
700 Union Building
723 Kanawha Boulevard - East
Charleston, WVA 25301

Veronica Ahern
Nixon, Hargraves, Devans & Doyle
One Thomas Circle, NW
Washington, DC 20036

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
Sprint
1850 M Street, NW - Suite 1100
Washington, DC 20036

Paul Rodgers
Charles D. Gray
James Bradford Ramsey
NARUC
1102 ICC Building - P.O. Box 684
Washington, DC 20044

Kathy L. Shobert
General Communication, Inc..
901 15th Street, NW
Suite 900
Washington, DC 20005

Ronald Dunn
Information Industry Association
1730 M Street, NW
Suite 700
Washington, DC 20036

Robert S. Tongren
David C. Bergmann
Office of the Consumers' Counsel - State of Ohio
77 South High Street
15th Floor
Columbus, OH 43266

Kenneth Burchett
GVNW Inc./Management
P.O. Box 230399
Portland, OR 97223

Richard A. Askoff
Donna A. DiMartino
NECA
100 South Jefferson Road
Whippany, NJ 07981

Brian R. Moir
Moir & Hardman
2000 L Street, NW
Suite 512
Washington, DC 20036

Gail L. Polivy
GTE
1850 M Street, NW
Suite 1200
Washington, DC 20036

Margot Smiley Humphrey
Koteen & Naftalin
1150 Connecticut Avenue, NW
Suite 1000
Washington, DC 20036

Michael J. Karson
Ameritech
2000 West Ameritech Center Drive
Room 4H84
Hoffman Estates, IL 60196

Peter Arth, Jr.
Edward W. O'Neill
Mary Mack Adu
State of California and the PUC of California
505 Van Ness Avenue
San Francisco, CA 94102

Michael F. Altschul
Randall S. Coleman
Cellular Telecommunications Industry Assn.
1250 Connecticut Avenue, NW
Suite 200
Washington, DC 20036

Randolph J. May
Timothy J. Cooney
Sutherland, Asbill & Brennan
1275 Pennsylvania Avenue, NW
Washington, DC 20004

L. Marie Guillory
NTCA
2626 Pennsylvania Avenue, NW
Washington, DC 20036

Michael T. Skrivan
Harris, Skrivan & Associates, LLC
8801 S. Yale - Suite 220
Tulsa, OK 74137

James Gattuso
Wayne A. Leighton
Citizens for a Sound Economy Foundation
1250 H Street, NW
Washington, DC 20005

Eric B. White
Missouri PSC
P.O. Box 360
Jefferson City, MO 65102

Delbert D. Smith
Reed, Smith, Shaw & McClay
1301 K Street, NW
Suit 1100 - East Tower
Washington, DC 20036

Jan F. Reimer
ICORE, Inc..
326 S. Second Street
Emmaus, PA 18049

Craig T. Smith
United Telecommunications, Inc..
P.O. Box 11315
Kansas City, MO 64112

B.B. Knowles
Georgia PSC
244 Washington Street, SW
Atlanta, GA 30334

M. Robert Sutherland
Richard M. Sbaratta
Rebecca M. Lough
BellSouth
1155 Peachtree Street, NE - Suite 1700
Atlanta, GA 30375

Henry Geller
Samuel A. Simon
Alliance for Public Technology
901 15th Street, NW
Suite 230
Washington, DC 20005

Michael S. Fox
John Staurulakis, Inc..
6315 Seabrook Road
Seabrook, MD 20706

Kenneth T. Burchette
GVNW Inc.
2270 La Monta Way
Colorado Springs, CO 80918

William H. Smith
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Illona A. Jeffcoat-Sacco
North Dakota PSC
600 E. Boulevard
Bismarck, ND 58505

Kenneth Stofferahn
James A. Burg
South Dakota PUC
500 East Capitol Avenue
Pierre, SD 57501

Marc A. Stone
Fred Williamson & Associates, Inc..
2921 E. 91st Street
Suite 200
Tulsa, OK 74137

Gary M. Epstein
Teresa D. Baer
Michael S. Wroblewski
Latham & Watkins
1001 Pennsylvania Avenue, NW - Suite 1300
Washington, DC 20004

Michael J. Shortley, III
Rochester Telephone Corp.
180 South Clinton Avenue
Rochester, NY 14646

David Beckett
Colorado PUC
1580 Logan Street - OL -2
Denver, CO 80203

Commissioner Rod Johnson
Nebraska PSC
300 The Atrium
1200 N Street
P.O. Box 94927
Lincoln, NE 68509

William J. Janklow
South Dakota PUC
500 East Capitol Avenue
Pierre, SD 57501

Pat Wood, III
Robert W. Gee
Judy Walsh
Steve Davis
Texas PUC
1701 North Congress Avenue - P.O. Box 13326
Austin, TX 78701

Mary E. Newmeyer
Alabama PSC
P.O. Box 991
Montgomery, AL 36101

Mark Cooper
Gene Kimmelman
Consumer Federation of America
1424 16th Street, NW - Suite 604
Washington, DC 20036

David R. Poe
Yvonne M. Coviello
LeBoeuf, Lamb, Greene and MacRae
1875 Connecticut Avenue, NW
Suite 1200
Washington, DC 20009

Thomas E. Taylor
Jack B. Harrison
Frost & Jacobs
201 East Fifth Street
Cincinnati, OH 45202

David A. Gross
AirTouch Communications
1818 N Street, NW
Washington, DC 20036

Jeffrey L. Sheldon
Sean A. Stokes
Utilities Telecommunications Council
1140 Connecticut Avenue, NW
Suite 1140
Washington, DC 20036

Raymond G. Bender, Jr.
J.G. Harrington
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036

John W. Katz
Office of the State of Alaska
444 North Capitol Street, NW
Suite 336
Washington, DC 20001

R. Glenn Rhyne
South Carolina PSC
P.O. Drawer 11649
Columbia SC 29211

Andrew D. Lipman
Mark Sievers
Swidler & Berlin, Chtd.
3000 K Street, NW
Suite 300
Washington, DC 20007

Robert M. Lynch
Durward D. Dupre
Michael J. Zpevak
Southwestern Bell Telephone Co.
One Bell Center - Room 3524
St. Louis, MO 63101

Maureen O. Helmer
Penny B. Rubin
John Starrs
PSC of NY
Three Empire State Plaza
Albany, NY 12223

Mary J. Dent
Goldberg, Godles, Wiener & Wright
1229 19th Street, NW
Washington, DC 20036

Brenda L. Fox
Continental Cablevision, Inc..
1020 19th Street, NW
Suite 700
Washington, DC 20036

National Association of Development Organizations
444 North Capitol Street, NW
Suite 630
Washington, DC 20001

Jere W. Glover
Barry Pineles
US Small Business Administration
409 Third Street, SW
Washington, DC 20416

Cheryl A. Tritt
James A. Casey
Morrison & Foerster
2000 Pennsylvania Avenue, NW
Suite 5500
Washington, DC 20006

David W. McGann
Illinois Commerce Commission
160 North LaSalle Street
Suite C-800
Chicago, IL 60601

Kathryn Marie Krause
Dan L. Poole
U S WEST, Inc..
1020 19th Street, NW
Suite 700
Washington, DC 20036

Joseph K. Witmer
Pennsylvania PUC
P.O. Box 3265
Harrisburg, PA 17120

Roger Hamilton
Ron Eachus
Joan H. Smith
Oregon PUC - Justice Building
550 Capitol Street, NE
Salem, OR 97310

Victor A. Hurbert
Frederick & Warinner
10901 W. 84th Terrace
Suite 101
Lenexa, KS 66214

Charles H. Kennedy
Morrison & Foerster
2000 Pennsylvania Avenue, NW
Suite 5500
Washington, DC 20006

Joseph P. Markoski
James M. Fink
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, NW
P.O. Box 407
Washington, DC 20044

Joseph DiBella
NYNEX
1300 Eye Street, NW
Suite 400 West
Washington, DC 20005

Betty D. Montgomery
Duane W. Luckey
Steven T. Nourse
PUC of Ohio
180 East Broad Street
Columbus, OH 43266

Emily C. Hewitt
Vincent L. Crivella
Michael J. Ettner
GSA
18th & F Streets, NW - Room 4002
Washington, DC 20405

Dale White
Churchill County Telephone and Telegraph System
P.O. Box 1390
50 W. Williams Avenue
Fallon, NV 89406

Jack Brown
Golden West Telecommunications Coop., Inc..
P.O. Box 411
Wall, SD 57790

Joan Mandeville
Montana Telephone Assn.
P.O. Box 2166
Great Falls, MT 59403

Robert F. Manifold
NASUCA
900 4th Avenue
Suite 2000
Seattle, WA 98164

Sandra Mattavous-Frye
Office of the People's Counsel of DC
1133 15th Street, NW
Suite 575
Washington, DC 20005

Michael C. Strand
Montana Independent Telecommunications
Systems, Inc..
519 N. Sanders
P.O. Box 5237
Helena, MT 59604

John F. Mortell
G. Richard Klein
David E. Ziegner
Indiana Utility Regulatory Commission
302 West Washington - Suite E306
Indianapolis, IN 46204

Thomas K. Crowe
Law Offices of Thomas K. Crowe, PC
2300 M Street, NW
Suite 800
Washington, DC 20037

Michael J. Nowick
Minnesota Telephone Assn., Inc..
1650 Minnesota World Trade Center
30 East Seventh Street
St. Paul, MN 55101

Lawrence W. Katz
Edward D. Young, III
Michael E. Glover
Bell Atlantic
1320 North Court House Road - Eighth Floor
Arlington, VA 22201

Robert M. Halperin
Crowell & Moring
1001 Pennsylvania Avenue, NW
Washington, DC 20004

J. Manning Lee
Gail Garfield Schwartz
Paul E. Cain, Sr
Teleport Communications Group, Inc..
Two Teleport Drive
Staten Island, NY 10311

Katherine G. Grincewich
US Catholic Conference
Office of the General Counsel
3211 4th Street, NE
Washington, DC 20017

Robert J. Sachs
Howard B. Homonoff
Continental Cablevision, Inc..
Pilot House - Lewis Wharf
Boston, MA 02110

Anne U. MacClintock
SNET
227 Church Street - Suite 1500
New Haven, CT 06510

Judith St. Ledger- Roty
Stefen M. Lopatkiewicz
Reed, Smith, Shaw & McClay
1301 K Street, NW
Suite 1100 - East Tower
Washington, DC 20005

Daniel L. Brenner
Neal M. Goldberg
David L. Nicoll
NCTA
1724 Massachusetts Avenue, NW
Washington, DC 20036

Director
Office of the Consumer Advocate
US Postal Rate Commission
Washington, DC 20268

Charles M. Oliver
iSCAN, L.P.
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Ave., NW
Suite 800
Washington, DC 20036

Monica A. Leimone
Paul, Weiss, Rifkind, Wharton & Garrison
1615 L St., NW, Suite 1300
Washington, DC 20036

Pamela Arluk
Swidler & Berlin, Chartered
3000 K St., NW, Suite 300
Washington, DC 20007

Paul H. Kuzia
Arch Comm. Group, Inc.
1800 West Park Dr., Suite 350
Westborough, MA 01581

Tim Size
Rural Wisconsin Health Cooperative
724 Water St.
Sauk City, WI 53583

Timothy R. Graham
Robert M. Berger
Joseph M. Sandri, Jr.
Winstar Communications, Inc..
1146 19th Street, NW - Suite 200
Washington, DC 20036

Barbara S. Wellbery
Chief Counsel
U.S. Department of Commerce RM. 4713
14th St. & Constitution Ave., N.W.
Washington, D.C. 20230

Mark J. O'Connor
CIX
Piper & Marbury L.L.P.
1200 19th St, NW
Washington, DC 20036

Judith St. Ledger-Roty
Reed Smith Shaw & McClay
1301 K St., NW
East Tower
Washington, DC 20005

Joseph A. Godles
Panamsat Corp.
Goldberg, Godles, Wiener & Wright
1229 19th St., NW
Washington, DC 20554

Robert K. Lock, Jr.
The Competitive Strategies Group, Ltd.
70 East Lake St.
Suite 630
Chicago, IL. 60601

American Public Health Association
1015 15th St., NW
Washington, DC 20005-2605

Margot S. Humphrey
TDS Telecomm. Corp.
KOTEEN & NAFTALIN
1150 Connecticut Ave., NW
Washington, DC 20036

Maureen O. Helmer
New York State Department of Public Services
Three Empire State Plaza
Albany, New York 12223-1350

Kate McGee
Oracle Corp.
1667 K St., NW, Suite
Suite 700
Washington, DC 20006

Diane C. Gaylor
Paul, Weiss, Rifkind, Wharton & Garrison
1615 L St., NW, Suite 1300
Washington, DC 20036

Glenn B. Manishin
Netaction
1615 M St., NW, Suite 700
Washington, DC 20036

Kurt A. Wimmer
Covington & Burling
1201 Pennsylvania Ave., NW
P.O. Box 7566
Washington, DC 20044

Carl K Oshiro
Markham & Oshiro
100 1st St., Suite 2540
San Francisco, CA 94105

Robert L. Goggarth
PCIA
500 Montgomery ST.
Suite 700
Alexandria, VA 22314-1561

Gary M. Epstein
Hughes Comm. Galaxy, Inc.
Latham & Watkins
1001 Pennsylvania Ave., NW
Suite 1300
Washington, DC 20004

Peter A. Rohrbach
GE American Comm., Inc.
Hogan & Hartson L.L.P.
555 13th St., NW
Washington, DC 20004

Jonathan D. Blake
Business Software Alliance
Covington & Burling
1201 Pennsylvania Ave., NW
P.O. Box 7566
Washington, DC 20044

Patricia E. Klinck
Vermont Department of Libraies
109 State Street
Montpelier, Vermont 05620-2701

Regina Costa
The Utility Reform Network (TURN)
625 Polk St., Suite 403
San Francisco, CA 98102

Mark J. Golden
PCIA
500 Montgomery St.
Suite 700
Alexandria, VA 22314-1561

Carolyn C. Hill
Alltel Telephone Services Corp.
655 15th St., NW
Suite 220
Washington, DC 20005

Jacquelyn Brand
Universal Service Alliance
2175 East Francisco Dr., Suite L
San Rafael, CA 94901

Dee N. Monsen
RT Communications, Inc.
130 South 9th
Worland, Wy 82401

Daniel J. Fly
REMEC
1105 16th St.
Traverse City, MI 49684-2386

Douglas J. Wagner
Tularosa Basin Telephone Co. Inc.
402 Higuera St.
Tularosa, NM 88352-0068

Emily C. Hewitt
General Services Administration
18th & F St., NW., Rm. 4002
Washington, DC 20405

Thomas J. Keller, Esq.
Orion Atlantic
901 - 15th St., NW
Suite 700
Washington, DC 20005

James T. Roche
Keystone Communications Corp.
400 North Capitol St., NW,
Suite 880
Washington, DC 20001

Burton G. Tregub
Cylink Corp.
910 Hermosa Ct.
Sunnyvale, CA 94086

Brian O'Connor
Aerial Comm., Inc.
8410 West Bryn Mawr Ave., #1100
Chicago, IL 60631

James Baller
American Public Power Association
The Baller Law Group
1820 Jefferson Place, NW
Suite 200
Washington, DC 20036

United Cerebral Palsy Associations
1660 L St., NW
Suite 700
Washington, DC 20036

John A. Butler
National Urban League, Inc.
120 Wall Street
Seventh Floor
New York, NY 10005

Peter Arth, Jr.
California PUC
505 Van Ness Ave.
San Francisco, CA 94102

Mississippi State Department of Health
2423 North State St.
P.O. Box 1700
Jackson, MS 39215-1700

Donna Hammack
Good Samaritan Hospital Foundation
Box 1810
Kearney, NE 68848-1810

Beverly A. Stauffer
Pottawatomie County Health Department
320 Main, Box H
Westmoreland, KS 66549

Richard J. Morrissey
Kansas Department of Health & Environment
Bureau of Local & Rural Health Systems
900 SW Jackson, Rm 665
Topeka, KS 66612-1290

Assn. of American Medical Colleges
2450 N St., NW
Washington, DC 20037

John R. Lumpkin
Illinois Department of Public Health
525-535 W. Jefferson St.
Springfield, IL 62761-0001

Michael B. Severns
St. Charles Medical Center
2500 NE Neff Rd.
Bend, OR 97701-6015

Tim Best
OILTS
The Ohio Department Of Education
1320 Arthur E. Adams Dr.
Columbus, OH 43221

Matthew Lampe
City of Seattle Department of Administrative Services
12th Fl Alaska Building
618 Second Avenue
Seattle, WA 98104-2214

Karen Peltz Strauss
Nationa Assn. of the Deaf
814 Thayer Ave.
Silver Spring, MD 20910-4500

Frederick M. Joyce
CelPage, Inc.
Joyce & Jacobs, Attys. at Law, L.L.P.
1019 19th St., NW
14th Floor, PH-2
Washington, DC 20036

David L. Meier
Cincinnati Bell Telephone
201 E. 4th St.
P.O. Box 2301
Cincinnati, OH 45201-2301

Edward M. O'Connor
Southern Adirondack Library System
22 Whitney Place
Saratoga Springs, NY 12866-4596

Frank Spencer
Mississippi Council for Education Technology & Library
Commission
802 N. State St.
Suite 204 Jackson, MS 39202

Jim Hart
Office of Consumer Affairs
Consumers' Utility Counsel Division
#2 Dr. M.L. King, Jr. Drive
Plaza Level, East Tower
Atlanta, GA 30334

Dana Frix
Excel Telecomm., Inc.
Swidler & Berlin, Chartered
3000 K St., N.W. Suite 300
Washington, DC 20007

Randall M. Johnson
Marquette County Health Department
184 U.S. 41 Highway
Negawee, MI 49886

University of Nevada School of Medicine
Center for Education & Services Outreach
Savitt Medical Building/150
Reno, NV 89557

Jeffrey Blumenfeld
Blumenfeld & Cohen - Technology Law Group
1615 M St., NW, Suite 700
Washington, DC 20036

Robert G. Oenning
Washington E911 Program
Washington State Military Department
Emergency Management Division
P.O. Box 40955
Olympia, WA 98504-0955

Raymond G. Bender, Jr.
Vanguard Cellular Systems, Inc.
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Ave., NW
Washington, DC 20036

Michael L. Ginsberg
Utah Public Service Commission & Utah DPU
160 E. 300 South
Box 146751
Salt Lake City, UT 84114-6751

Ron McCue
Silver Star Telephone Co.
P.O. Box 226 104101 HWY 89
Freedom, WY 83120

Bridget L. Lamont
Illinois State Library
300 S. Second Street
Springfield, IL 62701-1796

Sandra Wright
Osage County Health Department
103 E 9th
Lyndon, KS 66451

Tom Cook
Oregon Public Education Network
P.O. Box 216
Marylhurst, OR 97036-0216

James D. Bentley
American Hospital Assn.
Liberty Place
Washington Office
325 7th St., NW
Washington, DC 20004-2802

Jim Gay
NASTD
c/o The Council of State Governments
Iron Works Pike
P.O. Box 11910
Lexington, KY 40578-1910

Werner K. Hartenberger
Cox Comm., Inc.
Dow, Lohnes & Albertson PLLC
1200 New Hampshire Ave.
Washington, DC 20036

Lawrence D. Crocker, III
District of Columbia PSC
717 14th St., NW
Washington, DC 20005

Phoebe Forsythe Isales
Puerto Rico Telecommunication
Calle Juan Calaf #400
Suite 439
San Juan, PR 00918-9903

David A. Irwin
Irwin Campbell & Tannenwald, PC
1730 Rhode Island Avenue, NW
Suite 200
Washington, DC 20036

Richard D. Gary
Virginia's Rural Telephone Co.
Hunton & Williams
951 East Byrd St.
Richmond, VA 23219

Dale E. Lutz
Owen J. Roberts School District
Administration Building
901 Ridge Rd.
Pottstown, PA 19465

Jon H. Flint
Larned High School
815 Corse St.
Larned, Kansas 67550

Robert V. Antonucci
Massachusetts Department of Education
350 Main St.
Malden, MA 02148

Tom Cook
Oregon Public Education Network
P.O. Box 216
Marylhurst, OR 97036-0216

Shari Frueh
St. Alexius Medical Center
900 E. Broadway
Bismarck, ND 58506

Edwin Boyd
Dorchester School District Four
500 Ridge St.
Saint George, SC 29477

Kenneth T. Davis
Lodi Unified School District
Governing board
1305 E. Vine St.
Lodi, CA 95240

William A. Rentschler
Oregon-Davis School Corp.
P.O. Box 65
Hamlet, IN 46532-0065

Gary R. Gibson
Lakeview Local School District
300 Hillman Dr.
Cortland, OH 44410

Robert Zurek
Rhodes Elementary School District
8913 W. Fullerton Ave.
River Grove, IL 60171

James U. Troup
Steven J. Hamrick
Arter & Hadden
1801 K Street, NW - Suite 400K
Washington, DC 20006

Leonard J. Kennedy
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036

Philip V. Otero
GE American Communications, Inc.
Four Research Way
Princeton, NJ 08540

Peter A. Rohrbach
David L. Sieradzki
Hogan & Hartson LLP
555 13th Street, NW
Washington, DC 20004

Albert H. Kramer
Robert F. Aldrich
Dickstein Shapiro Morin & Oshinsky LLP
2101 L Street, NW
Washington, DC 20037

Lawanda R. Gilert
New Jersey Division of the Ratepayer Advocate
31 Clinton Street
P.O. Box 46005
Newark, NJ 07101

Sandra-Ann Y.H. Wong
Sandwich Isles Communications, Inc.
1001 Bishop Street
Pauahi Tower - Suite 2750
Honolulu, HI 96813

Robert B. McKenna
John L. Traylor
U S WEST
1020 19th Street, NW
Suite 700
Washington, DC 20036

David Higginbotham
Teletouch Licenses, Inc.
P.O. Box 7370
Tyler, TX 75711

Wayne V. Black
C. Douglas Jarrett
Susan M. Hafeli
Keller and Heckman, LLP
1001 G Street, NW - Suite 500 West
Washington, DC 20001

Benjamin H. Dickens, Jr.
Gerard J. Duffy
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, NW
Washington, DC 20037

Paul J. Berman
Alane C. Weixel
Covington & Burling
1201 Pennsylvania Avenue, NW
P.O. Box 7566
Washington, DC 20044

Elisabeth H. Ross
Birch, Horton, Bittner and Cherot
1155 Connecticut Avenue, NW - Suite 1200
Washington, DC 20036

Jerome K. Blask
Daniel E. Smith
Gurman, Blask & Freedman
1400 16th Street, NW
Suite 500
Washington, DC 20036

Susan Lehman Keitel
New York Library Assn.
252 Hudson Avenue
Albany, NY 12210

Linda Nelson
Florida Department of Management Services
4050 Esplanade Way
Tallahassee, FL 32399

Babara O'Connor
Donald Vial
Allen S. Hammond
Alliance for Public Technology
901 15th Street, NW - Suite 230
Washington, DC 20005

Carrol S. Verosky
Wyoming PSC
700 West 21st Street
Cheyenne, WY 82002

Peter H. Jacoby
AT&T
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Elizabeth R. Sachs
LUKAS, McGOWAN, NACE & GUTIERREZ
1111 Nineteenth Street, NW
12th Floor
Washington, DC 20036

David W. Danner
Washington State Department of Information Services
P.O. Box 42445
Olympia, WA 98504

W. Paul Mason
Information Technology
200 Piedmont Avenue
Suite 1402 - West Tower
Atlanta, GA 30334

Lori Anne Dolqueist
Angela J. Campbell
Institute of Public Representation
Georgetown University Law Center
600 New Jersey Avenue, NW
Washington, DC 20001

Judy Sello
AT&T
295 North Maple Avenue
Basking Ridge, NJ 07920

Jonathan Jacob Nadler
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, NW
Suite 500
Washington, DC 20044

Alan R. Shark
American Mobile Telecommunications Association, Inc.
1150 18th Street, N.W., Suite 250
Washington, D.C. 20036

DOW, LOHNES & ALBERTSON, PLLC
1200 New Hampshire Ave, NW
Suite 800
Washington, DC 20036-6802

Herbert E. Marks
James M. Fink
SQUIRE, SANDERS & DEMPSEY, L.L.P.
1201 Pennsylvania Avenue, NW
P.O. Box 407
Washington, DC 20044

Sue D. Blumenfield
Michael G. Jones
Jennifer Desmond McCarthy
WILLKIE FARR & GALLAGHER
Three Lafayette Center
1155 21st Street, NW
Washington, DC 20036

Brian Conboy
Thomas Jones
Jay Angelo
WILLKIE FARR & GALLAGHER
Three Lafayette Center
1155 21st Street, NW
Washington, DC 20036

Geoffrey Honaker
New Hanover Regional Medical Center
P.O. Box 900
2131 S. 17th Street
Wilmington, NC 28402

Francis R. Perkins
Meyner and Landis
One Gateway Center
Newark, NJ 07102

Cheryl L. Parrino
Universal Service Administrative Co.
1201 Pennsylvania Avenue, NW
Suite 300
Washington, DC 20004

Kathryn Matayoshi
Charles W. Totto
DEPT. OF COMMERCE AND CONSUMER AFFAIRS
250 South King Street
Honolulu, Hawaii 96813

Bruce Burcat
Delaware PSC
861 Silver Lake Blvd.
Cannon Building - Suite 100
Dover, DE 19904

Maurice W. Miller
Northern Arizona Regional Behavioral Health Authority
125 E. Elm
Suite E
Flagstaff, AZ 86001

Martha A. McInnis
Alabama Department of Economic and Community Affairs
401 Adams Avenue
Suite 580
P.O. Box 5690
Montgomery, AL 36103

Ramsey L. Woodworth
Robert M. Gurs
Rudolph J. Geist
Wilkes, Artis, Hedrick & Lane, Chtd.
1666 K Street, NW - Suite 1100
Washington, DC 20006

ITS
1231-20th Street, NW
Washington, DC 20036