

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054**

In the Matter of)	
)	CC Docket No. 96-45
Federal-State Joint Board)	
On Universal Service)	
)	
Access Charge Reform)	CC Docket No. 96-262

REPLY

The National Exchange Carrier Association, Inc. (NECA) files this Reply to comments submitted in response to the Commission's *Further Notice of Proposed Rulemaking* in the above-captioned proceeding.¹

The proposals described in the *FNPRM* generally focus on support mechanisms for non-rural incumbent local exchange carriers (ILECs). Comments submitted by the United States Telephone Association (USTA)² and the Rural Telephone Coalition (RTC)³ express concern, however, that rural carriers may unintentionally be harmed when non-rural carriers move to a proxy model. Both USTA and RTC suggest that the Commission examine potential effects on rural companies prior to implementing new non-rural support mechanisms on January 1, 2000.

In response to these concerns, NECA has analyzed universal service fund (USF) data submitted for the current payment year. NECA's analyses show that, if new

¹ Federal-State Joint Board on Universal Service, and Access Charge Reform, CC Docket Nos. 96-45 and 96-262, *Seventh Report & Order and Thirteenth Order on Reconsideration in CC Docket No. 96-45 Fourth Report & Order in CC Docket No. 96-262 and Further Notice of Proposed Rulemaking*, FCC 99-119 (rel. May 28, 1999). (*Further Notice of Proposed Rulemaking or FNPRM*)

² See USTA Comments (July 23, 1999)(USTA Comments).

³ See RTC Comments (July 23, 1999)(RTC Comments).

mechanisms proposed for non-rural companies had been implemented on January 1, 1999, rural carriers would have received approximately \$30 million dollars less in high cost funding than they receive under the current mechanism.⁴ NECA believes that it would be reasonable to expect that similar reductions will occur next year, should non-rural carriers shift to a proxy-based system on January 1, 2000, as planned.

The reasons for these reductions are complex. Traditionally, high cost loop support for all ILECs has been calculated by comparing each individual ILEC's study area loop cost to the national average cost per loop (NACPL). Under the Commission's Part 36 rules, all ILECs currently submit data regarding costs associated with subscriber "loop" plant. NECA is then required to compile these data, calculate a NACPL, and submit the results to the Commission and the universal service program administrator. Carriers' with loop costs that exceed 115 percent of the national average are allowed to recover an additional portion of these costs from the interstate high cost fund.⁵

Concern over growth in the fund led the Commission to institute an "interim" cap on universal service funding in 1994.⁶ The indexing methodology chosen by the Commission limits the fund's growth each year to annual growth in nationwide loops.⁷ Under the Commission's rules, the administrator is required to compare growth in actual

⁴ Using the Commission's *Public Notice* that identified carriers that would be treated as non-rural for universal service support purposes, NECA used the calendar year 1997 and 1998 results contained in its October 1, 1998 USF submission to isolate the non-rural carriers and test the impact of the rule revisions on the rural carrier population. See Common Carrier Bureau Sends Updated Lists of Rural and Non-Rural Telephone Companies to the Universal Service Administrative Company and Changes 1999 Self-Certification Filing Deadline, *Public Notice*, DA 99-459 (Mar. 16, 1999).

⁵ See generally 47 C.F.R. Part 36, Subpart F.

⁶ See Amendment of Part 36 of the Commission's Rules and Establishment of a Joint Board, *Report and Order*, 9 FCC Rcd 303 (1993).

⁷ See 47 C.F.R. § 36.601(c).

fund requirements (as determined by ILEC cost submissions) with indexed levels. When actual fund requirements exceed the cap on available funds, the administrator implements the cap by imputing a higher NACPL than the actual.⁸ The higher imputed NACPL, when applied to USF cost data submissions, produces smaller individual ILEC expense adjustments that, in total, do not exceed the cap.⁹

When the Commission determined that non-rural carriers should move to a new forward-looking cost mechanism for determining high-cost support, it made two changes to the NACPL calculation rules, that affect rural telephone company payments in the year 2000. Specifically, the Commission amended section 36.601(c) of its rules to specify that, effective January 1, 2000, the interim "cap" will be computed based on growth in rural company lines (not nationwide lines). The Commission also amended section 36.622(d) of its rules to specify that, beginning January 1, 2000, the NACPL will be the greater of (a) the 1997 NACPL plus an annual inflation adjustment based on the Gross Domestic Product Chained Price Index (GDP-CPI) or (b) the amount necessary to implement the interim "cap" limitation described above.

Adjustments to the NACPL made pursuant to these rule provisions will have a significant effect on high cost rural carriers beginning January 1, 2000. Current universal service calculation methods were designed to apply to all ILECs, a group that serves over

⁸ See 47 C.F.R. § 36.622.

⁹ For example, in 1999, the funding requirement for high cost support for the industry is approximately \$926.9 million. (This funding requirement includes the limitation on the assignment of corporate operations expense to the loop cost calculation, which if lifted, would raise the industry expense adjustment requirement to \$970.6 million). Under the interim cap rule, available funding based on year-over-year growth in loops equals only \$864.1 million. To produce individual expense adjustments that do not exceed the capped amount, a revised NACPL of \$251.39 was developed to replace the actual NACPL of \$245.47. Use of a higher imputed national average accordingly required that the level at which support begins to become available increased from \$282.29 (115% of 245.47) to \$289.10 (115% of \$251.39).

173.9 million access lines nationwide. The preponderance of lines receiving support in the current environment is associated with non-rural carriers, however (23.2 million non-rural lines versus 8.2 million rural lines receiving support).

Although the Commission appears to have intended that support for rural carriers remain stable when new mechanisms are implemented for non-rural carriers,¹⁰ this result will not likely be achieved. Vast differences in cost characteristics between these different groups of carriers virtually guarantee that unintended shifts in support levels will occur when the "current" rules (modified as described above) are applied to the much smaller universe of rural carriers.

For example, the average reduction in support among all high cost carriers attributable to the interim "cap" was about \$0.14 per loop per month in 1999. Even under the current system, the "cap" tends to have a higher proportional impact on rural carriers. For example, one rural high cost carrier serving 1,319 lines with annual study area loop costs equal to \$308.73 per line,¹¹ experienced a reduction in support due to the cap from \$1.40 to \$1.06 per loop per month (\$0.34 per loop per month).

When the interim "cap" rule is applied to rural companies alone, however, the proportionate impact on small rural companies increases significantly. This effect can be demonstrated by examining the Universal Service Administrative Company's (USAC) April 1999 quarterly filing, which anticipated that non-rural carriers' support would be

¹⁰ See, e.g., *FNPRM* at ¶ 21 and Federal-State Joint Board on Universal Service, *Report and Order*, 12 FCC Rcd 8776, 8889 (1997).

¹¹ NECA's October 1, 1998 Submission of 1997 Study Results provides study area detail of the impact of the cap on individual companies. See USF 1998 Submission of 1997 Study Results by the NECA at Tab 8 (Oct. 1, 1998).

calculated based on a forward-looking model beginning July 1, 1999.¹² In that filing, USAC estimated that a NACPL of \$259.99 would be needed to comply with the cap on funding. If such a mechanism had gone into effect on July 1, 1999, as expected, this same rural telephone company would have experienced a reduction in support from \$1.40 to \$0.81, approximately \$0.59 per subscriber per month, or 73.5% more than if the cap had been applied both to rural and non-rural carriers.¹³

Under the current mechanism, the "cap reduction" amount (*i.e.*, the amount by which universal service funding is reduced to avoid exceeding the cap) is about \$62 million in 1999. One would expect that, if non-rural carriers were moved to a new funding mechanism, the "cap reduction" amount would be reduced roughly in proportion to the overall fund.¹⁴ In fact, the opposite occurs. If non-rural carriers are removed from the current funding mechanism, the cap reduction amount *increases* from \$62 million to \$69 million. As this larger reduction is applied solely to rural carriers, the overall result is a significant reduction in funding for these companies compared to amounts available under the current system.

Even if the interim "cap" is removed, as RTC and USTA have suggested,¹⁵ rural companies are likely to experience reductions in universal service support over current levels caused by the operation of section 36.622(d)(1) of the rules. As noted

¹² See USAC, Federal Universal Service Programs, Fund Size Projections & Contributions Base for the Third Quarter 1999 (Apr. 30, 1999).

¹³ The \$298.99 level at which support would have been available on July 1, 1999 is 121.8 percent of the actual NACPL of \$245.47 reported by NECA in its October 1, 1998 submission.

¹⁴ If non-rural carriers were removed from the 1999 fund, overall funding (uncapped) would shrink from about \$926 million to \$782 million.

¹⁵ See USTA Comments at n. 14 and RTC Comments at 21.

above, this provision requires the administrator to increase the NACPL each year based on the percentage growth in the GDP-CPI. While it would seem reasonable for the Commission to assume that an inflation-adjusted NACPL for rural carriers would be equivalent to a NACPL calculated using actual data from all carriers, this is not the case. In fact, the actual NACPL has remained relatively stable over the past three years, decreasing at an annual rate of 0.60 percent. In contrast, the GDP-CPI over the same period has increased by an average of 1.45 percent per year.¹⁶ Thus, substituting an inflation-indexed NACPL for the actual average effective January 1, 2000, will likely cause a reduction in universal service support for rural carriers compared to current methods, even if the interim "cap" were to be removed.

If the Commission wishes to assure that rural carriers are not adversely affected by the introduction of new universal service support mechanisms, further revisions or waivers of Commission rules regarding the calculation of the NACPL appear necessary. As RTC and USTA have suggested, the Commission could resolve problems associated with the calculation of the interim cap by eliminating it.

If the Commission wishes to continue applying the interim cap to USF expense adjustments of rural companies, it could consider waiving sections 36.601(c) and 36.622(d) of the rules insofar as they require changes to current methods of calculating the NACPL. Specifically, as an interim step to avoid unintended reductions in payments to rural carriers in the year 2000, the Commission could allow the administrator to continue calculating universal service funding and the NACPL as if all carriers continued to participate in the high cost fund. To accomplish this, the administrator would calculate

¹⁶ U.S. Department of Commerce, Bureau of Economic Analysis, Press Release, April 30, 1999

the NACPL based on cost data submitted by all ILECs, both rural and non-rural.¹⁷ The administrator would then determine an expense adjustment amount for each carrier, regardless of whether it participated in the system. A total USF funding requirement would be determined by summing the total of individual expense adjustments for all carriers, as required under current rules.

Concurrently, the administrator would utilize prior-calendar year support payments of (\$864.1 million in 1999), grown by total industry growth in lines, to establish a support funding cap for the industry as a whole. Should the total funding requirement for 2000 exceed the cap, the NACPL would be increased to a level that would satisfy the cap requirement, as required by section 36.622(c).¹⁸

Under this proposal, the effect of the cap on rural carriers' support levels would continue to be determined by their portion of the total support amount, calculated pursuant to § 36.631.¹⁹ This approach would assure that reductions associated with the interim cap would be apportioned to rural companies consistent with current methods, thereby avoiding unintended reductions resulting from the elimination of non-rural carriers' data from high cost calculations.²⁰

¹⁷ As required by section 36.611 of the Commission's rules, NECA continues to collect cost data from both rural and non-rural ILECs for purposes of computing USF expense adjustments, for the year 2000 payments. Since administrative processes are currently in place for the collection of these data, no new administrative burdens would be incurred by carriers in reporting data.

¹⁸ Optional quarterly updates would utilize the existing process as well, *i.e.*, the data submitted by companies providing quarterly updates would be combined with the data for all carriers in determining their support amounts.

¹⁹ 47 C.F.R. § 36.631

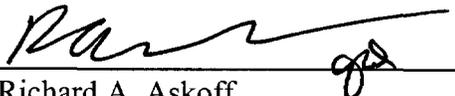
²⁰ For consistency purposes, if the Commission adopts NECA's proposed interim rule waiver, NECA proposes that the adjustment to Long Term Support (which, as defined in Section 54.303(b)(4), is also scheduled to begin using the GDP-CPI chained index) for the year 2000 continue to reflect the actual change in the national average cost per loop as well.

CONCLUSION

As the Commission moves forward with its evaluation of a new universal service mechanism for non-rural carriers, it should keep in mind the potentially negative effects its actions could have on universal service in areas served by rural carriers. The Commission should consider adopting NECA's suggested interim methodology, which produces results that essentially hold rural carriers "harmless" through the provision of consistent treatment in their support calculation once the non-rural carriers move to a proxy model.

Respectfully submitted,

NATIONAL EXCHANGE
CARRIER ASSOCIATION, Inc.

By: 
Richard A. Askoff
Its Attorney

August 6, 1999

100 S. Jefferson Road
Whippany, NJ 07981

CERTIFICATE OF SERVICE

I hereby certify that copy of the Reply Comments was served this 6th day of August 1999, by electronic filing, hand delivery or first class mail, to the persons listed below.

By: R. Marcelle
Rocky Marcelle

The following parties were served:

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
TW-B204F
Washington, DC 20554

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

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

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

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

Diane Zake
Rowland Curry
Texas PUC
1701 North Congress Avenue
P.O. Box 13326
Austin, TX 78711-3326

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

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

The Honorable David Baker
Georgia PSC
47 Trinity Ave.
Atlanta, GA 30334

Susan Stevens Miller
Tony Myers
Ann Dean
Maryland PSC
6 St. Paul Street
16th Floor
Baltimore, MD 21202-6806

Emily Hoffnar
Federal Communications Commission
445 12th Street, S.W.
6th Floor
Washington, DC 20554

Timothy Peterson
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Tiane Sommers
Georgia PSC
47 Trinity Ave.
Atlanta, GA 30334

The Honorable Julia Johnson
Chairman
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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

Paul Gallant
Federal Communications Commission
445 12th Street, S.W.
8th Floor
Washington, DC 20554

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

Sheryl Todd (3 copies)
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

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

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
445 12th Street, S.W.
Washington, DC 20554

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

Bryan Clopton
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

L. Charles Keller
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

David Krech
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Lowell C. Johnson, Chairman
Nebraska Public Service Commission
300 The Atrium
1200 N Street
P.O. Box 94927
Lincoln, NE 68509-4927

John Clark
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Irene Flannery
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Alice H. Hanley
Lorraine Kenyon
Alaska Public Utilities Commission
1016 West Sixth Avenue
Suite 400
Anchorage, AK 99501-1693

Greg Fogleman
Bridget Duff
Dave Dowds
Mark Long
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399-0850

Robert Loube
Federal Communications Commission
445 12th Street, S.W., 6th Floor
Washington, DC 20554

Allan Kniep
William H. Smith, Jr.
Johanna Benson
Iowa Utilities Board
350 Maple Street
Des Moines, IA 50319-0069

Kevin Martin
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Tejal Mehtu
Federal Communications Commission
2100 M St., N.W., Room 8625
Washington, DC 20554

Mark Nadel
Federal Communications Commission
445 12th Street, S.W., 6th Floor
Washington, DC 20554

Samuel I. Loudenslager
Arkansas Public Service Commission
1000 Center Street
Little Rock, AK 72203-0400

Joel H. Cheskis, Esq.
Philip F. McClelland, Esq.
Pennsylvania Office of Consumer Advocate
555 Walnut Street
Forum Place – Fifth Floor
Harrisburg, PA 17101-1923

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

Scott Bohler
Tim Zakriski
Carl Johnson
Frederick Sistarenik
New York Public Service Commission
Three Empire Plaza
Albany, NY 12223-1350

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

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

Peter Arth, Jr.
Ellen S. Levine
Lionel B. Wilson
California Public Utilities Commission and
Attorneys for the People of the State of
California
California State Building
505 Van Ness Avenue
San Francisco, CA 94102-3298

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

Lawrence C. St. Blanc
Gayle T. Kellner
Louisiana PSC
P.O. Box 91154
Baton Rouge, LA 70821-9154

Martin Jacobson, Esq.
Karen Finstad Hammel
Montana PSC
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601

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

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

William J. Janklow
Kenneth Sofferahn
James A. Burg
South Dakota PUC
500 East Capitol Avenue
Pierre, SD 57501-5070

Governor William J. Janklow
State of South Dakota
State Capitol
500 East Capitol
Pierre, SD 57501-5070

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

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

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

Donald L. Howell, II
Idaho PUC
P.O. Box 83720
Boise, ID 83720-0074

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

Edward H. Salmon
State of New Jersey Board of Public
Utilities
P.O. Box 350
Trenton, NJ 08625

Ken Nilsson
Federal Communication Commission
445 12th Street, S.W.
Washington, DC 20554

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

Alan Buzacott
Chuck Goldfarb
MCI TeleComm., Inc.
1801 Pennsylvania Avenue, NW
Washington, DC 20006

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

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

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

Joel B. Shifman, Esquire
Maine PUC
242 State Street
18 State House Station
Augusta, ME 04333-0018

Thomas R. Parker, HQE03J43
GTE Service Corporation
P.O. Box 152092
Irving, TX 75015-2092

Stephen G. Oxley
Wyoming PSC
2515 Warren Avenue
Suite 300
Cheyenne, WY 82002

Robert B. McKenna
Kathryn E. Ford
Steven R. Beck
U S WEST, Inc.
1020 19th Street, NW
Suite 700
Washington, DC 20036

Michael Gallagher
New Jersey Board of Public Utilities
Two Gateway Center
Newark, NJ 07102

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

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

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

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

Jill Canfield
R. Scott Reiter
L. Marie Guillory
NTCA
2626 Pennsylvania Avenue, NW
Washington, DC 20037

Steve Hamula
Billy Jack Gregg
Terry D. Blackwood
West Virginia PSC
201 Brooks Street
Charleston, WV 25301

Lawrence E. Sarjeant
Keith Townsend
Linda Kent
John W. Hunter
USTA
1401 H Street, NW – Suite 600
Washington, DC 20005

Leander R. Valent
Ameritech
9525 West Bryn Mawr
Suite 600
Rosemont, IL 60018

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

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

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

M. Robert Sutherland
Richard M. Sbaratta
BellSouth Corp.
1155 Peachtree Street, NE
Suite 1700
Atlanta, GA 30309-3610

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

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

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

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

Illona A. Jeffcoat-Sacco
North Dakota PSC
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480

Pat Wood, III
Judy Walsh
Brett Perlman
Texas PUC
1701 North Congress Avenue
P.O. Box 13326
Austin, TX 78711-3326

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

Robert J. Cryzmala
Durward D. Dupre
Michael J. Zpevak
Southwestern Bell Telephone Co.
One Bell Center – Room 3532
St. Louis, MO 63101

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

Doris McCarter
Scott Potter
PUC of Ohio
180 East Broad Street
Columbus, OH 43215-3793

Mary E. Newmeyer
Alabama PSC
100 North Union Street
Suite 800
Montgomery, AL 36101

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

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

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

Roger Hamilton
Ron Eachus
Joan H. Smith
Oregon PUC – Justice Building
550 East Capitol Street, NE
Salem, OR 97310-1380

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

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

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

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

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

Edward Shakin
Joseph DiBella
Bell Atlantic
1320 North Court House Road
Eighth Floor
Arlington, VA 22201

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

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

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

George N. Barclay
Michael J. Ettner
General Services Administration
18th & F St., NW, Rm. 4002
Washington, DC 20405

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

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

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

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

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

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

Mark C. Rosenblum
Judy Sello
AT&T Corp.
295 North Maple Avenue
Room 324511
Basking Ridge, NJ 07920

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

International Transcription Services (ITS)
1220 21st Street
Washington, DC 20037

Charles Bolle
Nevada Public Service Commission
1150 East William Street
Carson City, NV 89701-3109

George Young
Peter Bluhm
Vermont Public Service Board
112 State Street
Montpelier, VT 05620-2701

Joel Ader
Telecordia Technologies
710 L'Enfant Plaza S.W.
Promenade Level, East Building
Washington, DC 20024

Tom Wilson
Washington Utilities and Transportation
Commission
Chandler Plaza Building
P.O. Box 47250
Olympia, WA 98504-7250

Charles Gray
James Bradford Ramsay
NARUC
1100 Pennsylvania Avenue, N.W.
Suite 603
Washington, DC 20044-0684

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

Alfred G. Richter Jr.
Roger K. Toppins
Hope Thurrott
SBC Communications Inc.
One Bell Plaza, Room 3023
Dallas, TX 75202

Christopher J. Wilson
Corporate Attorney
Cincinnati Bell Telephone Company
201 East 4th Street, Room 102-620
Cincinnati, OH 45201

Gerard J. Duffy
Attorney for The Western Alliance
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, NW, Suite 300
Washington, D.C. 20037

George Y. Wheeler
Attorney for United States Cellular Corp.
Koteen & Naftalin, L.L.P.
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036

Benjamin H. Dickens, Jr.
Mary J. Sisak
Attorneys for Omnipoint Communications
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, N.W.
Washington, D.C. 20037

Michele C. Farquhar
Attorney for Western Wireless Corporation
Hogan & Hartson, L.L.P.
Columbia Square
555 Thirteenth Street, N.W.
Washington, D.C. 20004-1109

Gene DeJordy
Western Wireless Corporation
3650-131st Ave., S.E., Suite 400
Bellevue, WA 98006

Jay C. Keithley
Leon Kestenbaum
Sprint Corp.
1850 M Street N.W., 11th Floor
Washington, D.C. 20036-5807

Sandra K. Williams
Sprint Corporation
4220 Shawnee Mission Parkway
Suite 303A
Westwood, KS 66205

Jonathan Chambers
Sprint PCS
1801 K Street N.W., Suite M112
Washington, D.C. 20006

Jeffrey H. Smith
GVNW Consulting, Inc.
8050 SW Warm Springs Street
Tualatin, OR 97062

Karen Brinkman
Richard R. Cameron
Attorneys for CenturyTel, Inc.
Latham & Watkins
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

John F. Jones
Director of Government Relations
CenturyTel, Inc.
100 Century Park Drive
Monroe, LA 71203

Russell M. Blau
Harry N. Malone
Counsel for Commonwealth Tel. Co.
Swidler Berlin Shereff Friedman, LLP
3000 K Street N.W., Suite 300
Washington, D.C. 20007

Carolyn C. Hill
Attorney for ALLTEL
Communications Service Corporation
601 Pennsylvania Avenue, N.W.
Suite 720
Washington, D.C. 20004

John B. Adams
Attorney for Citizens Utilities Company
1400 16th Street, N.W.
Suite 500
Washington, D.C. 20036

Bernard A. Nigro, Jr.
Christopher S. Huther
Thomas W. Mitchell
Attorneys for GTE Service Corp.
Collier, Shannon, Rill & Scott, PLLC
3050 K Street, N.W., Suite 400
Washington, D.C. 20007

Stuart Polikoff
Kate Kaercher
OPASTCO
21 Dupont Circle NW
Suite 700
Washington, D.C. 20036

Margot Smiley Humphrey
Attorney for NRTA
Koteen & Naftalin, LLP
1150 Connecticut Avenue, NW
Suite 1000
Washington, D.C. 20036

Joe D. Edge
Tina M. Pidgeon
Attorneys for Puerto Rico Tel. Co. Inc.
Drinker Biddle & Reath LLP
1500 K Street, N.W.
Suite 110
Washington, D.C. 20005

James Rowe
Alaska Telephone Commission
201 E. 56th, suite 114
Anchorage, AK 99518

Samuel E. Ebbesen
President & CEO
Virgin Islands Telephone Corporation
P.O. Box 6100
St. Thomas, USVI 00801-6100

Benjamin H. Dickens, Jr.
Mary J. Sisak
Attorneys for TXU Comm. Tel Co.
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, N.W.
Washington, D.C. 20037

James J. Kail
Bentleyville Telephone Co.
608 Main Street
Bentleyville, PA 15314

Paula E. Eller
Yukon Telephone Company, Inc.
P.O. Box 873809
Wasilla, AK 99687

Carolyn C. Hill
Attorney for Aliant Communications, Inc.
601 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Lawrence G. Malone
General Counsel
Public Service Commission
Of the State of New York
Three Empire State Plaza
Albany, NY 12223-1350

Gary Epler, Esq.
General Counsel
New Hampshire PUC
8 Old Suncook Road, Building No. 1
Concord, NH 03301-7319

Margot Smiley Humphrey
Attorney for TDS Telecommunications
Koteen & Naftalin, LLP
1150 Connecticut Avenue
Suite 1000
Washington, D.C. 20036-4104

Laurie Pappas
Deputy Public Counsel
Texas Office of Public Utility Counsel
1701 N. Congress Ave., Suite 9-180
Austin, TX 78701

Michael Travieso
Chair, Telecommunications Committee
NASUCA
1133 15th Street, N.W., Suite 550
Washington, D.C. 20005

Mark Cooper
Director of Research
Consumer Federation of America
504 Highgate Terrace
Silver Spring, MD 20904

Gene Kimmelman
Co-Director
Consumers Union
1666 Connecticut Avenue, N.W.
Washington, D.C. 20009

Ave M. Bie, Chairperson
PSC of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854