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August 4, 1999

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Re: CC Docket No. 96-45 - Federal-State Joint Board on Universal Service
CC Docket No. 96-262 - Access Charge Reform

Dear Ms. Salas:

Enclosed please find the original and 12 copies of the Florida Public Service Commission Reply Comments in the above noted dockets. The summary starts on page 16. Please date stamp and return one copy in the enclosed self-addressed envelope.

A copy on diskette is being provided to Sheryl Todd.

Sincerely,

Cynthia B. Miller
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cc: Brad Ramsay
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Before the
Federal Communications Commission
Washington, D.C. 20554

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

REPLY COMMENTS OF THE
FLORIDA PUBLIC SERVICE COMMISSION
TO FURTHER NOTICE OF PROPOSED RULEMAKING
ON IMPLEMENTATION ISSUES

On May 27, 1999, the FCC adopted its Seventh Report and Order and Thirteenth Order on Reconsideration in its Universal Service docket. In the Order the FCC adopted principles for a federal universal service high-cost mechanism applicable to nonrural carriers that comport with the recommendations contained in the Joint Board's Second Recommended Decision. However, since the FCC believed that the record was insufficient to draw conclusions on certain aspects necessary to implement fully the new high-cost mechanism, they chose to issue a companion further notice of proposed rulemaking (FNPRM) to elicit comment on several specific implementation issues. The Florida Public Service Commission (FPSC) is pleased to submit the following comments in response to

the FCC's FNPRM. These comments should not be construed to prejudge the ultimate development of any Florida intrastate universal service mechanism.

National Benchmark (¶ 96-100); State's Ability to Support High-Cost Areas (¶ 110-112)

In the Seventh Order the FCC adopted the Joint Board's recommendations to use a cost-based benchmark, instead of a revenue benchmark, when evaluating rate comparability. The determination of high-cost funding for nonrural LECs has now become a multi-step process. First, a given area's forward-looking cost estimates would be compared with a single national benchmark to ascertain whether the area's costs are significantly greater than the national average. In its Second Recommended Decision, the Joint Board recommended that the national benchmark be set at a level between 115 and 150 percent of the national weighted average forward-looking cost per line; the FCC seeks comment on where this benchmark should be established.

Second, a fixed per-line dollar amount is to be used as a measure of a state's ability to support its universal service needs internally. This per-line amount would be multiplied by the number

of nonrural lines, and the result subtracted from the preliminary funding requirement amount from the first step. The FCC notes that in its May 1997 First Universal Service order, it had suggested a revenue benchmark of $31 per month per line. It now seeks comment on whether it should set the assumed level of state support available to a nonrural LEC so that it equates to 3 to 6 percent of this $31 figure; the FCC observes that an assumed $2.00 per line is roughly 6 percent of $31. (¶ 111)

Third, the amount of federal support to be provided is either the result from the second step or the existing level of support, whichever is greater.

At the outset, the FPSC would note that absent our conducting an exhaustive evidentiary proceeding, we do not believe it appropriate for us to draw conclusions as to the FCC's universal service cost determinations. Moreover, since not all aspects of the cost methodology, including many of the inputs, have been finalized, such a review would not be productive. Consequently, we will limit our comments to more general principles that we believe the FCC should consider when finalizing its new high-cost funding methodology for nonrural LECs.

The FPSC strongly agrees with the FCC's conclusion that existing competitive local market conditions do not warrant a significant increase over current levels in the amount of high-cost funding for local rates provided by the federal support mechanisms. (¶ 69-70) In Florida we monitor on an ongoing basis the degree of local exchange competition present in our markets. Although the market share held by CLECs has risen gradually, we have seen no evidence that universal service has deteriorated in our state. Accordingly, we have suggested to our legislature a cautious approach when they consider establishing an intrastate explicitly funded universal service mechanism.

Similarly, the FPSC believes that for the present it would be reasonable to cap interstate high-cost funding provided to nonrural LECs at existing levels. This conclusion assumes that the extent of local exchange competition in the near term will not escalate dramatically. Only if and when rivalry in the local exchange market accelerates greatly and universal service is deemed at risk, should the required level of funding need to be revisited.

Capping the level of interstate funding in this manner also cleanly differentiates between sizing the fund and determining how

distributions from the high-cost fund should be made. As discussed later in these comments, we believe that universal service funding should be targeted to those truly high-cost areas; the role of the cost analysis is to identify those areas which are candidates for funding. However, while the overall level of universal service funding inevitably must be limited in some fashion, we do not believe that such rationing should be performed in conjunction with the cost analysis.

Area Over Which Costs Should Be Averaged (¶ 101-109)

The FCC notes that in its May 1997 Universal Service Order, it adopted the Joint Board's recommendation that forward-looking economic costs (FLEC) should be estimated at a level no higher than the wire center. However, in the Second Recommended Decision, the Joint Board has reconsidered its original recommendation and now proposes that federal support be based on costs measured over a much larger area, the study area level. While the Joint Board acknowledged that computing FLEC at the wire center level provides for support measurements at a more disaggregated basis, they concluded that support calculated at the study area is appropriate for the present, in light of the existing extent of local exchange

competition. However, they observed that determining costs at a level below the study area may be warranted as local competition expands. (¶ 101)

Accordingly, the FCC seeks comment as to the level at which forward-looking economic costs should be calculated for purposes of comparison with the national benchmark to yield federal support levels: at the wire center level, at the unbundled network element (UNE) cost zone level, or at the study area level. Notwithstanding the FCC's and the Joint Board's concerns with respect to establishing a high-cost fund for nonrural LECs that greatly exceeds current levels in light of the extremely modest extent of local competition today (a concern that we share), the FPSC believes that <u>economic costs</u> should be derived at the most disaggregated level at which reliable estimates can be made. As noted in the FNPRM (¶ 103), such deaveraging allows for increased likelihood that support can be targeted to those subscribers residing in high-cost areas, and since such targeted support will be portable, it increases the likelihood that local exchange competitive entry will be more widespread, rather than limited solely to urban low-cost regions of the nation.

Consequently, we do not endorse the calculation of costs at the study area level for purposes of determining federal support funding for nonrural carriers. A study area is synonymous with the service area of a LEC within a state; averaging costs at such a high level essentially precludes truly targeting support amounts. Moreover, if high-cost support is based on study area costs, then each line served within the study area could receive the same amount of per-line support. Since federal funding is to be portable, this could yield the anomalous result that CLECs receive high-cost federal funding for capturing and serving low-cost urban customers.

With respect to unbundled network element (UNE) cost zones, the FCC envisions that wire centers would be assigned to state-specified UNE cost zones, and each wire center within a cost zone would receive the same per-line level of support. It observes that use of UNE cost zones for high-cost funding may mitigate arbitrage opportunities relative to UNE rates. While the FPSC believes that use of UNE cost zones is preferable to cost averaging at the study area level, potential problems may arise in implementation. First, while the FCC's UNE deaveraging rule requires a minimum of three

zones, in its Order staying this rule the FCC acknowledged that local, state-specific conditions may support fewer than (or more than) three UNE cost zones. If state-established UNE zones vary widely, there may be administrative difficulties in determining funding amounts. Second, there may be differences in terms of how the various states arrived at the cost estimates on which their UNE cost zones and rates are based. In addition to possible methodological differences between the states, there may be differences between the states' UNE costing approaches and the FCC's universal service costing model. We would also note that while the May 1997 universal service order provided for the option of states submitting cost studies on which their high-cost funding could be based, the FCC subsequently abandoned this approach, endorsing instead a single FLEC model to be applied nationwide. On balance, we believe that a single approach applied nationwide by the FCC to determine high-cost funding needs is most appropriate.

At ¶ 107, the FCC comes to the crux of the matter, where it seeks comment ". . . on ways to resolve the tension between the goal of preventing the fund from increasing significantly above current levels, and the goal of ensuring that support is, to the

extent possible, directly targeted to high-cost areas within study areas." The FCC offers four proposals to resolve the conflict. The first option is to derive funding amounts by using the HCPM to compute costs at the study area, but then to re-run the model at the wire center level and use these results to target support to the high-cost wire centers within a given study area. Option two would compute costs and thus support at a level such as UNE zones or wire centers, but fund only an explicit percentage of the support indicated. Option three proposes to compute cost and support at UNE zones or wire centers, but caps the amount of support available to a given state at some percentage of the total fund. Option four again would compute costs and initial support at a detailed level such as UNE zones or wire centers, and then constrain the overall size of the fund ". . . by either raising the cost benchmark appropriately or adopting incremental funding levels for costs above the selected benchmark similar to the existing high-cost loop support mechanism." (¶ 109)

As alluded to above, the FPSC believes that high-cost funding should first identify those areas which are truly high-cost and, second, determine from what sources funding should be made

available, and the amount of such monies. If the FCC chooses to cap the overall amount of high-cost funds provided to nonrural LECs at its current level due to the absence of extensive local competition, the "tension" cited by the FCC is eliminated for the present. If the FCC opts not to freeze nonrural high-cost funding, we cannot endorse Option one, because by averaging costs at the study area, it has masked the bulk of all cost differences; moreover, this approach effectively first rations available support and then distributes it.

The FCC's Options two through four all appear to identify high-cost areas at the outset, and each implicitly constrains the size of the fund to some (unspecified) maximum amount. While Option three limits the maximum percentage of the fund any one state can receive, Option two (overall percentage cap) and Option four (choice of nationwide cost benchmark) limit the overall size of the fund. Although we believe it would be more straightforward to cap the fund, the FPSC believes either Option two or four can yield a fund that approximates the dollar amount of the existing fund. However, our initial reaction is not to support Option three, because it is doubtful that the distribution of high-cost

areas between states is uniform. Intuitively, once the size of a fund has been established, it appears that a reasonable way to conduct distributions from the fund would be based upon relative costs. For example, one approach would be to rank order all qualifying wire centers by the amount per line per month that their costs exceeded the national benchmark, and make distributions from the fund starting with the highest cost wire center, until the fund is depleted. However, absent a "hold harmless" provision, while this approach should target the truly high-cost wire centers, it might result in undue disruptions in funding to certain companies or states.

Distribution and Application of Support (¶ 113-116)

Given that the Act requires that recipients of federal universal service monies are to use this support "for the provision, maintenance, and upgrading of facilities and services for which the support is intended," the FCC seeks comment on what if any restrictions are needed in order to satisfy this requirement. One option proposed by the FCC is to treat federal support as carrier revenue subject to the intrastate rate setting process. The FCC observes that in states where rate of return

regulation exists, federal funding would be applied against intrastate revenue requirements. Alternatively, the FCC notes that in states where price cap regulation exists, exogenous price cap adjustments could be made to reflect support received for high-cost areas. In Florida all three of our nonrural LECs are under price cap regulation in the intrastate jurisdiction. However, Florida's state law establishing price cap regulation does not provide for downward adjustments to the price caps. Thus, the FCC's tentative conclusion could not be implemented in Florida.

The FCC also offers its tentative conclusion that state oversight may not in all cases be sufficient to ensure that the requirements of Section 254(e) are met, and seeks comment on whether it would be appropriate to make receipt of federal high-cost universal service funds contingent on state actions, such as adjustments to local exchange tariffs to reflect federal support. Alternatively, in those states (such as Florida) that do not have the authority to mandate rate adjustments for certain carriers, the FCC proposes that a state commission could certify to the FCC that a carrier had properly accounted for federal support received in accord with the Act's requirements. The FPSC believes this latter

proposal might be viable so long as the onus was on a carrier to provide to the commission sufficient, reliable information to make such a certification. On balance, we believe that the best approach would be for the FCC to specify multiple options, any one of which would be deemed adequate to ensure that the Section 254(e) mandates had been satisfied.

Hold-Harmless and Portability of Support (¶ 117-122)

In the Seventh Order, the FCC adopted the Joint Board's proposal to incorporate a "hold-harmless" provision, in order to prevent precipitous decreases in federal high-cost funding when the revised mechanism is implemented. The FCC now seeks comment on whether a hold-harmless provision for nonrural LECs should be implemented on a state-by-state basis, or on a carrier-by-carrier basis.

If implemented on a state-by-state basis, no state would receive less federal support than it currently receives, but a given provider in the state might receive less funding. Alternatively, under a carrier-by-carrier approach, no individual carrier would receive less than it receives today. Of the two

approaches, the carrier-by-carrier approach would tend to increase the overall fund size more.

Although Florida is one of the relatively few states with multiple nonrural LECs, the FPSC believes that if a hold-harmless provision is to be implemented, a state-by-state approach is preferable. As noted earlier in these comments, we believe that the first step in implementing a revised high-cost mechanism is to identify those truly high-cost areas, and second, to determine what portion of these high-cost areas should receive funding (equivalently, size the fund). The effect of implementing a carrier-by-carrier hold-harmless provision is to add a third step that only further ratchets up the fund size. Moreover, such an approach casts doubt on whether it is consistent with the Joint Board's and the FCC's earlier determination that the current extent of local competition implies that a federal high-cost fund not significantly greater than the current fund is appropriate.

If a state-by-state hold-harmless provision is adopted, the FCC seeks comment on how to apportion hold-harmless support where the total amount of hold-harmless support available to a state is not adequate to hold all carriers harmless. The FCC proposes to

allocate the available hold-harmless monies pro rata among those carriers who will experience a shortfall relative to current funding received. (¶ 120) We believe this approach is reasonable and recommend its implementation.

The FCC also asks for comment on the relationship between the hold-harmless provision and portability of high-cost support. Specifically, where a CLEC wins a customer from an ILEC receiving hold-harmless support, the FCC asks whether the CLEC should receive the hold-harmless support, or just the support based on the forward-looking cost mechanism received by the ILEC for serving the area. (¶ 122) Although we acknowledge that the purpose of the hold-harmless provision was to prevent rate increases by carriers who had become dependent on their current support amount, nevertheless the hold-harmless amount is equally a subsidy, ultimately paid for by other ratepayers, and it too should go to the carrier that serves the high-cost customer.

FCC's Repudiation of the 25% / 75% Mechanism

The FPSC commends the FCC for repudiating its jurisdictional framework of the 25% / 75% mechanism which appeared in the earlier universal service order, which would have capped federal high-cost

funds at a maximum of 25% of the difference between forward-looking economic cost and a revenue benchmark. Telling carriers to obtain the remaining 75% of the necessary high-cost funds from intrastate sources would intrude on state authority. In accord with the Joint Board's Second Recommended Decision, the FCC's Seventh Order instead states that, to the extent a state's resources are deemed inadequate to maintain affordable and reasonably comparable rates, the federal mechanism will provide additional necessary support if required.

Summary

The FPSC generally agrees with the Joint Board and the FCC that existing competitive local market conditions do not warrant a significant increase over current levels in the amount of high-cost funding for local rates provided by the federal support mechanisms. However, our conclusion is predicated on the assumption that the local exchange market competition will approximate current levels. Further, the absence of extensive local exchange competition leads the FPSC to believe that it would be reasonable to cap the amount of interstate high-cost funding provided to nonrural LECs at existing levels.

In order to target high-cost funding, the FPSC believes that economic costs should be derived at the most disaggregated level where reasonable estimates can be made. We do not endorse the calculation of costs at the study area level, as a means of limiting the overall size of the fund. The FPSC believes that the use of UNE price zones is preferable to cost averaging at the study level but potential conflicts may arise in implementation by the states, and the FCC's desire for a single nationwide approach.

If the FCC opts not to cap nonrural funding for the present, of the four options proposed by the FCC to prevent the fund from increasing significantly from current levels while ensuring support is targeted toward high-cost study areas, the FPSC cannot support option one (study area cost averaging), believes that either options two (fund an explicit percentage of indicated support) or four (limit fund size by increasing benchmark or using incremental funding levels) can reasonably limit the size of the desired fund, and does not endorse option three (limiting each state's amount of support at some percentage of the total fund)

Since circumstances can vary widely between states and between providers' regulatory treatment within a state, we believe that the

best approach would be for the FCC to identify an array of acceptable options, any one of which would be adequate to comply with the mandates of Section 254(e).

If the FCC chooses to implement a "hold-harmless" provision, the FPSC believes that a state-by-state approach should be implemented, and that hold-harmless monies should be allocated pro rata among carriers that will experience a shortfall relevant to their current funding. implemented. Further, we believe that when a CLEC wins a customer from an ILEC that receives hold-harmless support, the carrier that serves the high-cost customer should receive the hold-harmless amount.

Respectfully submitted,

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DATED: August 4, 1999

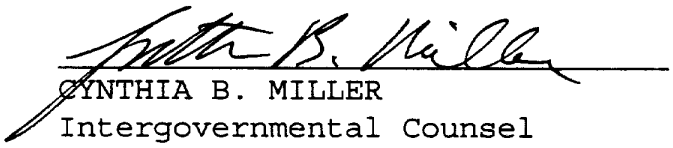
reply262.jmb

Before the
Federal Communications Commission
Washington, D.C. 20554

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Reply Comments of the Florida Public Service Commission will be sent to the attached list of parties by the 5th day of August, 1999.



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