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Bell Atlantic
1300 I Street N.W.
Suite 400W
Washington, DC 20005

G. R. Evans
Vice President,
Federal Regulatory Matters

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October 12, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Federal-State Joint Board on Universal Service, CC Docket No. 96-45
Forward-Looking Mechanism for High Cost Support for Non-Rural LECs,
CC Docket No. 97-160✓

Dear Ms. Salas:

Please include the attached letter into the record of the above referenced proceeding. Should you have any questions, please contact me at 202-336-7911.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. R. Evans".

Attachment

Bell Atlantic
1300 I Street N.W.
Suite 400W
Washington, DC 20005

G. R. Evans
Vice President,
Federal Regulatory Matters

October 12, 1999



The Honorable William Kennard
Chairman
Federal Communications Commission
445 12th Street, SW – Room 8-B201H
Washington, DC 20554

Re: Federal-State Joint Board on Universal Service, CC Docket No. 96-45
Forward-Looking Mechanism for High Cost Support for Non-Rural LECs,
CC Docket No. 97-160

Dear Chairman Kennard:

While the Commission is in the process of considering using a proxy model for the purpose of calculating and distributing universal service funding, Bell Atlantic remains concerned that the final proxy model adopted for this purpose will not be subject to public comment and review. In particular, we are concerned over suggestions that there have been additional changes to the model that have altered the relative distribution among states. To date, the Hybrid Cost Proxy Model (HCPM) and the input values necessary to run and test the model have not been finalized. Consequently, interested parties are still unable to obtain reliable data in order to analyze the model and determine whether it is accurately identifying high-cost areas.

Given the complex nature of the HCPM and its history of significant changes, interested parties must be given an opportunity to analyze the model and its input values prior to its adoption. In compliance with the Administrative Procedures Act¹, the Commission should, at the very least, schedule another round of notice and comment after the HCPM and its input values have been finalized.

Sincerely,

A handwritten signature in black ink, appearing to read "G. R. Evans", written over a horizontal line.

cc: Commissioner Susan Ness
Commissioner Gloria Tristani
Commissioner Harold Furchtgott-Roth
Commissioner Michael Powell
Dorothy Attwood
Linda Kinney
Sarah Whitesell
Kyle Dixon
Rebecca Beynon
Kathryn Brown
Larry Strickling
Lisa Zaina

¹ 5 U.S.C. Section 553.