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December 1, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND-DELIVERY
Magalie Salas, Esq.
Secretary
Federal Communications Commission
Room TW-B204
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 96-45
Comments of Roseville Telephone Company
On the Interim Hold-Harmless Provision

Dear Ms. Salas:

On behalf of Roseville Telephone Company, I enclose an original and four copies of Comments in response to the Commission's November 3, 1999 Public Notice in CC Docket No. 96-45, regarding the interim hold-harmless provision of the Commission's high-cost support mechanism. If there are any questions regarding this matter, please contact me.

Very truly yours,

Paul J. Feldman

Paul J. Feldman
Counsel for Roseville
Telephone Company

cc: Mr. Mike Campbell (w/encl.)
Mr. Greg Gierczak (w/encl.)
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In the Matter of	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	

COMMENTS OF ROSEVILLE TELEPHONE COMPANY
ON THE INTERIM HOLD-HARMLESS PROVISION

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

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

COMMENTS OF ROSEVILLE TELEPHONE COMPANY
ON THE INTERIM HOLD-HARMLESS PROVISION

Roseville Telephone Company ("RTC") hereby submits these comments in response to the Public Notice released by the Federal-State Joint Board on Universal Service in the above-captioned proceeding on November 3, 1999. In these comments, RTC recommends that the major components of federal high cost support be analyzed separately, and that:

- Long Term Support ("LTS") not be phased out at this time;
- Phase out of Universal Service Fund payments not be considered until completion of the comprehensive three year review of the new explicit high-cost mechanism; and
- Study Areas with less than 200,000 lines and which receive LTS should be considered under the provisions for "rural" LECs to be recommended by the Rural Task Force.

I. Introduction and Summary

RTC is an incumbent local exchange carrier ("ILEC") serving subscribers in the Roseville, California area, and it has been providing high quality communications services to its subscribers for over 80 years. RTC currently serves approximately 128,000 access lines. As RTC's access line count places it a mere 28,000 lines above the criterion in the 1996 Telecommunications Act used to define "rural" telephone companies for certain regulatory purposes (but not for universal service), RTC is among the smallest of the "non-rural" LECs ("NRLECs").[1] To the extent that larger companies can use their size to create greater cost savings, smaller companies like RTC are in fact closer to rural companies than to the giant NRLECs with which RTC is being categorized, for the purposes of federal high cost support.

In the Notice, the Joint Board seeks comment on "...schedules and procedures for phasing out or eliminating the interim hold-harmless provisions of the Commission's new forward-looking high-cost support mechanism for non-rural carriers". RTC believes that to properly consider this issue, the Joint Board's decision must separately address the two major components of "high-cost support" that the FCC seeks to replace with the new mechanism:

- Long Term Support ("LTS")
- Universal Service Fund ("USF")

For reasons discussed below, RTC believes that the FCC erred in including LTS received by RTC and several other non-rural LECs in its consideration of the new explicit high-cost support mechanism. The phase-out and/or elimination of these LTS funds would have serious and unintended consequences not only on RTC but on Interexchange Carriers and other LECs, including rural LECs who participate in the

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[1] In reality, the monikers "non-rural" and "rural" have little to do with the territory which a LEC serves, and everything to do with its size. Borrowing the definition used for other purposes in the 1996 Telecommunications Act, "non-rural" companies are deemed as those who serve over 100,000 lines in a study area. As will be demonstrated later in these comments, there are other more appropriate dividing points between "large" and "small" LECs for determination of high-cost funding, and transition from the current mechanisms.

NECA Common Line Pool. Thus, LTS should not be phased out or eliminated until a holistic solution to the pricing of interstate common line costs for NECA pooling companies is developed and implemented.

The Commission's new high cost support mechanism replaces funding currently provide through the USF, with new funding determined through the use of a forward-looking proxy cost model. Because of serious concerns regarding the accuracy of the new "Synthesis Model" ("SM"), RTC believes that current USF amounts which exceed the amount determined by the SM should not be considered for phase out for any non-rural LEC until the Commission's comprehensive review of the new high-cost mechanism. By the FCC's *Order*, this review will occur no later than January 1, 2003. Furthermore, since companies like RTC are so small when compared to the majority of the other "non-rural" LECs[2], it is inappropriate to apply the same cost model, inputs and phase-out requirements as are applied to the RBOCs and GTE on RTC and similarly situated small "non-rural" LECs. For these and other reasons discussed below, USF payments for RTC and similarly situated small "non-rural" LECs should not be phased out, but rather should be handled in a manner consistent with the Commission's ultimate determination of the new explicit support mechanism for the small "rural" LECs.

II. LTS Should Not be Phased Out Until a Holistic Solution to the Pricing of Interstate Common Line Costs is Implemented.

In describing the new explicit high-cost support plan, the FCC states the following:

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[2] RTC serves approximately 128,000 lines in two wire centers. In contrast, the RBOCs and GTE each serve millions of customers in hundreds of wire centers.

> The support determined by the mechanism described in this *Order* will replace the support that non-rural carriers currently receive from the existing high-cost fund, which provides support for *intrastate* rates and services.[3] (emphasis added)

The USF, as described in Part 36 of the FCC Rules, is precisely such a support mechanism. To compute USF funding, a LEC's embedded loop costs within a study area are identified and compared to the nationwide average cost for all LECs. Carriers whose costs exceed the national average by defined percentages are allowed to remove portions of these costs from their intrastate revenue requirement. These costs are instead recovered in the interstate jurisdiction through the USF. In this way the federal jurisdiction helps the state regulator to establish local rates that are more affordable.

Long Term Support functions differently. It is totally interstate in its operation. When interstate access charges were established in the mid-1980s, the interstate loop costs of all LECs were averaged through the NECA Common Line Pool. In this way, interstate Common Line charges for carriers in high-cost areas benefited from implicit support from the lower cost areas contained in the average. Because of this support, however, the largest carriers (the RBOCs and GTE) sought to get out of the pool. Not only did they subsidize the smaller LECs, but they were also, in effect, subsidizing each other. As a result of a negotiated settlement, ultimately codified in Parts 69 and 54 of the FCC's rules, those carriers who chose to remain in the Common Line Pool would charge an interstate Common Line rate that was the same level as if all LECs were still

---

[3] Ninth Report & Order and Eighteenth Order on Reconsideration, CC Docket No. 96-45 released November 2, 1999, ("*FCC Order*"), Paragraph 2.

in the pool. Those carriers who chose to leave the pool would charge Common Line rates based on their own costs, but would also contribute to the LTS fund that would make up the difference between the revenue generated by the NECA Pool rate and the NECA Pool revenue requirement. Thus, carriers who chose to remain in the Common Line Pool would recover their interstate Common Line revenue requirement through a combination of revenues from subscriber line charges, the Pool rate, and payments from the LTS fund.

RTC believes that the FCC inadvertently erred in including the LTS funds within the hold-harmless and phase-out provisions of its new explicit high-cost support mechanism. Absent other changes, it would be totally inappropriate to phase out LTS as part of implementing the new mechanism.

First, as discussed above, LTS recovers only <u>interstate</u> revenue requirements. The new explicit high-cost mechanism is designed to cover only <u>intrastate</u> costs. The interstate portions of the forward-looking cost are specifically removed prior to the calculation of support under the new mechanism. As stated in the *FCC Order*:

> Our current separations rules allow carriers to recover 25 percent of their book loop costs through interstate rates. Carriers also recover 15 percent of their book port costs, on average, through interstate rates, and 100 percent of the federal LNP costs through the federal LNP cost recovery mechanism. We therefore conclude that the forward-looking mechanism will calculate support based on 75 percent of forward-looking loop costs, 85 percent of forward-looking port costs, and 0 percent of forward-looking LNP costs...[4]

It would be totally inappropriate, indeed it would be confiscatory, to eliminate <u>interstate</u> LTS payments as part of implementing the new <u>intrastate</u> explicit support mechanism. To do

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[4] *FCC Order* at Paragraph 63.

so would deprive "non-rural" LECs who participate in the NECA Pool the ability to recover their legitimate interstate common line revenue requirements. LTS represents a portion of the 25% of book loop costs which the separations rules allow to be recovered in interstate rates. <u>The new explicit high-cost support mechanism specifically excludes these costs</u>. Before LTS can be removed there must be a comprehensive revision in the rules by which "non-rural" LECs that are in the NECA Pool recover their interstate common line costs.

A second reason for not phasing out LTS is that to do so would have unintended consequences on other parties. Of the carriers currently classified as "non-rural", only three, RTC, North State Telephone Company, and the Puerto Rico Telephone Authority participate in the NECA Common Line Pool and receive LTS. When one party exits the pool it has an impact on other Pool participants, including many "rural" LECs through re-computation of the Pool common line rate. If RTC and others were to cease receiving LTS payments, NECA would be forced to file increased Carrier Common Line rates to recover the Pool's legitimate interstate common line revenue requirements. This would have an adverse impact on interexchange carriers, and thus likely on end-users.

Accordingly, the Joint Board should recommend in its report to the FCC that current LTS payments to "non-rural" LECs should not be reduced or altered unless and until the FCC undertakes a comprehensive review of the entire interstate Common Line pricing process for NECA Pool participants.

III. Phase-Out of USF for Any Non-Rural LEC Should Not Even Be Considered Until Completion of the Commission's Comprehensive Review of Its New High Cost Support Mechanism.

Key to the Commission's new explicit support mechanism is the forward-looking proxy cost model called the Synthesis Model ("SM"). Under the plan outlined in the *Order*, carriers in states whose statewide average cost under the SM exceed 135% of the nationwide average cost receive explicit interstate funding. Non-rural LECs operating in states where average SM costs are less than 135% of the nationwide average will receive no explicit federal support, other than the hold-harmless support. If and/or when these hold-harmless provisions are phased out non-rural LECs operating in such states will receive no explicit federal high-cost funding. The Joint Board seeks comment on the potential elimination of this hold-harmless support. It is RTC's position that phase out of existing USF support should not even be considered until the FCC and the Joint Board complete the comprehensive review of the new explicit mechanism to be completed no later than January 1, 2003.

RTC, like most other LECs, is currently in the process of examining the SM. It is premature to say what action RTC or any other party might take regarding this model, and the FCC's overall plan for the new explicit support mechanism. It can be noted, however, that a cursory analysis of the results of the model yields some curious findings. The bulk of the new funding goes to three southern states. Wyoming is the only state west of the Mississippi to receive any funding, and its funding is reduced from current levels. The state of Mississippi sees its funding increase from $7 million under the old mechanism to $113 million under the new. For this to be the case, it would imply that the forward-looking cost in Mississippi is significantly greater than the embedded cost, yet in most other states the opposite is true. There are also some interesting shifts in relative costs in the states between different vintages of the model.[5] These hanging questions create an uncertainty that would suggest that it would be imprudent to reduce present funding until the full review of the new system is completed.

In addition to uncertainty over the ultimate content of the SM, another reason to delay the reduction of hold-harmless amounts is the serious impact that such reductions will have on state regulators, carriers and customers. The interstate support provided by current mechanisms is being used by state regulators to keep local rates affordable today. In RTC's most recent general State rate case, the California Public Utilities Commission explicitly ordered that Federal USF must be used to offset any proposed RTC increase in local rates.[6] Furthermore, in that proceeding, the CPUC put in place a mechanism that provides that any adjustment, either up or down, in Federal USF received by RTC, will result in an adjustment to local rates. Therefore, any elimination of Hold Harmless support will have a direct impact on the end users' local rate. The following chart shows the potential per-line impact on certain carriers from the removal of hold-harmless support to non-rural LECs.[7]

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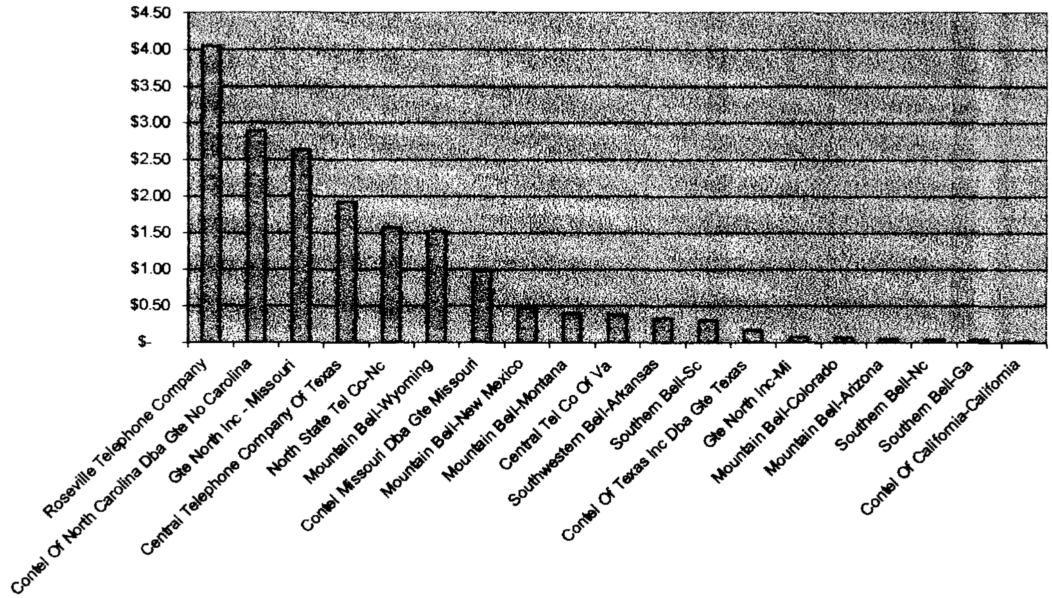
[5] For example, under the HAI 5.0 Wyoming had an average cost of $37.40 and Mississippi $37.09 – almost the same. Under the SM, Wyoming's cost is now $33.68, and Mississippi is $42.16 – a difference of over $9.00. The basis for this change is unclear.

[6] Application 95-05-030, Decision 96-12-074, as modified by Decision 99-04-027.

[7] This chart intentionally excludes the Puerto Rico Telephone Authority which we believe represents a special case due to its extremely high LTS receipts and its pending acquisition by GTE.

Hold Harmless Customer Impact



Current local rates vary by carrier within any state, and elimination of hold-harmless support will exacerbate the problems that can arise as a result of these variations. For example, in California local rates for basic residential service range from $6 to over $20 per month. Even considering the current interstate support, residential customers of RTC pay $20.13 per month (including State-mandated surcharges) under rates established by the California PUC. If hold-harmless support were totally eliminated, these rates could increase to over $24 per line. This is in stark contrast to neighboring exchanges served by Pacific Bell. PacBell rates in these exchanges are $10.69 per month, and since PacBell currently receives no USF support these rates would not be subject to upward pressure with the elimination of USF. Under the portability provisions of the FCC's proposed plan, if PacBell (which is a CLEC in RTC's service area) were to "win" a RTC customer they would also receive $4 per line per month of RTC's hold-harmless support. Thus, a $9.44 per line price advantage would become a $13.44 per line advantage. This is indicative of the types of problems that smaller non-rural LECs and state regulators could face under the FCC's plan as currently proposed.

Neither the Joint Board nor the Commission should ignore the fact that high costs that were identified and funded under the previous rules do not merely go away when they no longer fit in the new model-based mechanism. If Federal support for those costs is eliminated, they will still have to be recovered, either from state funds or from local rate payers.

Accordingly, in light of the uncertain future of the current SM, and the serious impact that reductions in federal support will have on local rates, RTC suggests that it is premature to even consider the nature and timing of the elimination of hold-harmless support. Such action would best be considered only after review of the actual operation of the new high cost mechanism, as called for in the FCC's *Order*.

IV. USF Payments for Small "Non-Rural" LECs Should be Not be Phased Out, But Should be Handled in a Manner Consistent with Small "Rural" LECs.

As was noted above, RTC and similarly situated companies are at the very low end of the group of "non-rural" LECs in terms of size. However, as illustrated in the table above, RTC is at the very high end of per line customer impact if LTS and USF are phased out. There are three important characteristics which account for the significant impact of eliminating hold-harmless support for RTC and other similarly situated small "non-rural" LECs.

The first difference is the receipt of LTS, as discussed above. Indeed, of the \$5.7 million in hold-harmless support that RTC will receive, \$4.1 million is due to LTS. As noted above, the FCC and the Joint Board must consider the different nature of LTS and recognize this in any plans that are finally adopted.

A second reason why customers of small non-rural LECs like RTC would be disproportionately impacted by the phase-out of hold-harmless support is the different way that the current USF treats support for companies with less than 200,000 lines in a study area. The RBOCs and most GTE study areas contain well over 200,000 lines. Under the USF rules[8], such study areas receive support for only 10% of their cost in excess of 115% of the nationwide average. Companies with less than 200,000 lines, such as RTC, receive 65% of their cost in excess of 115% from the USF. This is no windfall, however, as state regulators have taken this support into account in the establishment of intrastate rates.[9] What this suggests is that an under 200,000 company faces a very different problem as hold-harmless is phased out than a larger company. This is the case since the amount of USF it receives will be over six times greater than the support a larger company with similar costs would have received. Again, the Joint Board and the FCC should recognize this difference in any plans that are finally adopted.

A final difference between RTC and most of the other non-rural LECs lies in the application of the model, and particularly its inputs. Recently, the FCC ruled that a single set of national inputs should be used for all non-rural LECs.[10] In its logic explaining the levels that it has decided for various inputs, the Commission repeatedly cites the scale and scope advantages enjoyed by the larger LECs[11]. While the RBOCs and GTE have tens

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[8] Section 36.631.

[9] *See supra*, page 8.

[10] Tenth Report and Order in CC Dockets 96-45 and 97-160, FCC 99-304 (released November 2, 1999)("*Inputs R&O*") at para. 30.

[11] *Inputs R&O* at paras. 146-163, 341.

of millions of customers and hundreds of wire centers, RTC serves 128,000 customers in 2 wire centers. Simple logic and common sense tells us that RTC will experience different costs than its mega-brethren. The Joint Board and the FCC must recognize this difference in any plans that are finally adopted.

These Comments have identified three specific characteristics that differentiate the transitional problems of companies like RTC from those of the RBOCs and GTE:

1. Receipt of LTS,
2. Under 200,000 lines in the study area, and
3. Small number of customers and wire centers.

While these characteristics differentiate RTC and at least one other similarly situated "non-rural" companies from the RBOCs and GTE, they make RTC and several others look remarkably similar to the "rural" LECs.[12]

There is no statutory justification for the use of the "rural" and "non-rural" definitions contained in the 1996 Act as the demarcation point between the treatment of "large" and "small" telephone companies under the Commission's new explicit high-cost mechanism.[13] While these terms have specific application in other Sections of the Act[14], the provision that explicitly addresses universal service (Section 254) merely states that:

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12 The other carrier that currently meets these criteria is North State Telephone Company. However, in the next few years prior to comprehensive review of the high cost mechanism, it appears likely that other carriers currently under 100,000 access lines will grow above that level, and be in the same position as RTC and North State, facing the same dramatic impact of the loss of hold harmless support.

13 The Commission itself recognizes this lack of statutory requirement. *See, Inputs R&O* at para. 458.

14 For example, Section 214 regarding the designation of multiple ETCs and Sections 251 and 252 regarding interconnection and unbundling requirements.

- Quality services should be available at just, reasonable and affordable rates.[15]
- Access to advanced telecommunications and information services should be provided in all regions of the Nation.[16]
- Consumers in all regions of the Nation ... should have access to services ... at rates that are reasonably comparable to rates charged for similar services in urban areas.[17]
- There should be specific, predictable and sufficient Federal and State mechanisms to preserve and advance universal service.[18]
- The Commission shall institute a single proceeding to implement the recommendations from the Joint Board ... The rules established by such proceeding shall include a definition of the services that are supported by Federal universal service support mechanisms and a specific timetable for implementation.[19]

The Commission could just as easily have chosen 200,000 lines as the demarcation point between "large" and "small" companies. In hindsight, such a choice would have made more sense given the vastly different treatment of study areas above and below 200,000 lines under the current USF rules, as noted above. The Commission could have also taken into consideration the different nature of LTS, and included companies that currently receive LTS in the second wave of implementation of the new high cost support mechanism.

RTC thus respectfully suggests that the Joint Board, in its July 1, 2000 Report to the FCC, recommend that the demarcation point for the phased implementation of the new explicit mechanism be modified from the current rural/non-rural definition to the following:

- Study areas with less than 200,000 lines, and

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[15] Section 254(b)(1)
[16] Section 254(b)(2)
[17] Section 254(b)(3)
[18] Section 254(b)(5)
[19] Section 254(a)(2)

- Study areas that receive Long Term Support.

The Joint Board has created the Rural Task Force (RTF) to study and recommend how the models, rules and provisions adopted for the larger LECs should be modified for application to the smaller (a.k.a. "rural") LECs. The Joint Board and the FCC will benefit greatly from the input of the RTF on these issues.

V. <u>Conclusion</u>

RTC commends the FCC for its wisdom in establishing the "hold-harmless" provisions in its implementation of the new explicit support high-cost support mechanism. It provides breathing room to carefully evaluate the new mechanism to assure that its final implementation will accomplish the noble objectives of the 1996 Act. As described above, RTC suggests that the Joint Board recommend to the FCC that:

- Long Term Support not be phased out at this time;[20]
- Phase out of USF payments not be considered until completion of the comprehensive three year review of the new explicit high-cost mechanism; and
- Study Areas with less than 200,000 lines and which receive LTS should be considered under the provisions to be recommended by the Rural Task Force.

[20] LTS issues should be addressed in a comprehensive review of the pricing of the interstate common line charges for NECA pooling companies.

WHEREFORE, Roseville Telephone Company requests that the Joint Board incorporate the above proposals into its July 1, 2000 Report to the Federal Communications Commission.

Respectfully submitted,
ROSEVILLE TELEPHONE COMPANY

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December 1, 1999

CERTIFICATE OF SERVICE

I, Stacy R. Eveslage, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that true copies of the foregoing Comments of Roseville Telephone Company on the Interim Hold-Harmless Provision was served this 1st day of December, 1999, upon:

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