

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

DEC 3 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
Access Charge Reform)	CC Docket No. 96-262
Price Cap Performance Review for Local Exchange Carriers)	CC Docket No. 94-1
Low-Volume Long Distance Users)	CC Docket No. 99-249
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45

REPLY COMMENTS OF SPRINT CORPORATION

Jay C. Keithley
1850 M Street N.W., 11th Floor
Washington, DC 20036-5807
(202) 857-1030

Sandra K. Williams
901 East 104th Street
Mailstop MOKCMD0204
Kansas City, MO 64131
(816) 854-6696
Its Attorneys

December 3, 1999

TABLE OF CONTENTS

	Page
Introduction and Summary	1
I. THE REALIGNMENT OF LOCAL SWITCHING AND COMMON LINE RECOVERY IN THE CALLS PLAN IS BOTH APPROPRIATE AND NECESSARY	2
II. IT IS APPROPRIATE TO FREEZE RATE CAPS FOR TRAFFIC SENSITIVE ELEMENTS ONCE THE TARGET LEVELS HAVE BEEN REACHED	4
III. THE CURRENT LEVEL OF COMMON LINE REVENUE IS REASONABLE, IF NOT UNDERSTATED	5
IV. THE CALLS PLAN WILL BENEFIT LOW INCOME SUBSCRIBERS	8
V. THE COMPETITIVE LONG DISTANCE MARKET WILL ENSURE THE FLOW- THROUGH OF ACCESS REDUCTIONS	10
Conclusion	12
Exhibit A	

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Access Charge Reform)	CC Docket No. 96-262
)	
Price Cap Performance Review for Local Exchange Carriers)	CC Docket No. 94-1
)	
Low-Volume Long Distance Users)	CC Docket No. 99-249
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	

REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint") hereby submits its reply to the comments filed in these matters on November 12, 1999.

SUMMARY AND INTRODUCTION

Sprint is a member of the Coalition for Affordable Local and Long Distance Service ("CALLS")¹, the group that has put forth the proposal being considered herein. As a member of CALLS, Sprint supports the joint comments filed by the plan sponsors on November 12, 1999, as well as the joint reply comments being offered today. However, there are a number of issues addressed in the initial comments to which Sprint wishes to respond individually, as well. First, contrary to the claims of certain commenters, it is both appropriate and necessary to realign common line and local switching cost recovery. Second, it is reasonable and appropriate to freeze caps on traffic sensitive rates once the

¹ Other members of CALLS include AT&T, Bell Atlantic, BellSouth, GTE, and SBC.

target levels are reached. Third, a review of cost and common line rate levels shows that the per-line rate levels under the CALLS plan are reasonable and that fears of rate increases are grossly overstated. Finally, commenters who question the flow-through of access reductions are ignoring history and the competitiveness of the long distance marketplace.

I. THE REALIGNMENT OF LOCAL SWITCHING AND COMMON LINE RECOVERY IN THE CALLS PLAN IS BOTH APPROPRIATE AND NECESSARY.

Historically, the price cap “X” factor has been applied uniformly across each of the price cap baskets resulting in the same annual percentage reductions in the price cap index for all baskets. Uniform application of the X factor ignores the underlying productivity differences in the price cap baskets. There have been a host of technological advances in switching (from analog to digital) and transport (the development of fiber and SONET technology) that result in cost savings and thus higher profitability in these baskets. On the other hand, similar technological changes in the provision of the largely copper loop plant have not occurred. As a consequence, the uniform application of the X factor produces rates for local switching that are well above forward-looking costs, while the common line revenues are close to and in some cases below the interstate-allocated portion of forward-looking loop costs. The plan’s proposal to shift 25% of MOU switching costs to common line helps to rectify this unintended distortion in the rates.

MCI WorldCom agrees with this assessment. At pp. 8-9 of its comments in this proceeding, MCI WorldCom notes that it agrees with the CALLS sponsors that there is a reasonable basis for shifting a portion of LEC revenue recovery from local switching rates to the common line. MCI WorldCom goes on to suggest that shifting 25% of local switching revenues to the common line basket and targeting X factor reductions to traffic sensitive

rates until the target rate is achieved (a facet of the plan that is discussed in more detail below) is a reasonable way to address the Commissions' concerns about inflated local switching rates.

Similarly, in comments filed in response to the Commission's recent Further Notice of Proposed Rulemaking regarding access charge reform,² the issue of switching costs and the attendant problems created in the blanket application of the X factor were discussed in some detail by several of the commenters. For example, both Bell Atlantic and MCI WorldCom noted that the high rate of return in the traffic-sensitive basket is in large part a function of the Commission's determination to apply the X-factor across the board to all baskets. MCI WorldCom, in particular, questioned this standardized application in light of the fact that "... productivity gains for local switching may have outpaced the gains for other access elements."³ Similarly, Bell Atlantic reminded the Commission that, from the outset of price cap regulation, the Commission itself recognized that rates of return for various baskets would vary because productivity gains differ.⁴ Moreover, Sprint's own research reveals that from 1992 to 1998 the investment in digital switching for all Tier I price cap ILECs has increased from 62% to 89% of total central office switching investment.⁵ Clearly, these technological improvements in switching outdistance productivity in other baskets, particularly common line.

The X factor was established using total company information; there was no distinction made with respect to any specific basket or service. There can be no harm in bringing a modicum of reality into the application of the factor to the baskets today. The

² *In the Matter of Access Charge Reform*, CC Docket No. 96-262, Fifth Report and Order and Further Notice of Proposed Rulemaking, (rel. August 27, 1999). Initial comments on the FNPRM were filed October 29, 1999.

³ *Id.*, MCI WorldCom Comments at p. 13.

⁴ *Id.*, Bell Atlantic Comments at n. 5 at p. 11.

⁵ Source: ARMIS 43-02, Table B1b, Balance Sheet Accounts (Plant Accounts), lines 2210 and 2212.

CALLS proposal does just that. The Commission should recognize the differences in productivity that have come about due to advances in switching technology and embrace this opportunity to shift 25% of MOU switching costs to the common line basket.

II. IT IS APPROPRIATE TO FREEZE RATE CAPS FOR TRAFFIC SENSITIVE ELEMENTS ONCE THE TARGET LEVELS HAVE BEEN REACHED.

Price cap regulation was introduced in order to create an environment that would more closely replicate the operation of a competitive market than rate of return regulation had in the past. Similarly, the purpose of the X factor was to incent the price cap LECs to be as efficient as possible. In a time when rates were still at monopoly levels, the X factor provided the incentive necessary for the LECs to redefine their networks and operating cost structures in the fashion that a totally market-driven company would. However, as discussed above, because of the uniform application of the X factor, the existing price cap mechanism has not, unfortunately, produced rates reflective of economic costs. The CALLS plan, on the other hand, would supplant the existing price cap mechanism with an aggressive transition to rate levels that reasonably approximate underlying forward looking economic cost. Once rates reflect their forward-looking cost levels, further reductions cannot be achieved unless or until a major technological advancement that alters FLEC comes along. The continued application of a factor based on historic productivity gains on rates that approximate FLEC makes no economic sense; certainly does not replicate the operations of a competitive model; and stands the economic incentives price caps were designed to create on their heads.

Sprint stresses that adopting the CALLS proposal would not preclude the Commission from re-examining costs at the conclusion of the five-year period provided for

in the plan in order to include any efficiency gains realized during the life of the CALLS plan. However, continued application of a subjective factor to a demonstrably cost-based rate will only create economic distortions in the market.

III. THE CURRENT LEVEL OF COMMON LINE REVENUE IS REASONABLE, IF NOT UNDERSTATED.

Certain commenters⁶ urge the Commission to reject both the notion of shifting 25% of MOU switching costs to the common line basket, as well as the elimination of the X factor application to the common line services basket. One allegation is that ILECs are currently receiving common line revenues in excess of their economic costs. Consequently, rather than realigning switching and common line recovery, or eliminating the application of the X factor, parties suggest that common line rates should be lowered.

As discussed above, there are no longer valid economic or regulatory reasons for maintaining the status quo with respect to the switching cost and X factor application issues described above. The opposing arguments are based not on economic realities, but rather on some perceived benefits that these parties believe the current regulatory environment provides. As explained herein, those perceived benefits do not, in reality, exist.

Similarly, the current common line revenues being realized by the ILECs are not what at least one of these commenters has represented them to be⁷. The common line revenues of the Sprint local telephone companies *do not* exceed the companies' economic costs. To the contrary, with one exception, Sprint's revenues do not even reach the level of the companies' forward-looking economic costs. Exhibit A to these comments compares

⁶ For example, California Public Utilities Commission at pp. 19-22; Competition Policy Institute at pp. 5-7; New Jersey Division of the Ratepayer Advocate at p. 18; Time Warner at pp. 2 and 6; Texas Office of Public Utility Counsel, Consumer Federation of America and Consumers Union at pp. 35-36.

⁷ See, Texas Office of Public Utility Counsel, Consumer Federation of America and Consumers Union at pp. 28-29.

the common line revenues generated by Sprint's non-rural LECs with the loop and port costs generated by the Commission's Synthesis Model. (Sprint notes that it has utilized the Synthesis Model here as a test of reasonableness only. Generally, Sprint does not support use of the Synthesis Model for the calculation of access costs beyond the loop and advocates the use of company specific inputs when calculating economic costs for the loop and port.) Column G of this exhibit shows that the loop and port costs for Sprint's non-rural territories, when calculated using the Synthesis Model, using the Commission's default inputs, are greater than current common line revenues. Overall, the revenue is merely 78% of costs. Indeed if one adds the 25% shift to common line recovery that CALLS and Sprint advocate, the percent of revenue to cost is just 83%.

Reducing switching costs, in concert with increasing the subscriber line charge results in a realignment of price with cost. Furthermore, shifting 25% of MOU switching costs to the common line basket will not only bring switching rates down to a level that reasonably approximates FLEC, but will push common line rates toward FLEC. From both an economic and a regulatory perspective, this is the right result. Accordingly, in order to move all access service rates to or near their economic costs, targeting of the X factor to services other than those in the common line basket is clearly warranted.

In addition to the economic justification for the changes proposed in the CALLS plan, Sprint wishes to address concerns raised about the end-user rate impacts of the CALLS plan. Consider first the status quo: today, between the SLC and the PICC, most customers are incurring a monthly charge of at least \$5.00. Add to that figure the \$.50 increase in the PICC scheduled to take effect next July and the majority of primary residential and single-line business customers will pay a combined rate of \$5.50 per month. Finally, when making any comparisons between the status quo and the CALLS proposal, one must remember that

the Commission's current plan is designed to drive flat rate recovery of the full interstate loop cost – thus even the “status quo” will change over time.

It is clear, therefore, that any comparison of the current \$3.50 SLC rate with the proposed CALLS rate is a classic apples to oranges comparison. Such an exercise fails to acknowledge the fact that \$3.50 is not the only interstate, loop-related charge that customers pay. The CALLS proposal simply recognizes this reality and provides for an initial cap on the SLC of \$5.50, which equals the flat rate recovery provided for under the “status quo.” This cap rises as is also the case for PICCs under the current rules. A major difference, however is that the CALLS plan places an ultimate cap of \$7.00, whereas under current rules, combined SLC and PICC well can exceed \$7.00.

Sprint strongly believes that, the majority of customers will never reach the cap (and those who do reside in the areas that are the highest cost areas) and a great many will see reductions in their fixed monthly charges, paying less than under the current SLC/PICC rate structure. A review of the effect of CALLS on Sprint's own local customers bears out these projected rate impacts. Those who oppose CALLS are not only opposing sizeable per-minute reductions for all users, but per-line reductions for a significant portion of the population.

Moreover, the CALLS proposal will alleviate the current cross-subsidization that exists between business/non-primary residential and residential customers in the current plan. While the Commission's current plan is designed to eventually balance the recovery between these customer classes, that equalization will not occur any time soon. In fact, the timing of that event cannot be defined, especially for rural areas. The CALLS plan, on the other hand, would quickly narrow the disparity between customer classes and would do so for urban and rural areas alike. Accordingly, to maintain the status quo essentially provides

an incentive to the IXCs to move away from providing service in rural areas⁸, where the PICCs will remain high indefinitely, and concentrate instead on urban areas where the PICC rate will more quickly decline. This is certainly not an outcome that the Commission can or should endorse, especially when it has a workable option in the CALLS plan.

IV. THE CALLS PLAN WILL BENEFIT LOW INCOME SUBSCRIBERS

In a somewhat confusing discussion, at page 38 of comments filed by the Texas Office of Public Utility Counsel, Consumer Federation of America and Consumers Union (Joint Consumer Commenters or “JCC”) arguments are adopted from reply comments filed more than two years ago by the Texas Office of Public Utility Counsel.⁹ In those earlier comments, the JCC discussed an analysis conducted by Sprint to determine the effects of allowing the rates paid for local service to reflect more accurately the cost of service. This analysis included a potential increase in the subscriber line charge. The JCC claimed (in 1997, and again in their November 12, 1999 comments) that allowing rates to reflect costs, as Sprint suggested, was somehow “regressive” and would cause undue hardship on those who are least able to afford price increases.

The JCC’s arguments must be rejected for several reasons. First, the JCC took Sprint’s prior comments completely out of context. Contrary to the JCC’s assertions, Sprint cannot - nor did it ever attempt to - claim that every customer in every city in every situation will be made better off by allowing rates to reflect costs. What Sprint maintained, both then and now, is the economic fact that, when rates reflect costs, customers benefit overall.

⁸ For example, if the status quo is maintained, by July, 2001 PICC rates in Sprint’s Nebraska and Wyoming local territories, both rural in nature, are estimated to go as high as \$7.51 for multi-line business customers while non-primary residential PICCs will hover at \$4.65 per line.

⁹ *In the Matter of Access Charge Reform*, CC Docket No. 96-262, Reply Comments of Texas Office of Public Utility Counsel filed February 14, 1997.

Second, the analysis performed by JCC is seriously flawed. The JCC's conclusion on its alleged regressiveness are based on faulty assumptions regarding the median income of the low-income range. Furthermore, the JCC completely ignored the fact that long distance calling done by low-income households represents a larger portion of their household budget than those with higher incomes – and correspondingly, that there is a relative benefit from price reductions that will be greater for these customers than for those in higher income households. In sum, the conclusions reached by the JCC cannot be supported when properly analyzed and should be rejected.

More important, the CALLS plan clearly recognizes and addresses the needs of low-income users. It expands Lifeline support to ensure that these consumers would pay no monthly SLC and pay no PICC-related charges. This approach targets only those customers for whom affordability is of greatest concern. By providing universal service support to those who need it most, and at the same time slashing access charges in half, the CALLS plan promises to strengthen subscribership among low-income consumers. Interestingly, in spite of their alleged conclusion that CALLS will harm low-income subscribers, at page 45 of their comments, the JCC *openly admit* that the CALLS proposal would benefit low-income Lifeline consumers, including those with low volumes of long distance use.

In sum, the JCC have provided no rational support for their premise that CALLS will harm consumers.

V. THE COMPETITIVE LONG DISTANCE MARKET WILL ENSURE THE FLOW-THROUGH OF ACCESS REDUCTIONS

In a related issue, arguments have once again surfaced that IXCs will not flow-through to the end user customers savings from access reductions. This argument has been made – and soundly refuted by Sprint and each of the other major IXCs – numerous times. For this reason, Sprint will not engage in a protracted discussion of the issue. It is enough to point to the facts. Sprint has provided irrefutable evidence of its long distance division’s continuous price reductions which have, on average, been implemented more quickly than the correspondingly reductions in access charges. For example, in 1998, Sprint’s average access cost per minute dropped \$0.004 from the previous year. However, Sprint’s average revenue per minute dropped twice as much, or \$0.008, from the previous year. This trend continues in 1999, as Sprint’s average access cost per minutes has dropped \$0.01, while its average revenue per minute has dropped 50 percent more to \$0.015. Furthermore, Sprint is on record as stating that it will further reduce its prices and simplify its long distance pricing plans as the Commission moves forward to complete access charge reform.¹⁰

In what is their most dubious criticism of the CALLS plan, the JCC states that the proposal must be rejected because it offers no guarantee of rate reductions. They state that “[T]he claim that the long distance market is sufficiently competitive to compel price decreases is arguable at best.” Sprint strongly disagrees with this baseless statement and is encouraged by the fact that the Commission’s Chairman William Kennard apparently disagrees as well, as reflected by his recent statement that:

¹⁰ See, Comments of Sprint Communications Company L.P. in *In the Matter of Low Volume Long Distance Users*, CC Docket No. 99-249.

American consumers are enjoying the lowest long distance rates in history and the lowest Internet rates in the world for one reason: Competition. Competition has produced a price war in the long distance market.”¹¹

The bottom line of the flow-through issue is, simply stated, that market competition, rather than regulation, may be relied on for the development of the most efficient pricing mechanisms. The history of the long distance market has proven this fact time and again. In this highly competitive market, competitive pressures will force (and have forced) IXCs to set their rates at appropriate levels. Flow-through is, in the end, a non-issue.

¹¹ Press statement of Chairman Kennard released October 5, 1999.

CONCLUSION

The Commission and the industry have been struggling with access reform, universal service and price cap reform for far too long. These three beacons of federal telephone regulation have become the Bermuda Triangle. The CALLS proposal charts a solid course to a sound and economically rational safe harbor for consumer and competitor alike.

The CALLS proposal will stabilize universal service support and increase Lifeline support, cut per minute interstate access charges in half and simplify consumer bills by consolidating multiple line items into one easily understood charge. It will simplify and stabilize the interstate price cap plan for five years. The plan offers benefits to both residential and business consumers, rural and urban customers, and subscribers in all income levels. For all these reasons, Sprint strongly urges the Commission to adopt the proposal *in toto*.

Respectfully submitted,
SPRINT CORPORATION

By  for
Jay C. Keithley
1850 M Street N.W., 11th Floor
Washington, DC 20036-5807
(202) 857-1030

Sandra K. Williams
901 East 104th Street
Mailstop MOKCMD0204
Kansas City, MO 64131
(816) 854-6696
Its Attorneys

December 3, 1999

Exhibit A

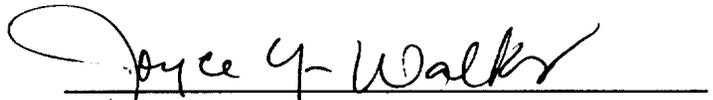
**Sprint Non-Rural Territories
Comparison of Interstate Allowable Common Line Revenue per Line to the
Forward-looking Economic Cost for Loop and Port taken from FCC's Synthesis Model
(most recent version, using FCC default inputs)**

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)
STATE	COMPANY	AVERAGE LOOP & PORT COST	ACCESS LINES	25% OF AVERAGE LOOP & PORT COST	ALLOWABLE COMMON LINE REVENUE/LINE	% OF COMMON LINE REVENUE TO COST	25% OF LOCAL SWITCHING PER LINE	TOTAL ALLOWABLE REVENUE/LINE	% OF TOTAL REVENUE TO COST
Florida	Central Tel Co Of Florida	\$ 30.33	407,248						
Florida	United Tel Co Of Florida	\$ 26.12	1,539,224						
Florida	Sprint Statewide Average	\$ 27.00	1,946,473	\$ 6.75	\$ 6.72	100%	\$ 0.42	\$ 7.14	106%
Nevada	Central Telephone Company - NV	\$ 18.41	807,548	\$ 4.60	\$ 3.69	80%	\$ 0.43	\$ 4.12	90%
North Carolina	Carolina Tel And Tel Co	\$ 35.70	1,102,171						
North Carolina	Central Tel Co-NC	\$ 39.14	263,188						
North Carolina	Sprint Statewide Average	\$ 36.36	1,365,359	\$ 9.09	\$ 5.95	65%	\$ 0.33	\$ 6.28	69%
Ohio	United Tel Co Of Ohio	\$ 37.36	593,546	\$ 9.34	\$ 6.37	68%	\$ 0.44	\$ 6.81	73%
Tennessee	United Inter-mountain Tel Co-TN	\$ 30.30	240,963	\$ 7.58	\$ 5.95	79%	\$ 0.30	\$ 6.25	82%
Virginia	Central Tel Co Of VA	\$ 42.42	282,108						
Virginia	United Inter-mountain Tel Co-VA	\$ 45.99	104,928						
Virginia	Sprint Statewide Average	\$ 43.39	387,036	\$ 10.85	\$ 6.37	59%	\$ 0.28	\$ 6.65	61%
	Non-Rural Average	30.58	5,340,925	\$ 7.65	5.97	78%	\$ 0.39	\$ 6.35	83%

NOTE: Sprint property in Texas is split between the rural United Telephone and non-rural Central Telephone. Since the Synthesis Model is currently designed for non-rural LECs only, Sprint Texas was not included in this analysis.

CERTIFICATE OF SERVICE

I, Joyce Y. Walker, hereby certify that I have on this 3rd day of December 1999, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing reply comments of Sprint Corporation," In the Matter of the Petition of Access Reform; Price Cap Performance Review for Local Exchange Carriers; Low-Volume Long Distance Users and Federal-State Joint Board on Universal Service, CC Dockets Nos. 96-262, 94-1, 99-249 and 96-45, filed this date with the Secretary, Federal Communications Commission, to the persons listed below.



Joyce Y. Walker

ITS
The Portals
445 12th Street SW Room CY-B400
Washington, D.C. 20036

Charles D. Gray
James Bradford Ramsey
NARUC
1101 Vermont Ave NW Suite 200
Washington, DC 20006

Maureen A. Lewis
Alliance for Public Technology
919 18th Street NW., Tenth Floor
Washington, D.C. 20006

Debbie Goldman
Communication Workers of America
501 Third Street NW Suite 1100
Washington, DC 20001

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

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

Charles Hunter
Catherine Hannan
Hunter Communications Law Group
1620 I Street NW Suite 701
Washington, DC 20006

Rachel J. Rothstein
Brent M. Olson
Cable & Wireless USA. Inc.
8219 Leesburg Pike
Vienna, VA 22182

Jonathan E. Canis
Charles M. Oliver
Danny E. Adams
Joan M. Griffin
Robert J Aamoth
Kelly Drye & Warren LLP
1200-19th Street NW., Suite 500
Washington, D.C. 20036

Jonathan Askin
Emily Williams
The Association for Local Telecommunications
Services
888 17th Street NW Suite 900
Washington, DC 20006

Wanda Harris (3 Copies)
Competitive Pricing Division
445 Twelfth Street SW Fifth Floor
Washington, D.C. 20554

Carol Ann Bischoff
Competitive Telecommunications Association
1900 M Street NW Suite 800
Washington, DC 20036

Michael Wilson
John Mapes
Department of Commerce and Consumer
Affairs
State of Hawaii
250 South King Street
Honolulu, HA 96813

Herbert E. Marks
Brian J. McHugh
Squire, Sanders & Dempsey, L.L.P.
1201 Pennsylvania Ave NW
P.O Box 407
Washington, DC 20044

Brian Conboy
Thomas Jones
Willke Farr & Gallagher
Three Lafayette Centre
1155 21st Street, N.W.,
Washington, D.C. 20036

Ave M Bie, Chairperson
Joseph P. Mettner, Commissioner
John H. Farrow, Commissioner
Public Service Commission of Wisconsin
610 North Whitney Way
PO Box 7854
Madison, WI 53707-7854

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

Alan Buzacott
MCI WorldCom Inc.
1801 Pennsylvania Ave, NW
Washington, DC 20006

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

Harold Furchtgott-Roth, Commissioner
Federal Communications Commission
Room 8-A302
445-12th Street SW
Washington, DC 20554

Michael Powell, Commissioner
Federal Communications Commission
Room 8-A204
45-12th Street SW
Washington, DC 20554

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

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

Dorothy Attwood, Legal Advisor
Office of Chairman Kennard
Room 8-B201
445-12th Street SW
Washington, DC 20554

Linda Kinney, Legal Advisor
Office of Commissioner Ness
Room 8-B115
445-12th Street SW
Washington, DC 20554

Rebecca Beynon, Legal Advisor
Office of Commissioner Furchtgott-Roth
Room 8-A302
445-12th Street SW
Washington, DC 20554

Kyle Dixon, Legal Advisor
Office of Commissioner Powell
Room 8-A204
445-12th Street SW
Washington, DC 20554

Sarah Whitesell, Legal Advisor
Office of Commissioner Tristani
Room 8-C-302
445-12th Street SW
Washington, DC 20554

James S. Blaszak
Levine, Blaszak, Block & Boothby, LLP
2001 L Street NW
Suite 900
Washington, DC 20036

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

L. Marie Guillory
Daniel Mitchell
National Telephone Cooperative Association
4121 Wilson Blvd Tenth Floor
Arlington, VA 22203

Linda Armstrong
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-A422
445-12th Street SW
Washington, DC 20554

Lisa Boehley
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-B544
445-12th Street SW
Washington, DC 20554

Craig Brown
Deputy Division Chief
Federal Communications Commission
Room 5-B418
445-12th Street SW
Washington, DC 20554

Brian Clopton
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-A465
445-12th Street SW
Washington, DC 20554

Andrew Firth
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-A505
445-12th Street SW
Washington, DC 20554

Irene Flannery
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-B426
445-12th Street SW
Washington, DC 20554

Genaro Fullano
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-A623
445-12th Street SW
Washington, DC 20554

Charles L. Keller
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
5th Floor
445-12th Street SW
Washington, DC 20554

Katie King
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-B530
445-12th Street SW
Washington, DC 20554

Matthew Vitale
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-B530
445-12th Street SW
Washington, DC 20554

Robert Loube
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-B524
445-12th Street SW
Washington, DC 20554

Brian Millin
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-A525
445-12th Street SW
Washington, DC 20554

Mark Nadel
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-B551
445-12th Street SW
Washington, DC 20554

Richard D. Smith
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-B448
445-12th Street SW
Washington, DC 20554

Lisa Boehley
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-B544
445-12th Street SW
Washington, DC 20554

Elizabeth H. Valinoti
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-C408
445-12th Street SW
Washington, DC 20554

Sharon Webber
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-B552
445-12th Street SW
Washington, DC 20554

Jack Zinman
Common Carrier Bureau Accounting Policy
Division
Federal Communications Commission
Room 5-A663
445-12th Street SW
Washington, DC 20554

Commission Julia Johnson
Florida Public Service Commission
2540 Shumard Oak Blvd
Gerald Gunter Bldg
Tallahassee, FL 32399-0850

Martha Hogerty
Missouri Office of Public Counsel
301 West High Street, Suite 250
Truman Bldg
PO Box 7800
Jefferson City, MO 65102

Commissioner James M. Posey
Alaska Public Utilities Commission
1016 West 6th Ave., Suite 400
Anchorage, AK 99501

Commissioner Laska Schoenfelder
South Dakota Public Utilities Commission
State Capitol
500 East Capitol Street
Pierre, SD 57501-5070

Commissioner Sandra Makeeff Adams
Iowa Utilities Board
350 Maple Street
Des Moines, IA 50319

Doris McCarter
Ohio Public Utilities Commission
180 East Broad Street
Des Moines, IA 50319

Chairman Patrick H. Woods, III
Texas Public Utilities Commission
1701 North Congress Ave
PB Box 13326
Austin, TX 78711-3326

Peter Bluhm
Director of Policy Research
Vermont Public Service Board
Drawer 20
112 State Street, 4th Floor
Montpieller, VT 05620-2701

Charles Bolle
Nevada Public Utilities Commission
1150 E. Williams Street
Carson City, NE 89701-3105

Rowland Curry
Texas Public Utilities Commission
1701 North Congress Ave
PO Box 13326
Austin, TX 78701

Ann Dean
Maryland Public Service Commission
16th Floor, 6 St. Paul Street
Baltimore, MD 21202-6806

Carl Johnson
New York Public Service Commission
3 Empire State Plaza
Albany, NY 12223-1350

Philip McClelland
PA Office of Consumer Advocate
555 Walnut Street
Forum Place 5th Floor
Harrisburg, PA 17101-1923

Susan Stevens Miller
Maryland Public Services Commission
16th Floor, 6 St. Paul Street
Baltimore, MD 21202-6806

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

Mary E. Newmeyer
Federal Affair Advisor
Alabama Public Service Commission
100 N. Union Street, Suite 800
Montgomery, AL 36104

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

Tom Wilson
Washington Utilities & Transportation
Commission
1300 Evergreen Park Drive, SW
PO Box 47250
Olympia, WA 98504-7250

David Dowds
Florida Public Service Commission
2540 Shumard Oakes BLVD
Gerald Gunter Bldg
Tallahassee, FL 32399-0850

Don Durack
Indiana Office of Consumer Counsel
10 North Senate Ave
Indianapolis, IN 46204-2208

Greg Fogelman
Florida Public Service Commission
1540 Shumard Oak Blvd
Gerald Gunter Bldg
Tallahassee, FL 32399-0850

Anthony Myers
Maryland Public Service Commission
6 St. Paul Street, 19th Floor
Baltimore, MD 21202-6806

Diana Zake
Texas Public Utility Commission
1701 N. Congress Ave
Austin, TX 78711-3326

Tim Zakriski
NYS Department of Public Service
3 Empire State Plaza
Albany, NE 12223

Cheryl A. Tritt
Frank W. Krogh
Morrison & Foerster LLP
2000 Pennsylvania Ave NW
Suite 500
Washington, DC 20006-1888

Mitchell F. Brecher
Debra A. McGuire
Greenberg Traurig
1300 Connecticut Ave NW
Suite 1000
Washington, DC 20036

John Nakahata
Harris, Wiltshire & Grannis LLP
1200 18th Street NW
Washington, DC 20036

Lawrence Strickling
Chief, Common Carrier Bureau
Federal Communications Commission
445-12th Street SW Room 5-B303
Washington, DC 20554

Jane Jackson
Chief, Competitive Pricing Division
Federal Communications Commission
445-12th Street SW Room 5-A207
Washington, DC 20554

Rick D. Doyle
Doyle & Wright
384 N. Madison Ave
Greenwood, IN 46142

George. Barclay
Michael J. Ettner
Snively King Majoros O'Connor & Lee, Inc.
1220 L Street NW Suite 410
Washington, DC 20005

Edith Herman
Communciations Daily
2115 Ward Court NW
Washington, DC 20037

Genevieve Morelli
Paul Gallant
Quest Communications Coorporation
4250 N. Fairfax Dr.
Arlington, VA 22203

Linda Oliver
Hogan & Hartson LLP
555 13th Street NW
Washington, DC 20004

Kathryn Brown
Federal Communications Commission
445 12th Street SW Room 8-B201E
Washington, DC. 20554

William Bailey
Legal Advisor to Commissioner Furchtgott-
Roth
Federal Communications Commission
445-12th Street SW Room 8-A302E
Washington, DC 20554

Yog Varma
Common Carrier Bureau
Federal Communications Commission
445-12th Street SW Room 5-C352
Washington, DC 20554

Christopher J. Wilson
Delia Reid Saba
Attorneys for Cincinnati Bell Telephone
201 East Fourth Street
Cincinnati, OH 45202

Janet Gail Besser
James Connelly
W, Robert Keating
Paul B. Vasington
Eugene J Sullivan
Commonwealth of Massachusetts
One South Station
Boston, MA 02110

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

Mark C. Rosenblum
Julie Sello
AT&T Corp
295 North Maple Ave
Basking Ridge, NJ 07920

Gene C. Schaerr
James P. Young
Sidley & Austin
1722 Eye Street NW
Washington, DC 20006

Sheryl Todd
Federal Communications Commission
445-12th Street NW
Washington, D.C 20554

Tiane Sommer
Georgia Public Service Commission
244 Washington St SW
Atlanta, GA 30334-5701

Laurie Pappas
Texas Office of Public Utilities Counsel
1701 Congress Ave Suite 9-180
Austin, Texas 78701

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

Gene Kimmelman
Consumers Union
1666 Connecticut Ave
Washington, DC 20009

Peter Arth, Jr.
Lionel B. Wilson
Ellen S. Levine
State of California and California Public
Utilities Commission
505 Van Ness Ave
San Francisco, CA 94102

Betty D. Montgomery
Duane Luckey
Steven T. Nourse
Stephen M. Hoerstring
Public Utilities Section
180 E Broad St, 7th Fl
Columbus, OH 43215

Cynthia B. Miller
Capital Circle Office Center
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850

W. Kenneth Ferree
Goldberg, Godles, Wiener & Wright
1229 Nineteenth Street NW
Washington, DC 20036

Ronald J. Binz
Debra R. Berlyn
Competitive Policy Institute
1156 15th Street NW Suite 520
Washington, DC 20005

Brian R. Moir
Moir & Hardman
1828 L Street NW Suite 901
Washington, DC 20036-5117