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December 3, 1999

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12 Street, SW
Washington, DC

RE: Dockets 96-262, 94-1, 99-249, 96-45

Dear Ms. Salas:

The League of United Latin American Citizens (LULAC) would like to offer the Federal Communications Commission (FCC) our comments in response to a proposal submitted by the Coalition for Affordable Local and Long Distance Service (CALLS) to reform interstate access charges and universal service.

LULAC has worked with many of the coalition members on other telecommunications issues because on the average, Latinos spend more on telephone service than do other Americans, both in absolute dollars and as a percentage of household expenditures. In fact, it has been estimated that Latinos spend over \$7 billion a year on telephone services. LULAC is committed to advancing public policy and regulations that benefit our members, including lowering the costs of basic utilities and expanding the availability of technology.

Access charge reform is a high priority for the FCC and for the telecommunications industry, and we applaud the coalition of local and long distance companies for coming together to work out an issue that has been contentious for the last 15 years. While access charges are a complicated regulatory issue of primary interest to the industry and regulators, we also recognize the impact that access charges have on things that are important to our members—affordable telephone service, a well funded universal service fund, and expanded competition and choice among service providers.

That is why LULAC supports some of the benefits that will result from adoption of the CALLS proposal. These benefits have also been identified by the Communications Workers of America and the National Association of Development Organizations in a previous filing, which noted that the proposed plan:

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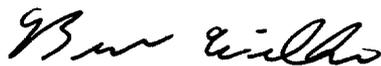
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- Creates a new \$650 million universal service fund to help defray the cost of providing phone service in rural America, which traditionally costs more to serve;
- Consolidates the existing Subscriber Line Charge (SLC) and the Presubscribed Interexchange Carrier Charge (PICC) on consumers bills into a single access charge and makes the entire cost eligible for Lifeline subsidies. This means that low-income consumers will have more of their basic telephone charges waived;
- Phases out the distinction between primary and secondary phone lines and the higher per-line monthly charge for additional lines; thereby promoting the affordability of second line for dedicated Internet access for educational, personal and professional development; and
- Offers a "social compact" providing for a 50 percent reduction over five years in per minute interstate access charges.

LULAC feels strongly about preserving universal service for high cost areas and enhancing Lifeline benefits for low-income consumers. To that end, it is imperative that the Commission work closely with states and telecommunication companies to maximize enrollment in the Lifeline program. We also urge the CALLS coalition to pass along savings to consumers so more consumers can benefit from the availability of new technologies. By reducing the cost of telecommunication services, it is more likely that consumers will increase their usage of services and products. We urge the commission to ensure that interexchange carriers cut long distance rates in a manner that maximizes the consumer welfare benefits.

Thank you for the opportunity to comment on a very important regulatory matter that affects the Latino community.

Sincerely,



Brent Wilkes
Executive Director