

DOCKET FILE COPY ORIGINAL

RECEIVED

FEB 23 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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)	
)	
Petition of AMSC Subsidiary Corporation)	DA 00-237
For Clarification of Sections 54.601(c) and)	
54.605 of the Commission's Rules)	

**COMMENTS
OF THE
UNITED STATES TELECOM ASSOCIATION**

The United States Telecom Association (USTA)¹ hereby submits its comments in response to the Commission's Public Notice² regarding the petition of AMSC Subsidiary Corporation ("AMSC") seeking clarification of two rules applicable to Universal Service support for rural health care providers. Specifically, AMSC requests that the Commission either determine that the Universal Service rural health care program will support lease of its Mobile Satellite Service ("MSS") terminals so that it can offer emergency communications services to Native Americans throughout the United States, or waive the rules that currently preclude such support. In addition, AMSC asks the Commission to clarify the provision in Section 54.605 of its rules³ regarding the

¹ The United States Telecom Association, formerly the United States Telephone Association, is the nation's oldest trade organization for the local exchange carrier industry. USTA represents more than 1200 telecommunications companies worldwide that provide a full array of voice, data and video services over wireline and wireless networks. USTA members support the concept of universal service and are leaders in the deployment of advanced telecommunications capabilities to American and international markets.

² Public Notice, DA 00-237, released February 9, 2000 ("Public Notice").

³ 47 C.F.R. § 54.605.

No. of Copies rec'd 074
List A B C D E

determination of the “urban rate” for purposes of calculating the discount applicable to the provision of emergency communications service on Native American lands.

USTA has been and continues to be supportive of the rural health care program. As such, USTA is sympathetic to the broad, underlying objectives that AMSC states it hopes to achieve through the relief sought in its petition. However, USTA believes that a number of critical questions are raised by the petition, particularly with regard to the statutory bounds of the rural health care program. Therefore, USTA advocates that the Commission must thoroughly consider these issues before taking final action on AMSC’s request.

1. The Statutory Parameters of the Rural Health Care Program

The universal service rural health care program is governed by the provisions in Section 254(h)(1)(A) of the Communications Act of 1934, as amended.⁴ That provision states that, upon a bona fide request, a telecommunications carrier must provide telecommunications services necessary for the provision of health care services to any public or nonprofit health care provider that serves rural areas at rates that are “reasonably comparable” to rates charged for similar services in urban areas in the same state.

It is clear both from the statute and the Commission’s rules implementing the rural health care program⁵ that the entity eligible for support is the rural health care facility, not the customer of the rural health care facility or the service provider. It is equally clear that the services eligible for support are telecommunications services

⁴ 47 U.S.C. § 254(h)(1)(A).

⁵ 47 C.F.R. Subpart G.

available to rural health care providers, not telecommunications services available to the customer of rural health care providers.

2. The Nature of the AMSC Service Offering, Its Eligibility for Funding and the Relief Requested

Considering AMSC's request in light of the statute and the Commission's rules raises a number of fundamental questions that are critical to a full evaluation and proper resolution of AMSC's petition. First, who is the entity requesting support? The statute requires that the rural health care provider ("RHCP") itself make the request for support. AMSC is a service provider, not an RHCP. Further, the statute requires that an RHCP, not end users, receive the support. It is not clear from AMSC's petition who would actually receive support because its service description is rather general and brief. In one instance, AMSC states that the tribal authorities would be the party leasing the call boxes. In another, it states that a RHCP would lease the MSS call box terminals. The statutory provisions make questionable whether AMSC or the particular tribal authority could be an eligible RHCP. If the RHCP is the leasing party, it must comply with the requirements of soliciting competitive bids from multiple providers. However, AMSC is proposing its service offering in this instance as the sole type of service. There may be other service providers or other types of service offerings that could meet the needs of the RHCP. It is precisely this type of situation that the competitive bidding requirements are meant to protect. In addition, further questions are raised concerning the allowable functions of that equipment, which are further evaluated below.

Second, what service is AMSC proposing to provide? It appears that the MSS call box terminal is to be leased. It is unclear whether the associated emergency service is also to be provided. Section 254(h)(1)(A) of the Act provides that rural health care

support is to be for service to RHCPs. That statutory provision limits the rural health care program to telecommunications service that accesses the RHCP. It does not cover equipment to provide that service or to establish local telecommunications service, other than service which is necessary for the provision of health care services to a public or nonprofit health care provider serving rural areas. If the service is to be placed in the tribal territories, would access to other emergency services such as police and fire and to non-emergency services be restricted? It is unclear from AMSC's petition whether the MSS terminals would be configured to limit calls to the RHCP, but such a restriction would be necessary to comply with the strictures of the rural health care program as set forth in Section 254 of the Act.

Third, what relief is AMSC actually seeking? The facility or service proposed by AMSC seems to contemplate a much broader service offering that could be beyond the scope of the rural health care program. More specifically, it appears that AMSC wants to place its emergency access service in Native American service areas and obtain rural health care support to subsidize its costs. This raises the question of whether this is the type of service that can or should be supported by this program. The rural health care program was not statutorily constructed for a 911 type service that, by its nature, would include medical, police, fire and other emergency notification. It was also not intended to expand into non-emergency or local telecommunications service. As proposed, it appears that AMSC is seeking to draw a service offering into the rural health care program that is beyond the scope of services that the statute was designed to support. It appears that this request is an attempt to have the rural health care program subsidize its infrastructure

deployment.⁶ To seek rural health care support for such offerings is beyond the scope of the existing program and raises significant precedential issues that the Commission should carefully consider.

3. The Comparable Rate for Similar Services

AMSC argues that the comparable rate for its service offering should be zero, because customers do not pay for 911 service. USTA finds a number of problems with AMSC's position. First, the rural health care program provides a subsidy for mileage charges, not equipment access. This relates to the fact that AMSC is attempting to apply the rural health care program to an offering that is arguably beyond the scope of the statutory parameters of the program.

Second, there is a cost for emergency service in urban areas. End users pay for 911 type services indirectly through taxes paid to local governments that contract with private entities that provide 911 service. Those local governments, in turn, are the purchasers of 911 service and pay the service provider directly for such service. These collective costs of providing service reflect the comparable rate charged for similar service and should, at a minimum, be used as a rate comparison. It is not appropriate to rely on the fact that a person placing an emergency call from a call box or payphone pays nothing, because that does not reflect these costs. If AMSC's service is to be considered for assistance, the rate must be recalculated based on these factors.

⁶ AMSC has previously made attempts to seek funding for its service offering, none of which have been successful. *See* AMSC Subsidiary Corporation Request for Waiver, CC Docket No. 96-45, Memorandum Opinion and Order, DA 98-2236, released November 4, 1998; AMSC Comments in Extending Wireless Telecommunications Services to Tribal Lands, WT Docket No. 99-266, filed November 9, 1999; AMSC Comments in Federal-State joint Board on Universal Service, Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas, CC Docket No. 96-45, filed December 17, 1999 ("AMSC Unserved Area Comments").

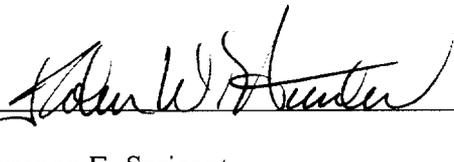
Third, in a separate pleading before the Commission,⁷ AMSC stated that the cost of MSS is the same in rural and urban areas. Since the rural health care program is based on comparable urban and rural rates, this means that there is no difference in AMSC's comparable rates for MSS. This difference is the basis upon which the rural health care program determines support to RHCPs. Without such a rate difference, it is difficult to see how AMSC qualifies for support.

Conclusion

The issues raised by the AMSC petition have broad implications to the overall scope of the federal rural health care program. The Commission should thoroughly consider the statutory and practical implications of AMSC's request that are raised in these comments.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION

By 

Its Attorneys:

Lawrence E. Sarjeant
Linda L. Kent
Keith Townsend
John W. Hunter
Julie L. Rones

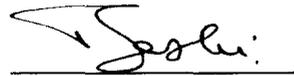
1401 H Street, N.W.
Suite 600
Washington, D.C. 20005
(202) 326-7375

February 23, 2000

⁷ AMSC Unserved Area Comments at 6.

CERTIFICATE OF SERVICE

I, Meena Joshi, do certify that on February 23, 2000, Comments Of The United States Telecom Association was either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.



Meena Joshi

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

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

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
445-12th Street, SW
Room 8-B302
Washington, DC 20554

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

Linda Kinney
Federal Communications Commission
445-12th Street, SW
Room 8-A302
Washington, DC 20554

Sarah Whitesell
Federal Communications Commission
445-12th Street, SW
Room 8-C302
Washington, DC 20554

Kevin Martin
Rebecca Beynan
Federal Communications Commission
445-12th Street, SW
Room 8-C302
Washington, DC 20554

Linda Armstrong
Federal Communications Commission
445-12th Street, SW
Room 8-A302C
Washington, DC 20554

Lisa Boehley
Federal Communications Commission
445-12th Street, SW
Room 5-B544
Washington, DC 20554

Steve Burnett
Federal Communications Commission
445-12th Street, SW
Room 5-B418
Washington, DC 20554

Bryan Clopton
Federal Communications Commission
445-12th Street, SW
Room 5-A465
Washington, DC 20554

Andrew Firth
Federal Communications Commission
445-12th Street, SW
Room 5-A505
Washington, DC 20554

Irene Flannery
Federal Communications Commission
445-12th Street, SW
Room 5-A426
Washington, DC 20554

Genaro Fullano
Federal Communications Commission
445-12th Street, SW
Room 5-A623
Washington, DC 20554

L. Charles Keller
Federal Communications Commission
445-12th Street, SW
Washington, DC 20554

Robert Loube
Federal Communications Commission
445-12th Street, SW
Room 5-B524
Washington, DC 20554

Katie King
Federal Communications Commission
445-12th Street, SW
Room 5-B550
Washington, DC 20554

Brian Miillin
Federal Communications Commission
445-12th Street, SW
Room 5-A525
Washington, DC 20554

Mark Nadel
Federal Communications Commission
445-12th Street, SW
Room 5-B551
Washington, DC 20554

Richard D. Smith
Federal Communications Commission
445-12th Street, SW
Room 5-B448
Washington, DC 20554

Elizabeth H. Valinoti
Federal Communications Commission
445-12th Street, SW
Room 5-C408
Washington, DC 20554

Matthew Vitale
Federal Communications Commission
445-12th Street, SW
Room 5-B530
Washington, DC 20554

Jack Zinman
Federal Communications Commission
445-12th Street, SW
Room 5-A663
Washington, DC 20554

Ann Dean
Maryland Public Service Commission
Six Paul Street
16th Floor
Baltimore, MD 21202

Susan Stevens Miller
Maryland Public Service Commission
Six Paul Street
16th Floor
Baltimore, MD 21202

Carl Johnson
New York Public Service Commission
Three Empire State Plaza
Albany, NY 12223

Rowland Curry
Texas PUC
1701 North Congress Avenue
P.O. Box 13326
Austin, TX 78701

Bridget Duff
Florida PSC
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

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

Kevin Schwenzfeier
NYDPS
Three Empire State Plaza
Albany, NY 12223

Tiane Sommer
Georgia PSC
244 Washington Street, SW
Atlanta, GA 30334

The Honorable Julia Johnson
Chairman
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

The Honorable Kenneth McClure
Vice Chairman
Missouri Public Service Commission
301 W. High Street
Suite 530
Jefferson City, MO 65102

The Honorable Laska Schoenfelder
Commissioner
South Dakota Public Utilities Commission
500 E. Capital Street
Pierre, SD 57501

Martha S. Hogerty
Public Counsel for the State of Missouri
P.O. Box 7800
Harry S. Truman Building
Room 250
Jefferson City, MO 65102

Deonne Bruning
Nebraska Public Service Commission
300 The Atrium
1200 N Street
Lincoln, NE 68509

Larry D. Barnes
Eclipse Telecommunications Inc.
1122 Capital of Texas Hwy South
Suite 100
Austin, TX 78746

Charles Bolle
Nevada Public Utilities Commission
1150 E. Williams Street
Carson City, NV 89701

Lori Kenyon
Alaska Public Utilities Commission
1016 West Sixth Avenue
Suite 400
Anchorage, AK 99501

Doris McCarter
Ohio Public Utilities Commission
180 East Broad Street
Telecommunications - Third Floor
Columbus, OH 43215

Mark Long
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399

Arthur H. Stuenkel
Arkansas Public Service Commission
P.O. Box 400
Little Rock, AK 72203-0400

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

Peter Bluhm
Vermont Public Service Board
Drawer 20
112 State Street - Fourth Floor
Montpellier, VT 05620

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
555 Walnut Street
Forum Place - Fifth Floor
Harrisburg, PA 17101

Michael A. McRae
DC Office of People's Counsel
1133 15th Street, NW
Suite 500
Washington, DC 20005

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

Diana Zake
Texas Public Utility Commission
1701 N. Congress Avenue
Austin, TX 78711

Tim Zakriski
New York Department of Public Service
Three Empire State Plaza
Albany, NY 12223

David Dowds
Florida Public Service Commission
2540 Shumard Oaks Blvd.
Gerald Gunter Bldg.
Tallahassee, FL 32399

Don Durack
Barry Payne
Indiana Office of Consumer Counsel
100 North Senate Avenue
Indianapolis, IN 46204

Greg Fogleman
Florida Public Service Commission
2540 Shumard Oaks Blvd.
Gerald Gunter Bldg.
Tallahassee, FL 32399

Brad Ramsay
NARUC
1100 Pennsylvania Avenue, NW
P.O. Box 684
Washington, DC 20044

Tom Wilson
Washington Utilities & Transportation Commission
1300 Evergreen Park Drive, SW
P.O. Box 47250
Olympia, WA 98504

Brian Roberts
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Allen P. Stayman
U.S. Department of the Interior
Office of the Secretary
Washington, DC 20240

Paul W. Schroeder
American Foundation for the Blind
401 N. Michigan Avenue
Suite 308
Chicago, IL 60611

Kweisi Mfume
NAACP
4805 Mt. Hope Drive
Baltimore, MD 21215

Norman D. Rasmussen
Colorado Independent Telephone Association, Inc.
3236 Hiwan Drive
Evergreen, CO 80439

Ted Schultz
Nebraska Association of Hospitals and Health Sys.
1640 L Street
Suite D
Lincoln, NB 68508

Joe Dudick
Pennsylvania Rural Development Council
Room 506 Finance Building
Harrisburg, PA 17120

Lawrence C. St. Blanc
Gayle T. Kellner
Louisiana PSC
P.O. Box 91154
Baton Rouge, LA 70821

Kenneth Sofferahn
James A. Burg
South Dakota PUC
500 East Capitol Avenue
Pierre, SD 57501

Karen Finstad Hammel
Montana PSC
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59601

Maggie Murphy
STAR Program
300 Centennial Building
658 Cedar Street
St. Paul, MN 55155

Governor William J. Janklow
State of South Dakota
State Capitol
500 East Capitol
Pierre, SD 57501

Jim Williams
The Federation of American Research Networks
1112 16th Street, NW
Suite 600
Washington, DC 20036

Philip L. Verveer
Brian A. Finley
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036

Adrienne G. Southgate
State of Rhode Island and Providence Plantations
Public Utilities Commission
100 Orange Street
Providence, RI 02903

Edward H. Salmon
State of New Jersey Board of Public Utilities
CN-350
Trenton, NJ 08625

Kathleen F. O'Reilly
The Michigan Consumer Federation, etal
414 A Street, SE
Washington, DC 20003

Jeff Beck
Beck & Ackerman
Four Embarcadero Center
Suite 760
San Francisco, CA 94111

Virginia J. Taylor
Richard A. Elbrecht
California Department of Consumer Affairs
400 R Street
Suite 3090
Sacramento, CA 95814

Amy E. Dougherty
Kentucky PSC
P.O. Box 615
Frankfort, KY 40602

William B. Hill
Keystone-Arthur Telephone Company
P.O. Box 240
Keystone, NE 69144

Robert D. Carlitz
Information Renaissance
600 Gran Street
Suite 4680
Pittsburgh, PA 15219

John E. Cawthorne
National Urban League
106 Campion Hall
Boston College
Chestnut Hill, MA 02146

Stuart Blake
Kinko, Inc..
World Headquarters
255 West Stanley Avenue
Ventura, CA 93002

Laura L. Wilson
Florida Cable Telecommunications Association
310 North Monroe Street
Tallahassee, FL 32301

Patrice McDermott
Information Policy Analyst
OMB WATCH
1742 Connecticut Avenue, NW
Washington, DC 20009

Fiona Branton
Information Technology Industry Council
1250 Eye Street, NW
Washington, DC 20005

B. Robert Piller
Gerald A. Norlander
Public Utility Law Project of New York, Inc..
90 State Street
Suite 601
Albany, NY 12207

Benjamin Perez
Gerald M. Zuckerman
Mark J. Becker
Abacus Communications Co.
1801 Columbia Road, NW - Suite 101
Washington, DC 20009

Jeffrey C. Ogden
Merit Network
4251 Plymouth Road
Ann Arbor, MI 48105

Tom Udall
Richard Weiner
New Mexico Attorney General's Office
P.O. Box Drawer 1508
Santa Fe, NM 87504

Ronald L. Plesser
James H. Halpert
Mark J. O'Connor
Piper & Marbury, LLP
1200 19th Street, NW - Seventh Floor
Washington, DC 20036

Martin Avery
Navajo Nation
1101 17th Street, NW
Suite 250
Washington, DC 20036

J.D. Williams
Cheyenne River Sioux Telephone Authority
100 Main Street
Eagle Butte, SD 57625

L. Jerry Mitchell
Blountsville Telephone Co., Inc..
P.O. Box 1049
Blountsville, AL 35031

Ronald K. Greenhalgh
National Rural Electric Cooperative Association
4301 Wilson Boulevard
Arlington, VA 22203

Richard A. Finnigan
Oregon Independent Telephone Association
2405 Evergreen Park Drive, SW
Suite B-01
Olympia, WA 98502

Donald L. Howell, II
Idaho PUC
P.O. Box 83720
Boise, ID 83720

Mary J. Sisak
Mary L. Brown
MCI WorldComm., Inc.
1801 Pennsylvania Avenue, NW
Washington, DC 20006

James T. Coyle
Shawnee Telephone Co.
P.O. Box 69
Equality, IL 62934

Adam Turner
Commonwealth of Northern Marianas
2121 R Street, NW
Washington, DC 20006

Ronald A. Gagon
NOBLE
26 Cherry Hill
Danver, MA 01923

David F. Hemmings
Brite Voice Systems, Inc..
7309 East 21st Street North
Wichita, KS 67206

John G. Strand
John C. Shea
State of Michigan PSC
6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909

Blossom A. Peretz
NJ Department of Treasury
31 Clinton Street - 11th Floor
P.O. Box 46005
Newark, NJ 07101

Encarnita Catalan-Marchan
Maria Pizarro-Figueroa
Telefonica Larga Distancia de Puerto Rico, Inc..
Metro Office Park
Building No. 8 - Street No. 1
Guaynabo, PR 00922

Gayle T. Killner
Louisiana PSC
P.O. Box 91154
Baton Rouge, LA 70821

Mark D. Wilkerson
Brantley & Wilkerson, PC
P.O. Box 830
Montgomery, AL 36101

Harold M. Thompson
Iowa Communications Network
P.O. Box 587
Johnston, IA 50131

Jim Williams
FARNET
1112 16th Street, NW
Suite 600
Washington, DC 20036

Mark Savage
Stevan Rosenzweig
Carmela Castellano
Public Advocates, Inc..
1535 Mission Street
San Francisco, CA 94103

Carolyn Pucell
Department of Information Resources
P.O. Box 13564
Austin, TX 78711

Bonnie Price
7027 Haverhill Park Road
Whittier, CA 90602

Curtis T. White
Allied Communications Group, Inc...
4201 Connecticut Avenue, NW
Suite 402
Washington, DC 20008

Danny E. Adams
Steven A. Augustino
Kelley Drye & Warren
1200 19th Street, NW
Suite 500
Washington, DC 20036

Brad E. Mutschelknaus
John J. Heitmann
Kelley Drye & Warren
1200 19th Street, NW
Suite 500
Washington, DC 20036

Robert A. Hart IV
Hart Engineers & CEO of 21st Century Telesis, Inc..
4615 North Boulevard
Baton Rouge, LA 70806

Charles D. Cosson
AirTouch Communications, Inc..
One California Street - 29th Floor
San Francisco, CA 94105

Robert F. Kelley, Jr.
Office of the Governor
P.O. Box 2950
Agana, Guam 96910

Howard Hunt
RIITA
P.O. Box 10
Dixon, IA 52745

Norman Rasmussen
Colorado Independent Telephone Association
3236 Hiwan Drive
Evergreen, CO 80439

Paul Hoff
Park Region Mutual Telephone Co.
P.O. Box 277
100 Main Street
Underwood, MN 56586

Charles H. Helein
Helein & Associates, PC
8180 Greensboro Drive
Suite 700
McLean, VA 22102

Scott L. Smith
Matanuska Telephone Assn.
1740 South Chugach Street
Palmer, AK 99645

J. Scott Searl
Baird, Holm, McEachen, Pedersen, Hamann &
Strasheim
1500 Woodmen Tower
Omaha, NE 68102

O. Lee Darrington
Rhonda R. Maun
Larry D. Brennan
Telec Consulting Resources, Inc..
909 North 98th Street - Suite 203
Omaha, NE 68114

Robert Clemons
Bledsoe Telephone Coop.
P.O. Box 609
203 Cumberland Avenue
Pikeville, TN 37367

Cynthia B. Miller
State of Florida PSC
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Richard B. Bulman
Rural Telephone Finance Coop.
2201 Cooperative Way
Herndon, VA 22071

Boyd D. Spiker
Rock Port Telephone Company
107 Opp Street
Rock Port, MO 64482

Jill A. Lesser
People for the American Way
2000 M Street, NW
Washington, DC 20036

Angela J. Campbell
Ilene R. Penn
Georgetown University Law Center
600 New Jersey Avenue, NW
Washington, DC 20001

Charles C. Hunter
Hunter & Mow, PC
1620 Eye Street, NW
Suite 701
Washington, DC 20006

Bruce D. Jacobs
Mel Engle
Glenn S. Richards
Theodore N. Stern
Fisher Wayland Cooper Leader and Zaragoza, LLP
2001 Pennsylvania Avenue, NW - Suite 400
Washington, DC 20006

Stephen G. Oxley
Wyoming PSC
700 West 21st Street
Cheyenne, WY 82002

James Rowe
Alaska Telephone Assn.
201 E. 56th Avenue #114
Anchorage, AK 99518

Steve Hamlen
United Utilities, Inc..
P.O. Box 9-2730
Anchorage, AK 99509

Richard M. Tettelbaum
John B. Adams
Citizens Utilities Company
1400 16th Street, NW
Suite 500
Washington, DC 20036

Rachel B. Ferber
360 Communications Company
8725 Higgins Road
Chicago, IL 60631

Gene DeJordy
Christopher Johnson
Western Wireless Corporation
2001 NW Sammamish Road #100
Issaquah, WA 98027

Philip L. Malet
Alfred Mamlet
Steptoe & Johnson
1330 Connecticut Avenue, NW
Washington, DC 20036

Marc A. Paul
Steptoe & Johnson
1330 Connecticut Avenue, NW
Washington, DC 20036

Terry Wegener
Winnebago Cooperative Telephone Assn.
704 East Main
Lake Mills, IA 50450

Joel B. Shifman
Maine PSC
242 State Street
Augusta, ME 04333

Michael Gallagher
New Jersey Board of Public Utilities
Two Gateway Center
Newark, NJ 07120

Emily M. Williams
Association for Local Telecommunications
Services
888-17th Street, NW
Suite 900
Washington, DC 20006

Jeffrey Blumenfeld
Glenn B. Manishin
Blumenfeld & Cohen
1615 M Street, NW
Suite 700
Washington, DC 20036

Lon C. Levin
AMSC Subsidiary Corp.
10802 Park Ridge Boulevard
Reston, VA 20191

Dan Morales
Jorge Vega
Thomas P. Perkins
Consumer Protection Division
P.O. Box 12548, Capitol Station
Austin, TX 78711

Joel Blau
Ann Kutter
NYS Consumer Protection Board
Five Empire State Plaza
Suite 2101
Albany, NY 12223

Joe D. Edge
Richard J. Arsenault
Drinker Biddle & Reath
901 15th Street, NW
Suite 900
Washington, DC 20005

Robert S. Tongren
David C. Bergmann
Office of the Consumers' Counsel - State of Ohio
77 South High Street
15th Floor
Columbus, OH 43266

Veronica Ahern
Nixon, Hargraves, Devans & Doyle
One Thomas Circle, NW
Washington, DC 20036

Richard McKenna,
John F. Raposa
600 Hidden Ridge, HQE03J36
P.O. Box 152092
Irving, TX 75015

Howard J. Symons
Jennifer A. Purvis
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, PC
701 Pennsylvania Avenue, NW
Suite 900
Washington, DC 20004

Alyce H. Hanley
Alaska PUC
1016 West 6th Avenue
Suite 400
Anchorage, AK 99501

Kathy L. Shobert
General Communication, Inc..
901 15th Street, NW
Suite 900
Washington, DC 20005

Robert A. Mansbach
COMSAT Corp.
6560 Rock Spring Drive
Bethesda, MD 20817

Billy Jack Gregg
Terry D. Blackwood
West Virginia PSC
700 Union Building
723 Kanawha Boulevard - East
Charleston, WVA 25301

Richard A. Askoff
Donna A. DiMartino
Regina McNeil
National Exchange Carrier Association, Inc.
80 South Jefferson Road
Whippany, NJ 07981

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
Sprint
401 9th Street, NW - Suite 400
Washington, DC 20004

Paul Rodgers
Charles D. Gray
James Bradford Ramsey
NARUC
1102 ICC Building - P.O. Box 684
Washington, DC 20044

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

Peter Arth, Jr.
Edward W. O'Neill
Mary Mack Adu
State of California and the PUC of California
505 Van Ness Avenue
San Francisco, CA 94102

L. Marie Guillory
Jill Canfield
NTCA
4121 Wilson Boulevard
Tenth Floor
Arlington, VA 22203

James Gattuso
Wayne A. Leighton
Citizens for a Sound Economy Foundation
1250 H Street, NW
Washington, DC 20005

Jan F. Reimer
ICORE, Inc..
326 S. Second Street
Emmaus, PA 18049

Brian R. Moir
Moir & Hardman
2000 L Street, NW
Suite 512
Washington, DC 20036

Gail L. Polivy
GTE
1850 M Street, NW
Suite 1200
Washington, DC 20036

Michael J. Karson
Ameritech
2000 West Ameritech Center Drive
Room 4H84
Hoffman Estates, IL 60196

Michael F. Altschul
Randall S. Coleman
Cellular Telecommunications Industry Assn.
1250 Connecticut Avenue, NW
Suite 200
Washington, DC 20036

Michael T. Skrivan
Harris, Skrivan & Associates, LLC
8801 S. Yale - Suite 220
Tulsa, OK 74137

Eric B. White
Missouri PSC
P.O. Box 360
Jefferson City, MO 65102

B.B. Knowles
Georgia PSC
244 Washington Street, SW
Atlanta, GA 30334

M. Robert Sutherland
Richard M. Sbaratta
Rebecca M. Lough
BellSouth
1155 Peachtree Street, NE - Suite 1700
Atlanta, GA 30375

Henry Geller
Samuel A. Simon
Alliance for Public Technology
901 15th Street, NW
Suite 230
Washington, DC 20005

Gary M. Epstein
Teresa D. Baer
Michael S. Wroblewski
Latham & Watkins
1001 Pennsylvania Avenue, NW - Suite 1300
Washington, DC 20004

Michael S. Fox
John Staurulakis, Inc..
6315 Seabrook Road
Seabrook, MD 20706

Michael J. Shortley, III
Global Crossings
180 South Clinton Avenue
Rochester, NY 14646

David Beckett
Colorado PUC
1580 Logan Street - OL -2
Denver, CO 80203

William H. Smith
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Commissioner Rod Johnson
Nebraska PSC
300 The Atrium
1200 N Street
P.O. Box 94927
Lincoln, NE 68509

Illona A. Jeffcoat-Sacco
North Dakota PSC
600 E. Boulevard
Bismarck, ND 58505

William J. Janklow
South Dakota PUC
500 East Capitol Avenue
Pierre, SD 57501

Kenneth Stofferahn
James A. Burg
South Dakota PUC
500 East Capitol Avenue
Pierre, SD 57501

Pat Wood, III
Texas PUC
1701 North Congress Avenue - P.O. Box 13326
Austin, TX 78701

Marc A. Stone
Fred Williamson & Associates, Inc..
2921 E. 91st Street
Suite 200
Tulsa, OK 74137

Mary E. Newmeyer
Alabama PSC
100 North Union Street
Suite 800
Montgomery, AL 36104

Mark Cooper
Gene Kimmelman
Consumer Federation of America
1424 16th Street, NW - Suite 604
Washington, DC 20036

R. Glenn Rhyne
South Carolina PSC
P.O. Drawer 11649
Columbia SC 29211

David R. Poe
Yvonne M. Coviello
LeBoeuf, Lamb, Greene and MacRae
1875 Connecticut Avenue, NW
Suite 1200
Washington, DC 20009

Andrew D. Lipman
Mark Sievers
Swidler & Berlin, Chtd.
3000 K Street, NW
Suite 300
Washington, DC 20007

Thomas E. Taylor
Jack B. Harrison
Frost & Jacobs
201 East Fifth Street
Cincinnati, OH 45202

Robert M. Lynch
Durward D. Dupre
Michael J. Zpevak
Southwestern Bell Telephone Co.
One Bell Center - Room 3524
St. Louis, MO 63101

David A. Gross
AirTouch Communications
1818 N Street, NW
Washington, DC 20036

Maureen O. Helmer
Penny B. Rubin
John Starrs
PSC of NY
Three Empire State Plaza
Albany, NY 12223

Jeffrey L. Sheldon
Sean A. Stokes
Utilities Telecommunications Council
1140 Connecticut Avenue, NW
Suite 1140
Washington, DC 20036

Mary J. Dent
Goldberg, Godles, Wiener & Wright
1229 19th Street, NW
Washington, DC 20036

Raymond G. Bender, Jr.
J.G. Harrington
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036

Brenda L. Fox
Continental Cablevision, Inc..
1020 19th Street, NW
Suite 700
Washington, DC 20036

John W. Katz
Office of the State of Alaska
444 North Capitol Street, NW
Suite 336
Washington, DC 20001

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

Jere W. Glover
Barry Pineles
US Small Business Administration
409 Third Street, SW
Washington, DC 20416

Joseph P. Markoski
James M. Fink
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, NW
P.O. Box 407
Washington, DC 20044

Joseph DiBella
Bell Atlantic Telephone Companies
1320 North Court House Road
Eight Floor
Arlington, VA 22201

Betty D. Montgomery
Duane W. Luckey
Steven T. Nourse
PUC of Ohio
180 East Broad Street
Columbus, OH 43266

Emily C. Hewitt
Vincent L. Crivella
Michael J. Ettner
GSA
18th & F Streets, NW - Room 4002
Washington, DC 20405

Dale White
Churchill County Telephone and Telegraph System
P.O. Box 1390
50 W. Williams Avenue
Fallon, NV 89406

Jack Brown
Golden West Telecommunications Coop., Inc..
P.O. Box 411
Wall, SD 57790

Cheryl A. Tritt
Charles H. Kennedy
James A. Casey
Morrison & Foerster
2000 Pennsylvania Avenue, NW
Suite 5500
Washington, DC 20006

David W. McGann
Illinois Commerce Commission
160 North LaSalle Street
Suite C-800
Chicago, IL 60601

Robert McKenna
Ken Cartnell
U S WEST, Inc..
1020 19th Street, NW
Suite 700
Washington, DC 20036

Joseph K. Witmer
Pennsylvania PUC
P.O. Box 3265
Harrisburg, PA 17120

Roger Hamilton
Ron Eachus
Joan H. Smith
Oregon PUC - Justice Building
550 Capitol Street, NE
Salem, OR 97310

Victor A. Hurbert
Frederick & Warinner
10901 W. 84th Terrace
Suite 101
Lenexa, KS 66214

Joan Mandeville
Montana Telephone Assn.
208 N. Montana Avenue - Suite 207
Helena, MT 59601

Robert F. Manifold
NASUCA
900 4th Avenue
Suite 2000
Seattle, WA 98164

Sandra Mattavous-Frye
Office of the People's Counsel of DC
1133 15th Street, NW
Suite 575
Washington, DC 20005

Michael C. Strand
Montana Independent Telecommunications
Systems, Inc..
519 N. Sanders
P.O. Box 5237
Helena, MT 59604

John F. Mortell
G. Richard Klein
David E. Ziegner
Indiana Utility Regulatory Commission
302 West Washington - Suite E306
Indianapolis, IN 46204

Thomas K. Crowe
Law Offices of Thomas K. Crowe, PC
2300 M Street, NW
Suite 800
Washington, DC 20037

Michael J. Nowick
Minnesota Telephone Assn., Inc..
1650 Minnesota World Trade Center
30 East Seventh Street
St. Paul, MN 55101

Lawrence W. Katz
Edward D. Young, III
Michael E. Glover
Bell Atlantic
1320 North Court House Road - Eighth Floor
Arlington, VA 22201

Robert M. Halperin
Crowell & Moring
1001 Pennsylvania Avenue, NW
Washington, DC 20004

J. Manning Lee
Gail Garfield Schwartz
Paul E. Cain, Sr
Teleport Communications Group, Inc..
Two Teleport Drive
Staten Island, NY 10311

Katherine G. Grincewich
US Catholic Conference
Office of the General Counsel
3211 4th Street, NE
Washington, DC 20017

Daniel L. Brenner
Neal M. Goldberg
David L. Nicoll
NCTA
1724 Massachusetts Avenue, NW
Washington, DC 20036

Timothy R. Graham
Robert M. Berger
Joseph M. Sandri, Jr.
Winstar Communications, Inc..
1146 19th Street, NW - Suite 200
Washington, DC 20036

Director
Office of the Consumer Advocate
US Postal Rate Commission
Washington, DC 20268

Barbara S. Wellbery
Chief Counsel
U.S. Department of Commerce RM. 4713
14th St. & Constitution Ave., N.W.
Washington, D.C. 20230

Charles M. Oliver
iSCAN, L.P.
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Ave., NW
Suite 800
Washington, DC 20036

Mark J. O'Connor
CIX
Piper & Marbury L.L.P.
1200 19th St, NW
Washington, DC 20036

Diane C. Gaylor
Monica A. Leimone
Paul, Weiss, Rifkind, Wharton & Garrison
1615 L St., NW, Suite 1300
Washington, DC 20036

Joseph A. Godles
Panamsat Corp.
Goldberg, Godles, Wiener & Wright
1229 19th St., NW
Washington, DC 20554

Paul H. Kuzia
Arch Comm. Group, Inc.
1800 West Park Dr., Suite 350
Westborough, MA 01581

Robert K. Lock, Jr.
The Competitive Strategies Group, Ltd.
70 East Lake St.
Suite 630
Chicago, IL. 60601

Robert L. Hoggarth
PCIA
500 Montgomery ST.
Suite 700
Alexandria, VA 22314-1561

Kate McGee
Oracle Corp.
1667 K St., NW, Suite
Suite 700
Washington, DC 20006

Peter A. Rohrbach
GE American Comm., Inc.
Hogan & Hartson L.L.P.
555 13th St., NW
Washington, DC 20004

Jonathan D. Blake
Business Software Alliance
Covington & Burling
1201 Pennsylvania Ave., NW
P.O. Box 7566
Washington, DC 20044

Glenn B. Manishin
Netaction
1615 M St., NW, Suite 700
Washington, DC 20036

Kurt A. Wimmer
Covington & Burling
1201 Pennsylvania Ave., NW
P.O. Box 7566
Washington, DC 20044

Regina Costa
The Utility Reform Network (TURN)
625 Polk St., Suite 403
San Francisco, CA 98102

Carl K. Oshiro
Markham & Oshiro
100 1st St., Suite 2540
San Francisco, CA 94105

Carolyn C. Hill
ALLTEL
655 15th St., NW
Suite 220
Washington, DC 20005

Jacquelyn Brand
Universal Service Alliance
2175 East Francisco Dr., Suite L
San Rafael, CA 94901

Dee N. Monsen
RT Communications, Inc.
130 South 9th
Worland, WY 82401

Daniel J. Fly
REMEC
1105 16th St.
Traverse City, MI 49684-2386

Douglas J. Wagner
Tularosa Basin Telephone Co. Inc.
402 Higuera St.
Tularosa, NM 88352-0068

Thomas J. Keller, Esq.
Orion Atlantic
901 - 15th St., NW
Suite 700
Washington, DC 20005

Burton G. Tregub
Cylink Corp.
910 Hermosa Ct.
Sunnyvale, CA 94086

Brian O'Connor
Aerial Comm., Inc.
8410 West Bryn Mawr Ave., #1100
Chicago, IL 60631

James Baller
American Public Power Association
The Baller Law Group
1820 Jefferson Place, NW
Suite 200
Washington, DC 20036

John A. Butler
National Urban League, Inc.
120 Wall Street
Seventh Floor
New York, NY 10005

Matthew Lampe
City of Seattle Department of Administrative Services
12th Fl Alaska Building
618 Second Avenue
Seattle, WA 98104-2214

Frederick M. Joyce
CelPage, Inc.
Joyce & Jacobs, Attys. at Law, L.L.P.
1019 19th St., NW
14th Floor, PH-2
Washington, DC 20036

David L. Meier
Cincinnati Bell Telephone
201 E. 4th St.
P.O. Box 2301
Cincinnati, OH 45201-2301

Jim Hart
Office of Consumer Affairs
Consumers' Utility Counsel Division
#2 Dr. M.L. King, Jr. Drive
Plaza Level, East Tower
Atlanta, GA 30334

Michael L. Ginsberg
Utah Public Service Commission & Utah DPU
160 E. 300 South
Box 146751
Salt Lake City, UT 84114-6751

Dana Frix
Excel Telecomm., Inc.
Swidler & Berlin, Chartered
3000 K St., N.W. Suite 300
Washington, DC 20007

Ron McCue
Silver Star Telephone Co.
P.O. Box 226 104101 HWY 89
Freedom, WY 83120

Raymond G. Bender, Jr.
Vanguard Cellular Systems, Inc.
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Ave., NW
Washington, DC 20036

Jim Gay
NASTD
c/o The Council of State Governments
Iron Works Pike
P.O. Box 11910
Lexington, KY 40578-1910

Werner K. Hartenberger
Cox Comm., Inc.
Dow, Lohnes & Albertson PLLC
1200 New Hampshire Ave.
Washington, DC 20036

Lawrence D. Crocker, III
District of Columbia PSC
717 14th St., NW
Washington, DC 20005

Phoebe Forsythe Sales
Puerto Rico Telecommunication
Calle Juan Calaf #400
Suite 439
San Juan, PR 00918-9903

David A. Irwin
Irwin Campbell & Tannenwald, PC
1730 Rhode Island Avenue, NW
Suite 200
Washington, DC 20036

Richard D. Gary
Virginia's Rural Telephone Co.
Hunton & Williams
951 East Byrd St.
Richmond, VA 23219

James U. Troup
Steven J. Hamrick
Arter & Hadden
1801 K Street, NW - Suite 400K
Washington, DC 20006

Philip V. Otero
GE American Communications, Inc.
Four Research Way
Princeton, NJ 08540

Peter A. Rohrbach
David L. Sieradzki
Hogan & Hartson LLP
555 13th Street, NW
Washington, DC 20004

Albert H. Kramer
Robert F. Aldrich
Dickstein Shapiro Morin & Oshinsky LLP
2101 L Street, NW
Washington, DC 20037

Lawanda R. Gilert
New Jersey Division of the Ratepayer Advocate
31 Clinton Street
P.O. Box 46005
Newark, NJ 07101

Sandra-Ann Y.H. Wong
Sandwich Isles Communications, Inc.
1001 Bishop Street
Pauahi Tower - Suite 2750
Honolulu, HI 96813

David Higginbotham
Teletouch Licenses, Inc.
P.O. Box 7370
Tyler, TX 75711

Paul J. Berman
Alane C. Weixel
Covington & Burling
1201 Pennsylvania Avenue, NW
P.O. Box 7566
Washington, DC 20044

Elisabeth H. Ross
Birch, Horton, Bittner and Cherot
1155 Connecticut Avenue, NW - Suite 1200
Washington, DC 20036

Jerome K. Blask
Daniel E. Smith
Gurman, Blask & Freedman
1400 16th Street, NW
Suite 500
Washington, DC 20036

David W. Danner
Washington State Department of Information Services
P.O. Box 42445
Olympia, WA 98504

W. Paul Mason
Information Technology
200 Piedmont Avenue
Suite 1402 - West Tower
Atlanta, GA 30334

Lori Anne Dolqueist
Angela J. Campbell
Institute of Public Representation
Georgetown University Law Center
600 New Jersey Avenue, NW
Washington, DC 20001

Judy Sello
Mark C. Rosenblum
AT&T
295 North Maple Avenue
Room 1135L2
Basking Ridge, NJ 07920

Carrol S. Verosky
Wyoming PSC
700 West 21st Street
Cheyenne, WY 82002

Peter H. Jacoby
AT&T
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Alan R. Shark
American Mobile Telecommunications Association, Inc.
1150 18th Street, N.W., Suite 250
Washington, D.C. 20036

Herbert E. Marks
James M. Fink
SQUIRE, SANDERS & DEMPSEY, L.L.P.
1201 Pennsylvania Avenue, NW
P.O. Box 407
Washington, DC 20044

Kathryn Matayoshi
Charles W. Totto
DEPT. OF COMMERCE AND CONSUMER AFFAIRS
250 South King Street
Honolulu, Hawaii 96813

Sue D. Blumenfield
Michael G. Jones
Jennifer Desmond McCarthy
WILLKIE FARR & GALLAGHER
Three Lafayette Center
1155 21st Street, NW
Washington, DC 20036

Bruce Burcat
Delaware PSC
861 Silver Lake Blvd.
Cannon Building - Suite 100
Dover, DE 19904

Brian Conboy
Thomas Jones
Jay Angelo
WILLKIE FARR & GALLAGHER
Three Lafayette Center
1155 21st Street, NW
Washington, DC 20036

Francis R. Perkins
Meyner and Landis
One Gateway Center
Newark, NJ 07102

Ramsey L. Woodworth
Robert M. Gurs
Rudolph J. Geist
Wilkes, Artis, Hedrick & Lane, Chtd.
1666 K Street, NW - Suite 1100
Washington, DC 20006

Michele C. Farquhar
Dvid L. Sieradzki
Ronnie London
Hogan & Hartson, LLP (Western Wireless)
555-13th Street, NW
Washington, DC 20004

Alfred G. Richter Jr.
Roger K. Toppins
Hope Thurrott
SBC Communications
One Bell Plaza - Room 3023
Dallas, TX 75202

ITS
1231-20th Street, NW
Washington, DC 20036

Christopher A. McLean
Rural Utilities Service
US Department of Agriculture
Washington, DC 20250

Mary M. Tennyson
Senior Assistant Attorney General
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive Southwest
Olympia, WA 98504-7250

David L. Lawson
Rudolph M. Kammerer
Christopher T. Shenk
Sidley & Austin
1722 Eye Street, N.W.,
Washington D.C. 2000

Stephen L. Goodman
Halprin, Temple, Goodman & Maher
555 12th Street, N.W.
Suite 950, North Tower
Washington, D.C. 20004

John G. Lamb, Jr.
Nortel Networks Inc.
2100 Lakeside Boulevard
Richardson, Texas 75081-1599