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

In the Matter of )  
)  
ATEAC, Inc., Alaska Telephone Company, )  
Arctic Slope Telephone Association )  
Cooperative, Inc., Interior Telephone )  
Company Inc., Mukluk Telephone )  
Company, Inc., and United-Kuc, Inc. )  
)  
Petition for Waiver of the Definition of )  
"Study Area" in Part 36, Appendix- )  
Glossary of the Commission's Rules )

CC Docket No. 96-45

**COMMENTS OF THE  
UNITED STATES TELECOM ASSOCIATION**

The United States Telecom Association ("USTA")<sup>1</sup> hereby submits its comments in the above captioned proceeding<sup>2</sup> in support of the petitioners' requests for waiver of the definition of "study area" in Part 36 of the Commission's rules.<sup>3</sup>

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<sup>1</sup> 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.

<sup>2</sup> The Commission established the pleading cycle in this proceeding in its *Public Notice* in CC Docket No. 96-45, DA 00-2306, released October 12, 2000 (*"Notice"*). The Petition for Study Area Waiver (*"Petition"*) was filed on September 22, 2000.

<sup>3</sup> 47 C.F.R. Part 36 Appendix-Glossary.

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## I. BACKGROUND

The *Petition* involves the sale of all thirteen Alaska exchanges (serving approximately 23,800 access lines) now owned by GTEA, an Alaska corporation whose parent company is GTE Corporation, to four Alaska incumbent LECs and one new Alaska LEC.<sup>4</sup> ATEAC is the acquisition company formed by GTE to negotiate the sale of the exchanges to the acquiring companies.<sup>5</sup> The acquiring companies are:

Alaska Telephone Company ("ATC"), a rural incumbent local exchange carrier ("LEC") presently serving approximately 4,500 access lines from 14 exchanges in southeastern Alaska. It will acquire through ATEAC six more exchanges serving approximately 7,600 access lines in the same area of Alaska, and through grant of the requested waiver seeks to add these exchanges to its existing Alaska study area.<sup>6</sup> The expanded ATC study area will thus serve approximately 12,100 access lines;

Arctic Slope Telephone Association Cooperative ("ASTAC"), a rural incumbent LEC presently serving approximately 2,400 access lines from eight exchanges in northern Alaska. It will acquire through ATEAC a single exchange serving approximately 3,700 access lines in Barrow, Alaska which is near its other northern Alaska exchanges, and

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<sup>4</sup> *Petition* at 2. GTE Corporation is a New York Corporation recently merged with Bell Atlantic to form Verizon Corporation.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* at 2-3.

through grant of the requested waiver seeks to add this exchange to its existing Alaska study area.<sup>7</sup> The expanded ASTAC study area will thus serve approximately 6,100 access lines;

Interior Telephone Company, Inc. ("ITC"), a rural incumbent LEC serving approximately 4,800 access lines from nine exchanges in central and southwestern Alaska. It will acquire through ATEAC two exchanges serving approximately 4,100 access lines in south central Alaska near to its presently served areas. ITC seeks to add these exchanges to its existing Alaska study area through grant of the requested waiver.<sup>8</sup> The expanded ITC study area will thus serve approximately 8,900 access lines;

Mukluk Telephone Company, Inc. ("MTC"), a rural incumbent LEC serving approximately 1,300 access lines from 12 exchanges in west central Alaska. It will acquire through ATEAC a single exchange serving approximately 3,400 access lines in Nome, Alaska which is near its presently served areas. MTC seeks to add this exchange to its existing Alaska study area through grant of the requested waiver.<sup>9</sup> The expanded MTC study area will thus serve approximately 4,700 access lines; and

United-KUC, Inc. ("United"), a new Alaska corporation not previously providing service as a LEC. However, another subsidiary of United's parent company is United Utilities,

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<sup>7</sup> *Id.* at 3.

<sup>8</sup> *Id.*

<sup>9</sup> *Id.* at 4.

Inc., which serves approximately 5,900 access lines from 57 exchanges in central and southwestern Alaska. United will acquire through ATEAC three exchanges serving 5,000 access lines in southwestern Alaska. Through grant of the requested waiver, it seeks to operate these exchanges as part of a new Alaska study area.<sup>10</sup>

In the aggregate, with the exit from Alaska of GTEA, the acquiring petitioners will move from four LECs serving 13,000 access lines in rural Alaska communities to five LECs serving 36,800 access lines. They seek grant of their request for waiver of the Commission's study area rules in order that the transaction be allowed to proceed to completion.<sup>11</sup>

USTA believes that Petitioners have demonstrated good cause for grant of their requested waivers, and, as explained further below, urges the Commission to expeditiously grant their requests.

## **II. THE COMMISSION'S TESTS FOR GRANTING A STUDY AREA WAIVER HAVE BEEN MET**

The Commission's rules state that "(s)tudy area boundaries shall be frozen as they are on November 15, 1984."<sup>12</sup> However, the Commission has granted numerous waivers from this rule where it determined that "special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest."<sup>13</sup> The Commission normally applies a three

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<sup>10</sup> *Id.*

<sup>11</sup> *Id.* at 17.

<sup>12</sup> 47 C.F.R. Part 36, Appendix-Glossary.

<sup>13</sup> Sully Buttes Telephone Cooperative, Inc. and Qwest Corporation Joint Petition for Waiver of Definition of "Study Area" Contained in Part 36, Appendix-Glossary of the Commission's Rules; and Sully Buttes Telephone Cooperative, Inc. Petition for Waiver of

prong standard in these instances.

First, the requested study area boundary change must not have an adverse impact on the Universal Service Fund ("USF").<sup>14</sup> Petitioners demonstrate that this condition will be met. They note that the Commission's rules require that a carrier acquiring exchanges from a non-affiliated carrier shall receive the same level of per-line support from the USF as the exchanges were eligible for before the transfer. The amount of support they receive from their pre-existing exchanges is not a factor.<sup>15</sup> Thus, the Commission's own rules lock in compliance with the first standard of its test. Even if this were not the case, Petitioners explain that the size of the high-cost USF is limited by the interim indexed cap.<sup>16</sup>

Second, the state regulatory commission having jurisdiction over the area to be transferred does not oppose the change.<sup>17</sup> Petitioners have included as attachments orders of the Regulatory Commission of Alaska which clearly demonstrate that it does not oppose the transfers of the 13 GTEA exchanges to the acquiring LECs through ATEAC.<sup>18</sup>

Third, the transfer must serve the public interest. Petitioners explain that as a result of this transaction, customers in the acquired exchanges will be served by Alaska companies with

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Sections 61.41(c) and (d) and 69.3(3)(11) of the Commission's Rules, *Order*, CC Docket No. 96-45, released August 18, 2000, ¶ 8 ("*Sully Buttes Order*").

<sup>14</sup> *Id.*

<sup>15</sup> *Petition*, pg. 11, citing 47 C.F.R. §54.305.

<sup>16</sup> *Id.*, citing In the Matter of Amendment of Part 36 of the Commission's Rules and Establishment of a Joint Board, *Report and Order*, CC Docket 80-286, 9 FCC Rcd 303 (1993).

<sup>17</sup> *Sully Buttes Order* at ¶ 8.

<sup>18</sup> *Petition* at 12-13, and Exhibits B through F.

local control for the first time. Petitioners maintain that this local control will be more responsive to customers in the 13 communities served by the acquiring companies.<sup>19</sup>

Petitioners also state that the increased size of the acquiring carriers' serving areas will avail them of scale and scope economies which will enable them to enhance the array of services provided to all their customers, and to do so more efficiently. Petitioners add that retention of profits from telecommunications services and additional telecommunications jobs and purchases in Alaska will have a positive impact on rural Alaska economic development.<sup>20</sup>

Petitioners note with concern the Commission's reluctance since 1994 to approve the creation of new study areas due to a concern over artificially increasing USF support.<sup>21</sup> They explain that they are seeking to create a new study area for the exchanges being acquired by United for business reasons wholly unrelated to USF considerations, and that in any event §54.305 of the Commission's rules precludes any such "gaming."<sup>22</sup>

USTA believes that petitioners have demonstrated that the public interest will be served by allowing the transfers to proceed.

### **III. EXPEDITED ACTION ON THE REQUESTED WAIVER IS NECESSARY**

Petitioners filed their request for waiver of the Commission's rules on September 22, 2000. The Commission's *Notice* sets a pleading cycle under which comments are due by October 27, 2000, and replies by November 6, 2000. Under this pleading schedule, it is not certain that

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<sup>19</sup> *Id.* at 13-14.

<sup>20</sup> *Id.* at 14.

<sup>21</sup> *Id.* at 15.

<sup>22</sup> *Id.* at 15-16.

the Commission will issue an order before January 1, 2001. This would be more than three months after the parties sought their waiver. If indeed the waiver is found to be in the public interest, as USTA believes it is, then swift action by the Commission can only further serve the public interest. USTA urges the Commission to recognize the importance of acting quickly to help bring the benefits set forth in the *Petition* to the customers, present and future, of ATC, ASTAC, ITC, MTC, and United.

**V. CONCLUSION**

For the foregoing reasons, USTA urges the Commission to expeditiously approve the waivers of its rules as requested by ATEAC, ATC, ASTAC, ITC, MTC, and United in their *Petition*.

Respectfully submitted,

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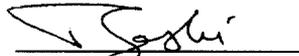
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**CERTIFICATE OF SERVICE**

I, Meena Joshi, do certify that on October 27, 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 attached service list.

  
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