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Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
)	
Comments on the Rural Task Force)	FCC-00J-3
Recommendation)	
To: The Joint Board		

REPLY COMMENTS

UNITED STATES TELECOM ASSOCIATION

OPASTCO

NATIONAL RURAL TELECOM
ASSOCIATION

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

November 30, 2000

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SUMMARY

In these reply comments, The United States Telecom Association, the Organization for the Promotion and Advancement of Small Telecommunications Companies, and the National Rural Telecom Association (collectively the Associations) continue to support the *Rural Task Force Recommendation* and advocate that the Joint Board move the *Recommendation* forward to the Commission without change. Since the Associations believe that the *Rural Task Force Recommendation* is complementary to the principles contained in the Petition for Rulemaking of the LEC Multi-Association Group (the MAG Plan), the *Rural Task Force Recommendation* and the MAG Plan should move ahead immediately in tandem.

Several issues raised in other parties' comments warrant further comment. First, certain parties question the finding that the synthesis model should not be used to size the universal service fund for rural carriers. The Associations believe that the Rural Task Force has adequately substantiated its determination and that this finding should be affirmed.

Second, arguments that the five year period for continuing the current support system for rural carriers is too long are without merit. Both the Joint Board and the Commission have long recognized the differences between rural and non-rural carriers as a justification for separate evaluation and treatment. On the other hand, as substantiated by the Virgin Islands Public Service Commission and the Virgin Islands Telephone Corporation, insular areas are properly included in the definition of rural carriers for universal service support.

Third, several parties raised concerns that the *Recommendation* did not ensure that funding levels will be only as sufficient as necessary to support qualified services. The Rural Task Force fully addressed the fact that smaller calling scopes of many rural carriers results in increased toll calls. Even with the re-based cap on the fund, as proposed by the Rural Task Force, support would remain below carriers' costs.

Finally, two issues were raised that are clearly beyond the scope of the Rural Task Force and the Joint Board and therefore should not be further considered in this context. One is the argument that the Commission should address its prior-year assessment methodology for USF contributions before it considers increasing the size of the fund for rural carriers. This issue is being considered separately by the Commission. The other involves an attempt to include intrastate revenues in assessing federal USF support. Not only was this issue not referred to the Joint Board, addressing this issue would further delay the resolution of universal service reform for rural carriers, because additional statutory authority may be required.

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REPLY COMMENTS

The United States Telecom Association (USTA), the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), and the National Rural Telecom Association (NRTA) (collectively the Associations) hereby submit their reply comments to the comments filed regarding the *Rural Task Force Recommendation to the Federal-State Joint Board on Universal Service (Rural Task Force Recommendation)*.¹

In their comments, the Associations observed that the Rural Task Force adopted a set of recommendations that constitute reasonable approaches to the universal service needs of rural carriers and the areas they serve, and advocated that the Joint Board move the *Rural Task Force Recommendation* forward to the Commission without change. Since the Associations believe that the *Rural Task Force Recommendation* is complementary to the principles contained in the Petition for Rulemaking of the LEC

¹ FCC-00J-3, released Sept. 29, 2000. Comments and reply comments were solicited by Public Notice, 65 Fed. Reg. 61330 (2000).

Multi-Association Group (the MAG Plan),² the Associations advocated that the *Rural Task Force Recommendation* and the MAG Plan move ahead immediately in tandem.

A number of issues raised in other parties' comments warrant further comment.

Each of those issues is addressed below:

I. The Rural Task Force Determination that a Synthesis Model to Size the Universal Service Fund for Rural Carriers is Inappropriate Should be Upheld

Several parties questioned the firm conclusion of the *Rural Task Force Recommendation* that a forward-looking cost model should not be used to size the universal service fund for rural carriers. WorldCom contended that the Rural Task Force has not provided a basis for the Commission to reconsider its "selection" of a forward-looking cost approach for rural carriers.³ WorldCom claimed that the criticisms of the model for rural carriers focus on inputs rather than structure.⁴ Despite these criticisms, WorldCom did not object to the use of embedded cost mechanisms for a transition period of five years or less.⁵ Sprint expressed disappointment that the Rural Task Force selected an embedded cost methodology, but acknowledged that it is a "practical way" to proceed.⁶ California argued that the Rural Task Force has not explained why the use of a forward-looking cost model is not appropriate for rural carriers but is appropriate for non-

² Improved Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, RM No. ___, *Petition for Rulemaking of the LEC Multi-Association Group*, filed Oct. 20, 2000 (the MAG Plan).

³ WorldCom, Inc. Comments at 2.

⁴ *Id.* at 3.

⁵ *Id.* at 5.

⁶ Sprint Corporation Comments at 1-2.

rural carriers serving rural areas, and therefore has no basis for rejecting the cost model.⁷ California suggested that modifications to the forward-looking cost model for rural carriers should be considered.⁸

The Rural Task Force stated that it “gave careful consideration to the model adopted by the FCC for non-Rural Carriers,” as it was directed to do when the Rural Task Force was established.⁹ As already noted by the Associations,¹⁰ the Rural Task Force devoted extensive time and other resources to evaluating the appropriateness of the model to rural carriers. It conducted a detailed study of 23 sample rural companies and compared model results with actual company data for 195 additional companies. Its White Paper 4, *A Review of the FCC’s Non-Rural Universal Service Fund Method and the Synthesis Model for Rural Telephone Companies*, is the culmination of that process, which clearly and convincingly demonstrates that “the Synthesis Model was not the appropriate tool to recommend for developing federal universal service support for Rural Carriers.”¹¹ Specifically, White Paper 4 found that the model results differ significantly from rural carriers’ actual lines, number of route miles, type of plant, wire center area, Central Office Equipment switching investment, elements of general support investment, and Network Operations and Corporate Operations expenses.¹² The Rural Task Force’s extensive evaluation and analysis constitute well-reasoned substantiation for the

⁷ People of the State of California and the California Public Utilities Commission Comments at 2-3.

⁸ *Id.* at 3.

⁹ *Rural Task Force Recommendation* at 17, n. 31.

¹⁰ The Associations’ Comments at 4.

¹¹ *Id.*, White Paper 4 at 48.

conclusion that the forward-looking cost model is not appropriate for determining rural carriers' costs. Its recommendation should be adopted by the Joint Board, notwithstanding the reservations expressed in the above comments.

II. Distinct Treatment of Rural Carriers, Including Insular Areas, for Universal Service Funding is Fully Justified

Maine and Vermont sought elimination of the differences between universal service support systems for non-rural and rural carriers and urged that the Joint Board find that the five year period for continuing the current system is too long.¹³ They claimed that the *Rural Task Force Recommendation* should have focused on rural customers, rather than rural companies,¹⁴ and urged the Joint Board to take steps to align the separate non-rural and rural support systems.¹⁵ Similarly, Alaska urged the Commission to disaggregate rural carriers into “at least two discrete subgroups” on the basis that a wide range of differences exist between carriers in that classification.¹⁶

Conversely, both the Virgin Islands Public Service Commission and the Virgin Islands Telephone Corporation supported the *Rural Task Force Recommendation* that recognizes the unique conditions of insular areas that justify their inclusion in the definition of rural carriers for universal service support.¹⁷ The Virgin Islands Commission stated that the Rural Task Force properly accounted for “the fact that the

¹² *Id.* at 9-10.

¹³ Maine Public Utilities Commission, Vermont Department of Public Service, and Vermont Public Service Board Comments at 2-7 (Maine/Vermont Comments).

¹⁴ *Id.* at 3.

¹⁵ *Id.* at 7.

¹⁶ Regulatory Commission of Alaska Comments at 5-7 (Alaska Comments).

¹⁷ Public Service Commission of the United States Virgin Islands Comments at 2-5 (Virgin Islands Commission Comments); Virgin Islands Telephone Corporation Comments at 3-6 (Vitelco Comments).

economic and geographic characteristics that distinguish rural and insular areas from urban areas also contribute to differing universal service needs.”¹⁸ The Virgin Islands Commission also found that the *Rural Task Force Recommendation* “provides a mechanism for universal service to keep pace with those costs [in rural and insular areas] while allowing for investment in modernization of the telecommunications infrastructure.”¹⁹ Vitelco provided legal justification that supports Rural Task Force and Commission recognition that insular areas are “subject to their own set of unique challenges when it comes to the provision of universal telecommunications service.”²⁰

The Joint Board, in its November 1996 *Recommended Decision* on Universal Service, recognized the significant differences between rural and non-rural carriers.²¹ Specifically, the Joint Board noted that rural carriers generally serve fewer subscribers, serve more sparsely populated areas, and do not generally benefit from economies of scale and scope.²² The Joint Board also recognized “the difficulty in precisely modeling small, rural carriers’ costs.”²³ Based upon the Joint Board’s *Recommended Decision*, the Commission decided to apply the non-rural/rural carrier designation to universal service reform.²⁴ In implementing this bifurcated approach, the Commission adopted the

¹⁸ Virgin Islands Commission Comments at 2-3.

¹⁹ *Id.* at 5.

²⁰ Vitelco comments at 4, 5.

²¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, *Recommended Decision*, FCC 96J-3, released November 8, 1996 (*Recommended Decision*).

²² *Id.* at ¶283.

²³ *Id.* at ¶285.

²⁴ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, *Report and Order*, released May 8, 1997 at ¶96 (*Report and Order*).

definition of “rural telephone company” in Section 153(37) of the Act.²⁵ Carriers serving insular areas also fall under the broader term of “rural carriers” as the basis for the non-rural/rural distinction, consistent with the intent of Congress.²⁶ In so doing, the Commission recognized that several non-rural carriers serve rural areas, but that significant differences exist between non-rural and rural carriers which warrant different universal service treatment.²⁷ The Rural Task Force has documented these differences.²⁸ The Commission confirmed a year ago that it would continue to employ the statutory “rural telephone company” definition for purposes of bifurcating its approach to universal service.²⁹

Maine/Vermont and Alaska are attempting to seek reconsideration of these existing Commission determinations concerning the basis for its non-rural/rural treatment of universal service reform. Such requests are untimely and otherwise procedurally deficient, since they are seeking reconsideration of Commission orders in comments on the *Rural Task Force Recommendation* to the Joint Board.³⁰ They must be rejected on this ground alone.

²⁵ 47 U.S.C. §153(37).

²⁶ Section 254(b)(3) applies the principle of rate and service comparability with urban areas to “rural, insular, and high cost areas.”

²⁷ *Report and Order* at ¶ 291.

²⁸ *Rural Task Force Recommendation* at 10-14; White Paper 2, *The Rural Difference*; White Paper 1, *Rural Task Force Mission and Focus* at 9-15.

²⁹ Federal-State Joint Board on Universal Service; Forward-Looking Support Mechanism for Non-Rural Carriers, CC Docket Nos. 96-45 and 97-160, 14 FCC Rcd. 20156 at ¶459 (1999).

³⁰ *Report and Order* at ¶253; *Tenth Report and Order*, CC Docket Nos. 96-45 and 97-160 (FCC 99-304, released Nov. 2, 1999) at ¶459. Furthermore, the Rural Task Force explained this aspect of its efforts in White Paper 1, *Rural Task Force Mission and Focus* at 15-16.

The Maine/Vermont and Alaska requests must fail on the merits as well. The Rural Task Force has completed a substantial, comprehensive analysis of the differences between rural and non-rural carriers which has been supported by the majority of the comments. These substantive determinations adequately justify the Commission's initial determination to treat non-rural and rural carriers uniquely for universal service programs.

The notion that support for loops, switching and transport should be combined into a single support mechanism ignores the differences in the cost characteristics of these three plant categories once investment decisions have been made. Even if the initial choice among these elements involves network design trade-offs, once deployed each must be able to recover its own costs, particularly for a rural carrier that loses its rural exemption under section 251(f) and must provide them as unbundled elements. The incumbent cannot offset high loop costs with lower switching or transport costs, for example, unless it continues to provide both. Similarly, if a competitor offers one or more of these elements separately to customers, the support that is portable to that competitor when it captures a customer from the incumbent cannot rationally include the support for the functions which the incumbent is still providing.

In addition, the determination that the *Rural Task Force Recommendation* remain in place for five years is well-reasoned. Sufficient time--at least five years--is necessary to promote the regulatory certainty and stability in the industry necessary for investment decisions and rational business planning, as well as to give participants time to implement the policies. In addition, a rural access plan, as contained in the MAG Plan, should be

implemented and given a chance to function together with the rural universal service plan.

On the other hand, the Virgin Islands Commission and Vitelco have provided a comprehensive analysis that fully justifies the *Rural Task Force Recommendation* that insular areas, such as the Virgin Islands, should be included in the rural treatment of universal service support. The Joint Board should affirm the inclusion of insular areas in the rural universal service plan.

III. Evidence Does Not Support Assertions that Funding Levels May Exceed What is Required to Attain “Sufficiency”

Some commenters criticized the *Rural Task Force Recommendation* on the basis that it does not ensure that funding levels will be only as sufficient as necessary to support qualified services.³¹ Maine/Vermont cited local rates offered by specific carriers, with the implication that low local rates indicates that support is overly generous.³² Yet Maine/Vermont does not account for the smaller calling scopes of these carriers’ service areas, and how much in toll charges the customers may need to incur in order to make calls that are typically local in the more densely populated areas served by larger non-rural carriers. The Rural Task Force’s second white paper provides extensive data regarding how the limited local calling scopes of rural telephone companies impel their customers to make more toll calls, resulting in average total (local plus toll) monthly rates for both rural and non-rural consumers that are strikingly similar.³³ This data

³¹ Maine/Vermont Comments at 8-10; New York State Department of Public Service, Connecticut Department of Public Utility Control, Illinois Commerce Commission, and Maryland Public Service Commission Comments (New York *et al.* Comments) at 2-4.

³² Maine/Vermont Comments at 9.

³³ Rural Task Force White Paper 2, *The Rural Difference*, at 39-43; *Rural Task Force Recommendation* at 33.

demonstrates why the low local rates of -some rural telephone companies cannot be interpreted as an indication that support is too generous.

In fact, even with the re-based cap on the fund proposed in the *Rural Task Force Recommendation*, it should be noted that support would remain below carriers' costs.³⁴ Specifically, the *Rural Task Force Recommendation* calls for the cap on the high-cost loop fund to be re-based as if the cap had not been in effect for the year 2000, resulting in an increase of \$118.5 million.³⁵ Yet NECA has established that shortfalls for this year alone run to \$133 million.³⁶ Thus, the *Rural Task Force Recommendation* does not allow support to grow unfettered, as some might imply.³⁷ The *Rural Task Force Recommendation* clearly calls for average loop support costs to be frozen at \$240.00, based on recent actual data.³⁸ The *Rural Task Force Recommendation* also calls for accountability, and recognizes the role state commissions, NECA, the Universal Service Administration Company (USAC) and the Commission play to ensure that support goes only to qualified services.³⁹

In addition, New York *et al.* claimed that the *Rural Task Force Recommendation* does not ensure that support levels reach "only that amount necessary to enable states to

³⁴ Associations Comments at 6-7.

³⁵ *Rural Task Force Recommendation* at 24, n. 46.

³⁶ National Exchange Carrier Association (NECA), *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, *Further Notice of Proposed Rulemaking*, FCC 99-204, filed Dec. 17, 1999 at 3-4.

³⁷ New York *et al.* Comments at 2, 4.

³⁸ *Rural Task Force Recommendation* at 24. Similar to current caps, the re-based cap would be adjusted for inflation and growth.

³⁹ *Id.* at 32-33; *see also* Associations Comments at 11-12; Wyoming Comments at 4.

establish rates for ‘universal service’ in [rural] areas that are ‘reasonably comparable’ to those in urban areas.”⁴⁰ New York *et al.* also note that the Commission, in the proceeding for non-rural carriers, placed an emphasis on the role of federal support “to enable reasonable comparability of rates *among* states.”⁴¹ The Rural Task Force was aware of questions regarding the coordination of federal and state programs and policies.⁴² Yet it also recognized that the Commission had previously determined that it would not make receipt of federal support contingent on the changing or implementation of programs by states.⁴³ Although it was not required to do so, the Rural Task Force considered emulating the federal-state relationship established in the proceeding for universal service support for non-rural carriers.⁴⁴ However, their detailed examination of the complex issues involved led them to conclude that such a relationship would prove too burdensome and risky for states, rural carriers and consumers alike. The Rural Task Force properly concluded that the differences between rural and non-rural carriers necessitate a different solution.

Further, the Rural Task Force recognized that the basic premise of federal universal service support lies in the fact that higher telephone penetration levels nationwide benefit the entire country. While states fulfill vital roles in promoting high

⁴⁰ NY *et al.* Comments, at 3-4 (cite omitted).

⁴¹ *Id.* at 3 (cite omitted).

⁴² White Paper 1, *Rural Task Force Mission and Focus*, at 18-19.

⁴³ *Id.* at 18 (citing Federal-State Joint Board on Universal Service, *Seventh Report and Order*, CC Docket No. 96-45, released May 27, 1999 at ¶¶11, 45. See *Texas Office of Public Utility Counsel v. FCC*, No. 97060421, 1997 WL 556461 (5 th Cir. July 30, 1999)).

⁴⁴ White Paper 3, *Alternative Mechanisms for Sizing A Universal Service Fund for Rural Telephone Companies* at 23-24; White Paper 4, *A Review of the FCC's Non-Rural Universal Service Fund Method and the Synthesis Model for Rural Telephone Companies* at 4-8, 16-19.

penetration levels, local rates in high-cost areas remain affordable because the costs are spread nationwide. The primacy of the federal component of universal service is vital to keep rates affordable for consumers in the highest-cost markets who are typically served by smaller carriers.

IV. Attempts to Eliminate the USF Prior-Year Assessment Methodology are Beyond the Scope of this Proceeding

AT&T argued that the Commission should address its prior-year assessment methodology for USF contributions before it considers increasing the size of the universal service fund to accommodate rural carrier concerns.⁴⁵ As AT&T recognized, the Commission is considering this issue separately.⁴⁶ It is not an issue that the Commission and the Joint Board designated for consideration by the Rural Task Force. In fact, this is an access charge issue solely under the Commission's jurisdiction that is being separately considered in a Commission proceeding.⁴⁷ Therefore, AT&T's argument is misplaced and should not be considered by the Joint Board.

V. Attempts to Include Intrastate Revenues in Calculating USF Support are Beyond the Scope of this Proceeding and Would Further Delay Universal Service Reform for Rural Carriers

AT&T argued for inclusion of intrastate revenues in assessing USF support, recognizing that such a policy would require additional statutory authority.⁴⁸ The whole issue of the assessment base for USF support was not referred to the Rural Task Force or

⁴⁵ AT&T Comments at 4-5.

⁴⁶ *Id.* See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, *Further Notice of Proposed Rulemaking and Order*, FCC 00-359, released Oct. 12, 2000.

⁴⁷ Access Charge Reform for Incumbent Local Exchange Carriers Subject to Rate-or-Return Regulation, CC Docket No. 98-77, *Notice of Proposed Rulemaking*, FCC 98-101, released June 4, 1998.

⁴⁸ AT&T Comments at 4.

the Joint Board. It is beyond the scope of the Rural Task Force and the Joint Board.

Therefore, AT&T's comments on this matter should not be considered by the Joint Board in considering the *Rural Task Force Recommendation*. Furthermore, because additional statutory authority may be required, addressing the issue would further delay the resolution of universal service reform for rural carriers.

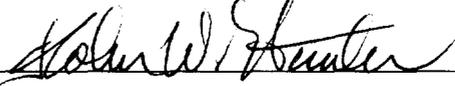
VI. Conclusion

The Associations continue to urge the Joint Board to move the *Rural Task Force Recommendation* forward to the Commission as containing reasonable proposals to address the universal service needs of rural carriers and the areas they serve that the Commission should consider. The Associations also continue to advocate that the FCC consider the *Rural Task Force Recommendation* and the MAG Plan together on an expedited track, so that final Commission action is taken to allow the *Rural Task Force Recommendation* to become effective by January 1, 2001 and the MAG Plan by July 1, 2001. In order to achieve this schedule, the Associations urge the Joint Board to move the *Recommendation* forward to the Commission without change. This is a procedural

recommendation. Toward this end, the Associations request that the Joint Board consider their initial comments and the reply comments contained herein

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION

By 

Its Attorneys:

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

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

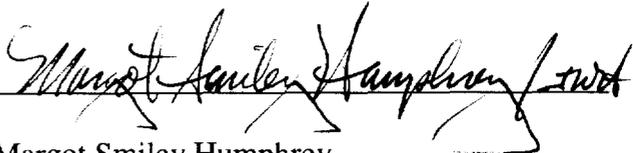
OPASTCO

By 

Stuart Polikoff
Stephen Pastorkovich

21 Dupont Circle, N.W.
Suite 700
Washington, D.C. 20036
(202) 659-5990

NATIONAL RURAL TELECOM ASSOCIATION

By 

Margot Smiley Humphrey

HOLLAND & KNIGHT LLP
2100 Pennsylvania Avenue, N.W.
Suite 400
Washington, D.C. 20037
(202) 457-5915

November 30, 2000

CERTIFICATE OF SERVICE

I, Meena Joshi, do certify that on November 30, 2000, Reply 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.



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

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

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

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

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

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

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

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

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
Paul Rodgers
Charles D. Gray
NARUC
1101 Vermont Avenue, N.W. Suite 200
Washington, DC 20005

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Joe D. Edge
Richard J. Arsenault
Drinker Biddle & Reath
1500 K Street, NW
Suite 1100
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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

William J. Janklow
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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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
601 Pennsylvania Avenue, NW
Suite 720
Washington, DC 20004

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.
3131 Jay St.
Box 54952
Santa Clara, CA 95054-3308

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
Alston & Bird LLP
601 Pennsylvania Avenue, NW
North Building - 11th Floor
Washington, DC 20004

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Ramsey L. Woodworth
Robert M. Gurss
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

Hope Thurrott
SBC Communications
1401 Eye Street, NW
Suite 1100
Washington, DC 20005

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

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