ORIGINAL

DOCKET FILE COPY ORIGINAL

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

RECEIVED

DEC 14 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45

AT&T REPLY COMMENTS ON USF LAG FNPRM

Mark C. Rosenblum
Judy Sello

Its Attorneys

Room 1135L2
295 North Maple Avenue
Basking Ridge, New Jersey 07920
(908) 221-8984

December 14, 2000

No. of Copies rec'd 0+4
List ABCDE

TABLE OF CONTENTS

INTRODUCTION AND SUMMARY. 1

I. THE COMMISSION MUST REVISE THE PRIOR-YEAR ASSESSMENT METHODOLOGY BECAUSE IT VIOLATES THE ACT 2

II. A CARRIER ASSESSMENT BASED ON CURRENT REVENUES IS WORKABLE AND CAN BE IMPLEMENTED PROMPTLY IN A MANNER THAT WOULD ENSURE THE INTEGRITY OF THE USF PROGRAM 7

III. MODIFYING THE PRIOR-YEAR ASSESSMENT MECHANISM TO A SHORTER LAG INTERVAL WOULD NOT SOLVE THE COMPETITIVE INEQUITY OF THE EXISTING METHOD. 14

CONCLUSION. 15

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

Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45

AT&T REPLY COMMENTS ON USF LAG FNPRM

Pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. § 1.415, AT&T Corp. ("AT&T") submits this reply to other parties' comments on the Commission's Further Notice of Proposed Rulemaking and Order ("FNPRM"), FCC 00-359, released October 12, 2000 and published in 65 Fed. Reg. 67322, 67371 (November 9, 2000), in the Commission's *Universal Service* proceedings.[1]

INTRODUCTION AND SUMMARY

In the FNPRM, the Commission seeks comments on revising the existing assessment method for determining carriers' universal service contributions based on their prior-year revenues.[2] Such a revision is long overdue, both to restore fairness to the universal service contributions borne by interexchange carriers ("IXCs") and their

---

[1] Cellular Telecommunications Industry Association ("CTIA"), Network Operator Services, Inc. ("NOS"), Operator Communications, Inc. d/b/a Oncor Communications, Inc. ("Oncor"), Qwest Corporation ("Qwest"), Sprint Corporation ("Sprint"), Universal Service Administrative Company ("USAC"), United States Telecom Association ("USTA"), Verizon Communications Corp. ("Verizon"), and WorldCom, Inc. ("WorldCom") filed comments.

[2] The Commission adopted the prior-year assessment mechanism in *Federal-State Joint Board on Universal Service*, 12 FCC Rcd 8776 (1997) ("*Universal Service Order*").

customers, and to comport with Congress's mandate that such contributions be equitable and nondiscriminatory. As AT&T showed in its comments, and as confirmed in Part I, that methodology systematically disadvantages carriers with declining revenues, violates statutory requirements, discourages local competition, and should be promptly rectified. Part II shows that a carrier assessment based on current revenues is workable and can be implemented promptly. By contrast, as shown in Part III, simply shortening the lag would not cure the competitive inequity.

I. THE COMMISSION MUST REVISE THE PRIOR-YEAR ASSESSMENT METHODOLOGY BECAUSE IT VIOLATES THE ACT.

As AT&T showed (at 2-5), Section 254(d) of the Telecommunications Act of 1996 requires that all interstate telecommunications service providers make an equitable and nondiscriminatory contribution to universal service support. The Commission's existing USF recovery mechanism – which assesses carriers' USF contribution obligation based on prior-year revenues – is profoundly anticompetitive and does not comply with this statutory directive because it means that carriers with declining interstate revenues will be systematically disadvantaged as compared to carriers with increasing interstate revenues. Specifically, it will put IXCs, who must compete with Regional Bell Operating Companies ("RBOCs") as they gain entry into the long distance market, at a severe and untenable competitive disadvantage because, under the Commission's prior-year assessment and contribution methodology, the RBOCs will escape contributions for one year on their increasing retail interstate long distance revenues after in-region entry.[3] In addition, in

[3] Instead, the RBOCs will make their USF contributions for the first year after in-region entry based exclusively on their prior-year revenues from the subscriber line charge

(footnote continued on following page)

subsequent years of their ramp-up in the long distance market, their USF assessments, and corresponding contributions, will be based on their lower prior-year interstate revenues. To the extent the RBOCs increase market share following in-region entry, the revenue base for recovery of their USF obligations will always be greater than the revenue base on which their USF obligations were assessed. In fact, the RBOCs will be able to use this discrepancy to finance their market share growth. By contrast, IXCs will be in precisely the reverse situation: they will be forced to recover the USF assessments made against a larger prior-year revenue base from a diminishing long distance customer base.

Most parties recognize this fundamental problem with the Commission's current rule. As WorldCom (at 1-2) points out, "the existing universal service assessment methodology provides an unfair competitive advantage to new entrants in the long distance market. Because new entrants are not required to make universal service contributions for the first twelve months of operation, new entrants can charge prices that [are] purely a regulatory artifact, not a reflection of superior efficiency."

As Oncor (at 2) demonstrates, "basing universal service contributions on prior year revenues unfairly awards a competitive advantage to carriers that have experienced revenue growth over the previous year and improperly imposes a significant and unfair competitive disadvantage on those carriers that have suffered declines in revenues over the previous year." This is because, as NOS (at 1-2) explains, for "carriers whose revenues have increased since the preceding year, . . . their contribution is a smaller

---

(footnote continued from previous page)

("SLC"), special access and such limited corridor service that an RBOC was previously permitted to provide.

percentage of their current year's revenue" than for those carriers whose year-over-year revenues have declined. In a year in which its revenues decline, the carrier's universal service assessment will be a higher proportion of its current year revenue base than carriers with increasing or stable revenues." . . . "As a result, established providers or carriers with declining revenues may need to charge their end-users non-competitive rates in order to generate the additional revenue needed to meet their universal service contributions. In a competitive sector such as the long distance market, pass-through of a carrier's inequitable assessment will essentially price the carrier's services out of the market and cause the carrier to lose customers. Furthermore, new entrants and carriers with increasing revenues can either undercut the prices of other carriers or charge the same rates and earn an additional profit. This discriminatory effect impairs the ability of certain carriers to provide competitive telecommunications service because they will have to charge their end users higher rates to collect the necessary fees for their universal service contribution." *Id.*

Indeed, as Sprint (at 2) shows, the "current system confers a double competitive benefit to the RBOCs – their federal USF contributions are based on their lower, prior year revenue figures, which results in a USF obligation which is lower than it would be if current revenues were used; and their USF obligation is spread out over a higher base (current revenues), enabling the RBOCs to assess a lower surcharge (or in any case, incur lower USF costs per dollar of current revenues). Of course, the opposite will hold true for carriers whose interstate revenue base is declining; they have a higher USF obligation, which they must recover from a smaller base, resulting in a higher USF surcharge. . . . In the intensely competitive interexchange marketplace, with its razor-thin margins, a regulation-induced cost advantage of only a few percentage points can mean all

the difference to the individual carriers competing in the marketplace." Sprint at 2. In fact, "the competitive imbalance between RBOCs and IXCs will be exacerbated over time, as the RBOCs win an ever-increasing number of customers (and thus revenues) from IXCs. Furthermore, as the Commission itself recognizes (¶ 11), the competitive advantage enjoyed by the RBOCs under the current system may well have ramifications in the local markets as well, 'by giving incumbent local exchange carriers entering the long distance marketplace a competitive advantage in the provision of bundled local and long distance service offerings.'" Sprint at 2-3. The Commission did *not* consider these particular impacts in establishing the rule, even though, as Verizon points out (at 3), the prospect of eventual long distance entry by the Bell companies existed since the Telecommunications Act of 1996 was passed.

Despite these indisputable effects, and Qwest's statement (at i) that it "supports the goal of using more recent revenue data in . . . applying the universal service contribution factor, so that there is a closer relationship between a carrier's current revenues and its contribution to the fund," Verizon (at 2), Qwest (at 4, 8) and USTA (at 2), all of whom are would-be beneficiaries of the existing rule, nonetheless contend that the fact that AT&T and other carriers have declining revenues does not render the prior-year assessment mechanism inequitable and that parties who advocate change to the existing assessment mechanism are somehow attempting to insulate themselves from competitive losses. Verizon (at 3), for example, asserts that "[t]he fact that the regional Bell operating companies have been highly successful in gaining new customers in the states where they have received in-region long distance authority while AT&T, for one, has continued to lose long distance market share, is the result of each carrier's marketing efforts and cannot be

attributed to an alleged new-entrant advantage in universal service assessments." To the contrary, neither AT&T nor any other carrier operating in a competitive market can insulate itself from competitive losses and modifying the universal service assessment mechanism to one based on current revenues will not and cannot shield AT&T or any other carrier from competitive losses. Thus, the very premise of Verizon's contention is incorrect.

The fact is that the Commission's prior-year USF assessment mechanism creates a distinct advantage to each RBOC after it gains in-region entry, an advantage that cannot be explained away by the fact that other long distance carriers will likely rapidly lose market share to these new entrants. As Hertz correctly explained, in comments filed on AT&T's March 1, 2000 petition for reconsideration (at 6), the fact that "some carriers are experiencing declines in market share and revenues is undoubtedly attributable to market forces that are independent of the Commission's rules. *It does not follow, however, that the Commission's rules, when applied to these pre-existing market conditions, have no separate or distinct competitive effect.*" (emphasis added). The FCC rule itself necessarily "punishes carriers with declining revenues and rewards those with increasing revenues." *Id.* at 5. Thus, the prior-year assessment mechanism when applied to BOC provision of in-region, interLATA services is a far cry from the competitive neutrality demanded by Section 254. The Commission must therefore modify its USF assessment mechanism to bring it into compliance with Section 254(d)'s requirements.

Verizon (at 2) cites to the Commission's finding in the *Seventeenth Reconsideration Order,* FCC 99-280, released October 13, 1999 (¶ 21), that the "fact that some carriers may have difficulty recovering their contributions from a declining customer base is the product of a competitive marketplace, not an inequitable, discriminatory, or

competitively-biased Commission rule." The Commission did make this statement. However, it is precisely because this finding is incorrect that the Commission has issued the FNPRM so that it may examine the issue afresh. As AT&T, Hertz, NOS, Oncor, Sprint and WorldCom have demonstrated, the existing prior-year USF assessment mechanism itself has an independent anticompetitive impact that violates Section 254(d)'s requirements. The Commission must now proceed to correct this problem by adopting a current-revenue carrier assessment or a mandatory end-user surcharge.

II. A CARRIER ASSESSMENT BASED ON CURRENT REVENUES IS WORKABLE AND CAN BE IMPLEMENTED PROMPTLY IN A MANNER THAT WOULD ENSURE THE INTEGRITY OF THE USF PROGRAM.

Although recognizing the inequity of the prior-year assessment mechanism, several commenters oppose any significant modification because of the administrative convenience of the existing methodology.[4] The fact that a current-revenue assessment would require more frequent reporting and thus would put some additional burden on carriers is not an unreasonable trade-off to ensure competitive neutrality. Neither the existing prior-year assessment nor any other mechanism that fails to redress the inequity of the lag can be justified based on administrative convenience because it is flatly inconsistent with the dictates of the Act. On the other hand, as AT&T demonstrated (at 6-10), a methodology based on current revenues is workable and can be implemented promptly in a manner that would ensure the integrity of the USF program.

---

[4] CTIA at 8-9; WorldCom at 2. *See also* Qwest at 4, 8; USTA at 9; Verizon at 2 (all opposing significant change).

To be sure, under AT&T's proposal there would be 14 carrier reports. However, two of these are the already existing USF reporting forms, namely, the Form 499A filed April 1 and the Form 499S filed September 1. The twelve monthly submissions to be filed 45 days after the close of the billing month would only need to identify the carrier's billed assessable revenues multiplied by the Commission-specified USF factor to confirm the correctness of the carrier's USF contribution. Thus, although the frequency of carrier reports would increase under a current-revenue assessment mechanism, as NOS (at 6) points out, monthly reporting is *not* unduly burdensome and in many instances is consistent with state USF reporting requirements.

Moreover, various carriers' contentions that a current-revenue assessment would be too burdensome for carriers is, at best, disingenuous. In earlier phases of this proceeding *all* carriers had supported a mandatory end-user surcharge, which would have similarly required carriers to provide a monthly revenue report with their USF contributions and which would have assured that both assessment and recovery of USF obligations would be based on current revenues.[5] Indeed, GTE and Southwestern Bell *appealed* the Commission's failure to adopt such a recovery mechanism to the Fifth Circuit.[6]

As the FNPRM (¶¶ 14-15) recognizes and as USAC (at 7) notes, with a current-revenue assessment there is the possibility that changes in market conditions might

---

[5] In the proceedings leading up to the *Universal Service Order*, AT&T and other carriers had urged the Joint Board and the Commission to recover universal service costs through a retail surcharge on end-users' bills, applied to customer-specific retail revenues. *See* AT&T at 10-11 & n.11 (citing parties).

[6] *Texas Office of Public Utility Counsel v. FCC*, No. 97-60421, Brief of GTE and Southwestern Bell Tel. Co. at 96-99 (Feb. 20, 1998).

result in a decline in interstate end-user telecommunications revenues which could generate a shortfall in the USF. *See also* Verizon at 5. However, "Sprint does not anticipate dramatic fluctuations (especially downwards) in total industry revenues in the period between the dates on which carriers would file their Form 499, although there could be shifts in revenue between carriers (which of course would not affect total industry revenues)." Sprint 3-4. Although USAC indicates (at 7) that in 5 out of 13 quarters there has been a decline in the USF revenue base, there have been no year-over-year negative changes. Indeed, as NOS (at 4) shows, Commission data show that telecommunications revenues have increased every year since 1992. Thus, as the Commission recognized (¶ 14), assuming this growth in telecommunications revenues continues, there should be no shortfall.

Nonetheless, given quarterly fluctuations in telecommunication revenues, to ensure the adequacy of support funds should a shortfall occur, the Commission needs to establish a "reserve." AT&T believes that USAC's suggestion (at 8) of a $378 million reserve, which represents an entire month of USF revenues, is far too large if it is going to be funded by carrier contributions as opposed to a commercial loan which USAC is authorized to obtain. 47 C.F.R. § 54. 709(c). AT&T suggests that a reserve of $150 million, which is more than 10 percent of the quarterly support amount of $136 million for the 4th Quarter 2000, would be appropriate. As USAC (at 8) reports, 10 percent is consistent with the TRS contingency fund.

Assuming that the Commission determines that a $150 million reserve account or contingency to cover the transition to the current-revenue mechanism is the appropriate amount, it can be set up as follows, assuming the transition begins on

January 1, 2001.[7] Currently, USAC does not make the first distribution of Schools and Libraries ("S&L") support until the end of February 2001, after it has received the January 2001 USF contributions from carriers on February 15, 2001. The S&L Fund is to be funded at a rate of $527 million for the 1st Quarter 2001, or $176 million for each month.[8] Accordingly, there should be available in the S&L Fund $176 million on February 15, 2001 that can be used for intra-USF borrowing. By delaying the S&L disbursements scheduled for the end of February until later on in the quarter, USAC can use $150 million of the $176 million available to initially fund the reserve account. Then, as the reserve account is funded by carrier payments with the January, February and March assessments (which are collected on March 15, April 15 and May 15, respectively), USAC can reimburse the S&L Fund at a rate of $50 million per month.[9]

The reserve account can be administered as if it were a separate and distinct program within the USF. Thus, for funding purposes, the $150 million required for the reserve account would be added to the total program collection requirement for the 1st Quarter 2001, and the assessment rate would be calculated accordingly. For example, an updated 1st Quarter 2001 assessment rate, including a $150 million reserve account, would be 0.074232 [($1.353795B + $150M) total program funding requirement/ $20.258089B

---

7 WorldCom (at 3) asks for a six-month transition to any new USF assessment scheme. As AT&T (at 8-9) showed, however, this is unnecessary as a current-revenue assessment can be implemented in an orderly fashion commencing January 1, 2001.

8 Public Notice, *Proposed First Quarter 2001 Universal Service Contribution Factor*, DA 00-2764, released December 8, 2000.

9 The reimbursement may need to be spread out into the 2nd Quarter 2001 if USAC needs to tap into the reserve account for other reasons.

quarterly contribution base = 0.074232 USF factor], per Public Notice, DA 00-2764, released December 8, 2000.[10]

As the carrier payments are submitted, USAC would fund the four USF programs (high-cost, low-income, schools & libraries, and rural healthcare), with the remainder of the monthly carrier payments targeted for the reserve account. USAC should monitor the reserve account during the quarter, and should set the following quarter's assessment rate to maintain a balance of $150 million in that account.[11] If there is continued year-over-year growth of the assessment base, and barring any shortfall during the transition, the reserve account should exceed $150 million at the end of each quarter. As a result, the funding requirement of the reserve account for the succeeding quarter should be zero. However, the Commission may want to establish a threshold amount above $150 million whereby USAC would lower the following quarter's assessment rate in order to reduce the reserve account to $150 million.

Once a reserve account of proper size is established, true-ups needed for the USF would come from the reserve. Accordingly, contrary to Qwest's assertions (at 2, 7), there would be no need for carriers to maintain large cash funds to account for a true-up because the reserve would provide stability for carrier cash flow.

USAC (at 12) estimates that given the greater number of carrier reports required under a current-revenue assessment mechanism, its tracking and compliance

---

[10] Alternatively, the Commission may decide to recover the $150 million reserve over a six-month period to minimize the increase in the contribution factor.

[11] During the initial quarter, the reserve account may exceed $150 million prior to reimbursing the S&L Fund for the initial loan.

oversight duties would become more extensive. Specifically, USAC estimates that its annual administrative budget would increase by $1.1 million, from $300,000 to $1.4 million. This increase in administrative expense represents only 0.02 percent of the annual USF support program of $5.5 billion and thus is a very small price to pay to ensure competitive neutrality in how the USF is funded.

USAC (at 13, 16-19) also notes that with a current-revenue assessment the carrier determines the proper support amount, instead of paying the USAC-billed amount. Although this is true, even under the existing mechanism, the USAC-billed amount is based on carrier-reported revenues on their Forms 499; thus, in each instance, carriers are in substantial control. The Commission should continue with the two annual carrier revenue submissions, the Form 499A submitted on April 1 and the Form 499S submitted on September 1 and use these forms to reconcile the carrier payments. Specifically, USAC should compare the January – June revenues that carriers submit in their Form 499S with the monthly revenues as filed along with their carrier payments.[12] Any discrepancies between the filed monthly reports and the Form 499S may be trued-up by the carrier, with settlements reflected in the reserve account.

As Oncor (at 7) shows, basing contribution requirements on current revenues subject to true-up or reconciliation is neither unusual nor unduly cumbersome. In fact, it is the precise model used by the income tax system, where payments are made periodically during the tax year via payroll deductions or estimated taxes, subject to true-up (either a refund of an overpayment or an additional payment) based on the information shown on the

---

[12] Under AT&T's proposed current-revenue assessment, the last payment of the first half of the year, *i.e.,* the June payment, would be made by August 15.

tax return that is filed several months after the close of the tax year. As USAC suggests (at 13, 18), the Commission should consider imposing stiff penalties on carriers for under-reporting revenues and remitting incorrect support amounts.

USAC (at 14) also expresses some concern that under AT&T's proposal, USAC would be required to make USF support disbursements the same day it receives contribution amounts from carriers. This is incorrect. Under AT&T's proposal (at 9), carriers would submit their monthly contribution amounts within 45 days of the end of the billing month. *See* AT&T at Att. A. USAC makes the January support distribution at the end of February, not in the middle of month when payments are coming in.[13] Thus, under a current-revenue assessment, USAC would *not* be required to do a same-day turnaround to process collections and disbursements.

As Qwest (at 10-11) suggests, the Commission could opt to replace the quarterly assessment factor with a semi-annual assessment factor and thus minimize the administrative burden on USAC and carriers of implementing a new factor on a quarterly basis. This would reduce the need for carriers to adjust their USF line-item recovery factors and provide associated customer notices.

AT&T strongly urges the Commission to immediately revise its USF assessment methodology and adopt a contribution mechanism based on current revenues which would operate in a competitively neutral manner. Specifically, the Commission should require the USAC to set the USF contribution factor assessed against carriers (as it

---

[13] Under AT&T's proposed transition, there would be a February 15, 2001 payment based on December 2000 revenues. Accordingly, USAC will have sufficient funds to make USF support distributions at the end of February 2001. *See* AT&T at Att. A.

does today) but require carriers to contribute to the USF based on the application of the factor to their *current* retail revenues.[14] Such a carrier assessment would be competitively neutral because, as end-user revenues shift among carriers, so would their USF contribution obligation. In other words, the carrier contribution obligation would be portable, just as USF support distribution is, under the Commission's program. Although this would not insulate any carrier from competitive losses, it would ensure that no carrier is competitively disadvantaged by the USF program and that customers are free to select carriers based on the quality and price of their services, as contemplated by the Act.

III. MODIFYING THE PRIOR-YEAR ASSESSMENT MECHANISM TO A SHORTER LAG INTERVAL WOULD NOT SOLVE THE COMPETITIVE INEQUITY OF THE EXISTING METHOD.

Qwest (at 9-12) suggests maintaining the existing mechanism but shortening the lag by 3 months, leaving a lag of 9-15 months as compared to the existing 12-18 month lag. FNPRM, ¶ 21. Such a shortening of the lag would not address the competitive inequity in the current system given the sharp decline in traditional long distance revenues. Accordingly, neither the Commission's nor Qwest's shortened lag proposal should be adopted.

---

[14] This is the method used by Texas and Colorado for their state universal service funds. In Texas the factor is applied to monthly retail revenues, whereas Colorado applies the factor quarterly to current revenues.

CONCLUSION

To the extent and for the reasons stated above and in AT&T's Comments, the Commission should modify its prior-year assessment mechanism for USF contributions by adopting either: (a) a current-revenue carrier assessment mechanism or (b) a mandatory end-user surcharge.

Respectfully submitted,

AT&T CORP.

By /s/ Judy Sello

Mark C. Rosenblum
Judy Sello

Room 1135L2
295 North Maple Avenue
Basking Ridge, New Jersey 07920
(908) 221-8984

Its Attorneys

December 14, 2000

AT&T LAW ID:9089036120 DEC 14'00 14:51 No.003 P.04

CERTIFICATE OF SERVICE

I, Tracy L. Rudnicki, do hereby certify that on this 14th day of December, 2000, a copy of the foregoing "AT&T Reply Comments on USF Lag FNPRM" was served by U.S. first class mail, postage prepaid, on the parties named on the attached Service List.

/s/ Tracy L. Rudnicki
Tracy L. Rudnicki

AT&T LAW ID:9089036120 DEC 14'00 14:51 No.003 P.05

SERVICE LIST
UNIVERSAL SERVICE
CC DOCKET NO. 96-45

The Honorable Susan Ness, Chair
Commissioner
Federal Communications Commission
445 Twelfth Street, SW, Room 8-B115
Washington, DC 20554

Irene Flannery
Acting Ass't. Division Chief
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-A426
Washington, DC 20554

The Honorable Harold Furchtgott-Roth
Commissioner
Federal Communications Commission
445 Twelfth Street, SW, Room 8-A302
Washington, DC 20554

Paul Gallant
Federal Communications Commission
Legal Advisor to Commissioner Tristani
445 Twelfth Street, SW, Room 8-C302B
Washington, DC 20554

The Honorable Gloria Tristani
Commissioner
Federal Communications Commission
445 Twelfth Street, SW, Room A-C302
Washington, DC 20554

The Honorable Nanette G. Thompson
Regulatory Commission of Alaska
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501-1693

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

Mark Long
Economic Analyst
Florida Public Service Commission
Gerald Gunter Bldg.
2540 Shumard Oak Blvd.
Tallahasse, FL 32399-0866

The Honorable Bob Rowe
Montana Public Service Commission
1701 Prospect Avenue
PO Box 20261
Helena, MT 59620-2601

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

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

Kevin Martin
Federal Communications Commission
Legal Advisor to Commissioner Furchtgott-Roth
445 Twelfth Street, SW, Room 8-A302E
Washington, DC 20554

The Honorable Martha S. Hogerty
Public Counsel
Secretary of NASUCA
Truman Building
301 West High Street, Suite 250
P.O. Box 7800
Jefferson City, MO 65102

Philip F. McClelland
Assistant Consumer Advocate
Pennsylvania Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Charles Bolle
Public Utilities Commission of Nevada
1150 East William Street
Carson City, NV 89701

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

Jordan Goldstein
Federal Communications Commission
Legal Advisor to Commissioner Ness
445 Twelfth Street, SW, Room 5-C441
Washington, DC 20554

Barry Payne
Economist
Indiana Office of the Consumer Counsel
100 North Senate Avenue, Room N501
Indianapolis, IN 46204-2208

Rowland Curry
Policy Consultant
Texas Public Utility Commission
1701 North Congress Avenue
P.O. Box 13326
Austin, TX 78701

Brad Ramsay
Deputy Assistant
General Counsel
National Assoc. of Regulatory Utility
Commissioners
1101 Vermont Avenue, N.W., Suite 200
Washington, D.C. 20005

Jack Leutza
Regulatory Analyst
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Tiane Sommer
Special Assistant
Attorney General
Georgia Public Service Commission
47 Trinity Avenue
Atlanta, GA 30334

Patrick H. Wood, III
Chairman
Texas Public Utility Commission
1701 North Congress Avenue
P.O. Box 13326
Austin, TX 78711-3326

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

Walter Bolter
Intergovernmental Liaison
Florida Public Service Commission
Gerald Gunter Building, Suite 270
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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

Doris McCarter
Ohio Public Utilities Commission
180 E. Broad Street
Columbus, OH 43215-3793

Susan Stevens Miller
Assistant General Counsel
Maryland Public Service Commission
6 Paul Street, 16th Floor
Baltimore. MD 21202-6806

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

Tom Wilson
Economist
Washington Utilities & Transportation Commission
1300 Evergreen Park Drive, S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Linda Armstrong
Attorney
Federal Communications Commission
CCB, Accounting and Audits Division
Universal Service Branch
445 Twelfth Street, SW, Room 5A-663
Washington, DC 20554

Lisa Boehley
Attorney
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-B544
Washington, DC 20554

Katherine Schroder
Deputy Division Chief
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-A423
Washington, DC 20554

Steve Burnett
Public Utilities Specialist
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-B418
Washington, DC 20554

Bryan Clopton
Public Utilities Specialist
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-A465
Washington, DC 20554

Andrew Firth
Attorney
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-A505
Washington, DC 20554

Lisa Gelb
Division Chief
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-A520
Washington, DC 20554

Emily Hoffnar
Federal Staff Chair
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-A660
Washington, DC 20554

Charles L. Keller
Attorney
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-A664
Washington, DC 20554

Katie King
Attorney
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-B550
Washington, DC 20554

Robert Loube
Telecom. Policy Analyst
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-B524
Washington, DC 20554

Brian Millin
Interpreter
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-a525
Washington, DC 20552

Sumita Mukhoty
Attorney
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-A633
Washington, DC 20554

Mark Nadel
Attorney
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-B551
Washington, DC 20554

Gene Fullano
Attorney
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-A623
Washington, DC 20554

Richard D. Smith
Attorney
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5B-448
Washington, DC 20554

Matthew Vitale
Attorney
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-B530
Washington, DC 20554

Sharon Webber
Attorney
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-B552
Washington, DC 20554

Jane Whang
Attorney
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-B540
Washington, DC 20554

Adrian Wright
Accountant
Federal Communications Commission
CCB, Accounting Policy Division
445 Twelfth Street, SW, Room 5-B510
Washington, DC 20554

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

David Dowds
Public Utilities Supervisor
High Cost Model
Florida Public Service Commission
Gerald Gunter Bldg.
2540 Shumard Oaks Blvd.
Tallahassee, FL 32399-0866

Don Durack
High Cost Model
Staffer for Barry Payne
Indiana Office of Consumer Counsel
100 North Senate Avenue
Indianapolis, IN 46204-2208

Greg Fogleman
Regulatory Analyst
High Cost Model
Florida Public Service Commission
Gerald Gunter Bldg.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0866

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

Diana Zake
Texas Public Utility Commission
1701 North Congress Avenue
P.O. Box 13326
Austin, TX 78711-3326

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

Russell M. Blau
Tamar E. Finn
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, DC 20007-5116

Barbara Meisenheimer
Consumer Advocate
Missouri Office of Public Counsel
301 West Madison St., Suite 250
Truman Building
P.O. Box 7800
Jefferson City, MO 65102

Earl Poucher
Legislative Analyst
Office of the Public Counsel
111 West Madison, Rm. 812
Tallahassee, FL 32399-1400

Michael F. Altschul
Vice President, General Counsel
Randall S. Coleman
Vice President for Regulatory Policy and Law
Andrea D. Williams
Assistant General Counsel
Cellular Telecommunications Industry Association.
1250 Connecticut Avenue, N.W., Suite 800
Washington, DC 20036

Mitchell F. Brecher
Debra A. McGuire
Attorneys for Oncor Communications, Inc.
Greenberg Traurig, LLP
800 Connecticut Avenue, N.W.
Washington, DC 20006

John H. Harwood II
Matthew A. Brill
Russell P. Hanser
Counsel for Qwest Corporation
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, DC 20037

Robert B. McKenna
Counsel for Qwest Corporation
1801 California Street, Suite 5100
Denver, CO 80202

Jay C. Keithley
Richard Juhnke
Norina T. Moy
Sprint Corporation
401 9th St., N.W., Suite 400
Washington, DC 20004

D. Scott Barash
Vice President and General Counsel
Cheryl L. Parrino
Chief Executive Officer
Vice President and General Counsel
Robert W. Haga
Vice President Operations
Universal Service Administrative Company
2120 L Street, N.W., Suite 600
Washington, DC 20037

Lawrence E. Sarjeant
Linda L. Kent
Keith Townsend
John W. Hunter
Julie E. Rones
Attorneys for United States Telecom
Association
1401 H Street, N.W., Suite 600
Washington, DC 20005

Joseph DiBella
Attorney for Verizon Telephone Companies
1320 North Court House Road, Eighth Floor
Arlington, VA 22201

Alan Buzacott
WorldCom, Inc.
1801 Pennsylvania Ave., N.W.
Washington, DC 20006