

MAR 12 2001

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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Federal-State Joint Board on  
Universal Service

CC Docket No. 96-45 /  
FCC-00J-3

**AT&T FNPRM REPLY COMMENTS ON  
JOINT BOARD RURAL TASK FORCE RECOMMENDED DECISION**

Pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. § 1.415, and its Further Notice of Proposed Rulemaking, FCC 01-8, released January 12, 2001, and published in 66 Fed. Reg. 7867 (January 26, 2001) ("FNPRM"), AT&T Corp. ("AT&T") respectfully submits these reply comments on the Joint Board Rural Task Force Recommended Decision, FCC 00J-4, released December 22, 2000 ("Recommended Decision").

The majority of commenters support the Rural Task Force ("RTF") Recommendation for interim access charge and universal service reform and urge that it be adopted effective July 1, 2001. As the commenters recognize, the RTF spent 27 months producing this carefully-crafted compromise plan, which reasonably reconciles the interests of numerous competing and disparate parties.<sup>1</sup> Moreover, the

<sup>1</sup> See, e.g., NECA at 3 ("remarkable compromise among industry segments that traditionally have not found common ground"); GVNW at 4 ("delicately balanced and hard-fought compromise"); Wyoming at 1 ("delicately crafted package containing important and valuable compromises"); ALECA at 3 ("result of over two years of hard work and negotiations among diverse interests"); GCI at 2 ("consensus among task force member[s] that represent a diverse range of interested parties"); CenturyTel at 9 ("reached through exhaustive deliberation by a group of rural subject-matter experts"); Innovative Telephone at 27 ("carefully crafted compromise"); South Dakota Ind. Tel. Coalition at 2.

at 4

ORIGINAL

commenters agree that the Commission should adopt the entire Recommendation as a package and implement it effective July 1, 2001, rather than adopting only portions of the plan, which would jeopardize the broad but fragile consensus that now supports the plan.<sup>2</sup>

In particular, the commenters agree that Commission should immediately establish the Recommendation's High Cost Fund III ("HCF III"), the explicit universal service fund to replace subsidies currently implicit in rural carriers' access charges. Adoption of HCF III is urgently needed, to address the numerous problems associated with the large (and growing) disparity between rural LEC and price cap LEC access charges. Although some commenters quibble with aspects of HCF III (as well as other parts of the plan) that, in an ideal world, they would not prefer, the commenters as a whole agree that the public interest would be best served by immediate implementation of the Recommendation in its entirety. Indeed, the commenters' criticisms of the RTF plan and HCF III are not new, but were considered and rejected by the Joint Board in favor of the opportunity to recommend a plan that enjoys broad support from disparate parties. These questions could be endlessly debated, but the Commission should not allow the perfect to become the enemy of the good. The RTF plan is a reasonable and workable compromise that will make long overdue changes in access charges and

---

<sup>2</sup> See ALECA at 2 (urging expeditious "approv[al of] all of the RTF's Recommendations in their entirety"); Alaska Rural Coalition at 3 (urging adoption, "without change, the Rural Task Force's Recommendation"); ATA at 3 (supporting recommendation "if the Commission will accept it in its entirety"); GVNW at 4 (urging adoption of "the proposals set forth in the Recommended Decision"); Wyoming at 1 (urging adoption "as a package"); Western Alliance at iii (supporting "overall compromise package" only if "adopted without significant change"); Innovative Telephone at 18 (supporting adoption "without exception"); Evans *et al.* at 4 (urging adoption of consensus proposal); Interstate Telcom Group at ii (supporting plan "if adopted in its entirety without significant changes"); CenturyTel at 1, 9; *cf.* NRTA, OPASTCO, & USTA at 2, 7 ("generally support[ing]" RTF proposals).

universal service, and quick adoption of the plan would better promote the goals of Congress and the Commission.<sup>3</sup> If the Commission is not prepared to implement HCF III on July 1, 2001, however, the Commission should not implement *any* part of the RTF plan.

As the commenters recognize, immediate adoption of HCF III is necessary for four reasons: (1) to promote competition in rural areas; (2) to relieve pressure on national interexchange carriers for geographic deaveraging of rates; (3) to reduce per minute access charges and make access charge rate structures more economically rational; and (4) to comply with the plain language of Section 254. *See Recommended Decision* ¶¶ 30-32; GCI at 3 (“significant threat to rate averaging and universal service”).

First, making universal service subsidies explicit is a critical piece of the RTF’s integrated package because it is essential to promote competition in high cost areas. Subsidies must be made explicit in order to facilitate the portability of subsidies. Without portability, competitive entry into rural LEC territories will occur only for high-volume customers who are in the lower cost areas served by rural LECs. *See Wyoming* at 9 (supporting portability recommendations for competitive framework); *Fred Williamson & Assocs.* at 6 (supporting portability to promote competition); *Western Alliance* at 3 (arguing RTF plan will promote competition); *Innovative Telephone* at 18

---

<sup>3</sup> *See GCI* at 4 (urging prompt adoption); *CenturyTel* at 10 (urging quick adoption); *Wyoming* at 1 (opposing delay); *ALECA* at 2; *USVI* at 7 (urging adoption “without delay”).

(same).<sup>4</sup> Absent these reforms, broader competitive entry and consumer choice would be thwarted.

Second, making universal service subsidies explicit will remove the anticompetitive effects implicit subsidies cause as a result of the rate averaging requirements of Section 254(g) of the 1996 Act. As the RTF recognized, and as AT&T explained in its initial comments, the continuing disparity between rural and non-rural carriers' access rates creates significant pressure on interexchange carriers to geographically deaverage toll rates, which would potentially conflict with the requirements of Section 254(g). *See* Wisconsin MAG Comments at 8 (recognizing traffic sensitive rate reductions will help maintain the ability of long distance carriers to sustain nationwide averaged pricing); GCI MAG Comments at 3; TCA MAG Comments at 5. This disparity is especially anticompetitive because national interexchange carriers, which must maintain geographically averaged rates nationwide, will not be able to compete with powerful regional carriers (such as the Regional Bell Operating Companies) that have lower overall access costs because they do not offer service in the rural carriers' service areas. AT&T at 8; *see also* Ad Hoc at 26 (“[r]ural carrier access charges have long been set at levels that dwarf those of their non-rural counterparts. It is only appropriate that the implicit subsidies buried in those rates be removed and recovered elsewhere”).

---

<sup>4</sup> In the companion proceeding on the MAG proposal, there is broad recognition of the importance of portability. *See* Alaska MAG Comments at 6; California MAG Comments at 3; CUSC MAG Comments at 7, 10-12; Fred Williamson & Assocs. MAG Comments at 5; GVNW MAG Comments at 4; CORE MAG Comments at 17; Innovative Telephone MAG Comments at 3-4.

Third, commenters generally agree that rural LECs' traffic-sensitive access charges should be reduced. As AT&T suggested (at 8-10), the Commission should build on the CALLS plan, and set rural carriers' switched access rates based on that model. Specifically, AT&T suggested that the Commission (1) increase the caps on subscriber line charges to the levels in CALLS; (2) reduce the traffic-sensitive charges of rural carriers to \$0.0095 per minute (equivalent to that of the smaller price cap companies under CALLS); (3) allow rural carriers to recover the balance of their interstate switched access revenue requirements through a new interstate access-related component of the USF (HCF III); and (4) remove the USF flowback from carrier-paid access charges.<sup>5</sup> *Id.* GCI, in particular, supports an increase in SLCs and reduction of the traffic-sensitive charge to \$0.0095 per minute, "consistent with the target set for rural carriers in the CALLS plan." GCI at 3; *see* Global Crossing MAG Comments at 6-7 (suggesting CALLS rate of \$0.0095 per minute). Moreover, Ad Hoc supports recovery of "a greater portion of the interstate share of subscriber line costs that are presently recovered via per minute prices . . . from the subscribers of those lines, the ultimate cost causers." Ad Hoc at 26. In the concurrent MAG proceeding, there is broad support among commenters for reduced traffic sensitive rates. *See* TCA MAG Comments at 4; Qwest MAG Comments at 2; California MAG Comments at 14; Sprint MAG Comments at 5-6. The Commission can and should implement all of these changes July 1, 2001. *See also* Ad Hoc at 26

---

<sup>5</sup> The commenters agree that the Commission should eliminate the USF flowback, and require rural carriers to recover their USF obligations from their end user customers either in the form of an increment to the SLC or an additional line-item on the customer bill. Recovery of the LECs' USF contributions through carrier-paid access charges constitutes an impermissible implicit subsidy. *See Texas Office of Public Utility Counsel v. FCC*, 183 F.3d 393, 425 (5th Cir. 1999); WorldCom MAG Comments at 11.

(supports the RTF's proposed HCF III to move toward "more economically rational pricing structures").

Fourth, such reforms are required by the 1996 Act. Section 254(e) expressly requires that universal service support "should be explicit." As the Fifth Circuit has held in interpreting these provisions, "[t]he Commission . . . is responsible for making the changes necessary to its universal service program to ensure that it survives in the new world of competition. . . . [T]he old regime of implicit subsidies . . . must be phased out and replaced with explicit universal service subsidies . . . ." *Alenco Communications Inc. v. FCC*, 201 F.3d 608, 615-16 (5th Cir. 2000).

For all of these reasons, the commenters strongly support immediate adoption and implementation of the RTF plan and HCF III. For example, GCI supports the RTF plan "*only if* it is adopted with [the] integral piece," which is "replacement of implicit universal service support with USF high cost funding." GCI at 2; *see* CenturyTel at 2 ("Interstate access charges and universal service mechanisms must be reformed together"). "Simply stated, [the increased support and ability to disaggregate] should not be provided without also eliminating the implicit support that the carriers receive today." GCI at 2; *see also* WorldCom at 4 (although differing with the RTF's sizing of the HCF III, supports replacement of implicit subsidies with a "new explicit fund"); NRTA, OPASTCO, & USTA at 2 (supporting plan generally as a comprehensive approach to access charge reform and universal service). The Commission should adopt HCF III immediately and implement the RTF plan effective July 1, 2001.

Finally, the Commission should eliminate the “USF lag” before the RTF plan takes effect. As AT&T has explained here and elsewhere (*see* AT&T at 16-17 & n.19), the Commission’s assessment methodology based on the prior year’s revenues is unlawful and anticompetitive, because it systematically disadvantages carriers with declining interstate revenues. The RTF plan increases the rural component of the universal service fund, and thus would exacerbate the inequities of the USF lag unless the Commission immediately revises its rules, *prior* to adoption of the RTF Recommendation, to eliminate this flaw in the universal service system.

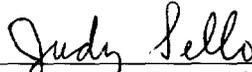
**CONCLUSION**

For the reasons stated above and in AT&T's Comments, the Commission should implement the RTF plan in its entirety by July 1, 2001 and should eliminate the competitive imbalance caused by the USF lag prior thereto. If, for any reason, the RTF access reform proposal and USF lag relief are delayed beyond July 1, 2001, then all universal service modifications that are part of the RTF should likewise be delayed to maintain the delicate balance between competing interests that the RTF has integrated into its comprehensive package.

Respectfully submitted,

AT&T CORP.

By



Mark C. Rosenblum

Judy Sello

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

Gene C. Schaerr  
James P. Young  
Michael L. Post  
Sidley & Austin  
1722 I Street, N.W.  
Washington, D.C. 20006  
(202) 736-8677

Its Attorneys

March 12, 2001

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of March, 2000, I caused true and correct copies of the foregoing Reply Comments of AT&T Corp. to be served on all parties by mailing, postage prepaid to their addresses listed on the attached service list.

Dated: March 12, 2000  
Washington, DC



---

Peter M. Andros

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.  
Tallahassee, 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, DC 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

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, 16<sup>th</sup> 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, 19<sup>th</sup> 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

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

Heather H. Grahame  
Attorneys for the Alaska Rural Coalition  
Dorsey & Whitney LLP  
1031 W. 4<sup>th</sup> Avenue, Suite 600  
Anchorage, AK 99501

James Rowe  
Executive Director  
Alaska Telephone Association  
201 E. 56<sup>th</sup>, Suite 114  
Anchorage, AK 99518

Peter Arth, Jr.  
Lionel B. Wilson  
Ellen S. Levine  
Jonady Hom Sun  
Attorneys for the People of the  
State of California and the California Public  
Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Karen Brinkmann  
Richard R. Cameron  
Counsel for CenturyTel, Inc.  
Latham & Watkins  
1001 Pennsylvania Avenue. N.W.  
Washington, DC 20004

John F. Jones  
Vice President, Government Relations  
CenturyTel, Inc.  
100 Century Park Drive  
Monroe, LA 71203

Michele C. Farquhar  
David L. Sieradzki  
Attorneys for Competitive Universal  
Service Coalition  
Hogan & Hartson, LLP  
555 Thirteenth St., N.W.  
Washington, DC 20004

Fred Williamson & Associates, Inc.  
2921 E. 91<sup>st</sup> St., Suite 200  
Tulsa, OK 74137-3300

Jimmy Jackson  
General Communication, Inc.  
2550 Denali Street, Suite 1000  
Anchorage, AK 99503

Samuel E. Ebbesen  
President & Chief Executive Officer  
Innovative Telephone  
P. O. Box 6100  
St. Thomas, USVI 00801-6100

Gregory J. Vogt  
Derek A. Yeo  
Joshua S. Turner  
Marcus E. Maker  
Attorneys for Innovative Telephone  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006

Bruce C. Reuber  
President  
Interstate Telcom Consulting, Inc.  
P.O. Box 668  
130 Birch Avenue West  
Hector, MN 53342-0668

Gerard J. Duffy  
Counsel for Interstate Telcom Group  
Blooston, Mordkofsky, Dickens,  
Duffy & Prendergast  
2120 L Street, NW, Suite 300  
Washington, DC 20037

Douglas Meredith  
Director Economics and Policy  
John Staurulakis, Inc.  
6315 Seabrook Road  
Seabrook, MD 20706

John Bentley  
Staff Attorney  
Vermont Public Service Board  
Montpelier, VT 05602

Richard A. Askoff  
Regina McNeil  
National Exchange Carriers Association  
80 South Jefferson Road  
Whippany, NJ 07981

Margot Smiley Humphrey  
Attorney for National Rural Telecom  
Association  
Holland & Knight LLP  
2100 Pennsylvania Avenue, NW, Suite 400  
Washington, DC 20037

Stuart Polikoff  
Stephen Pastorkovich  
Attorneys for OPASTCO  
21 Dupont Circle, NW, Suite 700  
Washington, DC 20036

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

Lawrence G. Malone, General Counsel  
New York State Department of Public Service  
Three Empire State Plaza  
Albany, NY 12223-1350

Walter L. Challenger  
Chairman  
Public Service Commission of the  
United States Virgin Islands  
P. O. Box 40  
Charlotte Amalie, USVI 00804

David Cosson  
John Kuykendall  
Attorneys for Rural Independent  
Competitive Alliance  
Kraskin, Lesse & Cosson, LLP  
2120 L St., N.W., Suite 520  
Washington, DC 20037

Jeffrey F. Beck  
Jillisa Bronfman  
Attorney for Small Rural LECs  
Evans Telephone Co., et. al.  
Beck & Ackerman  
Four Embarcardero Center, Suite 760  
San Francisco, CA 94111

Richard D. Coit  
General Counsel and Executive Director  
South Dakota Independent Telephone Coalition  
P. O. Box 57  
Pierre, SD 57501

Leon Kestenbaum  
Jay C. Keithley  
Richard Juhnke  
Sprint Corporation  
401 9<sup>th</sup> Street, N.W., #400  
Washington, DC 20004

Rick Zucker  
Sprint Corporation  
6360 Sprint Parkway, KSOPHE0302  
Overland Park, KS 66251

Benjamin H. Dickens, Jr.  
Mary J. Sisak  
Attorneys for Townes Telecommunications, Inc.  
Blooston, Modkofsky, Dickens,  
Duffy & Prendergast  
2120 L Street, NW., Suite 300  
Washington, DC 20037

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

Joseph DiBella  
Verizon  
1320 North Court House Road, Eighth Floor  
Arlington, VA 22201

Gerard J. Duffy  
Attorney for Western Alliance  
Blooston, Mordkofsky, Dickens, Duffy &  
Prendergast  
2120 L Street, N.W., Suite 300  
Washington, DC 20037

Alan Buzacott  
WorldCom, Inc.  
1133 19<sup>th</sup> Street, N.W.  
Washington, DC 20036

Steve Ellenberger, Chairman  
Steve Furtney, Deputy Chair  
Kristin H. Lee, Commissioner  
Wyoming Public Service Commission  
Hansen Building, Suite 300  
2515 Warren Avenue  
Cheyenne, WY 82002

Thomas E. Lodge  
Thompson Hine & Flory LLP  
One Columbus  
10 West Broad Street, Suite 700  
Columbus, OH 43215-3435

Paul J. Feldman  
Fletcher, Held & Hildreth, PLC  
1300 North 17<sup>th</sup> Street  
11<sup>th</sup> Floor  
Arlington, VA 22209

Chuck Strand  
Small Company Members of the  
Telephone Association of New England  
1 Chestnut Pasture  
Concord, NH 03301

Tara B. Shostek  
Counsel for ITCs, Inc.  
Irwin, Campbell & Tannenwald  
1730 Rhode Island Avenue, NW  
Suite 200  
Washington, DC 20036-3101

Colleen Boothby  
Levine, Blaszak, Block & Boothby LLP  
2001 L Street, NW, Suite 900  
Washington, DC 20036

Charles C. Hunter  
Catherine M. Hannan  
Hunter Communications Law Group  
1620 I Street, NW, Suite 701  
Washington, DC 20006

Michael J. Travieso  
National Association of State Utility  
Consumer Advocates  
8300 Colesville Road, Suite 101  
Silver Spring, MD 20910

Margot Smiley Humphrey  
Holland & Knight  
2099 Pennsylvania Avenue, NW  
Suite 100  
Washington, DC 20006

George N. Barclay  
Michael J. Ettner  
General Services Administration  
1800 F Street, NW, Room 4002  
Washington, DC 20405

Dana K. Joyce  
Marc D. Poston  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Kevin J. Kelly  
Chris Baron  
TCA Inc. – Telecom Consulting Associates  
1465 Kelly Johnson Blvd., Suite 200  
Colorado Springs, CO 80920

David W. Zesiger  
Independent Telephone &  
Telecommunications Alliance  
1300 Connecticut Avenue, NW, Suite 600  
Washington, DC 20036

Sharon J. Devine  
James T. Hannon  
Kathryn Marie Krause  
Qwest Communications International, Inc.  
Suite 700  
1020 19<sup>th</sup> Street, NW  
Washington, DC 20036

Michael J. Shortley, III  
John S. Morabito  
Global Crossing North America, Inc.  
180 South Clinton Avenue  
Rochester, NY 14646

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

Kelly R. Dahl  
Baird, Holm, McEachen, Pederson  
Hamann & Strasheim  
1500 Woodmen Tower  
Omaha, NE 68102

Corwin "Corky" Clairmont  
Ronan Telephone Consumer Advisory  
Committee  
P.O. Box 61  
Ronan, MT 59864

Myra Karagianes  
Sarah A. Naumer  
Thomas G. Aridas  
Illinois Commerce Commission  
160 N. LaSalle St., Suite C-800  
Chicago, IL 60601

Stephen L. Goodman  
Counsel for Rate of Return Coalition  
Halprin, Temple, Goodman & Maher  
555 12<sup>th</sup> Street, NW  
Suite 950 North  
Washington, DC 20004

Jeffry H. Smith  
GVNW Consulting, Inc.  
8050 SW Warm Springs Street, Suite 200  
8050 Tualatin, OR 97062

Richard M. Sbaratta  
BellSouth Corporation  
Suite 4300  
675 West Peachtree Street, NE  
Atlanta, GA 30375-001

Marc D. Wilkerson, Esq.  
Brantley, Wilkerson & Bryan  
P.O. Box 830  
Montgomery, AL 36101-0830

ITS  
1231 20<sup>th</sup> Street, NW  
Washington, DC 20036

Magalie Roman Salas  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Sheryl Todd  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

James H. Lister  
Arter & Hadden LLP  
1801 K Street, NW  
Suite 400K  
Washington, DC 20006-1301

Judy Walsh, Commissioner  
Brett A. Perlman, Commissioner  
Public Utility Commission of Texas  
1701 North Congress Avenue  
P.O. Box 13326  
Austin, TX 78711-3326

Lynda L. Dorr  
Public Service Commission of Wisconsin  
610 North Whitney Way  
P.O. Box 7854  
Madison, WI 53707-7854