

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

RECEIVED

MAR 12 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Multi-Association Group Plan for
Regulation of Interstate Services of
Non-Price Cap Incumbent Local Exchange
Carriers and Interexchange Carriers

Federal-State Joint Board on
Universal Service

Access Charge Reform for Incumbent
Local Exchange Carriers Subject to
Rate-of-Return Regulation

Prescribing the Authorized Rate of Return for
Interstate Services of Local Exchange Carriers

CC Docket No. 00-256

CC Docket No. 96-45

CC Docket No. 98-77 /

CC Docket No. 98-166

REPLY COMMENTS
of the
GENERAL SERVICES ADMINISTRATION

GEORGE N. BARCLAY
Associate General Counsel
Personal Property Division

MICHAEL J. ETTNER
Senior Assistant General Counsel
Personal Property Division

GENERAL SERVICES ADMINISTRATION
1800 F Street, N.W., Room 4002
Washington, D.C. 20405
(202) 501-1156

Economic Consultants:

Snavelly King Majoros O'Connor & Lee, Inc.
1220 L Street, N.W., Suite 410
Washington, D.C. 20005

March 12, 2001

EXTRA PUBLIC COPY

Table of Contents

	<u>Page No.</u>
Summary.....	i
I. INTRODUCTION.....	1
II. THE COMMISSION SHOULD NOT HEED REQUESTS TO ADOPT THE PROPOSED REGULATORY REGIME WITH NO CHANGES.....	4
III. COMMENTS FAIL TO SUPPORT INCREASING DIFFERENCES BETWEEN BUSINESS AND RESIDENCE LINE CHARGES.....	7
IV. CONTRARY TO CLAIMS BY INCUMBENT CARRIERS, A PRODUCTIVITY OFFSET IS AN ESSENTIAL PART OF AN EFFICIENT PRICE CAP PLAN.....	10
V. THE COMMISSION SHOULD NOT AGREE TO RECOMMENDATIONS TO FREEZE THE INTERSTATE RATE OF RETURN AT THE PRESENTLY AUTHORIZED LEVEL.....	13
VI. CONCLUSION.....	16

Summary

GSA responds to comments addressing a Petition to implement revisions in the regulatory regime for rate-of-return carriers.

Comments demonstrate that the proposed plan improves the structure of access charges for the smaller LECs. By establishing procedures for transitioning to incentive regulation, the plan also motivates these LECs to reduce costs, expand services, and invest in new technologies. In spite of these benefits however, numerous parties express concern with the lack of vital data on the impact of the plan. GSA urges the Commission to heed these parties, and not adopt the plan until impact assessments have been presented and thoroughly analyzed.

Also, GSA urges the Commission to find that several changes are necessary to ensure that the plan accomplishes its pro-competitive aims. For example, the proposed framework recovers more costs through flat monthly charges, but business users will be required to shoulder a larger share of the non-traffic sensitive revenue requirement. Several parties suggest shifting even more of the revenue requirement to business multi-lines, and also recommend that the Commission reverse steps to place Centrex and PBX configurations on an equal basis. Such suggestions should be rejected.

In addition, GSA urges the Commission to reject claims that a productivity offset should not be included in the proposed incentive plan. Comments by carriers and regulators demonstrate that even the smaller carriers under the new incentive plan can expect productivity improvements. Thus, GSA urges the Commission to reflect all productivity changes expected in the telecommunications industry, so that IXCs and end users will receive reductions in access charges as additional LECs transition to price caps.

Finally, GSA explains that the Commission should not agree to requests by several carriers to freeze the interstate rate of return at the presently authorized level. This action will not protect users who depend on the smaller carriers for local services.

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

Multi-Association Group Plan for
Regulation of Interstate Services of
Non-Price Cap Incumbent Local Exchange
Carriers and Interexchange Carriers

CC Docket No. 00-256

Federal-State Joint Board on
Universal Service

CC Docket No. 96-45

Access Charge Reform for Incumbent
Local Exchange Carriers Subject to
Rate-of-Return Regulation

CC Docket No. 98-77

Prescribing the Authorized Rate of Return for
Interstate Services of Local Exchange Carriers

CC Docket No. 98-166

**REPLY COMMENTS
of the
GENERAL SERVICES ADMINISTRATION**

The General Services Administration ("GSA") submits these Reply Comments on behalf of the customer interests of all Federal Executive Agencies ("FEAs") in response to the Notice of Proposed Rulemaking in CC Docket Nos. 00-256, 96-45, 98-77 and 98-166 ("Notice") released on January 5, 2001. The Notice seeks comments and replies on a set of proposals for interstate access reform and modifications in the universal service mechanisms for all incumbent local exchange carriers ("LECs") under rate-of-return regulation.

I. INTRODUCTION

On October 20, 2000, the Multi-Association Group ("MAG") submitted a Petition for Rulemaking to implement revisions in the regulatory regime for LECs not currently

under price caps ("Petition"). MAG includes the National Rural Telephone Association ("NRTA"), the National Telephone Cooperative Association ("NTCA"), the Organization for the Promotion and Advancement of Small Telephone Companies ("OPASTCO") and the United States Telecom Association ("USTA").¹ Together, these organizations represent a diverse group of incumbent local exchange carriers.

MAG describes the plan as a comprehensive approach to regulatory issues facing non-price cap carriers.² The plan contains elements designed to accomplish three objectives:

- permit rates to reflect costs more accurately by changing the structure of interstate access charges;
- allow rate-of-return carriers to transition to incentive regulation through two alternative paths; and
- ensure that universal service support is more explicit and better matched to the greater costs of providing telecommunications services in less populated areas.³

MAG asks the Commission to adopt the plan as a package without modification of any of its terms.⁴

To meet the goals of the Telecommunications Act of 1996, the Commission has taken numerous pro-competitive steps to reduce rates and promote more competition in all local exchange markets.⁵ For the largest LECs, the process began in 1997 and continued through the recent *CALLS Order*.⁶ The current proposal specifies the

1 Petition, p. 1.

2 *Id.*, pp. 1-2.

3 *Id.*, pp. 4-12.

4 *Id.*, p. 1.

5 Notice, para. 2, citing Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, codified at 47 U.S.C. § 151 *et seq.* ("Telecommunications Act").

6 *In the Matter of Access Charge Reform and Price Cap Performance Review for Local Exchange Carriers*, CC Docket Nos. 96-262 and 94-1, Sixth Report and Order, *Low-Volume*

framework for corresponding changes in the procedures for surveillance of the smaller and mid-size LECs that serve most of the nation's rural and insular areas.

Prior to the start of the proposed plan, all carriers not currently under price caps would be required to select between two regulatory frameworks — “Path A” or “Path B.”⁷ The provisions of the plan concerning increases in subscriber line charges (“SLCs”) and reductions in charges for interexchange carriers (“IXCs”) are identical for all participants, but the remaining elements differ for carriers on these two paths.

LECs on “Path A” will have five years from the start of the plan to transition each of their study areas from rate-of-return regulation to a new form of incentive regulation.⁸ This incentive framework will be based on the carrier's revenue per line (“RPL”) adjusted annually for inflation.⁹ Each year, the revenues for a “Path A” LEC will be calculated as the product of its RPL and its number of access lines.¹⁰ In contrast to the LECs on “Path A”, carriers on “Path B” will initially continue under rate-of-return regulation as either average schedule or cost companies.¹¹ The proponents explain that the option to defer any change in regulatory form recognizes the diverse conditions faced by non-price cap LECs.¹²

In the Notice starting the current proceeding, the Commission requested recommendations on various issues concerning MAG's proposals. On February 26,

Long-Distance Users, CC Docket No. 99-249, Report and Order, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Eleventh Report and Order, 15 FCC Rcd 12962 (“CALLS Order”), *pets. for review pending, Texas Office of Public Util. Counsel et al. v. FCC*, 5th Cir. Nos. 00-60434 and consolidated cases (2000).

7 Petition, p. 5.

8 *Id.*

9 *Id.*

10 *Id.*

11 *Id.*, p. 6.

12 *Id.*

2001, GSA submitted Comments in response to the Notice. In those Comments, GSA explained that several features of the plan should help more competition to develop outside of urban areas.¹³ Despite the significant benefits for carriers and users, GSA urged the Commission not to adopt the proposed plan without modifications.¹⁴ Also, GSA explained that more information is required about costs of the plan in order to assess its impact on consumers.¹⁵

In addition to GSA, more than 40 parties submitted comments in response to the Notice. These parties include:

- 26 incumbent LECs and groups LECs;
- 7 additional carriers, including IXCs and competitive LECs;
- 7 state regulatory agencies; and
- a group of large telecommunications users.

In these Reply Comments, GSA responds to the positions advanced by those parties.

II. THE COMMISSION SHOULD NOT HEED REQUESTS TO ADOPT THE PROPOSED REGULATORY REGIME WITH NO CHANGES.

In its comments on the Notice, MAG continues to assert its position that the Commission should adopt its proposals without change.¹⁶ According to MAG, the plan is formulated as a “unified, balanced and cohesive” package, and any modifications would detract from the “public interest benefits.”¹⁷ Nevertheless, MAG provides little information on the amount and sources of funding for the increased universal service support contained in the plan.

¹³ Comments of GSA, February 26, 2001, pp. 4-7.

¹⁴ *Id.*, pp. 7-15.

¹⁵ *Id.*, pp. 15-17.

¹⁶ Comments of MAG, p. 4.

¹⁷ *Id.*

More than 20 incumbent LECs and representatives of these carriers submitted comments urging the Commission to adopt the plan as a package. For example, 17 rural LECs in Alabama ("Alabama LECs") submitted joint comments stating that the plan "represents the best step for the FCC to take at this critical juncture for rural telecommunications, and should be adopted in its entirety as soon as possible."¹⁸ A carrier now under price caps also supports the plan. BellSouth asserts since the proposed structure would bring the Commission's rules in line with the requirements of a competitive marketplace, the plan should be adopted as proposed.¹⁹

GSA urges the Commission not to heed these recommendations. Although the plan contains significant benefits for carriers and users, some modifications are necessary and much more information is required before adopting the proposed regulatory structure.

From GSA's perspective as an end user, Qwest Communications International ("Qwest") provides a balanced assessment. Qwest approaches this matter from several diverse perspectives. First, as an IXC, Qwest must pay access charges, contribute to universal service support, and pass some or all of these costs to its customers.²⁰ Second, Qwest is both an incumbent and a competitive LEC that receives access charges, and both receives and contributes to universal service support.²¹ With these divergent interests, Qwest states:

Qwest supports some key elements of the plan. . . . Notwithstanding support of these elements, Qwest does not believe that the plan as a whole, at least as currently constituted, should be adopted. The plan fails to provide some crucial details about its suggested

18 Comments of Alabama LECs, p. 4.

19 Comments of BellSouth, p. 3.

20 Comments of Qwest, p. 1.

21 *Id.*, p. 2.

changes to the access rate structure and universal service support mechanisms.²²

GSA concurs with this assessment.

Other carriers also urge the Commission not to adopt the proposed plan in its present form. For example, Sprint observes that the MAG proposal is not formed from the “give-and-take process that was central to the CALLS plan.”²³ Thus, Sprint states, proposals should be accompanied by much more evidentiary support than was necessary for the Commission to evaluate the CALLS plan.²⁴ Sprint continues:

Yet, the opposite is the case. There is no evidentiary support whatsoever for major features of the plan, such as the target composite per-minute access charge or the new explicit interstate universal service program, known as rate averaging support (“RAS”).²⁵

Moreover, public advocates and state regulatory agencies voice serious concerns with the lack of data on the impact of the plan. For example, the National Association of State Utility Consumer Advocates (“NASUCA”) states:

The MAG plan presents no data to allow the FCC or other parties to make reasoned judgments about the impact of the recommended changes on consumers and telephone companies.²⁶

Similarly, the Public Utility Commission of Texas (“PUCT”) states that, as an initial matter, MAG has not shown that the benefits outweigh the costs of the plan.²⁷ Moreover, the New York Department of Public Service (“NYDPS”) observes that

22 *Id.*

23 Comments of Sprint Corporation (“Sprint”), p. 4.

24 *Id.*

25 *Id.* (emphasis provided.)

26 Comments of NASUCA, p. 3.

27 Comments of the PUCT, p. 2.

completely eliminating caps, as MAG proposes, simply “invites unchecked spending at the public expense.”²⁸

GSA urges the Commission to heed the concerns of carriers, state regulators and consumer advocates, and not approve the proposed plan until impact assessments have been presented and carefully analyzed. Moreover, GSA urges the Commission to find that several specific changes are necessary to ensure that the plan accomplishes its pro-competitive aims.

III. COMMENTS FAIL TO SUPPORT INCREASING DIFFERENCES BETWEEN BUSINESS AND RESIDENCE LINE CHARGES.

In its Comments, GSA explained that, apart from MAG’s proposals to revise the structure of access charges, an additional change is necessary to reduce disparities between charges for business and residence lines.²⁹ Under MAG’s plan, subscriber line charges (“SLCs”) will be set at \$5.00 per month for primary residence lines, non-primary residence lines, and single business lines on July 1, 2001.³⁰ At that time, the SLCs will be \$6.00 per month for business multi-lines.³¹ Moreover, the SLCs for primary residence lines, non-primary residence lines, and single business lines are expected to increase to \$5.83 per month over the following three years, while the SLCs for business multi-lines will increase to \$9.20 per month by July 1, 2003.³²

Greater SLCs for business multi-lines are not justified by cost differences or other factors.³³ Nevertheless, instead of supporting steps to modify this anti-

28 Comments of NYDPS, p. 2.

29 Comments of GSA, pp. 7-9.

30 Petition, Exhibit 3, pp. 3-16.

31 *Id.*

32 *Id.*

33 Comments of GSA, pp. 8-9.

competitive feature of the plan, two IXCs propose to make the structure even less rational. AT&T states that the Commission should increase the business multi-line SLC to \$9.20 immediately, rather than over a two-year transition period, as MAG proposes.³⁴ WorldCom also recommends a business multi-line SLC of \$9.20 per month at the start of the proposed transition period.³⁵

Ironically, AT&T seeks to justify the increase in SLCs on the basis of “costs.” Indeed, AT&T asserts that an “immediate increase” is necessary “to maximize efficient loop cost recovery from the cost causer of the loop, namely, the end user.”³⁶

In spite of the IXCs’ claims, cost efficiency supports a reduction in the business multi-line SLC because SLCs for other lines are lower and business lines are no more expensive. Indeed, as GSA explained, for all lines provided by an incumbent LEC in any study area, the access costs for multi-line business users will average less than the access costs for other subscribers.³⁷ This is because business and government users are usually located in the relatively more populated areas where local loops to the telephone company central offices are shorter and there are greater economies of scale in providing telecommunications services.³⁸

Compounding the impact of greater business multi-line SLCs, these two carriers offer another recommendation that increases the costs to business users. AT&T asserts that a PBX trunk equivalency factor should not be employed for Centrex

34 Comments of AT&T, p. 5.

35 Comments of WorldCom, p. 8.

36 Comments of AT&T, p. 5..

37 Comments of GSA, p. 8.

38 *Id.*

SLC charges because “unlike a PBX, each Centrex line is a common line to which a full SLC should apply.”³⁹ WorldCom’s comments contain a similar recommendation.⁴⁰

GSA urges the Commission to find that these proposals are also irrational. The PBX trunk equivalency factor recognizes that Centrex and PBX systems have different requirements for local loops. With Centrex, each main station on the customer premises is connected to the telephone company central office by a separate access facility. Thus, calls between customer stations are switched at the telephone company office.

On the other hand, with a PBX system, calls between customer stations are switched at the end user’s premises. Consequently, for any given level of calling volume to or from the public network, Centrex requires far more “common lines” — often five to 15 times as many lines depending on the size of the installation and the customer’s calling pattern.

MAG proposes an equivalency factor of one-ninth for Centrex lines to recognize the fact that Centrex access facilities must be provisioned to meet the needs of traffic not using the resources of the public network.⁴¹ Contrary to assertions by AT&T and WorldCom, this equivalency factor is necessary so that Centrex and PBX configurations placing the same total demands on the public network will have the same total charge. GSA urges the Commission to reject the requests by these IXCs to eliminate this important aspect of access reform.

39 Comments of AT&T, p. 5.

40 Comments of WorldCom, pp. 9-10.

41 MAG Petition, Exhibit 3-16, Proposed Rule 69.104.

IV. CONTRARY TO CLAIMS BY INCUMBENT CARRIERS, A PRODUCTIVITY OFFSET IS AN ESSENTIAL PART OF AN EFFICIENT PRICE CAP PLAN.

GSA explained that another necessary modification in the MAG proposal is to include a productivity offset, or “X-factor” term, in the incentive formula for carriers transitioning to price caps.⁴² This factor is important for end users because it would help to reduce access charges in the future.

MAG does not include a productivity adjustment in its proposed formula for determining price ceilings.⁴³ Moreover, in comments supporting the proposed plan, several parties representing rate-of-return LECs request that the Commission not include such a factor in the new price cap formula. For example, in a submission for 58 rural telephone companies, the Interstate Telcom Group states that rural and other small LECs electing incentive regulation cannot support an annual productivity offset like that imposed on the larger LECs now under price caps.⁴⁴

Similarly, the Western Alliance, a consortium of 250 rural LECs operating in places west of the Mississippi River, also argues against the productivity offset.⁴⁵ This group asserts that larger LECs can increase productivity by reductions in force, increased specialization, sale of less profitable exchanges, and other means, but the smaller LECs do not have these options.⁴⁶

In spite of these claims, GSA urges the Commission to employ a productivity offset for carriers now transitioning to incentive regulation. WorldCom points out that a number of “smaller” LECs, including Citizens, rural GTE companies, Frontier, and

⁴² Comments of GSA, p. 13.

⁴³ *Id.*

⁴⁴ Comments of Interstate Telecom Group, p. 1 and p. 15.

⁴⁵ Comments of Western Alliance, p. 2.

⁴⁶ *Id.*, p. 13.

Sprint LECs, have operated successfully for many years under price cap plans using an X-factor of 5.3 percent or 6.5 percent.⁴⁷

Comments by the People of the State of California and the California Public Utility Commission (“California”) acknowledge that the appropriate productivity offset for that the MAG plan may be different from that for the CALLS approach, because the MAG price cap formula uses revenues per line (“RPL”) as an income measure.⁴⁸ Nevertheless, these comments explain:

[t]here is no reason to believe, and MAG has produced no evidence to conclude, that rural LECs’ costs will reasonably increase in proportion to inflation and the number of access lines served, or that universal service funding should increase by such amounts.⁴⁹

Based on these observations, California recommends that the FCC include a productivity adjustment for carriers transitioning from rate-of-return regulation, and initiate a proceeding to determine its magnitude.⁵⁰

General Communication, Inc. (“GCI”), a carrier providing interexchange and local exchange services in Alaska, provides data demonstrating the need for a productivity offset with a price cap formulation reflecting the costs of access lines. GCI’s comments show that from 1994 to 1998, the average unseparated cost per loop declined one percent per year for all carriers nationwide, while inflation measured with the index employed by MAG (the Gross Domestic Product Price Index, or “GDP-PI”) increased at 1.9 percent per year.⁵¹ Thus, loop costs declined about three percent per year relative to inflation.

47 Comments of WorldCom, p. 5.

48 Comments of California, p. 22.

49 *Id.*

50 *Id.*

51 Comments of GCI, p. 5.

Other diversified carriers address the need for a productivity offset. For example, Global Crossing points out that from the start, the price cap plans employed by the Commission have required carriers to adjust their rates and charges each year in order to reflect productivity improvements in relation to the overall rate of productivity improvement.⁵² Global Crossing states:

As proposed, the MAG plan offers “Path A” carriers all of the benefits of incentive regulation (and then some) without bearing any of the risks.⁵³

Continuing, Global Crossing asks the Commission to establish a productivity factor for “Path A” carriers in a manner similar to that for the carriers under CALLS.⁵⁴

The Ad Hoc Telecommunications Users Committee (“Ad Hoc”) suggests a different modification of the MAG proposal to reflect productivity changes. Ad Hoc states that MAG’s plan to eliminate the cap on high-cost support would reduce or void all incentives for rural carriers to be efficient in their investment decisions.⁵⁵ Moreover, Ad Hoc observes that all Tier 1 LECs under price caps have been subject to a 6.5 percent “X-factor” since 1997.⁵⁶ To maintain similar incentives for carriers under the MAG plan, Ad Hoc recommends continuing the cap on high cost support, with a cap reduction of 6.5 percent annually in each future year.⁵⁷

On balance, comments by carriers and regulators show the need for some procedure to reflect productivity improvements, even for the smaller carriers under the incentive plan proposed by MAG. GSA urges the Commission to reflect the

52 Comments of Global Crossing, p. 7.

53 *Id.*, p. 8.

54 *Id.*, p. 9.

55 Comments of Ad Hoc, p. 15.

56 *Id.*, p. 17.

57 *Id.*

productivity changes so that IXCs and end users will receive the benefits of greater reductions in access charges as additional LECs transition to price caps.

V. THE COMMISSION SHOULD NOT AGREE TO RECOMMENDATIONS TO FREEZE THE INTERSTATE RATE OF RETURN AT THE PRESENTLY AUTHORIZED LEVEL

In addition to allowing carriers to keep the benefits of all increased efficiencies relative to the general economy, the MAG plan insulates LECs on “Path A” from the vagaries of the market by including a “low-end adjustment”.⁵⁸ The plan prevents the earnings of “Path A” LECs from falling more than a set amount below the authorized rate of return, which is now 11.25 percent.⁵⁹ Specifically, the proposed low-end adjustment is 10.75 percent for LECs with five or fewer study areas, and 10.25 percent for LECs with more than five study areas.⁶⁰

The Notice asks parties to comment on whether the Commission should terminate its current rate-of-return proceeding and maintain the currently authorized return of 11.25 percent if it adopts the low-end adjustment.⁶¹ In its Comments, GSA urged the Commission not to perpetuate this prescribed return level, either explicitly by terminating the open proceedings or implicitly by not taking any steps to address the appropriate interstate rate of return.⁶²

Several local carriers supporting the MAG proposal address retention of the authorized interstate rate of return at its present level. For example, the Alabama LECs contend that retention of the existing authorized interstate rate of return is a

⁵⁸ Petition, pp. 17-18.

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ Notice, para. 7.

⁶² Comments of GSA, pp. 15-16.

“critical component” of the MAG plan that is necessary to maintain incentives for investment and meet the capital needs of local carriers.⁶³

Carriers and end users rebut the need to continue the existing rate of return target. These parties explain that the proposed plan provides ample and redundant protections — removal of caps on existing support, new support mechanisms, no productivity offset, and a low-end adjustment as a “safety net” for carriers that have transitioned to incentive regulation.

In fact, the Association for Communications Enterprises (“ASCENT”) states that the plan appears to have been designed principally to insulate participating LECs from market forces, and indeed provides these carriers with a “veritable windfall.”⁶⁴ Similarly, Ad Hoc explains that without modification the plan provides funding for the participants at “unprecedented and unconstrained levels”.⁶⁵

Similarly, NASUCA addresses redundant safeguards in the plan. In its comments, NASUCA states:

The earnings floor with no productivity adjustment virtually assures a continual upward movement of rates and increasing profits without regard to and without encouraging productivity gains.⁶⁶

Also, NASUCA explains that the problem is compounded by basing the low-end adjustment on an excessive rate of return standard.

GSA explained that the current 11.25 percent authorized return is far above the level necessary (1) to meet the expectations of investors; (2) to attract capital in current financial markets and (3) to reflect the current level of competition for interstate

63 Comments of Alabama LECs, p. 2.

64 Comments of ASCENT, p. 2.

65 Comments of Ad Hoc, p. 1.

66 Comments of NASUCA, p. 20.

services.⁶⁷ Moreover, a lesser authorized rate of return would lead to reductions in access charges that will ultimately benefit end users. Therefore, GSA urges the Commission not to perpetuate this prescribed return level, either explicitly by terminating the open proceedings or implicitly by not taking any steps to address the appropriate interstate rate of return.

⁶⁷ Comments of GSA, pp. 15-16.

VI. CONCLUSION

As a major user of telecommunications services, GSA urges the Commission to implement the recommendations set forth in these Reply Comments.

Respectfully submitted,

GEORGE N. BARCLAY
Associate General Counsel
Personal Property Division



MICHAEL J. ETTNER
Senior Assistant General Counsel
Personal Property Division

GENERAL SERVICES ADMINISTRATION
1800 F Street, N.W., Rm. 4002
Washington, D.C. 20405
(202) 501-1156

March 12, 2001

CERTIFICATE OF SERVICE

I, MICHAEL J. ETTNER, do hereby certify that copies of the foregoing "Reply Comments of the General Services Administration" were served this 12th day of March, 2001, by hand delivery or postage paid to the following parties.

The Honorable Michael K. Powell,
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W. TW-A325
Washington, D.C. 20554

The Honorable Harold Furchtgott-Roth,
Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Ms. Judy Boley
Federal Communications Commission
445 12th Street, S.W., Room 1-C804
Washington, D.C. 20554

The Honorable Susan Ness,
Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Editorial Offices
Telecommunications Reports
1333 H Street, N.W., Room 100-E
Washington, D.C. 20005

The Honorable Gloria Tristani
Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Ms. Edith Herman
Senior Editor
Communications Daily
2115 Ward Court, N.W.
Washington, D.C. 20037

Mr. Edward Springer
OMB Desk Officer
Room 10236 NEOB
725 17th Street, N.W.
Washington, D.C. 20503

International Transcription Service
1231 20th Street, N.W.
Washington, D.C. 20036

Ms. Sheryl Todd
Accounting Policy Division
Federal Communications Commission
445 12th Street, S.W., Room 5-B540
Washington, D.C. 20554

Ms. Wanda Harris
Competitive Pricing Division
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554


