

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	
	)	
1998 Biennial Regulatory Review –	)	CC Docket No. 98-171
Streamlined Contributor Reporting	)	
Requirements Associated with Administration	)	
of Telecommunications Relay Service, North	)	
American Numbering Plan, Local Number	)	
Portability, and Universal Service Support	)	
Mechanisms	)	
	)	
Telecommunications Services for Individuals	)	CC Docket No. 90-571
with Hearing and Speech Disabilities, and the	)	
Americans with Disabilities Act of 1990	)	
	)	
Administration of the North American	)	CC Docket No. 92-237
Numbering Plan and North American	)	NSD File No. L-00-72
Numbering Plan Cost Recovery Contribution	)	
Factor and Fund Size	)	
	)	
Number Resource Optimization	)	CC Docket No. 99-200
	)	
Telephone Number Portability	)	CC Docket No. 95-116

**COMMENTS OF**  
**QWEST COMMUNICATIONS INTERNATIONAL INC.**

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**COMMENTS OF**  
**QWEST COMMUNICATIONS INTERNATIONAL INC.**

I. INTRODUCTION AND SUMMARY

Qwest Communications International Inc. (“Qwest”) hereby submits its Comments in response to the Federal Communications Commission’s (“Commission” or “FCC”) *Notice of Proposed Rulemaking*.<sup>1</sup> Qwest addresses a number of the issues raised by the Commission

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<sup>1</sup> *In the Matter of Federal-State Joint Board on Universal Service; 1998 Biennial Regulatory Review – Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms; Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990;*

regarding modifications in the manner in which the Commission assesses universal service contributions and carriers recover those contributions from their customers. Qwest is a large interexchange carrier (“IXC”), a wireless carrier, a competitive local exchange carrier (“CLEC”), and a data local exchange carrier (“DLEC”), while simultaneously being a large incumbent local exchange carrier (“ILEC”). Accordingly, Qwest is in the unique position of having to balance the needs and interests of each of these businesses, which is very much like the balancing that the Commission will undertake in considering proposed changes to the manner in which the Commission assesses and carriers recover universal service contributions. We attempt to reflect this balancing in these comments.

As discussed below, Qwest supports the Commission’s effort to streamline and reform its contribution methodology in light of the experience the Commission and carriers have gained since adoption of the universal service provisions of the Telecommunications Act of 1996. In particular, Qwest suggests that moving to assessment based on net booked revenues will simplify carrier reporting requirements and increase the reliability of the information reported, while enabling carriers to establish line-item charges for the recovery of universal service contributions that more closely match the contribution factors established by the Commission each quarter. Qwest’s Comments focus on creating a simplified, competitively neutral methodology in a constantly evolving telecommunications marketplace.

The contribution methodology proposed by Qwest complies fully with Section 254, including the requirement that all providers of telecommunications services contribute, on an equitable and nondiscriminatory basis, to a specific, predictable, and sufficient support

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*Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size; Number Resource Optimization; Telephone*

mechanism. In contrast, assessing contributions based on projected revenues or on a flat fee basis would be inconsistent with Section 254. Qwest also believes that the Commission should maintain the current wireless safe harbor and eliminate or narrow its *de minimis* exemption from contributions. Finally, Qwest supports the Commission's efforts to align more closely the line-item charges carriers assess on their customers to recover universal service contributions with the contribution factors established by the Commission, allowing for reasonable costs associated with recovery.

II. THE COMMISSION SHOULD MODIFY ITS CONTRIBUTION METHODOLOGY TO ENSURE THAT CONTRIBUTIONS ARE ASSESSED IN AN EQUITABLE AND NONDISCRIMINATORY MANNER

As discussed below, the Commission should make certain changes to the current contribution methodology to ensure that such contributions are assessed in an equitable and nondiscriminatory manner. Correlatively, the Commission should reject certain proposals in the *Notice* that are not competitively neutral. Finally, in considering any changes to the contribution methodology, the Commission should seek to reduce administrative burdens on all carriers, and thus consumers.

A. The Commission Should Assess Universal Service Contributions On Net Booked End-User Telecommunications Revenues

While Qwest agrees with the intent of the Commission's proposal to assess contributions on *collected*, instead of gross-billed, interstate and international end-user telecommunications revenues,<sup>2</sup> the Commission's goals can be better served by assessing on *net booked* interstate and international end-user telecommunications revenues. In the *Notice*, the Commission proposed assessment on collected, rather than billed, revenues for at least three reasons: (1) to eliminate a

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*Number Portability*, CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, *Notice of Proposed Rulemaking*, FCC 01-145, rel. May 8, 2001 ("*Notice*").

carrier's need to recover from customers amounts in addition to the assessed contribution percentage; (2) to simplify the assessment and recovery of contributions for carriers and consumers; and (3) to minimize the interval between the reporting of revenues and the assessment of universal service contributions. Basing universal contributions on net booked revenues offers each of these advantages while providing a more reliable and verifiable set of data than collected revenues, as described below.

“Net booked” revenues refer to the revenue amounts that a carrier enters into its accounting books, less any uncollectible revenues reflected in those books. A primary difference between “booked” and “collected” revenues is a matter of timing: booked revenues are tabulated when the revenues are earned, while collected revenues are credited when they are collected. Because booked revenues are used in a company's financial records, including its filings with the Securities and Exchange Commission, they must be maintained in a manner consistent with Generally Accepted Accounting Principles (“GAAP”).

Because the current methodology requires carriers to make contributions based on “billed” revenues, including billed revenues that will never be collected, some carriers spread the risk of noncollection by imposing a surcharge exceeding the assessed contribution percentage. As noted, net booked revenues exclude an amount as “bad debt” or uncollectible revenue, which is projected based on past experience. Thus, a net booked revenue contribution base offers a distinct advantage over the current contribution base, which includes end-user revenues that have been billed but may never be collected.

Because all public companies are required to maintain accounting books, it should be relatively simple for such companies to comply with reporting requirements based on net booked

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<sup>2</sup> *Id.* ¶ 22.

revenues. In contrast, records of collected revenues may not uniformly be maintained by companies, at least under the same scrutiny as booked revenues. In short, in light of current practices, requiring carriers to report revenues at the time they are booked is more natural than reporting collected revenues. In addition, because net booked revenues exclude uncollectible revenues, use of net booked revenues should simplify contributors' computation of the percentage they need to recover from their customers. As discussed by the Commission, some carriers have engaged in complex formulas to determine how much they need to recover from customers, because they cannot recover contributions on revenues that cannot be collected. If contributions are computed as a percentage of net booked revenues, the percentage collected from end-user customers should track the contribution percentage plus reasonable expenses.

Use of net booked revenues also furthers the Commission's objective of reducing the interval between reporting of revenues and the assessment of universal service contributions. As noted, net booked revenues are registered when they are earned. Thus, such revenues generally are more current than either billed or collected revenue amounts, assuming that revenues are generally billed and collected after they are earned.

Finally, booked revenues are a more reliable set of data than collected revenues. Booked revenues must be maintained consistent with accounting standards and are subject to audits and other safeguards to ensure accuracy. Furthermore, because these figures are used in financial records that are publicly disclosed to potential investors, companies have little or no incentive to understate these revenue numbers. Basing universal service contributions on a percentage of net booked revenues therefore should allow for less gaming by contributors than assessment based on billed or collected revenues. In sum, Qwest asserts that the use of net booked revenues will

accomplish the objectives identified by the Commission in the *Notice*, while providing a more reliable and verifiable set of data than collected revenues.

B. Assessing Contributions Based On Projected Revenues  
Would Be Inconsistent With The Requirements Of Section 254

In the *Notice*, the Commission seeks comment on whether to assess universal service contributions based on current or projected revenues. As discussed above, Qwest supports the use of net booked revenues, which should be more current than the historical gross-billed revenues that are used today to assess contributions. While basing contributions on projected revenues may appear to offer certain advantages, they are clearly outweighed by the disadvantages of such an approach. As a result, Qwest opposes basing universal service contributions on projected revenues.

If the Commission uses projected revenues to assess contributions, it will have to rely on projections made by individual carriers, by the Commission, or by USAC. Each of these approaches raises significant problems. Relying on projections by carriers could open the door to gaming to the extent carriers understate their expected revenue in order to reduce their contributions. While, in this scenario, the carrier might eventually be required to make an additional contribution based on the difference between its projected and actual revenues, the carrier might still benefit by delaying the contribution. In addition, to the extent such an approach required a true-up mechanism, carriers would not know with certainty when the Commission established a contribution factor the amount they would ultimately have to contribute. Such a true-up mechanism also would impose additional administrative burdens on USAC and contributing carriers.

Basing contributions on projections by the Commission or USAC would raise other problems. As the Commission acknowledges, reliance on projections creates the possibility of

an occasional shortfall in the universal service fund.<sup>3</sup> As a result, the Commission would either have to collect additional funds to establish a reserve against such shortfalls or establish another means of covering the shortfall.

The potential for uncertainty, gaming, and shortfall posed by this proposal leads to the conclusion that basing contributions on revenue projections cannot ensure compliance with Section 254's requirement that universal service support mechanisms be specific, predictable, and sufficient.<sup>4</sup> Moreover, as discussed, a net booked revenue base suffers from none of these flaws, and is more current than the gross-billed revenue base currently used. Furthermore, the concerns expressed in the *Notice* that the current system might give a competitive advantage to certain carriers is overstated.<sup>5</sup> As both an ILEC and an out-of-region IXC, Qwest views such advantages to be so short-lived as to be inconsequential.

C. The Commission Should Retain The Current Safe Harbor For Wireless Carrier Revenues

In the *Notice*, the Commission seeks comment on whether to continue using the interim safe harbor for calculating the percentage of interstate revenues for wireless telecommunications providers, and, if so, whether to increase the safe harbor percentages.<sup>6</sup> The Commission adopted the safe harbor due to concerns regarding the ability of wireless telecommunications providers to distinguish interstate and intrastate revenues.<sup>7</sup> These concerns continue to exist today. Specifically, given the mobile nature of wireless services and subscribers, it remains difficult to

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<sup>3</sup> *Id.* ¶ 33.

<sup>4</sup> 47 U.S.C. § 254(b)(5), (d).

<sup>5</sup> *Notice* ¶ 14.

<sup>6</sup> *Id.* ¶ 24.

<sup>7</sup> *Id.* ¶ 24 n.61.

determine whether calls made by wireless customers should be classified as interstate or intrastate. There is thus no reason to eliminate the safe harbor at this time.

It would also be inappropriate for the Commission to raise the percentages in the safe harbor absent data showing that the percentages adopted in the *Wireless Safe Harbor Order* are too low.<sup>8</sup> Any suggestion that the percentages should be increased because some national wireless providers are offering bundled local and long distance services would need to be carefully examined. Such bundling is by no means universal. Qwest Wireless, for one, currently does not offer the type of bundled package referred to in the *Notice*, whereby a wireless customer can call anywhere in the United States for no additional charge beyond the rate for local calls. Moreover, even for those carriers that do offer such calling plans, it is merely conjecture to assume that such plans cause the percentage of interstate calls for those carriers to rise above the percentage adopted in the *Wireless Safe Harbor Order*. The Commission therefore should retain the percentages adopted in that *Order*.

D. Assessing Universal Service Contributions On A Flat Fee Basis Would Be Inconsistent With Section 254

In the *Notice*, the Commission seeks comment on a proposal to assess universal service contributions on a flat fee basis, such as through a per-line or per-account charge.<sup>9</sup> The Commission should consider this proposal no further, because it would be inconsistent with the statutory requirement that universal service contributions be collected on an equitable and nondiscriminatory basis.<sup>10</sup>

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<sup>8</sup> *In the Matter of Federal-State Joint Board on Universal Service, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, 13 FCC Rcd. 21252 (1998) (“*Wireless Safe Harbor Order*”).

<sup>9</sup> *Notice* ¶ 25.

<sup>10</sup> 47 U.S.C. § 254(d).

In the *Universal Service Order*, the Commission specifically rejected a per-line universal service assessment, concluding that such an approach would be administratively difficult to implement and may favor certain services or providers over others.<sup>11</sup> This continues to be true. Likewise, this proposal could incite gaming of the system and advantage carriers and customers of carriers that serve a small number of high-volume users, such as large businesses, while disadvantaging carriers that serve large numbers of low-volume customers, such as residential customers. Consequently, this proposal is not competitively neutral.

While a flat fee assessment may appear simple and straightforward, in practice it may be very complicated, particularly if the Commission attempts to lessen the impact of this change by treating different classes of customers or services differently.<sup>12</sup> If the Commission assesses contribution on a per-line basis, the Commission will have to determine the definition of a “line.” For example, should a facility that can carry 24 voice channels be treated as one line or 24 lines? Moreover, what is the appropriate treatment of a facility for which the number of circuits depends on the electronics that are placed on either end of the facility? While such decisions are complicated, they also may artificially affect the demand for particular types of services. In addition, treating categories of customers differently also conflicts with the Commission’s stated preference to move toward a unified system, whereby the price charged for a service depends on the nature of the service rather than the nature of the customer.<sup>13</sup>

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<sup>11</sup> *In the Matter of Federal-State Joint Board on Universal Service, Report and Order*, 12 FCC Rcd. 8776, 9210 ¶ 852 (1997), *aff’d in part, rev’d in part, remanded in part sub nom. Texas Office of Public Utility Counsel v. FCC*, 183 F.3d 393 (5<sup>th</sup> Cir. 1999), *cert. denied*, 2000 WL 684656 (S.Ct. May 30, 2000) (“*Universal Service Order*”).

<sup>12</sup> *See Notice* ¶ 30.

<sup>13</sup> *In the Matter of Developing a Unified Inter-carrier Compensation Regime*, CC Docket No. 01-92, *Notice of Proposed Rulemaking*, FCC 01-132, rel. Apr. 27, 2001.

E. Exemptions

The Commission also asks whether it should modify the *de minimis* exemption. In general, Qwest believes that the Commission should seek to minimize exemptions for classes of carriers or classes of services, in order to comply with the Act's requirement that every provider of interstate telecommunications services contribute on an equitable and nondiscriminatory basis.<sup>14</sup>

Moreover, exemptions open the door to arbitrage, as carriers seek to use such exemptions to their benefit. As evidenced by the development of certain voice over Internet Protocol services, it will be more and more difficult over time for the Commission to distinguish services subject to contribution and those that are not. Exemptions and exceptions will provide opportunities for prospective contributors to eliminate or limit their contributions to universal service. As the contribution base shrinks, remaining contributors will have to contribute a larger and larger portion of their revenues to the fund, which places an inequitable burden on those contributors and the customers they serve.

The current *de minimis* exemption for interstate services providers who would contribute less than \$10,000 per year deprives the fund of more than \$8 million in contributions per year. As the revenue base is depleted, the remaining contributors must make up for this loss with higher contributions. As the Commission acknowledges, Section 254(d) does not require a *de minimis* exemption; it merely gives the Commission authority to create such an exemption. Fairness demands that the current *de minimis* exception be eliminated.

In any case, if the Commission decides to retain a *de minimis* exemption, the amount of the exemption should be reduced significantly. The \$10,000 exemption adopted in the *Fourth*

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<sup>14</sup> 47 U.S.C. § 254(d).

*Order on Reconsideration* was based on the flawed assumption that the *de minimis* exemption should be based on the administrative costs of both the administrator and the contributor.<sup>15</sup> As the Commission and the Joint Board originally concluded, any *de minimis* exemption should be limited to carriers whose contributions would be less than the *administrator's* administrative costs of collection.<sup>16</sup> Congress permitted the FCC to adopt such an exemption only to avoid “net loss” situations where the administrator’s cost of collecting a contribution exceeds the amount collected.<sup>17</sup>

All contributors incur compliance costs. That some contributors incur compliance costs higher than their contributions is not a basis for exempting those carriers. Moreover, even putting this question aside, the Commission has never justified the level of the current exemption. If the Commission insists on maintaining a *de minimis* exemption, that exemption should be much closer to the \$100 exemption adopted in the *Universal Service Order*.

F. Recovery Of Contributions

Qwest supports the Commission’s proposal regarding consistency between the contribution factor established by the Commission and line-item charges to end-user customers that are intended to recover a carrier’s contribution. Qwest agrees that, to the extent carriers choose to recover contributions through a line-item charge on customer bills, the charge should closely correspond to the prescribed percentage, plus a reasonable cost for expenses.

However, Qwest’s support of this proposal is conditioned on the Commission’s selection of a revenue base for assessment that closely corresponds to the revenue base from which

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<sup>15</sup> *In the Matter of Federal-State Joint Board on Universal Service, Fourth Order on Reconsideration in Docket No. 96-45*, 13 FCC Rcd. 5318, 5481 ¶ 295 (1997).

<sup>16</sup> *Universal Service Order*, 12 FCC Rcd. at 9187 ¶ 802.

<sup>17</sup> Joint Explanatory Statement of the Committee of the Conference (H.R. Rep. No. 458, 104th Cong., 2d Sess.) at 131 (1996).

carriers recover their contributions. As discussed above, the appropriate revenue base for assessment is net booked end-user telecommunications revenues. If contributions are computed as a percentage of net booked revenues, it is reasonable to expect that the percentage collected from end-user customers will more closely track the contribution percentage established by the Commission, however, it is important to continue to allow carriers a measure of flexibility for recovery.

The Commission has authority under Section 201(b) to ensure that rates, terms, and conditions are just and reasonable. Furthermore, the Commission promulgated truth-in-billing rules to ensure consumers' bills are clear with regard to billing items for recovery of charges associated with federal regulatory action such as the universal service fund.

If the Commission retains the current gross-billed revenue base, which includes revenues that are billed but cannot be collected, it would be inequitable to continue to require certain carriers to recover from end users at a rate no higher than the Commission's contribution factor. All carriers should be treated in the same manner in terms of recovery of contributions to the universal service fund.

Available enforcement powers can be used to ensure line-item charges more closely correspond to the prescribed contribution factor. This will benefit consumers by ensuring that the carrier is passing through no more than the amount it is contributing to the fund for the services provided to that customer, plus an allowance for reasonable administrative costs. Amounts above that should not be represented as a universal service fund assessment. Such a limitation also would eliminate the ability of carriers to apply excessive charges on certain

classes of customers, such as residential long distance customers, in order to offset its waiver of line-item charges for another customer or group of customers to gain a competitive advantage.<sup>18</sup>

III. CONCLUSION

For the reasons discussed above, the Commission should adopt the positions advocated in these comments. In particular, the Commission should assess universal service revenues based on net booked revenues; decline to assess contributions on projected revenues on a flat fee basis; retain the current wireless safe harbor; eliminate or reduce all exemptions to the extent possible; and create a flexible, competitively neutral recovery mechanism for universal service contributions for all carriers.

Respectfully submitted,

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June 25, 2001

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<sup>18</sup> Nevertheless, carriers should continue to be free to choose not to pass through their universal service contributions to their customers.

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **COMMENTS OF QWEST CORPORATION** to be filed with the FCC via its Electronic Comment Filing System, and (1) a copy of the **COMMENTS** to be served, via hand delivery on the entity denoted with an asterisk (\*), and (2) a copy of the **COMMENTS** to be served via United States First Class Mail, postage prepaid, upon all other parties listed on the attached service list.

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June 25, 2001

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