



Triangle Telephone Cooperative Association, Inc.

2121 HWY 2 NW ~ PO BOX 1220 ~ HAVRE MT 59501

RECEIVED

Phone: (406)394-7807 ~ Fax: (406)394-7801

www.ttc-cmc.net

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September 28, 2001

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: MAG Proceeding CC Docket Nos. 00-256, 96-45, 98-77, 98-166

Dear Ms. Salas:

The Board and Management of Triangle Telephone Cooperative Association, Inc. (TTC) are very concerned with what is understood to be the direction of the Federal Communication Commission (FCC) with respect to rural access reform. The most important aspect of access reform for rural carriers is to be regulated on a rate-of-return basis. Rate of return is necessary to ensure rural carriers retain the ability to continue offering quality service to rural America.

The MAG plan, as filed, provided a careful balance of the issues surrounding access reform implementation. Proposed amendments to the original filing, including any changes as a result of ex parte discussions, may have detrimental affects to maintaining quality service in rural America. The FCC is requested to carefully consider all plan modifications prior to issuing an order for rural access reform.

The FCC ordered reasonable steps be taken toward continuing rural universal service in conjunction with its Rural Task Force (RTF) Order (FCC 01-157) issued last May. Access reform was to progress as soon as logistically possible, however the circumstances, as noted above, dictate the issuance of a Further Notice of Proposed Rulemaking to allow more careful consideration of MAG plan modifications.

Additional deliberations are not intended to simply delay the proceedings, but to help focus an order on rural access reform to the needs of America's rural residents. Let's not undo the positive incentives for deployment of rural infrastructure just recently implemented in the FCC's most recent RTF Order.

Sincerely,

Richard Stevens
Assistant General Manager

Cc: Commissioner Powell; Commissioner Abernathy; Commissioner Martin; Commissioner Copps