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OCT 11 2001

MAIL ROOM

October 1, 2001

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

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

Dear Ms. Salas:

The purpose of this correspondence is to share my concerns with what I understand to be the direction the Commission is considering with respect to rural access reform that may be on the agenda for October 11th. I continue to believe that the most important aspect of access reform for rural carriers is to continue to be regulated on a rate-of-return basis. Only with this option can rural carriers like Kingdom Telephone Company maintain quality service and also continue to invest in new facilities that will provide rural customers with a connection to the digital world.

The issues surrounding access reform implementation are vital to rural local exchange carriers. As filed, the MAG plan provided a careful balance of all these issues. Any changes from the original filing, including changes resulting from ex parte discussions conducted in the final hours of this round of debate, do not necessarily represent my individual company's positions.

The Commission ordered reasonable steps toward continuing rural universal service with its Rural Task Force Order last May (FCC 01-157). While I recognize that in Chairman Powell's statement that accompanied the RTF Order he offered action on access reform as soon as logistically possible, I believe that circumstances dictate the issuance of a Further Notice of Proposed Rulemaking (FNPRM) and further consideration of these key issues.

I believe additional deliberation would help focus an order on rural access reform to the needs of rural customers and will hopefully not undo the positive incentives for deployment of rural infrastructure that were evident in the Commission's significant RTF Order earlier this year. If we are to continue to strive for equality of telecommunication services between urban and rural customers, additional deliberation can assist in reaching that goal.

Sincerely,

Tom Blevins
General Manager

CC: Chairman Michael K. Powell
Commissioner Kathleen Q. Abernathy
Commissioner Kevin J. Martin
Commissioner Michael J. Copps

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