

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

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In the Matter of

Federal-State Joint Board on  
Universal Service

CC Docket No. 96-45

REPLY COMMENTS  
of the  
GENERAL SERVICES ADMINISTRATION

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## Summary

GSA concurs with the position expressed by nearly all commenters that the Commission should not make significant changes in the list of services eligible for Federal universal service support. However, GSA agrees with several parties that the Commission should consider a few extensions in the definitions of supported services if the attendant costs are moderate.

Although several parties propose to initiate universal service support for broadband access to all households, GSA urges the Commission not to adopt this plan. First, commenters demonstrate that “broadband access” does not meet the definitional criteria for universal service eligibility — public interest, education, public health, and necessity. Also, several parties explain that the required expenditures would be large in comparison with the expected benefits.

GSA urges the Commission to be selective in expanding the list of services eligible for support. However, GSA recommends that the Commission study in more detail: (1) a proposal to extend support to Enhanced 911 services by wireless carriers; (2) support for payphone services; (3) adding capabilities required to implement the Communications for Law Enforcement Act (“CALEA”); (4) support for a service called “Soft Dial Tone”; and (5) support for services designated for persons with disabilities. In each case, however, funding requirements should be carefully considered.

Finally, GSA observes that consumers explain that some carriers are “marking-up” assessments for universal service programs. GSA urges the Commission to stop this practice by ruling that a line item charge used to recover the costs of universal service assessment should not exceed the corresponding cost to the carrier. Moreover, carriers should be required to state clearly that such “surcharges” are not legally mandated and not necessarily the same for all of the service providers that an end user may select.

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**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 Public Notice in CC Docket No. 96–45 (“Notice”) released on August 21, 2001. The Notice seeks comments and replies on the list of services eligible to receive Federal universal service support.

**I. INTRODUCTION**

In the Telecommunications Act, Congress established criteria for determining the services to be supported by Federal universal service support programs.<sup>1</sup> Pursuant to this legislation and recommendations by the Federal–State Joint Board on Universal Service (“Joint–Board”), the Commission designated the “core” services eligible for universal service support:

- voice–grade access to the public switched telephone network;
- single–party local exchange service;

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<sup>1</sup> Telecommunications Act of 1996, Pub. L. No. 104–104, 110 Stat. 56, codified at 47 U.S.C. §§ 151 *et seq.* (“Telecommunications Act”), Sec. 254(c)(1).

- dual-tone multifrequency signalling or its functional equivalent;
- access to emergency services;
- access to operator services;
- access to interexchange service;
- access to directory service; and
- toll limitation services for qualifying low-income consumers.<sup>2</sup>

In addition to prescribing support for these services, the Commission has implemented a program to facilitate access to advanced telecommunications offerings by eligible schools, libraries, and rural health care providers.<sup>3</sup>

The Telecommunications Act states that the scope of universal service needs is an evolving concept that the Commission must review periodically by “taking into account advances in telecommunications and information technologies and services.”<sup>4</sup> In the current proceeding, the Commission addresses the need to consider significant changes in the telecommunications industry by inviting comments on what services, if any, should be added to or removed from the list eligible for universal service support, and how these services should be defined.<sup>5</sup>

On November 5, 2001, GSA submitted Comments in response to the Notice. In those Comments, GSA explained the importance of universal service initiatives to all Federal agencies, and recommended that all “core” services identified by the Joint Board continue to receive universal service support.<sup>6</sup> However, in view of the need to contain costs, GSA recommended that support not be extended significantly at this

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<sup>2</sup> Report and Order, released May 8, 1997, paras. 56-87.

<sup>3</sup> Notice, n. 2.

<sup>4</sup> *Id.*, p. 1, citing Telecommunications Act, Sec. 254(c)(1).

<sup>5</sup> *Id.*, p. 2.

<sup>6</sup> Comments of GSA, pp. 3-4.

time.<sup>7</sup> Moreover, GSA proposed steps to help contain the funding requirements for universal service programs, and explained the need to eliminate unnecessary “universal service” charges that are billed to end users.<sup>8</sup>

In addition to GSA, more than 35 parties submitted comments in response to the Notice. In these Reply Comments, GSA responds to the positions and recommendations by those parties.

**II. CARRIERS, END USERS AND STATE REGULATORS URGE THE COMMISSION TO CONTINUE UNIVERSAL SERVICE SUPPORT FOR ALL PRESENTLY ELIGIBLE SERVICES.**

Carriers responding to the Notice include incumbent and competitive local exchange carriers (“LECs”), interexchange carriers, wireline and wireless carriers, large and small LECs serving urban, rural and insular areas, as well as associations of these firms. In addition, eight state regulatory agencies and consumer advocates, as well as 10 end user parties, public interest groups, and other parties provided comments. Nearly all of the respondents in this exceptionally diverse group concur that the Commission should not significantly modify the list of services now eligible for universal service support.

Each of the major incumbent wireline LECs urge the Commission to make no modifications in the list of services that are eligible for universal service support.<sup>9</sup> Also, most wireless LECs and interexchange carriers urge the Commission to make no changes. For example, AT&T urges the Commission to retain the current list of supported services and the current definition of voice grade access.<sup>10</sup> This carrier

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<sup>7</sup> *Id.*

<sup>8</sup> *Id.*, pp. 4-8.

<sup>9</sup> Comments of BellSouth Corporation, p. 2; Comments of SBC Communications, p. 5; Comments of Verizon, p. 1; and Comments of Qwest Communications International, p. 4.

<sup>10</sup> Comments of AT&T, p. 1.

explains that “an overly expansive list of services increases the cost of basic telecommunications services to all consumers.”<sup>11</sup>

State regulators also explain that the Commission should not expand the list of supported services. For example, the New York State Department of Public Service (“NYDPS”) acknowledges that universal service is properly concerned with activities to ensure that vital telecommunications capabilities are available in every home.<sup>12</sup> However, NYDPS cautions:

Any changes in the list of services eligible for universal service funding will have ramifications beyond Federal funding for universal service. Additions to the list of “core services” will not only increase the Federal fund, but ultimately place upward pressure on telephone subscribers’ basic service bills.<sup>13</sup>

GSA concurs with the assessments by these parties. Basically, GSA believes that regulators achieved a good balance in enumerating the services eligible for Federal universal service support.

**III. COMMENTERS EXPLAIN THAT THE COMMISSION SHOULD BE SELECTIVE IN HEEDING REQUESTS TO EXPAND THE SCOPE OF SUPPORT.**

**A. Support for broadband access should be limited to eligible organizations.**

Several parties advance proposals to extend support, with broadband access receiving the most attention as an additional potential beneficiary. In the context of this proceeding, broadband access refers to services that deliver T-1 or near T-1 speeds to homes and businesses at prices that are substantially below those generally available. Broadband access also includes services delivered by wireline LECs using

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<sup>11</sup> *Id.*, p. 7.

<sup>12</sup> Comments of NYDPS, pp. 2-3.

<sup>13</sup> *Id.*, p. 2.

digital subscriber lines (“DSLs”), as well as services delivered by cable providers using cable modem platforms.

Valor Telecommunications, an incumbent LEC with 550,000 local loops in 250 communities in rural areas, urges the Commission to make support available for the provision of “high-speed” Internet access in areas where deployment might not otherwise occur in a reasonable period of time.<sup>14</sup> For this purpose, “high-speed” access would be defined as a transmission rate of 200 kbps in one or two directions.<sup>15</sup>

TDS Telecom, representing 108 incumbent LECs in 28 states, also urges the Commission to add broadband loops to its list of supported functions.<sup>16</sup> In addition, TDS recommends that the Commission remove the cap on high cost support for rural incumbent LECs to ensure that there are no barriers to the provision of advanced services in the places that are the most costly to serve.<sup>17</sup> Furthermore, TDS urges the Commission to identify the most cost effective way to support nationwide access to the Internet without long distance charges.<sup>18</sup>

The arguments in support of including broadband access are effectively rebutted by other parties. Many explain that “broadband access for every household” should not be a candidate for universal service support. For example, WorldCom states that a supported service should have characteristics substantially related to the four factors that Congress specified in the Telecommunications Act: (1) the service is “essential” to education, public health, or public safety; (2) the service is used by a “substantial majority of residential customers”; (3) the service is widely deployed in

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14 Comments of Valor Telecommunications Enterprises, LLC (“Valor Telecommunications”), pp. 1-3.

15 *Id.*, p. 3.

16 Comments of TDS Telecommunications Corp. (“TDS”), p. 15.

17 *Id.*, p. 12.

18 *Id.*, p. 7.

telecommunications networks; and (4) support for the service is in the public interest.<sup>19</sup> In its comments, WorldCom shows that high-speed Internet access for all households fails these tests.<sup>20</sup>

In addition, regulators urge the Commission not to add high-speed access to the list of services eligible for universal service support. For example, NYDPS states that it opposes inclusion of this capability because it does not meet the criteria set in the Telecommunications Act, echoing WorldCom's position.<sup>21</sup>

Also, the Illinois Commerce Commission ("ICC") states that residential high-speed services have become a "mainstream offering" only in the last two or three years.<sup>22</sup> The ICC concludes that more time is necessary to determine whether government intervention is required to spur the deployment of advanced services.<sup>23</sup> At the present time, "it appears that the primary impact of including this service will be increased profits for the supported companies."<sup>24</sup>

In comments urging the Commission not to expand the list of supported services, Verizon Wireless provides data demonstrating that broadband access falls short of meeting the "majority of subscribers" test in the legislation. Verizon states:

Today, out of approximately 114 million total residential access lines and over 44 million single-line business access lines, only 5.2 million residential and business customers subscribe to high-speed access.<sup>25</sup>

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<sup>19</sup> Comments of WorldCom, p. 2, citing the Telecommunications Act, Sec. 254(c)(1).

<sup>20</sup> *Id.*, p. 11-28.

<sup>21</sup> Comments of NYDPS, pp. 1-2.

<sup>22</sup> Comments of ICC, p. 3.

<sup>23</sup> *Id.*

<sup>24</sup> *Id.*

<sup>25</sup> Comments of Verizon Wireless, p. 4.

GSA agrees with Verizon Wireless that if less than five percent of users find broadband access “necessary”, the service should not be considered as a candidate for universal service support.

The “cost” of adding ubiquitous broadband access is amorphous because there are various options. Specific funding requirements have not been defined, but comments by Verizon Wireless provide insight into the potential magnitude of the cost. Verizon Wireless cites a report by the National Exchange Carrier Association (“NECA”) stating that the costs of necessary upgrades to provide broadband access capabilities over only 3 million rural lines would be nearly \$11 billion.<sup>26</sup>

Finally, in comments expressing the position of large end users on high-speed access, Ad Hoc explains that the definitional criteria for universal service eligibility — public interest, education, public health, and necessity — have been adequately addressed through the Schools and Libraries and Rural Health Care programs.<sup>27</sup> These programs, started in the past few years, assist in reducing the costs of broadband access for educational, research, and medical facilities. Ad Hoc explains that consumers can obtain the benefits of financially-assisted access at the designated public locations, providing a very cost-effective alternative to access by each household.<sup>28</sup>

**B. The Commission should consider adding payphone services to the list eligible for universal service support.**

In its comments, a user organization called Community Voice Mail urges the Commission to include support for local payphone services in order to stem the

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<sup>26</sup> *Id.*, p. 6, citing Comments by NECA in CC Docket No. 98-146, September 24, 2001.

<sup>27</sup> Comments of Ad Hoc Telecommunications Users Committee (“Ad Hoc”), p. 9.

<sup>28</sup> *Id.*

removal of payphones from less profitable locations.<sup>29</sup> This organization states that its clients — often persons who are homeless, unemployed, or seeking a haven from domestic violence — frequently rely on payphones as their primary means to meet communications needs.<sup>30</sup>

Ad Hoc believes that the Commission should not use the universal service program as a means of encouraging payphone deployment.<sup>31</sup> Ad Hoc states, “The Commission risks increasing the expense of the universal service program and thus the cost of basic telecommunications for all consumers each time it contemplates expansion of the definition.”<sup>32</sup>

GSA concurs with Ad Hoc that it important to evaluate the cost to end users in considering additions to the list of services eligible for support. However, payphones can provide a vital link in many situations. They are especially important for individuals in transition, or in locations where access to wireless communications is limited. Indeed, the Commission acknowledged the importance of payphones in CC Docket No. 96-128, when it took steps to increase the profitability of payphones and expand competition among payphone providers.<sup>33</sup> Therefore, GSA urges the Commission to consider proposals for extending universal service support to payphone services in more detail.

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<sup>29</sup> Comments of Community Voice Mail, p. 1.

<sup>30</sup> *Id.*

<sup>31</sup> Comments of Ad Hoc, p. 16.

<sup>32</sup> *Id.* (emphasis supplied.)

<sup>33</sup> CC Docket No. 96-128, Third Report and Order, and Order on Reconsideration of the Second Report and Order, released February 4, 1999, paras. 13-18.

**C. Support should encompass Enhanced 911 and the capabilities needed to implement the Communications Assistance for Law Enforcement Act.**

Enhanced 911 (“E911”) includes two important capabilities that are not included with basic 911. These are Automatic Numbering Information (“ANI”), which gives the answering point call-back capability if the call is interrupted, and Automatic Location Information, (“ALI”), which allows emergency service providers to identify the geographic location of the calling party.<sup>34</sup> In 1997, the Commission designated E911 as a service meeting the criteria for universal service support.<sup>35</sup>

In 1999, the Commission ordered all wireless carriers to implement E911, but stated that a cost recovery mechanism should be in place before any carrier would be required to implement this capability.<sup>36</sup> However, the Commission subsequently reversed this position, and eliminated the prior funding condition, leaving wireless carriers to recover the costs from their subscribers or absorb the costs themselves.<sup>37</sup>

In its comments in this proceeding, the Rural Cellular Association (“RCA”) explains that this unfunded mandate causes a problem for rural wireless carriers.<sup>38</sup> RCA states that recovery of the costs from a small rural subscriber base would severely hamper the ability of rural wireless carriers to provide the types of services available in urban areas.<sup>39</sup> Also, RCA explains that Federal universal service support

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34 CC Docket No. 96-45, Report and Order, released May 8, 1997, para. 73.

35 *Id.*

36 *In the Matter of the Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Services*, CC Docket No. 94-102, Second Report and Order, 14 FCC Rcd 10954 (1999).

37 *Id.*, Second Memorandum Opinion and Order, 14 FCC Rcd 20850 (1999).

38 Comments of RCA, p. 7.

39 *Id.*, pp. 7-8.

for E911 would promote the objective of providing access to affordable services in all regions of the country in a competitively-neutral manner.<sup>40</sup>

A similar issue exists concerning implementation of the requirements of the Communications Assistance for Law Enforcement Act (“CALEA”).<sup>41</sup> Although this legislation predates the Telecommunications Act, efforts by the law enforcement community triggered by the events of September 11 underscore the essential nature of the telecommunications capabilities supporting CALEA.

As with E911, CALEA applies to both wireless and wireline carriers. Also, the associated telecommunications services are vital to public safety. Moreover, as RCA points out, compliance with CALEA presents a significant challenge for smaller rural carriers.<sup>42</sup>

Additional parties discuss communications to summon emergency services. Comments by the People of the State of California and the California Public Utilities Commission (“California”) point to a state law requiring all local exchange carriers to equip each residential telephone line with access to 911 even if the customer has not placed an order for service, or service has been disconnected.<sup>43</sup> This capability, variously called a “warm line” or “soft dial tone”, is often most valuable as an interim protection measure while service is being initiated or changed. California states that warm line service is essential to the public health and safety, and has a *de minimus* cost.<sup>44</sup> Therefore, California recommends that the service be included in the list of

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40 *Id.*, p. 8.

41 Communications Assistance for Law Enforcement Act, P.L. 103-104, 108 Stat. 4279, codified as amended in 18 U.S.C. Sec. 2522, and 47 U.S.C. Secs. 229, 1001-1010.

42 Comments of RCA, p. 8.

43 Comments of California, p. 4, citing California Public Utilities Code, Sec. 2883.

44 *Id.*, p. 5.

services for Federal universal service support to supplement the procedures for that state described in the Public Utilities Code.<sup>45</sup>

Other states have acted to provide similar capabilities. For example, Vermont adopted Continuous Emergency Access (“CEA”), a program analogous to Soft Dial tone.<sup>46</sup> This program applies to both incumbent and competitive LECs.

End users also explain the importance of adding this capability. Although Ad Hoc is sensitive to the need to contain the costs of universal service initiatives, the association supports provision of interim telecommunications services that are essential to public health and safety.<sup>47</sup> Specifically, Ad Hoc points out that Soft Dial Tone facilitates a transition between two customers at the same location (*e.g.* tenants moving in and out of an apartment) and provides valuable protection for the time that services are in transition.<sup>48</sup> In view of these benefits, Ad Hoc urges the Commission to initiate a study to determine the associated costs.<sup>49</sup>

GSA concurs with Ad Hoc’s recommendation. If the costs are reasonable as California indicates, GSA would support designation of the service for universal service support.

**D. Services designated for persons with disabilities should be considered for support.**

In comments responding to the Notice, Telecommunications for the Deaf, Inc. (“TDI”) states that the present definition of voice-grade service is not adequate for

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45 *Id.*, p. 5, citing California Public Utilities Code, Sec. 2883.

46 Investigation of Proposed Vermont Price Regulation Plan and Proposed Interim Incentive Regulation Plan of New England Telephone and Telegraph Company; and Petition of Department of Public Service for an Investigation of New England Telephone and Telegraph Company Rates, Docket No. 5700/5702, Order, released October 5, 1994, pp. 155-156.

47 Comments of Ad Hoc, p. 14.

48 *Id.*

49 *Id.*

persons with disabilities.<sup>50</sup> This group recommends support for Braille-based TTY (teletypewriter) equipment and two-line voice carry over (“2LVCO”), a system that permits an individual with partial hearing loss to communicate more efficiently over the telephone.<sup>51</sup>

Although urging caution concerning the scope of eligible services, GSA does not oppose expansion of local service to include the services identified by TDI under certain conditions. These services meet the requirements concerning public safety and public interest. Apparently, they are widely available and used by a majority of persons who have the targeted disabilities. Therefore, GSA would endorse universal support for the services if this step would entail moderate funding requirements.

#### **IV. END USERS DEMONSTRATE THAT CARRIERS ARE “MARKING-UP” ASSESSMENTS FOR UNIVERSAL SERVICE PROGRAMS.**

End users have explained that some carriers were turning universal service into a “profit center” by employing surcharges on end users that are substantially greater than their payments for the programs.<sup>52</sup> Such excess recovery is particularly onerous because monthly invoices to end users with charges purportedly reflecting universal service contributions rarely, if ever, contain a description allowing users to understand the purpose of the assessment.<sup>53</sup> By the wording and context, many consumers are left with the impression that the “universal service” charge is mandated and uniform among all carriers.<sup>54</sup> GSA urged the Commission to stop these practices.<sup>55</sup>

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50 Comments of TDI, pp. 13-14.

51 *Id.*, pp. 5-9.

52 Comments of GSA, p. 7, citing Comments of Ad Hoc, June 25, 2001

53 *Id.*

54 *Id.*

55 *Id.*

Several other commenters express the same view. For example, in joint comments the Association for Telecommunications Professionals in Higher Education and the National Association of College and University Business Officers (“ACUTA and NACUBO”) address this issue. These organizations state that for many carriers, the supposed “pass-through charge” is considerably greater than the amount assessed.<sup>56</sup> ACUTA and NACUBO urge the Commission to act promptly to require carriers to employ a uniform description for the charges designed to recover universal service contributions and to limit charges to the actual amount of their contribution requirement.<sup>57</sup>

In separate comments to the Commission, a director of telecommunications in the education field also addresses the point. He states:

End-user charges often are not properly supported or justified on invoices, and providers often are unwilling or unable to adequately answer end-user questions regarding these charges. Providers nearly always base their end-user charges on a factor that is higher than the factor on which the providers’ own universal service contributions are based.<sup>58</sup>

The comments continue that end users who wish to dispute their universal service charges are limited to filing a Section 208 formal complaint with the Commission.<sup>59</sup> This is not a practical course for most end users.

All too often, carriers have attempted to defend their billing practices by pointing to such factors as: (1) the billed revenue that cannot be collected; (2) a lag between projecting revenues and making contributions; (3) the cost of collection and administration; and (4) the need to correct for differences in the ways that contributions

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<sup>56</sup> Comments of ACUTA and NACUBO, pp. 3-4.

<sup>57</sup> *Id.*, p. 4.

<sup>58</sup> Comments of Stephen A. Judycki, p. 2.

<sup>59</sup> *Id.*, p. 2.

are levied on providers and collected from end users.<sup>60</sup> Admittedly, there are timing differences, but in GSA's view no carrier has provided a satisfactory explanation of why carriers are "marking-up" assessments by as much as 50 percent as Ad Hoc reports.<sup>61</sup>

GSA urges the Commission to rule that if a line item charge is used to recover the costs of universal service contributions, the amount of charge should not exceed the corresponding contribution.<sup>62</sup> Moreover, carriers should be required to state clearly that such "surcharges" are not legally mandated and not necessarily the same for all carriers that an end user may designate as service provider.<sup>63</sup>

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60 *Id.*

61 Comments of GSA, p. 7, citing Comments of Ad Hoc, June 25, 2001, p. 34. Ad Hoc's comments indicate that some carriers were applying surcharges as high as 8.6 percent, when they were paying only 5.67 percent of revenue, and surcharges as high as 9.9 percent when they were assessed only 6.68 percent of revenue.

62 *Id.*

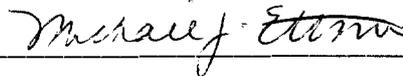
63 *Id.*

**V. CONCLUSION**

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

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