

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Multi-Association Group (MAG) Plan for	)	CC Docket No. 00-256
Regulation of Interstate Services of	)	
Non-Price Cap Incumbent Local Exchange	)	
Carriers and Interexchange Carriers	)	
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	
	)	
Access Charge Reform for Incumbent	)	CC Docket No. 98-77
Local Exchange Carriers Subject to	)	
Rate-of-Return Regulation	)	
	)	
Prescribing the Authorized Rate of Return	)	CC Docket No. 98-166
For Interstate Services of Local Exchange	)	
Carriers	)	

**PLAINS RURAL INDEPENDENT COMPANIES'  
OPPOSITION TO PETITIONS FOR RECONSIDERATION**

**I. INTRODUCTION**

Pursuant to Section 1.429 of the Commission's Rules, 47 C.F.R. Section 1.429, and its Public Notice (Report No. 2526) published in 67 Fed. Reg. 4430, the Plains Rural Independent Companies (the "Companies")<sup>1</sup> submit this opposition to the petitions for reconsideration filed by the Competitive Universal Service Coalition ("CUSC") and the Rural Consumer Choice Coalition (the "RCC Coalition") of the Federal Communications

---

<sup>1</sup> Companies submitting this opposition include: Arlington Telephone Company, The Blair Telephone Company, Cambridge Telephone Company, Clarks Telecommunications Co., Consolidated Telephone Company, Consolidated Telco, Inc., Eastern Nebraska Telephone Company, Great Plains Communications, Inc., Hartington Telecommunications Co., Inc., Hershey Cooperative Telephone Company, Inc., Hooper Telephone Company, K&M Telephone Company, Inc., NebCom, Inc., Nebraska Central Telephone Company, Northeast Nebraska Telephone Co., Pierce Telephone Co., Rock County Telephone Company, Schaller/ANC Telephone Company, Southeast Nebraska Telephone Co., Stanton Telephone Co., Inc. and Three River Telco.

Commission (“Commission”) Second Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 00-256, Fifteenth Report and Order in CC Docket No. 96-45, and Report and Order in CC Docket Nos. 98-77 and 98-166 (“MAG Order”).

## **II. THE COMMISSION SHOULD NOT CAP INTERSTATE COMMON LINE SUPPORT.**

In the *MAG Order*, the Commission established a new support mechanism, Interstate Common Line Support (“ICLS”), to help ensure the availability of high quality telecommunications service at affordable and reasonably comparable rates after the CCL charge is phased out.<sup>2</sup> The Commission declined to cap the size of the fund, noting “. . .that rate-of-return carriers are generally more dependent on their interstate access charge revenue streams and universal service support than price cap carriers, and, therefore, more sensitive to disruption of those streams.”<sup>3</sup> The Commission also found that universal service funding would not grow uncontrollably without a cap, and that it could review its decision if necessary.<sup>4</sup> Nonetheless, the CUSC seeks reconsideration of this decision and the imposition of a cap on ICLS funding. The Commission should reject the imposition of a cap, as it has already established a reasoned basis for not capping ICLS. Furthermore, as the Companies will demonstrate, the CUSC has previously supported many of the findings made by the Commission in reaching its

---

<sup>2</sup> See *MAG Order* at para. 120.

<sup>3</sup> Id. at para. 131.

<sup>4</sup> Id. at para. 132.

decision not to impose a cap in recently-filed comments on a similar issue.<sup>5</sup>

The lack of a cap on ICLS will not contribute to unlimited fund growth as argued by the CUSC. Institution of such a cap, in fact, will discourage investment by rural companies – much as does the current cap on universal service support. Furthermore, contrary to the assertions of the CUSC, the ICLS does not violate competitive neutrality as previously defined by the Commission. A cap on ICLS would also be inconsistent with rate-of-return (“ROR”) regulation, in that it would not ensure sufficient cost recovery.

**A. It Is Unlikely That The ICLS Fund Will Grow Substantially, Making A Cap On the Fund Unnecessary.**

The CUSC did not offer any reasoning in its petition as to why the lack of a cap on ICLS funding would contribute to unlimited fund growth. In fact, its explanation of the effects of competitive activity in other comments filed in this docket would indicate that it is unlikely that competitive activity would lead to substantial fund growth. The Commission has indicated that ICLS “. . .will be constrained by carriers’ embedded costs.”<sup>6</sup> The CUSC has suggested that “. . .market share changes, *per se*, have no effect on per-line support based on historical costs.”<sup>7</sup> This is because the CUSC believes that “. . .the Commission should not assume that competitive entry will mean that the ILEC

---

<sup>5</sup> The Companies also note that Western Wireless Corporation (“Western”), which is a member of the CUSC, has taken contradictory positions on this exact issue. While Western is asking the Commission to reconsider its decision not to impose a cap on ICLS in the petition which is the subject of this opposition, Western is also a member of the Rural Consumer Choice Coalition (“RCC Coalition”). The RCC Coalition proposed a plan for rate-of-return carrier access reform that did not include a cap on support for common line costs, as noted by the Commission in footnote 363 of the *MAG Order*.

<sup>6</sup> *Id.* at para. 133.

<sup>7</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, and *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, CC Docket No. 00-256, Reply Comments of the Competitive Universal Service Coalition (“*CUSC Reply Comments*”) filed Aug. 28, 2001 at 9.

loses customers.”<sup>8</sup> Rather, the CUSC argues that competitive entrants often attract new customers, and that competitive entry stimulates increases in demand. The Commission indicated that a carrier’s ICLS level “. . .will increase only if its common line costs grow faster than its ability to recover such costs through the SLC.”<sup>9</sup> However, if incumbent local exchange carriers (“ILECs”) do not lose existing customers to competitors as suggested by CUSC, then ILECs should be able to maintain or increase their subscriber line charge (“SLC”) revenues, which should in turn keep ICLS fund growth minimal. As stated by the CUSC with regard to the effect of competition on high-cost loop support “CUSC agrees with the ILECs and with the Commission that, during the next five years, it is unlikely that ILEC customer losses will reach such a critical mass that the per-line support amount rise sufficiently to pose a threat of excessive fund growth.”<sup>10</sup> Therefore, the CUSC’s assertion on reconsideration that the lack of a cap could result in potentially unlimited fund growth is without basis and is directly contrary to its position presented previously in this proceeding, and should not be used as a reason to institute a cap.

**B. A Cap On The ICLS Fund Would Discourage Investment In Rural Areas, As Well As Create Pressures For Rural Carriers To Increase Local Rates And Reduce Service Quality And Service Offerings.**

The Commission has recognized that certainty and stability are necessary for ROR carriers and will encourage investment in rural America.<sup>11</sup> Capping ICLS funds would not provide certainty and stability, which in turn would decrease investment. This reasoning seems to be shared by CUSC earlier in this proceeding when it stated with

---

<sup>8</sup> Ibid.

<sup>9</sup> *MAG Order* at para. 133.

<sup>10</sup> *CUSC Reply Comments* at 10.

<sup>11</sup> *See MAG Order* at para. 128.

regard to high-cost loop support that “Capping support. . . would do little to encourage investment in rural infrastructure – either by ILECs or competitive ETCs – nor would it promote competitive entry.”<sup>12</sup> In addition to discouraging investment, the Commission noted that the capping of support “. . . might undermine our universal service goals by creating pressures for certain ROR carriers to reduce service quality, increase local rates, or limit service offerings.”<sup>13</sup> While the CUSC now asserts on reconsideration that ICLS harms consumers by eliminating incentives for carriers to provide service efficiently and in a manner that best meets customers’ needs,<sup>14</sup> the Commission has indicated that reduced certainty and stability caused by a cap on ICLS could harm consumers for the reasons cited above. Thus, the CUSC’s assertion that the lack of a cap on ICLS will harm consumers is incorrect, in fact, a cap on ICLS is far more likely to harm consumers and should not be instituted for this reason.

**C. The ICLS Fund As Established Does Not Violate The Commission’s Principles of Competitive Neutrality.**

The CUSC argues that ICLS “. . . violates competitive neutrality by guaranteeing incumbents a revenue ‘war chest’ that will never be available to their competitors.”<sup>15</sup> However, the Commission clearly indicated that “[i]n accordance with section 54.307 of our rules, per-loop equivalents of Interstate Common Line Support will be portable to

---

<sup>12</sup> *CUSC Reply Comments* at 10.

<sup>13</sup> *MAG Order* at para. 132.

<sup>14</sup> See *Multi-Association Group (MAG) 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, and *Prescribing the Authorized Rate of Return for Interstate Services of Local Exchange Carriers*, CC Docket No. 98-166, *Petition for Reconsideration of the Competitive Universal Service Coalition (“CUSC Petition”)* filed Dec. 31, 2001 at 7.

<sup>15</sup> *Ibid.*

competitive eligible telecommunications carriers.”<sup>16</sup> Therefore, the Companies do not understand the basis for CUSC’s assertion, in that the Commission has adhered to the policy it had previously developed regarding competitive neutrality. In fact, contrary to the CUSC’s assertion that ICLS provides an advantage to ILECs, the Companies contend that the porting of all support, including the ICLS, provides an advantage for competitors in that they may not provide the same services or have the same costs as ILECs, yet they receive the same support. Because the Commission has adhered to its policy, CUSC’s assertion that not capping ICLS would not be competitively neutral is without merit.

**D. Placing A Cap On ICLS, Which Contributes To Access Cost Recovery, Would Be Inconsistent With Rate-of-Return Regulation.**

CUSC suggests that a cap on ICLS should be imposed because the Commission imposed a cap on interstate access universal service support for price cap LECs.<sup>17</sup> However, in making such a suggestion the CUSC has failed to recognize the differences between price cap and ROR carriers, which the Commission noted in the *MAG Order*.<sup>18</sup> The Commission decided in the *LEC Price Cap Order* that due to the significant differences in the size and scope of operation of Tier 1 companies,<sup>19</sup> price-cap regulation would only be made mandatory for the largest carriers within the Tier 1 group. However, the CUSC, in asking for a cap on the ICLS, is attempting to apply a form of price-cap or incentive regulation to ROR carriers, by capping the common line revenues that could be recovered through the ICLS. This is clearly inconsistent with ROR regulation, which

---

<sup>16</sup> *MAG Order* at para. 151.

<sup>17</sup> *See CUSC Petition* at 8.

<sup>18</sup> *See MAG Order* at para. 134.

<sup>19</sup> *See Policy and Rules Concerning Rates for Dominant Carriers*, CC Docket No. 87-313, Second Report and Order, 5 FCC Rcd 6818 (1990) (“*LEC Price Cap Order*”) at para. 260.

compensates carriers on a specific set of rules based on carrier costs. As such, ROR regulation does not impose caps on cost recovery, which is precisely what the CUSC is proposing. The imposition of caps is more appropriately dealt with as a form of alternative regulation, which is the subject of a Further Notice of Proposed Rulemaking (“FNPRM”).<sup>20</sup> In addition, the Companies note that the FNPRM suggests that alternative regulation for ROR carriers be optional for all or at least small ROR carriers.<sup>21</sup> As such, the imposition of a cap on ICLS should be rejected by the Commission.

### **III. THE COMMISSION SHOULD NOT REALLOCATE TRANSPORT INTERCONNECTION CHARGE AMOUNTS ALLOCATED TO LOCAL SWITCHING IN THE *MAG ORDER* TO COMMON LINE.**

In the *MAG Order* the Commission concluded that spreading the costs currently recovered through the Transport Interconnection Charge (“TIC”) over all access categories is most consistent with the record and with the approach used to eliminate TIC for price cap carriers.<sup>22</sup> In that determination the Commission admitted that it was uncertain as to the portion of the TIC costs that were truly transport related, however, the Commission indicated that it was clear that at least some TIC costs were transport related.<sup>23</sup> Despite this finding that TIC costs pertain to transport, in the *MAG Order* the Commission specifically determined that the amounts of TIC to be allocated shall be based on the projected revenue requirements of ROR carriers for all of the access categories, including special access.<sup>24</sup>

---

<sup>20</sup> See *MAG Order* at para. 212-276.

<sup>21</sup> Id. at para. 227.

<sup>22</sup> Id. at para. 100.

<sup>23</sup> Id. at para. 101.

<sup>24</sup> Id. at para. 102.

The RCC Coalition seeks reconsideration of this decision, and maintains that there was no basis in the record for the Commission's decision to shift recovery of ROR carriers' TIC costs to local switching.<sup>25</sup> The RCC Coalition recommends that the Commission should spread TIC recovery that was assigned to local switching in the *MAG Order* to either common line alone, or to common line, transport, and special access.<sup>26</sup> As the Companies explained in their petition for reconsideration, the Commission had no basis for allocating TIC costs to common line.<sup>27</sup> While the Companies agree that TIC costs should not have been spread to local switching, any TIC costs that were spread to local switching should not be redistributed to common line, but rather remain in transport rates, as the Companies argued in their motion for reconsideration. The Companies object to the RCC Coalition's motion and urge the FCC to reject it.

**A. The RCC Coalition's Use Of The Access Reform Order As A Basis For Allocation Of ROR TIC Costs Is Incomplete and Misleading.**

While the RCC Coalition is correct in its assertion that there is no evidence to support assignment of TIC cost recovery to local switching, the RCC Coalition's argument is incomplete and obviously misleading. For that matter, there is no evidence

---

<sup>25</sup> See *Multi-Association Group (MAG) 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, and *Prescribing the Authorized Rate of Return for Interstate Services of Local Exchange Carriers*, CC Docket No. 98-166, Rural Consumer Choice Coalition Petition for Reconsideration, filed Dec. 28, 2001 at 16.

<sup>26</sup> *Id.* at 18.

<sup>27</sup> See *Multi-Association Group (MAG) 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, and *Prescribing the Authorized Rate of Return for Interstate Services of Local Exchange Carriers*, CC Docket No. 98-166, Petition for Reconsideration of the Plains Rural Independent Companies ("*Plains Petition*"), filed Dec. 31, 2001.

that it is appropriate to assign *any* TIC costs for ROR carriers to any other access element other than transport, as the TIC originally was designated to capture transport costs of ROR carriers. However, in recounting Commission action regarding reassignment of the TIC for price cap carriers, the RCC Coalition skips over significant steps in the process and in so doing presents a misleading representation of the costs recovered by the TIC. The RCC Coalition's recommendation would reallocate TIC costs in an even more inappropriate manner than required in the *MAG Order*, which itself is unjustified and damaging to rural companies' ability to recover their access costs.

Through the FCC's rate design, the TIC has been an essential cost-recovery mechanism for ROR LECs in very rural parts of the country that have unavoidably high transport costs.<sup>28</sup> The treatment of TIC costs under the *MAG Order*, and even more inappropriately as recommended by the RCC Coalition, further disadvantages rural carriers with high transport costs by moving these TIC costs, which are solely related to providing transport services, into common line. Such treatment is not only unjustified and inconsistent with the FCC's record on the access element costs that constitute the TIC, but will improperly convert these TIC costs into additional portable support by way of the new Interstate Common Line Support mechanism.<sup>29</sup> The FCC must recognize this

---

<sup>28</sup> For many rural ROR carriers, the TIC has represented the majority of their transport cost recovery. For some of the Companies, the TIC represents almost three-quarters of their transport cost recovery. See Letter of Lisa Zaina to Magalie Roman Salas, Re: Ex Parte Submission, CC Docket Nos. 96-45 and 00-256 (filed Aug. 7, 2001).

<sup>29</sup> The Commission declined to allocate a portion of the costs recovered by the TIC to some form of universal service support recovery for price cap carriers. See *Access Charge Reform*, CC Docket No. 96-262, *Price Cap Performance Review for Local Exchange Carriers*, CC Docket No. 94-1, *Transport Rate Structure and Pricing*, CC Docket No. 91-213, and *End User Common Line Charges*, CC Docket No. 95-72, First Report and Order, FCC 97-158 ("*Access Charge Reform Order*") (rel. May 16, 1997) at para. 242.

damaging oversight, reject the RCC request, and take action to properly deal with these transport costs.

**B. The Commission’s Reallocation Of TIC Costs To Other Access Elements Did Not Move Any Costs To Common Line.**

In its *Access Charge Reform Order*, the Commission developed methods to reduce and eliminate the TIC in response to a remand by the Court of Appeals for the D.C. Circuit.<sup>30</sup> The first, and most significant step was that the Commission removed a large portion of the cost recovery associated with the TIC for price cap carriers by identifying “. . . several costs included in the TIC that should be reallocated to other access elements.”<sup>31</sup> It is critical to understand that none of TIC was reallocated to common line during this initial process.<sup>32</sup> The portion of TIC costs that were not reallocated after this process was completed was labeled the “residual TIC.” In its petition for reconsideration, the RCC Coalition completely – and conveniently – ignores this necessary step in the process. By omitting this important step from its explanation of how the TIC was reallocated for price cap carriers, the RCC Coalition implies that the treatment of the residual TIC, which was only a portion of the price cap carriers’ TIC costs prior to reallocation, is the method that was used by the Commission to reassign *all* TIC costs.

---

<sup>30</sup> Id. at para. 211.

<sup>31</sup> Id. at para. 213.

<sup>32</sup> Id. at para. 217-223.

**C. The Commission Could Not Identify Access Elements With Which “Residual TIC” Costs Were Associated, And Indicated That The Matter Would Be Referred To The Joint Board On Separations To Resolve The Issue.**

After the Commission completed the reallocation of TIC costs to other transport-related elements, it recognized that:

. . . some of the remaining costs recovered by the TIC result from at least two different causes: (1) the separations process assigned costs differently to private line and message (*i.e.*, switched ) services, resulting in costs allocated to special access being lower than those allocated to the message category, even though the two services use comparable facilities – rates for direct-trunked transport and the transmission component of tandem-switched transport, which are switched services, therefore, do not recover the full amount of separated costs; and (2) the cost of providing transport services in less densely populated areas is higher than that reflected by transport rates derived from those special access rates.<sup>33</sup>

Since the Commission said that “. . .we will soon be considering a Notice of Proposed Rulemaking to refer to a Joint Board questions regarding separations. . . .” it decided to “. . . leave the determination of the ultimate allocation of the remaining costs recovered by the TIC until the conclusion of that proceeding.”<sup>34</sup> There has not been a Joint Board on Separations recommendation on these issues, and there have been no cost allocation changes. Yet, the Commission has ignored its own stated understanding of the origination of TIC costs cited above, and has spread TIC costs for all ROR companies to common line in the absence of a determination that it announced it would seek.

For price cap carriers, the Commission developed a residual TIC reduction plan, but noted that “. . . referring separations questions to a Joint Board is the best means of reaching that ultimate objective.”<sup>35</sup> referring to the appropriate manner of addressing TIC

---

<sup>33</sup> Id. at para. 225.

<sup>34</sup> Ibid.

<sup>35</sup> Id. at para. 229.

costs. As noted above, the RCC Coalition relies on the treatment of the TIC in the residual TIC reduction plan as the basis for its recommendation on how the entire TIC for ROR carriers should be allocated. The Commission noted in the *Access Reform Order* that “[t]here is conflicting evidence in the record concerning the nature of the costs contained within the residual TIC; these costs may be traffic sensitive or NTS and may be associated with common line, transport, or switching services.”<sup>36</sup> The Commission goes on to state that “[t]he evidence, however, does not clearly resolve this issue.”<sup>37</sup> Because the Commission did not have clear evidence as to the nature of costs contained in the residual TIC, it found that “. . . we should err, if at all, on the side of NTS recovery of these costs.”<sup>38</sup> This inconclusive finding, along with the fact that the Commission required recovery of residual TIC amounts through the Presubscribed Interexchange Carrier Charge (“PICC”) “. . . to the extent that the PICC is below its ceiling,”<sup>39</sup> is inexplicably used by the RCC Coalition as justification that some or all of the TIC allocated to local switching in the *MAG Order* should be reallocated to common line.

**D. A Referral To And Ultimate Determination From The Joint Board On Separations Is Necessary To Resolve The Issue Of The Access Elements With Which TIC Costs Are Associated, Because ROR Carriers, Unlike Price Cap Carriers, Must Base Their Rates Directly On Their Costs.**

The Commission’s actions with respect to the reallocation of the residual TIC for price cap carriers does not contain any evidence that the residual TIC contained any NTS or common line costs. Rather, the Commission freely admitted that the evidence was

---

<sup>36</sup> Id. at para. 232.

<sup>37</sup> Ibid.

<sup>38</sup> Id. at para. 233.

<sup>39</sup> Id. at para. 239.

inconclusive and that a Joint Board review of separations was necessary to determine the ultimate allocation of remaining costs. Price cap carriers' rates are not computed as a direct function of costs, therefore, the Commission could redirect the recovery of costs, without a change in separations, to different categories without a direct effect on rates. However, the same is not true for ROR carriers, which are affected by the *MAG Order*. Rate-of-return carriers must, by rule, base their rates directly on costs. Therefore, the treatment of the residual TIC for price cap carriers is not a valid precedent upon which to base the reallocation of TIC costs for ROR carriers. Conclusive evidence that the TIC contains NTS or common line costs, through a finding by the Joint Board on Separations, should be required in order for an appropriate reallocation of costs to occur for ROR carriers. Therefore, the Companies urge the Commission to reject the recommendation of the RCC Coalition that TIC costs reallocated to local switching be reallocated to common line. Rather, the Commission should follow the recommendation of the Companies in their petition for reconsideration,<sup>40</sup> as is consistent with the FCC's strong finding in its *Access Charge Reform Order* referenced above.

#### **IV. CONCLUSION**

The Commission should deny the request by CUSC and reject the imposition of a cap on the ICLS fund. As the Companies have pointed out, absence of a cap on the ICLS fund will not lead to unlimited fund growth and uncapped ICLS support is necessary to ensure sufficient cost recovery for ROR carriers. The Commission should also reject the recommendation of the RCC Coalition that TIC costs that were allocated to local switching in the *MAG Order* should be reassigned to common line. At this time there is

---

<sup>40</sup> See *Plains Petition* at 15-16.

no evidence to indicate that TIC costs are not related to transport elements. The determination of the nature of costs contained in the TIC should be referred to the Joint Board on Separations before any changes are made to the TIC for ROR carriers, as these carriers must base their rates directly on their costs.

Respectfully submitted,

PLAINS RURAL INDEPENDENT COMPANIES

By: \_\_\_\_\_

Lisa M. Zaina  
Wallman Strategic Consulting, LLC  
1300 Connecticut Ave., NW, Suite 1000  
Washington, DC 20036  
(202) 347-4964

February 14, 2002

**CERTIFICATE OF SERVICE**

I, Lisa M. Zaina, of Wallman Strategic Consulting, LLC, 1300 Connecticut Ave., NW, Suite 1000, Washington, DC, 20036, hereby certify the foregoing “Opposition to Petitions for Reconsideration” was served on this 14<sup>th</sup> day of February 2002, to the following parties:

//s//

\_\_\_\_\_  
Lisa M. Zaina

Office of Chairman Michael Powell (e-mail)  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 8-B201  
Washington, DC 20554

Office of Commissioner Michael J. Copps (e-mail)  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 8-A302  
Washington, DC 20554

Office of Commissioner Kathleen Abernathy (e-mail)  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 8-A204  
Washington, DC 20554

Office Commissioner Kevin Martin (e-mail)  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 8-C302  
Washington, DC 20554

Dorothy Attwood, Chief, Common Carrier Bureau (e-mail)  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 5-C450  
Washington, DC 20554

Qualex International (U.S. mail)  
445 12<sup>th</sup> Street, SW  
Room CY-B402  
Washington, DC 20554 (diskette)

John T. Nakahata (U.S. mail)  
Timothy J. Simeone

Harris, Wiltshire & Grannis, LLP  
1200 18<sup>th</sup> Street, NW  
Washington, DC 20036  
*Counsel for RCC*

Mark C. Rosenblum (U.S. mail)  
Judy Sello  
AT&T CORP.  
Rm. 1135L2  
295 North Maple Ave.  
Basking Ridge, NJ 07920

James R. Jackson (U.S. mail)  
GENERAL COMMUNICATIONS INC.  
2550 Denali Street  
Suite 1000  
Anchorage, AK 99503

Gene A. DeJordy (U.S. mail)  
Mark S. Rubin  
WESTERN WIRELESS CORP.  
401 9<sup>th</sup> Street, NW  
Suite 550  
Washington, DC 20004

Michele C. Farquhar (U.S. mail)  
David L. Sieradzki  
Angela E. Giancarlo  
HOGAN & HARTSON, LLP  
555 13<sup>th</sup> Street, NW  
Washington, DC 20004  
*Counsel for Competitive Universal Service Coalition*