

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

MEMORANDUM OF ORAL EX PARTE PRESENTATION

On March 7, 2002, the following people met to discuss the data that will be submitted to USAC for its administration of Interstate Common Line Support (ICLS): Roger Nishi, Waitsfield-Fayston Telephone Company; Mike Hybl, Great Plains Communications; Susan Bahr, Law Offices of Susan Bahr, PC (who was representing: Armour Independent Telephone Co., Big Sandy Telecom Inc., Bluestem Telephone Company, Bridgewater-Canistota Telephone Co., C-R Telephone Company, Chautauqua & Erie Telephone Corporation, China Telephone Co., Chouteau Telephone Company, Clarks Telecommunications Co., Columbine Telecom Company, Ellensburg Telephone Company, Fremont Telecom, Great Plains

Communications, GTC Inc dba GT Com Inc., Kadoka Telephone Co., Maine Telephone Co., Marianna & Scenery Hill Telephone Company, Nebraska Central Telephone Company, Northland Telephone Company of Maine, Inc., Odin Telephone Exchange Inc., Peoples Mutual Telephone Company, Sidney Telephone Company, Standish Telephone Co., STE/NE Acquisition Corp. d/b/a Northland Telephone Company of Vermont, Sunflower Telephone Company, Inc. (KS), Sunflower Telephone Company Inc. (CO), Taconic Telephone Corporation, The Orwell Telephone Company, The El Paso Telephone Company, The Columbus Grove Telephone Company, Union Telephone Company of Hartford, Waitsfield-Fayston Telephone Company, Yates City Telephone Company, and YCOM Networks, Inc.); Brian O'Hara, NTCA; Jeff Smith, OPASTCO; Lawrence Sarjeant, USTA; Margot Humphrey, NRTA; Ken Levy and Jim Frame, NECA; Carol Matthey, Deputy Chief, Common Carrier, Bureau, FCC; Katherine Schroder, Chief, William Scher and Ted Burmeister, Accounting Policy Division, Common Carrier Bureau, FCC; and Irene Flannery and Linda Miller, USAC.

The focus of the meeting was the data that USAC will need to administer ICLS. The local exchange carriers (LECs) argued that:

- For common line pool participants, USAC should get the necessary data from NECA.
- For non-common line pool participants, USAC should get the data directly from the LECs, which can provide the information in a letter to USAC.

- The data provided to USAC should be limited to the data necessary to calculate the ICLS - about 6 data elements.
- If needed, the FCC should waive or reconsider the appropriate rules.

Enclosed is the handout that I distributed at the meeting.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this memorandum is being filed via ECFS in the captioned dockets.

Respectfully submitted,



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March 8, 2002

cc (VIA FAX):

Carol Matthey, Katherine Schroder, William Scher, Ted Burmeister, FCC
Irene Flannery and Linda Miller, USAC
Roger Nishi, Waitsfield-Fayston Telephone Company
Mike Hybl, Great Plains Communications
Larry Sarjeant, USTA
Brian O'Hara, NTCA
Jeff Smith, OPASTCO
Margot Humphrey, NRTA
Ken Levy and Jim Frame, NECA

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ICLS MEETING

March 7, 2002

NO FORMS

- For common line pool participants, USAC should get necessary data from NECA.
- For non-common line pool participants, USAC should get the data directly from the LECs, which can provide the information in a letter to USAC.

LIMITED AMOUNTS OF DATA

- The data provided to USAC should be limited to the data necessary to calculate the ICLS - about 6 data elements.

FCC ACTION

- If needed, waive or reconsider the appropriate rules.