

LAW OFFICES
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST
2120 L STREET, NW
WASHINGTON, DC 20037

HAROLD MORDKOFKY
BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL
KATHLEEN A. KAERCHER
DOUGLAS W. EVERETTE

(202) 659-0830
FACSIMILE: (202) 828-5568

AFFILIATED SOUTH AMERICAN OFFICES
ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

ROBERT M. JACKSON
OF COUNSEL

PERRY W. WOOFER
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKY J
DIRECTOR OF ENGINEERING
PRIVATE RADIO

April 3, 2002

ARTHUR BLOOSTON
1914 - 1999

RECEIVED

APR - 3 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

WRITER'S CONTACT INFORMATION
202-828-5528
gjd@bloostonlaw.com

William F. Caton, Acting Secretary
Office of Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

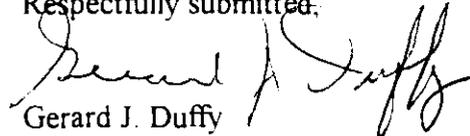
RE: CC Docket Nos. 00-256, 96-45/98-77 and 98-166

Dear Mr. Caton:

On April 1, 2002, Evelyn Jerden, Jack Rhyner and Gerry Duffy, on behalf of the Western Alliance, met with Commissioner Kathleen Q. Abernathy and Matthew Brill to discuss issues regarding the portability of Interstate Common Line Support ("ICLS") raised by the Western Alliance's December 31, 2001 "Petition for Reconsideration" in the above-captioned dockets. The discussion focused upon the erroneous economic signals, artificial competition and financial windfalls that will result from the provision of portable ICLS support to wireless competitors on the basis of the per-line support received by incumbent local exchange carriers rather than the actual costs of the competitors themselves. The discussion also touched upon the larger issues of portable universal service support in general, as well as the sustainability of federal universal service support mechanisms.

Pursuant to Section 1.1206(b) of the Commission's Rules, and original and eight copies of this submission are being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,


Gerard J. Duffy

cc: Commissioner Kathleen Q. Abernathy
Matthew Brill