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April 3, 2002

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

William F. Caton, Acting Secretary  
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Washington, DC 20554

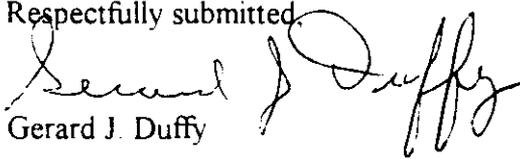
RE: CC Docket Nos. 00-256, 96-45/98-77 and 98-166

Dear Mr. Caton:

On April 2, 2002, Evelyn Jerden, Jack Rhyner and Gerry Duffy, on behalf of the Western Alliance, met with Jordan Goldstein 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: Jordan Goldstein