

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

ORIGINAL

April 3, 2002

ROBERT M. JACKSON  
OF COUNSEL

PERRY W. WOOFER  
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKY  
DIRECTOR OF ENGINEERING  
PRIVATE RADIO

ARTHUR BLOOSTON  
1914 - 1999

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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 12<sup>th</sup> Street, SW  
Washington, DC 20554

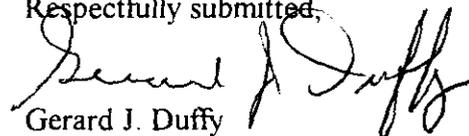
RE: CC Docket Nos. 00-256, ~~96-45~~, 98-77 and 98-166

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

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