Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
1998 Biennial Regulatory Review – Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms	)	CC Docket No. 98-171
	)	
Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990	)	CC Docket No. 90-571
	)	
Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size	)	CC Docket No. 92-237 NSD File No. L-00-72
	)	
Number Resource Optimization	)	CC Docket No. 99-200
	)	
Telephone Number Portability	)	CC Docket No. 95-116
	)	
Truth-in-Billing and Billing Format	)	CC Docket No. 98-170

COMMENTS OF WORLDCOM, INC.

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COMMENTS OF WORLDCOM, INC.

WorldCom, Inc. ("WorldCom"), by its attorneys, submits these comments in response to the Further Notice of Proposed Rulemaking ("*Further NPRM*") issued by the Federal Communications Commission ("Commission") in the above-captioned proceeding.[1] These comments supplement the joint comments that have been filed today by the Coalition for Sustainable Universal Service ("Coalition"), comprised of the Ad Hoc Telecommunications Users Committee, AT&T, e-commerce & Telecommunications Users Group, Level 3 Communications, and WorldCom. WorldCom endorses the Coalition comments in full and files this separate pleading to address a few additional issues not covered by the Coalition's submission.

I. INTRODUCTION AND SUMMARY

The existing universal service contribution methodology is fatally flawed and must be immediately reformed. As the Coalition's comments explain, since the Commission first adopted a revenue-based assessment methodology five years ago, several market and legal developments have undercut substantially the continued viability of that system.

Most significantly, wireline interstate telecommunications revenues have decreased drastically over the past couple of years, while universal service funding has grown and the contribution factor has increased to its highest level. In addition, millions upon millions of traditional wireline long distance voice minutes and the associated revenues have migrated to wireless, e-mail, and instant messaging and other new services

1 *Federal-State Joint Board on Universal Service; 1998 Biennial Regulatory Review – Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms; Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990; Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size; Number Resource Optimization; Telephone Number Portability; Truth-in-Billing and Billing Format*, 17 FCC Rcd 3752 (2002).

that either are not assessed or are assessed at a lower level than wireline revenues, further reducing the assessable revenue base. In other cases, wireline interstate long distance telecommunications services have been offered with intrastate services, information services, and customer premises equipment, as part of bundles in complex contracts with business customers in which a relatively small portion of the revenues may be characterized as attributable to interstate telecommunications, thereby creating "leakage" in the universal service fund ("USF") system and putting additional downward pressure on the fund's assessment base.[2] As a result, the pool of assessable revenues is now decreasing as the size of the fund that must be financed continues to grow, yielding ever higher contribution factors.[3] If the current assessment system is not immediately reformed, the USF "death spiral" is inevitable: contribution factors will continue to increase as the assessable revenue pool decreases and each increase will further reinforce the incentives of customers to subscribe to packages that bundle services with other products in a way that minimizes the portion attributable to interstate services, thereby

[2] As demonstrated by the Coalition, the USF contribution base has been steadily shrinking. For the third quarter of 2001, the end user interstate and international telecommunications revenues reported by interexchange carriers ("IXCs") were only $11.450 billion, a drop of over 17% from 1999 levels. Coalition Comments, CC Dockets No. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, 98-170, NSD File No. L-00-72, at 21 (filed April 22, 2002) ("Coalition Comments").

[3] As discussed in the Declaration of Daniel Kelley and David Nugent, who performed a sensitivity analysis of the model filed by Verizon in this proceeding, reasonable assumptions about increases in the universal service fund and decreases in end user interstate and international telecommunications revenue yield universal service contribution factors exceeding 10% by 2006, and could result in contribution factors approaching 13%. Declaration of Daniel Kelley and David Nugent ¶ 38 (appended as Attachment 4 to the Coalition Comments).

further decreasing the assessable pool.[4] Those customers for whom bundled service offerings are not a practical alternative will bear an ever-increasing burden.

To remedy these urgent problems and ensure the continued viability of the universal service fund, the Commission should adopt the Coalition's proposed connection- and capacity-based assessment methodology and a "collect-and-remit" recovery scheme. The advantages of this approach are demonstrable and substantial. Foremost, the Coalition proposal is sustainable, as connection assessments cannot easily be avoided by allocating bundled revenues to services other than interstate telecommunications or by shifting revenues to providers that are subject to "safe harbors" or other special exemptions.[5] This approach, therefore, provides a much more stable revenue base than interstate and international end user revenues, and it meets the statutory requirements that the universal service mechanism be "specific, predictable and sufficient."[6]

Moreover, the Coalition's connection-based assessment does not distinguish among particular categories of service providers or the technologies they use to offer service, and thus satisfies the equitable, nondiscriminatory, and competitively neutral requirements of the statute.[7] A connection-based contribution mechanism also is more

4 *See Further NPRM* ¶¶ 7-8, 11-14.

5 *See* Coalition Comments at 38-39.

6 *See* 47 U.S.C.§ 254(b)(5); *see also* Coalition Comments at 36-38.

7 *See* 47 U.S.C. § 254(b)(4); *see also* Coalition Comments at 42-45.

efficient, eliminates reporting lag inequities, reduces customer confusion, and facilitates price comparisons among carriers.

It also bears emphasis that the Coalition's proposal is pro-consumer. It will not impose an undue burden on low income users, because, on average, households with very low income (below $15,000 a year) would pay *less* in USF fees under the Coalition's connection-based mechanism than under the current revenue-based system – both for their primary wireline connection and for the totality of their wireline and wireless connections.[8] Indeed, the one percent of these low income consumers with the greatest interstate and international usage would see a reduction of nearly $10 in their universal service recovery fees under the Coalition's proposal, while no household would face an increase in excess of $0.59 per month.[9] Lifeline customers will also be better off under the Coalition's proposal, since they would be exempt from any universal service charge.[10] Further, in light of the inclusion in the contribution base of wireless connections – which correlate strongly with higher incomes – the proposed connection-based universal service assessment will be more progressive than the current system.[11] The Coalition proposal can be readily implemented and will not create substantial administrative burdens for carriers.[12]

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8 *See* Declaration of Martha Behrend ¶¶ 4, 15 (appended as Attachment 2 to the Coalition Comments).

9 *Id.* ¶¶ 4, 16.

10 *See id.*

11 *See id.*

12 *See* Coalition Comments at 49-61.

Further, WorldCom will continue to be a substantial contributor to universal service under the Coalition proposal. Just last week, WorldCom's residential unit, MCI Group, introduced three different bundled local and long distance service offerings targeting the local residential and small business segments. This revolutionary approach to home phone service, known as "The Neighborhood," includes the first truly all-inclusive, any-distance phone service offering unlimited local and long distance calls, along with a complete suite of calling and messaging features from a single company on one bill. The Neighborhood is currently available in 32 states reaching more than 50 million households, and WorldCom plans to expand the offering to all 50 states by early 2003. WorldCom already has over 1.5 million local customers and hopes to double that figure to more than 3 million local lines by year end. Under the Coalition's proposal, WorldCom will be responsible for collecting and remitting USF fees for each of these end user connections and will thus remain a significant contributor to the universal service fund.[13]

In addition to swiftly implementing a connection-based assessment methodology, the Commission also should adopt the Coalition's proposed "collect-and-remit" recovery scheme. Adoption of a collect-and-remit system will considerably simplify the USF recovery system and reduce carriers' administrative costs, which are currently recovered by adjusting the FCC-established USF factor upward. Although these administrative costs will be significantly lower under collect-and-remit, they will not be eliminated. As

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[13] This type of all-distance service, which erases the boundaries between local and long distance, underscores the critical importance of reforming the current system so that it is based on a per-connection methodology, rather than on interstate end user telecommunications revenues.

a result, the Commission must continue to permit carriers to recoup fully the costs they incur to recover and remit USF fees. To further ensure that these costs are minimized, the Commission must require the carrier that is providing the end user connection to collect the entire USF fee for that connection, rather than splitting the burden between the carrier that provides the connection and any other carriers that provide interexchange services over that connection. WorldCom also supports use of a variety of community outreach efforts to inform customers of changes in the universal service system and minimize confusion. Finally, unlike other proposals, the Coalition's proposal can be implemented promptly and will cure the core deficiencies of the current system.

II. THE COMMISSION SHOULD ADOPT A COLLECT-AND-REMIT SYSTEM FOR RECOVERY OF USF CONTRIBUTIONS.

The Commission seeks comments on whether to replace the current universal service recovery system with a collect-and-remit system.[14] WorldCom supports the Coalition's position that adoption of collect-and-remit would substantially simplify universal service recovery and eliminate or reduce several cost components that are currently recovered through a "mark-up" on the USF line item. WorldCom therefore urges the Commission to adopt this system.

Under collect-and-remit, providers would be required to bill their retail end users for USF contributions and then remit to the Universal Service Administrative Company ("USAC") the fees actually collected.[15] If a customer did not pay his or her bill, the carrier would not be required to contribute to the USF for that customer. A collect-and-

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[14] *See Further NPRM* ¶ 101.

[15] *See id.*

remit methodology is superior to the current methodology both because of its simplicity and administrative ease and because it will eliminate two of the most significant costs that carriers incur in implementing the USF program.

First, it would eliminate the need for carriers to "mark up" the percentage factor to account for uncollectibles, because carriers would remit only what they collect. Second, it would eliminate the need for many carriers to adjust the percentage factor upward to account for the fact their USF contributions must be recovered from a revenue base that is smaller than the historical revenue base on which the assessment is calculated. Because carriers would no longer contribute on the basis of revenues and there would no longer be a six-month lag between assessment and recovery, no adjustment would be required.

In addition, other administrative costs, such as those associated with credits, would likely decline under a collect-and-remit recovery system, as explained below. WorldCom expects that this downward pressure on "mark-ups" would be a desirable outcome for regulators and consumers alike.

III. EVEN UNDER A COLLECT-AND-REMIT RECOVERY SYSTEM, CARRIERS MUST BE ALLOWED TO COLLECT THEIR ADMINISTRATIVE COSTS INCURRED TO RECOVER AND REMIT THEIR FEDERAL UNIVERSAL SERVICE CONTRIBUTIONS.

Although USF administrative costs will be significantly lower under the Coalition's proposal – due to the collect-and-remit feature as well as lower credit and customer service costs with a per-connection charge – they will not be eliminated. As a result, even under a collect-and-remit approach, carriers must be able to recover their reasonable costs of collecting and remitting USF fees. If, however, the Commission decides against adopting a collect-and-remit approach to recovery, it must take steps to mitigate the disadvantages inherent in other recovery systems, as discussed in more detail below.

As noted, carriers incur billing costs, customer service costs (answering questions and providing invoices or other written communications), and other administrative costs to collect and remit USF revenue to USAC. Consistent with the Act, Commission precedent, and federal case law, the Commission must continue to permit carriers to recover these costs in an explicit USF line item.[16] Moreover, carriers should have the flexibility to apply different mark-ups to business and residential customers, because the administrative costs incurred in recovering contributions from each may vary. For example, customer service costs associated with universal service vary between the WorldCom corporate unit that supports business customers and the unit that responds to residential customers. Uncollectible rates and billing costs associated with universal service also tend to vary depending on the customer class and the category of service provided.

The Commission also sought comment on whether it should "establish an interim percentage safe harbor reflecting average carrier costs incurred in the recovery of universal service contributions."[17] WorldCom does not oppose the Commission's

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16 *See* 47 U.S.C. § 254(e) (universal service support "should be explicit and sufficient"); *Federal-State Joint Board on Universal Service*, 12 FCC Rcd 8776, ¶ 829 (1997); *see also COMSAT Corp. v. FCC*, 250 F.3d 931 (5th Cir. 2001); *Alenco Communications v. FCC*, 201 F.3d 608 (5th Cir. 2000); *Texas Office of Pub. Util. Coun. v. FCC*, 183 F.3d 393, 424-425 (5th Cir. 1999), *cert. denied* 2000 WL 684656 (U.S. Sup. Ct. May 30, 2000) (addressing propriety of explicit USF line item charges).

17 *See Further NPRM* ¶ 99.

adoption of a "safe harbor" for the recovery of such costs, provided that the prescribed factors are realistic and do not foreclose a carrier from demonstrating that its administrative costs in fact exceed the safe harbor level. Any Commission rule for a safe harbor mark-up should also include explicit language recognizing that individual carriers or classes of carriers may face, and should be allowed to recover, unique administrative costs not borne by all members of the industry. This is especially true if the Commission bases the safe harbor percentage on some estimate of average industry costs, since, by definition, the costs of a substantial portion of the industry would exceed the safe harbor.

The above analysis is, of course, predicated on adoption of the Coalition's assessment as well as its recovery proposals. If, however, the Commission were to adopt another recovery system or maintain the revenue-based assessment methodology, it would have to ensure that its rules take into account that the USF costs that WorldCom and other similarly situated carriers incur would be higher under a non-collect-and-remit methodology than under a collect-and-remit methodology and under a revenue-based mechanism than under a connection-based mechanism. For example, as noted, adjustments to a revenue-based factor would be higher without collect-and-remit due to uncollectibles and the declining interstate revenues of WorldCom and other carriers. The Commission's rules would need to recognize these and other disparities among the costs faced by carriers or classes of carriers under the different assessment and recovery systems.

IV. IN ORDER TO MINIMIZE USF ADMINISTRATIVE COSTS, THE COMMISSION MUST ASSESS ONLY THE CARRIER THAT HAS THE CONNECTION RELATIONSHIP WITH THE END USER.

It is essential that the Commission require only the carrier that is providing the end user connection – which has the most direct relationship with the customer – to be responsible for collecting the entire USF fee for that end user. As WorldCom pointed out in its initial comments in this proceeding, attempting to identify and allocate the contribution obligation among the various carriers associated with a particular line is a complex and unwieldy endeavor, susceptible to uncertainty and inequity, and bound to substantially raise the administrative costs associated with a per-connection charge, to the detriment of customers.[18] Simply identifying the number of providers with whom a given end user has a customer relationship would be difficult.

In addition, a major problem with requiring IXCs to contribute on the basis of a flat, per-connection assessment is that approximately 25 percent of IXC customers have zero usage in any given month and are therefore not billed for that period.[19] IXCs that are not the local connection provider also lack the information necessary to determine whether the end user is a Lifeline customer.[20] Splitting the fee also creates difficult issues when a customer switches providers; given that customers frequently switch long

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18 *See* WorldCom Comments, CC Dockets No. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, NSD File No. L-00-72, at 24 (filed June 25, 2001); *see also* Coalition Comments at 80-81.

19 *See* AT&T Study, *Zero-Volume Long Distance Customers* (appended as Attachment 3 to the Coalition Comments).

20 *See* WorldCom Reply Comments, CC Dockets No. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, NSD File No. L-00-72, at 19 & n.47 (filed July 9, 2001).

distance providers, churn presents a much more significant administrative problem in the long distance market than in the local market.[21] As noted earlier, WorldCom is aggressively targeting the local residential market and expects to remain a significant contributor to universal service even under a connection-based assessment methodology.

V. COMMUNITY OUTREACH EFFORTS WILL MINIMIZE THE RISK OF CUSTOMER CONFUSION.

WorldCom supports reasonable outreach efforts to consumer groups that are organized to explain changes to the FCC's universal service rules and to keep consumers generally informed about the origin and evolution of the universal service program. At a minimum, WorldCom would expect to provide invoice messaging to consumers to explain the changes. It likely would use other vehicles to communicate with its business and wireless customers about such changes. In addition, WorldCom anticipates that it would have a link on its home webpage that would lead to a more in-depth discussion of universal service in general and the current changes in particular.

The Commission should avoid mandating the specific manner in which carriers communicate with their customers about universal service changes. Instead, the Commission should give carriers the flexibility to determine how best to communicate these changes to their customers. The Commission has ample remedial authority at its disposal in the event it becomes concerned that a particular carrier may be abusing this flexibility, such as by violating the Commission's rules regarding truth-in-billing.

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21 *See* Coalition Comments at 80-81 (also discussing the Commission's negative experience with a similar "split the baby" solution with the Presubscribed Interexchange Carrier Charge (or PICC)).

VI. IT IS IMPERATIVE THAT THE COMMISSION ACT QUICKLY TO ADOPT THE COALITION PROPOSAL FOR REFORMING THE CURRENT SYSTEM.

For the reasons discussed above, it is essential that the Commission promptly adopt the Coalition USF reform proposal. The FCC, therefore, should reject other suggested approaches to reforming the current system in view of their obvious flaws. In addition, the Commission should defer issues regarding the effect, if any, adoption of a connection-based system would have on other FCC fee collection programs. These programs are small and no party has alleged that use of revenue-based fees has resulted in anticompetitive effects. Consequently, it is more important that the Commission act quickly to remedy the current USF death spiral. Finally, if the Commission requires carriers to label their USF assessment as the "Federal Universal Service Fee" on customer bills, it should clarify that carriers retain the flexibility to abbreviate reasonably the label to conform with technical limitations imposed by their individual billing systems.

A. Other Suggested Approaches to USF Reform Are Not Workable.

The Commission seeks comment on the desirability of adopting an assessment methodology based on either projected or current interstate end user revenues. As demonstrated in the Coalition comments, these two proposals suffer from many of the same deficiencies that afflict the current contribution methodology and, accordingly, should be rejected.[22] Among other problems, these revenue-based approaches, like the current scheme, do not comply with Section 254's requirement that an assessment

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22 *Id.* at 79; WorldCom Comments, CC Docket No. 96-45, at 10-13 (filed Apr. 12, 2002) ("WorldCom Waiver Comments").

scheme be equitable and non-discriminatory, and are not competitively neutral. More fundamentally, they fail to satisfy the requirement of sustainability – a primary driver of the current reform effort.

Proponents of a projected or current revenue methodology argue that use of either of these systems would eliminate the "USF lag" problem for industry sectors that face declining revenues.[23] Even if true, the "lag" problem is only one of the myriad problems that require reform of the current system. Neither system would remedy the core problem of sustainability because the base of end user interstate telecommunications revenues – whether projected or current – continues to shrink while the fund continues to grow.[24] Moreover, as other commenters have demonstrated, use of projected revenues to assess USF contributions would impose substantial administrative burdens and create incentives for carriers to underforecast demand.[25] These burdens include costly calculations to determine future revenues and possibly future uncollected revenue, as well as some form of a true-up mechanism to account for errors in carriers' projections.[26] Auditing the true-ups would further impose an unnecessary cost burden on both USAC and contributors.[27]

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23 *See Further NPRM* ¶ 10.

24 *See* Coalition Comments at 79.

25 *See* AT&T Reply Comments, CC Dockets No. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, NSD File No. L-00-72, at 9-10 & n.10 (filed July 9, 2001); *see also* WorldCom Waiver Comments at 10-13.

26 *See* WorldCom Waiver Comments at 10-13.

27 *See id.*

B. The Commission Should Defer Review of Its Other Fee Collection Programs and Should Allow Carriers Flexibility to Abbreviate Any Mandatory Uniform Line Item Label.

In the *Further NPRM*, the Commission notes that the existing assessment systems for other programs, such as the Telecommunications Relay Services ("TRS"), North American Numbering Plan ("NANP"), Local Number Portability ("LNP"), and regulatory fees administration programs, rely on similar revenue classifications.[28] The Commission thus seeks comment on whether it should continue to require carriers subject to these programs to report interstate end user telecommunications revenues if it adopts a connection-based system for universal service, or, alternatively, adopt different requirements.[29]

Because the other FCC fee collection programs are much smaller than the Universal Service program, their fees do not create large distortions in the market comparable to those caused by the current USF assessment scheme, and, hence, the sustainability of their funding is not threatened at this time. The Commission, therefore, need not immediately address the potential efficiency gains from converting these fees to per-connection charges as well.

Moreover, as the Commission acknowledges, these programs arise under different statutory mandates.[30] Although those funding mechanisms share some of the same principles of the universal service mechanism, they do not share all of the same

28 *Further NPRM* ¶ 82.

29 *Id.*

30 *Id.*

requirements. For example, although the LNP and NANP programs require funding to be competitively neutral, the TRS program requires that costs be recovered on a cost-causative basis.[31] These issues are more appropriately examined separately after development of a complete record in this proceeding. In any event, WorldCom is unaware of any allegations that the funding of these programs is having anticompetitive effects. Thus, the urgent need to resolve the problems with the existing universal service assessment scheme dictates that any issues raised by the effect of that solution on these other programs be deferred.

The Commission also asks whether it should mandate a uniform line item description and, if so, whether carriers should be permitted to abbreviate words in the description to accommodate billing systems' line item character limits.[32] WorldCom does not object to requiring use of the "Federal Universal Service Fee" label as long as there is flexibility to abbreviate where necessary to conform with potential technical limitations. For example, reasonable abbreviations such as "Fed Universal Svc Fee" or "Fed'l Univ Service Fee" are permissible, as long as they meet the Commission's truth-in-billing requirements. These abbreviated labels are appropriately descriptive and would fulfill the Commission's desire to enable consumers to better understand universal service charges and to more easily compare charges across carriers.[33]

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31 *See id.*

32 *Id.* ¶ 103.

33 *Id.*

VII. CONCLUSION

The current USF assessment methodology fails to meet the Act's requirements that it be "equitable and non-discriminatory" and "specific, predictable and sufficient." To remedy these urgent problems and ensure the continued viability of the universal service fund, the Commission should immediately adopt the Coalition's proposal for a connection-based assessment methodology and a collect-and-remit recovery scheme. In addition, the Commission should ensure that carriers continue to have a reasonable opportunity to recover their costs of administering the USF program through an explicit charge. Further, to minimize administrative costs and consumer confusion, it is essential that the Commission require only the carrier that is providing the end user connection to be responsible for collecting the entire USF fee for that end user.

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Dated: April 22, 2002

Certificate of Service

I, Denise Owusu, hereby certify that on this 22nd day of April, 2002, I caused a copy of the attached Comments of WorldCom, Inc. to be hand delivered to the following:

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