

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	CC Docket No. 96-45
)	
Request for comments related to the)	CC Docket No. 98-77
Commission’s Form Requesting Data for the)	
Universal Service Administrative Company’s)	CC Docket No. 98-166
Administration of the Interstate Common Line)	
Support mechanism – OMB control No 3060-)	CC Docket No. 00-256
0972		

COMMENTS OF GVNW CONSULTING, INC.

This is in response to The March 11, 2002 request for comments regarding the Collection of Data by the Universal Service Administrative Company in administering the Interstate Common Line Support (ICLS) Mechanism. See Federal Register: March 18, 2002 (Volume 67, Number 52 Page 12013-12014).

GVNW Consulting, Inc. (GVNW) is a consulting firm that provides consulting primarily to rate of return Local Exchange Carriers. On an annual basis we prepare well over 100 cost studies used to develop the interstate common line revenue requirement for clients’ submission to the National Exchange Carrier Association (NECA).

In March 2002 the ICLS administrator advised the industry that it would require each company to submit over 1,000 lines of data in order to receive ICLS.

We believe this extensive data request is not needed to administer the ICLS support and thus should be pared back to a reasonable level. It is our understanding that the initial data submission which was provided by the NECA on behalf of its member companies contained the following nine data item:

1. Common Line Revenue Requirement
2. End User Subscriber Line Charge (SLC) Revenue
3. End User ISDN Port Revenue
4. Special Access Surcharge Revenue
5. Carrier Common Line (CCL) Revenue
6. Long Term Support (LTS)
7. Interstate Common Line Support (ICLS)
8. Residential/Single-Line Business Lines
9. Multi-Line Business Lines

Since the above information is sufficient to administer the ICLS support, we recommend that the data request be modified to only include these items.

We recommend that each company should be free to complete the data request itself or utilize the services of an outside entity. We have no objection to NECA submitting the data but do not believe NECA should be the only vendor authorized to perform this service. Other consultants should also be able to assist companies in the preparation and submission of the data.

Respectfully Submitted,

Kenneth T. Burchett
Vice President
8050 SW Warm Springs St.
Tualatin Oregon 97062
Telephone: 503 612-4408
FAX: 503 612-4401
e-mail kburchett@gvnw.com