

September 17, 2002

EX PARTE – Via Electronic Filing

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Re: CC Dockets No. 96-45, 98-171, 90-571, 92-237, 99-200,
95-116, 98-170, and NSD File No. L-00-72

Dear Ms. Dortch:

This morning, on behalf of the Coalition for Sustainable Universal Service (“CoSUS”), I discussed with Sonja Rifken of the Office of General Counsel some of the legal issues addressed in our letter of August 22, 2002. In particular, I noted that the current system does not require contributions from, for example, carriers' carriers, nor does it assess interstate "activities" that are not sold to end users; that it does not make sense to analyze contributions in terms of the percentage of payments made by various telecommunications sectors, particularly since the CoSUS proposal is a collect and remit proposal; and that the CoSUS proposal is not inconsistent with section 2(b) because changes in intrastate offerings do not affect the amount of a carrier's contribution.

In accordance with FCC rules, a copy of this letter is being filed in each of the above-captioned dockets.

Sincerely,

/s/

Christopher J. Wright
Counsel to the Coalition for Sustainable Universal Service

cc: Sonja Rifken