Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Petition for Rulemaking to Define "Captured"	)	
and "New" Subscriber Lines for Purpose of	)	RM No. 10522
Receiving Universal Service Support,	)	
Pursuant to 47 C.F.R. § 54.307 *et seq.*	)	

<u>Comments of CenturyTel, Inc.</u>

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SUMMARY

On July 26, 2002, NTCA filed a Petition for Expedited Rulemaking proposing to define when a competitive eligible telecommunications carrier ("CETC") has "captured" or serves a "new" subscriber line for the purpose of receiving universal service support under Section 54.307 of the Commission's rules. Although the Commission has made significant strides in advancing universal service in high-cost areas, it must do more.

CenturyTel applauds the efforts of NTCA and others to preserve and advance universal service in high-cost areas by more clearly defining when a CETC is entitled to receive support. To the extent that NTCA's Petition suggests that only one line or only one ETC may receive support for service provided to a customer, CenturyTel maintains that all carriers that provide all of the supported services listed in Section 54.201(d) of the Commission's rules should remain eligible for support. As the Commission reviews comments filed in this proceeding, CenturyTel urges the Commission to consider that, after a CETC captures an existing subscriber line, the ILEC must continue to maintain the facilities leading up to or passing by premises for the subscriber line, even if it does not continue to serve the end user.

CenturyTel urges the Commission to review the manner in which CETCs currently receive universal service support. First, the Commission should examine whether a CETC's costs justify high-cost support. Second, it must ensure that a wireless CETC's service offering meets the definition of a supported service. Finally, the Commission should require a public interest analysis before designating an ETC to provide service to study areas that are smaller than the ILEC's.

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CenturyTel, Inc. (“CenturyTel”), through its attorneys, hereby offers the following Comments on the Petition for Rulemaking filed in the above-captioned proceeding by the National Telephone Cooperative Association (“NTCA”).[1] On September 9, 2002, the Commission issued an Order seeking comment on NTCA’s Petition.[2]

I. INTRODUCTION

On July 26, 2002, NTCA filed a Petition for Expedited Rulemaking to define when a competitive eligible telecommunications carrier (“CETC”) has “captured” or serves a “new” subscriber line for the purpose of receiving universal service support under Section 54.307 of the Commission’s rules.[3] Under the NTCA Petition, a CETC would be considered to have “captured” an existing subscriber line when the ILEC no longer provides the subscriber with any supported services.[4] NTCA further proposes that the first carrier to provide service to a customer shall receive support when there is more than one eligible telecommunications carrier

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1 National Telecommunications Cooperative Association, Petition for Expedited Rulemaking, filed July 26, 2002 (“Petition”).

2 *In the Matter of Petition for Rulemaking to Define “Captured” and “New” Subscriber Lines for Purpose of Receiving Universal Service Support Pursuant to 47 C.F.R. § 54.307 et seq.*, DA 02-2214, Order (rel. Sept. 9, 2002).

3 47 C.F.R. § 54.307.

4 Petition at 4.

("ETC") providing service to the customer at the same time.[5] The proposed definition of "new" subscriber is a CETC customer in the ILEC service area that has not previously taken local exchange service in the ILEC service area.[6] Under NTCA's proposed rules, if the Universal Service Administrative Company ("USAC") determines that duplicative support is being distributed, it may take appropriate action to discontinue support for those working loops that do not satisfy the definition of "captured" or "new."[7]

II. DISCUSSION

Since passage of the Telecommunications Act of 1996, the Commission has acknowledged that "a principal purpose of section 254 is to create mechanisms that will sustain universal service as competition emerges." As competition in rural markets continues to emerge, CenturyTel urges the Commission to remain ever vigilant, while promoting competition to preserve affordable access to telecommunications and information services in rural areas, as mandated by Congress in its adoption of Sections 214(e) and 254.[8]

A. CenturyTel supports efforts to reform the universal service system.

CenturyTel applauds the efforts of NTCA and others to preserve and advance universal service in high-cost areas by more clearly defining when a CETC is entitled to receive support under Section 54.307 of the Commission's rules. As NTCA's Petition describes and as

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5 Petition at 6.

6 Petition at 6.

7 *Id.*

8 *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776, 9244 at ¶928; *Federal-State Joint Board on Universal Service, IT&E Overseas, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, DA 02-1318, Memorandum Opinion and Order (rel. June 6, 2002); *Federal-State Joint Board on Universal Service, Guam Cellular and Paging, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum Opinion and Order, 17 FCC Rcd 1502 (2002); *Federal-State Joint Board on Universal Service, Western Wireless Corp. Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum Opinion and Order, 16 FCC Rcd 48 (2000).

CenturyTel notes below, there are rapidly escalating abuses of the universal service support system that ultimately compromise the sustainability of the universal service fund and service to rural customers. The continued viability of the universal service fund is critical in order to ensure affordable service in high-cost areas and must be preserved.

Section 254 of the Communications Act of 1934, as amended, (the "Act")[9] directs the Commission to promulgate rules that establish specific, predictable, and sufficient support mechanisms to preserve and advance universal service.[10] The FCC recently has taken significant steps toward preserving and advancing universal service in high-cost areas. For example, in the *RTF Order*, the Commission adopted the safety net additive, which provides additional support to rural carriers that make significant investment in years in which the fund is capped.[11] The Commission also adopted the safety valve support, which provides additional support to rural carriers when they acquire high-cost exchanges and make post-transaction investments to enhance network infrastructure.[12] Similarly, in the *MAG Order*, the Commission took steps "to bring to all Americans, especially those living in rural and high-cost areas, the benefits of

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9 47 U.S.C. § 151 *et seq*.

10 47 U.S.C. § 254.

11 *Federal-State Joint Board on Universal Service, Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45, and Report and Order in CC Docket No. 00-256, 16 FCC Rcd 11244 (2001) at ¶¶ 77-90 ("*RTF Order*").

12 *Id*. at ¶¶ 91-119. While CenturyTel has some concerns about its specific implementation, CenturyTel maintains that the safety valve supports the preservation and advancement of the high-cost universal service fund. CenturyTel comments filed in CC Docket 96-45 and CC Docket No. 00-256 on July 31, 2002.

competition and choice while preserving universal service in those areas" by reforming the interstate access charge and universal service support systems for rate-of-return carriers.[13]

Although these efforts are significant in advancing universal service in high-cost areas, the Commission can and must do more. As NTCA notes, the Commission's current rules give CETCs an unfair competitive advantage over ILECs because CETCs are not required to demonstrate their costs or to certify how they used the support. This unfair competitive advantage is exacerbated by the fact that CETCs often are not subject to state regulation while ILECs have significant carrier of last resort and quality of service obligations. CenturyTel urges the Commission to amend its universal service rules to ensure that the interests of rural customers are best served and that the Act's twin goals of competition and universal service are carefully balanced.

B. The Commission should carefully consider how universal service payments should be distributed in today's marketplace.

At a time of increasing demand on the universal service fund and related uncertainty, there remain many unresolved issues related to the distribution of universal service payments in today's multiple technology and multi-carrier environment. CenturyTel supports the goal of NTCA's Petition as the first round in a broader debate on universal service reform and seeks to expand upon and clarify many of the points raised in the Petition.

To the extent that the Petition suggests that only one line (or one ETC provider) may receive support for its service to the customer, assuming each carrier otherwise provides service that meets the definition of a supported service, CenturyTel believes the NTCA Petition

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13 *Multi-Association Group Plan for Regulation of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, Federal-State Joint Board on Universal Service*, FCC 02-89, First Order on Reconsideration in CC Docket 00-256, Twenty-Fourth Order on Reconsideration in CC Docket No. 96-45, ¶2 (rel. Mar. 22, 2002).

may lead to unintended consequences. CenturyTel maintains that all connections to the end user over which a carrier provides all of the supported services listed in Section 54.201(d) of the Commission's rules should remain eligible for support. To the extent that NTCA's Petition would have the effect of denying support for second lines, CenturyTel points out that the Commission has already rejected such a proposal. The Commission determined in 1997 that multiple residential and business lines shall be supported by the universal service fund.[14] There is no reason to alter the Commission's policy of supporting multiple residential and business lines now.

Further, any rule that attempts to identify the first carrier to provide service to a customer will be administratively complicated in today's marketplace where multiple carriers use various technologies to serve customers' needs. With the proliferation of wireless technology and second telephone lines, there simply are no bright line distinctions in terms of what constitutes a primary or secondary line in today's market. It used to be that each home only had a single phone line, and wireless technology was non-existent. Today, however, 52% of households in the 25 largest U.S. markets use wireless phones,[15] and more than 25% of homes have a second telephone line.[16] In some instances, the second line is used principally for Internet access; while, in other cases, particularly in group or multi-resident home environments, the "second" line may serve as the primary line for some of the residents. This new social and technological phenomenon raises many questions regarding the distribution of universal service payments in a multi-carrier and multiple technology environment.

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14 *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776, 8829 at ¶96.

15 *U.S. Wireless Penetration Continues Climb*, Wireless Today, (Sept. 28, 201).

16 *Trends in Telephone Service*, Industry Analysis and Technology Division, Wireline Competition Bureau, Table 8.4 (rel. May 2002).

As an example, consider the case of three college students that share a house. Each student has her own individual telephone phone service, all of which use the same billing address. There is a question under NTCA's Petition about whether all three lines would qualify for universal service support. Because all three lines constitute a supported service within the meaning of Section 54.201(d) of the Commission's rules, CenturyTel believes that all three lines should be eligible for support. There are numerous other examples of living arrangements that could complicate the process of identifying which line is primary and therefore qualified for support.

NTCA proposes that support be discontinued for any working loop that does not satisfy the definition of "captured" or "new." CenturyTel urges the Commission to further consider that, after a CETC captures an existing subscriber line, the ILEC must continue to maintain the facilities leading up to or passing by the premises for the subscriber line, regardless of whether it continues to serve the actual end user. The Commission's current rules do not require an ILEC to relinquish universal service support in this instance. Although recalculation of the loop cost following loss of the line permits the ILEC to recover some of the loss, such recalculation does not allow for full recovery. The Commission should ensure that the ILEC does not also lose all universal service support when a CETC captures a subscriber line formerly served by the ILEC.

C. The Commission should take immediate action to prevent arbitrage by CETCs of the universal service mechanism.

1. The Commission should examine whether a CETC's costs justify high-cost support.

CenturyTel fully agrees with NTCA that the current manner in which CETCs receive universal service support is in dire need of Commission review and repair. The

Commission should prevent ETCs that do not truly have "high" costs from receiving high-cost support. While a rural ILEC is eligible for high-cost support only if its loop costs exceed 115% of the national average loop cost,[17] CETCs receive support based on what the rural ILEC receives.[18] Thus, CETC support is derived without any regard to whether the CETC's costs are actually "high" under the federal standard. Rural ILECs receive high-cost support because their costs per unit are high due to the disperse nature of their service areas. If the number of subscribers served by a carrier is small, and the study area is large, then the costs per unit will be high compared to the national average, which includes more densely populated areas. A wireless CETC may serve only a portion of an entire study area and may not be required to invest in and serve the entire study area, thereby reducing its costs. If a CETC deploys low-cost technology (typically wireless) in a rural area that is otherwise served by a high-cost wireline ILEC, the CETC may reap a windfall -- one which it is likely to pass on to its shareholders but not to its customers. Section 254 "sets standards to prevent waste, windfalls and excessive expense for contributing carriers and their customers."[19] Each time a CETC accepts high-cost loop support for low-cost loops, it potentially receives a windfall. The distribution of high-cost support in this manner is damaging to the universal service fund and does not create sustainable competition. To resolve this problem, the Commission should require CETCs to provide cost support documentation and to certify how support is used in order to justify receipt of high-cost support.

Allowing CETCs using low-cost loops to receive high-cost support violates Section 254(e) of the Act in four ways. First, it violates Section 254's principle of affordability

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17 47 C.F.R. § 36.631.

18 *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776, at ¶289 (1997).

19 Rural Task Force, FCC 00J-4, CC Docket 96-45, Recommendation to the Federal-State Joint Board on Universal Service at ¶8 (rel. Sept. 29, 2000).

and reasonable comparability. High-cost support is distributed to carriers serving rural and other high-cost areas so as to ensure that services in these areas are affordable, and that rates in urban and rural areas are reasonably comparable. Providing high-cost support to low-cost CETCs does not advance the goals of affordability and reasonable comparability.

Second, distributing high-cost support to CETCs using low-cost loops violates the mandate that support be used "only for the provision, maintenance, and upgrading of facilities and services for which the support is intended."[20] Simply put, CenturyTel believes that high-cost loop support is intended to be used to provision, maintain, and upgrade facilities and services that serve high-cost loops.[21] Thus, whenever a CETC that serves low-cost loops accepts *high-*cost universal service support, it unlawfully takes and uses high-cost support to provision facilities and services for low-cost loops. The ramifications of this practice can be best explained through an example. Suppose the ILEC spends significant sums to build the necessary plant to provide service to a new housing development. Under this scenario, the ILEC's universal service support may increase as a result of its initial plant investment, if the loops meet the 115% high cost threshold, and may increase the carrier's support measured on a per-line basis if the investment causes the ILEC's cost per loop to rise. However, under the identical support rule, the CETC's universal service support may also increase even though it has not invested in the new community and may not even seek to provide the needed services in the new community. The identical support rule therefore increases the size of the universal service fund without requiring concomitant investment in high-cost areas by the CETC.

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20 47 U.S.C. § 254(e).

21 ACS of Fairbanks, Inc. recently filed a Petition for Declaratory Ruling demonstrating why high-cost loop support for CETCs should not be based on ILEC costs. ACS of FairBanks, Inc., Petition for Declaratory Ruling and Other Relief Pursuant to Section 254(e) of the Communications Act, filed July 24, 2002. *See also* CenturyTel Comments filed in CC Docket 96-45 on Sept. 13, 2002.

Third, CETC receipt of high-cost support for low-cost loops violates Section 254's principle that support be sufficient. Indeed, the United States Court of Appeals for the Fifth Circuit has observed that "excessive funding may itself violate the sufficiency requirements of the Act.[22] The court further noted that, "because universal service is funded by a general pool subsidized by all telecommunications providers — and thus indirectly by the customers — excess subsidization in some cases may detract from universal service by causing rates unnecessarily to rise, thereby pricing some consumers out of the market."[23] Thus, CETCs that receive support for low-cost loops may cause the fund to balloon beyond the size necessary to support high-cost lines in violation of the sufficiency principle.

Finally, allowing CETCs using low-cost loops to receive high-cost support violates the competitive neutrality principle. Under the competitive neutrality standard, the "universal service support mechanisms and rules neither unfairly advantage nor disadvantage one provider over another, and neither unfairly favor nor disfavor one technology over another."[24] Because CETCs, particularly wireless CETCs, are not required to demonstrate their costs, yet they receive support based on the often higher wireline carrier's costs, CETCs enjoy an unfair competitive advantage over wireline carriers. This advantage is exacerbated by the fact that ILECs often have onerous carrier of last resort responsibilities.

2. The Commission must ensure that a wireless CETC's service offering meets the definition of a supported service.

Rather than constraining support for carriers that may provide all of the supported services, the Commission should address the issues the NTCA Petition raises by ensuring that

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22 *See Alenco v. FCC*, 201 F3d 608, 620 (5th Cir. 2000).

23 *Id*.

24 *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776, 8801 at ¶47 (1997).

competitive ETC service offerings truly comply with the Commission's definition of "supported service," as CenturyTel has urged in other proceedings.[25] Section 54.201(d) of the Commission's rules provides that ETCs must offer the services that are supported by the federal universal service fund,[26] including local usage.[27] Although the Commission has previously acknowledged the importance of setting a minimum level of local usage that an ETC must provide to customers as part of a basic service package,[28] it has not yet quantified what the *minimum* local usage amount should be in order to qualify for universal service support.[29] Wireless carriers often have rate plans that, at the low end, provide little or no local usage. Without a minimum local usage, wireless carriers may be able to maximize support payments by winning many customers with "free" or nearly free monthly access while minimizing the cost of service by discouraging its use through extremely high per-minute usage charges. The Commission should ensure that wireless ETCs offer services that satisfy the definition of "supported service." Otherwise, support for services that do not meet the definition of "supported service" will divert funds from those services that actually comply with Section 54.201(d) of the Commission's rules. Such practice depletes the fund in violation of Section 254.

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25 CenturyTel Comments filed in CC Docket No. 96-45 on Apr. 4, 2002; CenturyTel Comments filed in CC Docket No. 96-45 on Sept. 13, 2002.

26 47 C.F.R. § 54.101(d)(1).

27 47 C.F.R. § 54.101(a)(2).

28 *Federal-State Joint Board On Universal Service*, Report and Order, 12 FCC Rcd 8776, 8813-14, ¶¶ 67-69.

29 The Commission issued a Further Notice on the level of local usage that should be included in the definition of universal service, but has not yet issued an order resolving this issue. *Federal-State Joint Board on Universal Service; Forward-Looking Mechanism for High Cost Support for Non-Rural LECs*, Further Notice of Proposed Rulemaking, 12 FCC Rcd 18514 (1997). CenturyTel urges the Commission to quickly resolve this issue.

3. The Commission should require a public interest analysis before designating an ETC to provide service to study areas that are smaller than the ILEC's.

NTCA's Petition raises only a few among many issues related to the distribution of universal service support payments to CETCs. CenturyTel maintains that the proliferation of CETCs certified to provide service over an area substantially smaller than the rural ILEC's study area threatens the viability of universal service. Many state commissions appear to be "rubber stamping" ETC designation requests in rural areas as a matter of course without analyzing whether an additional ETC will serve the public interest.[30] An increasing number of wireless CETCs also are being designated to provide service in areas much smaller than the service areas ILECs as carriers of last resort are required to serve.[31] Establishing ETC service areas that are smaller than the ILEC's study area may result in inefficient competition by encouraging CETCs to engage in cherry picking. For example, CETCs who are permitted to serve smaller study areas can target areas where support is highest relative to costs. Disaggregating and targeting support decrease the chances that support will be misdirected to areas that are not in need of it; however, rates are not typically deaveraged to the same degree. As a result, even in the wake of disaggregation, per-line revenue available through a combination of universal service support and sales of service may remain high relative to costs in lower-cost areas, while such revenue in higher-cost areas may continue to remain relatively low. This phenomenon, in turn, encourages selective entry, a process aided by state commission willingness to certify CETCs in areas

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30 *The Colorado Public Utilities Commission Petitions to Redefine the Service Area of CenturyTel of Eagle, Inc. in the State of Colorado*, Public Notice, (rel. Aug. 26, 2002); *Smith Bagley, Inc. Petitions to Redefine the Service Area of CenturyTel of the Southwest, Inc. in the State of New Mexico*, Public Notice, (rel. Mar. 13, 2002); *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Petition for Agreement with Change in Definition of Rural LEC Service Areas in the State of Arizona (filed Feb. 1, 2001).

31 NTCA Ex Parte Presentation, filed Sept. 18, 2002; Utah Rural Telecom Assoc. Comments, filed Sept. 9, 2002.

smaller than the rural ILEC's service territory without engaging in the balancing required by Section 214(e)(5).

Section 214(e) of the Act provides that a rural telephone company's service area shall be the company's study area "unless and until the Commission and the states, after taking into account recommendations of a Federal-State Joint Board instituted under Section 410(c) of the Act, establish a different definition of service area for such company."[32] Only in special circumstances, where it is found in the public interest by the state commission, can additional ETCs for a service area be designated in rural areas.[33] Thus, the Telecommunications Act of 1996 evidences Congress' intent to balance carefully the twin goals of competition and universal service without elevating one over the other. As the Commission has noted repeatedly in proceedings designating ETCs, "[a]lthough we recognize the substantial benefits of competition to consumers, we acknowledge that Congress expressed a specific intent to preserve and advance universal service in rural areas as competition emerges."[34] Thus, rather than approve an ETC designation request based on the mere suggestion that competition may flourish, as CenturyTel recently noted in comments in another ETC-related proceeding,[35] the state commissions and the FCC are required to analyze whether, taking the balance between competition and universal service into account, consumers will benefit overall from an additional carrier being designated as an ETC in a rural area.

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32 47 C.F.R. § 54.207(b).

33 CenturyTel comments filed in CC Docket 96-45 on Sept. 13, 2002 (citing 47 U.S.C. § 214(e)).

34 *Federal-State Joint Board on Universal Service, IT&E Overseas, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, DA 02-1318, Memorandum Opinion and Order (rel. June 6, 2002); *Federal-State Joint Board on Universal Service, Guam Cellular and Paging, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum Opinion and Order, 17 FCC Rcd 1502 (2002); *Federal-State Joint Board on Universal Service, Western Wireless Corp. Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum Opinion and Order, 16 FCC Rcd 48 (2000).

35 *Id.*

In addition, the Act allows an ETC that can justify serving less than the entire study area to seek approval from the FCC and the state commission.[36] CenturyTel therefore urges the FCC not to categorically eliminate the presumption that a CETC must serve an ILEC's study area, but instead treat requests by individual CETCs to serve a smaller area on a case-by-case basis. This will allow the Commission to enforce the letter and spirit of the law and either require that CETCs provide service to the entire study area or justify to the state and federal commissions why it would serve the public interest to change their service areas. Thus, establishing smaller ETC service areas may not promote lasting competition, although it is likely to attract competitors who otherwise could not serve the entire market on a cost-effective basis. The state and federal commissions should refrain from blindly approving ETCs service areas that are smaller than the ILEC's because it makes it easier for competitors to obtain support in areas they can cheaply serve.

III. CONCLUSION

For the aforementioned reasons, CenturyTel supports the goal of NTCA's Petition in preserving and advancing universal service in high-cost areas and believes the Commission should closely re-examine the present funding mechanisms for CETCs. CenturyTel maintains that all carriers providing all of the supported services are entitled to receive support, regardless of whether another ETC is receiving support at the same time. In an effort to control the increasing demands on the universal service system, the Commission should examine whether a CETC's costs justify high-cost support. Furthermore, the Commission can reform the system by ensuring that all wireless ETC services meet the definition of a supported service. Finally, the Commission must require a public interest analysis before designating an ETC to service an area

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36 47 U.S.C. § 214(e).

smaller than the ILEC's. In so doing, the Commission will reduce regulatory arbitrage opportunities and help preserve the universal service system.

Respectfully submitted,
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