

USF Contribution Mechanism

Federal-State Joint Board on Universal Service
CC Docket Nos. 96-45, 98-171, 90-571, 92-237,
99-200, 95-200, 95-116, 98-170 and NSD File No. L-00-72

- The COSUS proposal violates Section 254(d) of the Communications Act, which requires that every carrier providing interstate telecommunications services contribute on an equitable and nondiscriminatory basis.
- The COSUS definition of a connection produces a discriminatory and inequitable result by drastically reducing the contribution obligation of IXCs while disproportionately increasing the obligation of other providers of interstate telecommunications service providers.
- The telephone number substitute shares the same fatal legal flaws.
- The Associations' Sept 19, 2002 ex parte letter filed in this proceeding outlines the legal basis for this position.