



OPASTCO

**ORGANIZATION FOR THE
PROMOTION AND ADVANCEMENT
OF SMALL TELECOMMUNICATIONS
COMPANIES**

February 19, 2003

***NOTICE OF EX PARTE
PRESENTATION***

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

**RE: Federal-State Joint Board on Universal Service
CC Docket No. 96-45**

Dear Ms. Dortch:

On February 19, 2003, the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) sent the attached written *Ex Parte* presentation to staff members from the Office of the Bureau Chief for the Wireline Competition Bureau and staff members from the Commission's Office of Plans and Policy. In accordance with FCC Rules, this notice and a copy of the attached *Ex Parte* presentation are being filed in the above-captioned docket.

Sincerely yours,

/s/Jeffrey W. Smith
Jeffrey W. Smith
Policy Analyst



OPASTCO

ORGANIZATION FOR THE
PROMOTION AND ADVANCEMENT
OF SMALL TELECOMMUNICATIONS
COMPANIES

February 19, 2003

Ex Parte Presentation

William Maher, WCB Bureau Chief
Jeffrey Carlisle, WCB Senior Deputy Bureau Chief
Jane Jackson, WCB Associate Bureau Chief
Richard Lerner, WCB Associate Bureau Chief/Chief of Staff
Diane Griffin, WCB Assistant Bureau Chief
Scott Bergmann, WCB Legal Counsel to the Bureau Chief
Jessica Rosenworcel, WCB Legal Counsel to the Bureau Chief
Simon Wilkie, OPP Chief Economist
Donald Stockdale Jr., OPP
William Sharkey, OPP

RE: **Federal-State Joint Board on Universal Service**
CC Docket No. 96-45

As you know, the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) is a national trade association representing approximately 500 small incumbent local exchange carriers (ILECs) serving primarily rural areas throughout the United States. High-cost universal service funding is vitally important to OPASTCO member companies and to the rural consumers that they serve.

OPASTCO recently released the enclosed white paper "*Universal Service in Rural America: A Congressional Mandate at Risk.*" The paper outlines our views on universal service, in general, and more specifically, the issues surrounding the availability of high-cost funding to multiple carriers in rural service areas. The paper also lists six rural Universal Service Fund policy principles:

1. Rural consumers should have affordable telecommunications services, comparable in quality and price to urban areas.
2. Funding should be sufficient to provide for critical infrastructure in rural areas.
3. The Universal Service Fund is a scarce national resource. Therefore, supporting multiple carriers is in the public interest only when benefits exceed costs.

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4. The Universal Service Fund should not be used to create uneconomic competition.
5. All carriers receiving support should be held to the same service obligations and regulatory standards.
6. Funding should come from the broadest base of providers and services.

On February 7, 2003, the Federal-State Joint Board on Universal Service issued a Public Notice seeking comment on important issues regarding the rules that apply in areas where a Competitive Eligible Telecommunications Carrier has been designated. The Public Notice also seeks comment on the process for considering applications for Eligible Telecommunications Carrier status and whether there should be federal processing guidelines. OPASTCO welcomes the opportunity to work with you as you move forward with this critical proceeding.

Sincerely yours,

/s/ Stuart Polikoff

Director of Government Relations,
OPASTCO

Attachment

CERTIFICATE OF SERVICE

I, Jeffrey W. Smith, hereby certify that a copy of the *Ex Parte* presentation by the Organization for the Promotion and Advancement of Small Telecommunications Companies was sent by first class United States mail, postage prepaid, on this, the 19th day of February, 2003, to those listed on the attached list.

By: /s/ Jeffrey W. Smith
Jeffrey W. Smith

SERVICE LIST

CC Docket No. 96-45

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