Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	
	)	

REPLY COMMENTS OF THE ORGANIZATION FOR THE PROMOTION AND ADVANCEMENT OF SMALL TELECOMMUNICATIONS COMPANIES

By: Stuart Polikoff
Stephen Pastorkovich
OPASTCO
21 Dupont Circle NW
Suite 700
Washington, DC 20036
(202) 659-5990

April 28, 2003

TABLE OF CONTENTS

Page

SUMMARY……. ii

I. INTRODUCTION…… 1

II. THE RECORD SHOWS THAT THE ADDITION OF EQUAL ACCESS CONFORMS WITH THE 1996 ACT…….. 2

A. No commenter has explained how a voluntary undertaking can be portrayed as a blanket requirement …… ……..……. 2

B. Congressional desire for consumer choice of toll providers is clearly established in sections 251(b)(3) and 254(b)(3) of the 1996 Act…..……. 4

III. PROVISION OF EQUAL ACCESS BY *ALL* ETCs, REGARDLESS OF THE TECHNOLOGY THEY USE, IS NECESSARY BECAUSE ANY ETC MAY BECOME A RURAL MARKET'S SOLE LOCAL CARRIER…… 5

IV. THE RECORD DEMONSTRATES THAT INCLUSION OF EQUAL ACCESS IN THE UNIVERSAL SERVICE DEFINITION CLEARLY MEETS THE ACT'S FOUR CRITERIA……..……. 6

A. Equal access is essential to education, public health, or public safety……. 6

B. Equal access has, through the operation of market choices by customers, been subscribed to by a substantial majority of residential customers……. 7

C. Equal access is being deployed in public telecommunication networks by telecommunications carriers…….……..… 7

D. The inclusion of equal access is consistent with the public interest, convenience, and necessity…….…… 8

V. CONCLUSION……. 8

SUMMARY

Commenting parties demonstrate that section 332(c)(8) of the Act does not present a barrier to the addition of equal access to the universal service definition. Section 332(c)(8) prevents a blanket equal access requirement on all CMRS providers. It does not prevent equal access from being required of only those carriers that choose to seek ETC status. When sections 251(b)(3) and 254(b)(3) of the 1996 Act are also considered, the preference of Congress for consumers to have their choice of toll providers is unmistakable.

Because any ETC may become a rural market's sole local service provider, all ETCs – regardless of the technology they employ – should make equal access available to consumers. Rural markets have smaller local calling scopes, which impels rural consumers to make more toll calls. Thus, it is important that they have unfettered access to their choice of long distance providers, instead of being restricted to their ETC's preference.

Finally, and perhaps most significantly, the record shows that the addition of equal access meets all four of the statutory criteria for inclusion in the definition of supported services: 1) Because rural consumers must often use toll services to reach schools, health care providers, or public officials, equal access is essential to education, public health and public safety; 2) the vast majority of residential consumers have chosen service packages that include equal access; 3) equal access has been deployed in virtually all LEC networks, and 4) it is consistent with the public interest, convenience, and necessity to allow consumers, not CMRS ETCs, to choose which toll providers consumers will utilize.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
	)	

REPLY COMMENTS
of the
ORGANIZATION FOR THE PROMOTION AND ADVANCEMENT OF SMALL TELECOMMUNICATIONS COMPANIES

I. INTRODUCTION

The Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) hereby submits these replies to comments filed in response to the Federal Communication Commission's (FCC, Commission) Notice of Proposed Rulemaking (NPRM)[1] seeking comment on the Recommended Decision of the Federal-State Joint Board on Universal Service (Joint Board) regarding the definition of services supported by universal service.[2] OPASTCO is a national trade association representing approximately 500 small telecommunications carriers serving rural areas of the United States. Its members, which include both commercial companies and cooperatives, together serve over 2.5 million customers. All of OPASTCO's members are rural telephone companies as defined in 47 U.S.C. §153(37). In addition, they are all eligible telecommunications carriers (ETCs) in their service areas. Also, nearly one half of OPASTCO's members provide some type of mobile wireless service.

[1] *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 03-13 (rel. Feb. 25, 2003).
[2] *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Recommended Decision, 17 FCC Rcd 14095 (2002) (Recommended Decision).

The record in this proceeding strongly supports adding equal access to interexchange service to the list of core services supported by the Universal Service Fund (USF).[3] It is consistent with the law, advanced by the facts, and sanctioned by good public policy.

II. THE RECORD SHOWS THAT THE ADDITION OF EQUAL ACCESS CONFORMS WITH THE LAW

A. No commenter has explained how a voluntary undertaking can be portrayed as a blanket requirement

The record in this proceeding demonstrates that adding equal access to the universal service definition is consistent with section 332(c)(8) of the Communications Act of 1934, as amended (1996 Act, the Act), which prohibits a blanket, indiscriminate equal access requirement on all commercial mobile radio services (CMRS) providers. Commenters have explained that this provision does not bar the Commission from making the provision of equal access a prerequisite for those carriers, including but not limited to CMRS providers, which voluntarily choose to seek ETC status.[4]

Nonetheless, several commenters[5] have opined that the addition of equal access would somehow constitute a conflict with section 332(c)(8). However, this position is unsupportable. As NASUCA stated:

---

[3] *See*, comments of Fred Williamson and Associates, Inc. (FW&A); GVNW Consulting, Inc. (GVNW); Montana Universal Service Task Force (MUST); National Association of State Utility Consumer Advocates (NASUCA); National Telecommunications Cooperative Association (NTCA); Nebraska Rural Independent Companies (Nebraska Companies); OPASTCO; Valor Communications Enterprises, LLC (Valor).

[4] FW&A, pp. 5-6; GVNW, p. 3; MUST, p. 10; NASUCA, p. 3; NTCA, p. 4; Nebraska Companies, pp. 2-4; OPASTCO, pp. 3-5; Valor, pp. 2-3.

[5] *See*, *for example*, Cellular Telecommunications & Internet Association (CTIA), pp. 3-5; Florida Public Service Commission, p. 6; Nextel Communications, Inc. and Nextel Partners (Nextel), pp. 7-8; Rural Cellular Association and Alliance of Rural CMRS Carriers (RCA/ARC), pp. 2-4; United States Cellular Corporation (USCC), pp. 2-4.

> This view confuses placing conditions on wireless carriers that want to receive universal service support funds with imposing a requirement for equal access on all wireless carriers.[6]

Neither the opposing Joint Board members, nor any of the commenters endorsing their position, explain how a provision which mandates equal access only for those carriers *voluntarily* seeking ETC status can be considered tantamount to a blanket requirement for *all* CMRS providers. Indeed, many OPASTCO members provide mobile wireless service and have no interest in seeing a blanket equal access requirement imposed on all CMRS providers.

Furthermore, neither the opposing Joint Board members, nor parties expressing agreement with them, were able to offer any precedent that might lend credibility to their argument. In contrast, comments from OPASTCO and the Nebraska Companies referred to a legal precedent established by the Utah Supreme Court.[7] That decision found that imposing pricing conditions on mobile wireless ETCs did not amount to rate regulation in violation of section 332 of the Act, since it was applicable "only under discrete voluntary circumstances."[8]

A voluntary act undertaken by individual carriers cannot constitute a requirement imposed upon an entire class of carriers. The Commission must therefore reject the unsupported argument that adding equal access to the universal service definition would violate section 332(c)(8).

---

[6] NASUCA, p. 3.
[7] Nebraska Companies, p. 3; OPASTCO, p. 4 (citations omitted).
[8] *WWC Holdings Co. Inc. v. Public Service Commission of Utah, et. al.*, Case No. 20000835, 2002 UT 23 (filed March 5, 2002) (Utah case).

B. Congressional desire for consumer choice of toll providers is clearly established in sections 251(b)(3) and 254(b)(3) of the 1996 Act

Congress expressed its clear preference for consumer choice in the long distance market by establishing a dialing parity requirement for all local exchange carriers – both incumbents and competitive LECs – in section 251(b)(3) of the Act.[9] RCA/ARC claims that inclusion of equal access in the list of supported services is not necessary, because the market for toll services is competitive today.[10] However, the existence of choice in the market for toll services would become irrelevant to rural consumers, if their sole local service provider became a carrier that chose not to provide equal access.[11] Toll competition might continue to thrive in urban areas, but consumers served by such ETCs would not enjoy similar circumstances.[12] This would be inconsistent with section 254(b)(3), which explicitly states that rural and high-cost consumers should have access to interexhange services comparable to those available to urban consumers.

USCC claims that "there is no reason to believe" the stipulation of section 332(c)(8) "would change just because a wireless carrier becomes an ETC."[13] Yet reasons are clearly evident elsewhere in the statute. FW&A succinctly noted the shortcomings of arguments against the addition of equal access that are based upon reading 332(c)(8) in isolation from other sections of the Act:

> [T]his view ignores public interest and universal service sections of the Act that require ETCs to provide services in rural and high cost areas, such

---

[9] OPASTCO, p. 5.
[10] RCA/ARC, p. 5.
[11] See section III, below.
[12] In fact, rural consumers even today do not have access to the same level of long distance competition found in urban areas. As OPASTCO noted in initial comments (p. 12), a recent NECA study indicates that only 57 percent of rural consumers have access to discount long distance plans, and, in some cases, are paying per-minute rates that are two to three times the rates that urban consumers enjoy.
[13] USCC, p. 2.

> as equal access, that result in just, reasonable and affordable rates, comparable to the services and rates provided in urban areas.[14]

The record shows that an isolated interpretation of section 332(c)(8) cannot trump Congress's desire for all consumers, particularly those living in rural and high-cost areas, to reap the benefits of the competitive market for toll services. Adding equal access to the universal service definition is entirely consistent with Congress's intent in the 1996 Act.

III. PROVISION OF EQUAL ACCESS BY *ALL* ETCs, REGARDLESS OF THE TECHNOLOGY THEY USE, IS NECESSARY BECAUSE ANY ETC MAY BECOME A RURAL MARKET'S SOLE LOCAL CARRIER

Any competitive carrier that voluntarily assumes the ETC designation holds itself out to consumers as a substitute for that market's incumbent local exchange carrier (ILEC). Section 214(e)(4) of the Act requires state commissions to allow any carrier – including the ILEC – to relinquish their ETC designation in any area served by more than one ETC. Thus, when a CMRS provider is designated as an ETC, it is no longer providing services that are merely complimentary to wireline local exchange service. It is holding itself out as a substitute for the services offered by a LEC.

Both CTIA and the Nebraska Companies note that some consumers are already selecting CMRS providers to act as a substitute for their landline service.[15] As the Nebraska Companies stated, the notion that customers can always reach interexchange carriers (IXCs) of their choice through landline service is "not valid," because increasing

---

[14] FWA, p. 5. Furthermore, the combination of the Utah case, section 251(b)(3), and section 254(b)(3) more than adequately addresses the stretched "shifting burden of persuasion" argument advanced by Centennial Communications Corp. (Centennial), pp. 3-4.

[15] CTIA, p. 10; Nebraska Companies, pp. 4-7. In addition, CTIA pointed out that the FCC's Seventh CMRS Competition Report indicates that there is virtually no difference in the average monthly charge for wireless service between rural and urban consumers (CTIA, p. 9, fn. 25 (citation omitted)). If wireless carriers have been able to provide service to rural and urban consumers at comparable rates without support, it begs the question of why ETC status is necessary for these carriers to serve rural markets.

numbers of consumers have substituted landline carriers with CMRS providers that do not provide equal access.[16]

It is conceivable that, in a rural market served by more than one ETC, the ILEC (and any other LEC) could decide to relinquish its ETC designation. If the remaining ETC(s) did not provide equal access, then consumers would not have the benefits of choice in the competitive market for toll services. Such a result would be particularly detrimental for rural consumers, since geographic limitations impel them to make more toll calls.[17] In order to ensure that rural consumers continue to have real choice among toll providers, the Commission must add equal access to the definition of services supported by universal service.

IV. THE RECORD DEMONSTRATES THAT INCLUSION OF EQUAL ACCESS IN THE UNIVERSAL SERVICE DEFINITION CLEARLY MEETS THE ACT'S FOUR CRITERIA

Section 254(c)(1) of the Act establishes four criteria that must be considered with respect to any service contemplated for inclusion in the universal service definition. The record shows that equal access meets all four of these criteria.

A. Equal access is essential to education, public health, or public safety

As OPASTCO's initial comments stated, rural consumers are impelled to make more toll calls than urban consumers since rural markets have smaller local calling scopes.[18] Therefore, rural consumers are more likely to need to make toll calls in order to reach their "community of interest," including schools, health care providers, and public safety officials. Without equal access included in the universal service definition, rural consumers desiring an alternative toll provider may find themselves being forced to enter

[16] Nebraska Companies, p. 7. *See also* FW&A, p. 15; MUST, p. 11; NTCA, p. 2; OPASTCO pp. 10-11.
[17] See section IV, below.

inconvenient access codes in order to contact educational institutions, hospitals and doctors, or emergency service providers.

B. Equal access has, through the operation of market choices by customers, been subscribed to by a substantial majority of residential customers

Some have questioned whether equal access has been subscribed to by a substantial majority of residential consumers through the operation of market choices by customers.[19] Since consumers are said to not literally "subscribe" to equal access, there is a claim that this is not the kind of service envisioned by Congress as part of the universal service definition. However, as OPASTCO's initial comments explained,[20] this argument is invalidated by the existing list of supported services, all of which are subscribed to as part of an overall local service package consumers reasonably expect to receive. For example, when consumers subscribe to basic phone service, they do not make a series of distinct, individual choices regarding whether to subscribe to, or forgo, single party service, access to emergency services, access to operator services, or access to directory assistance. All are features of the overall package. The same applies to equal access. It is a standard and expected service in a basic local service package. If one were to follow the opposition's line of reasoning to its logical conclusion, none of the services listed above would be included in the universal service definition.

C. Equal access is being deployed in public telecommunication networks by telecommunications carriers

In its zeal to shelter CMRS providers from any service upgrade obligation in return for the high-cost support they receive, CTIA strains credulity to the breaking point

---

[18] OPASTCO p. 12, citing Rural Task Force White Paper 2, *The Rural Difference*.
[19] CTIA, pp. 6-7; Dobson Communications Corp. (Dobson), pp. 16-17; Nextel, p. 11; Western Wireless Corp., p. 10.
[20] OPASTCO, p. 2, fn. 5.

by attempting to claim that carriers are not deploying equal access to consumers today.[21] CTIA immediately contradicts itself by acknowledging that landline carriers provide the service.[22] The fact is, all LECs, both incumbents and competitors, have been required to provide toll dialing parity since February 8, 1999.[23] Therefore, deployment is obviously occurring on a widespread basis.

D. The inclusion of equal access is consistent with the public interest, convenience, and necessity

NASUCA has correctly noted that those opposed to the inclusion of equal access "focus almost exclusively on the impact on wireless carriers rather than on the overall public interest."[24] Indeed, it is audacious for the very carriers who relentlessly espouse the consumer benefits derived from supporting local competition in rural markets to seek to deny rural consumers the benefits of choice in the long distance market. Certainly, if it is consistent with the public interest to have multiple ETCs in a rural market, it is also consistent with the public interest to ensure that consumers have equal access to interexchange service, regardless of their choice of ETC.

V. CONCLUSION

Seeking ETC status is a voluntary decision. Therefore, the addition of equal access to the definition of supported services cannot be considered an indiscriminate requirement imposed upon all CMRS providers that is prohibited by section 333(c)(8). Because any ETC may become a rural market's sole local service provider, equal access should be added to the list of supported services in order to ensure that consumers have unfettered access to the toll provider of their own choice. In addition, equal access

---

[21] CTIA, p. 7. *See also* Dobson, p. 16.
[22] CTIA, *ibid*.
[23] 47 C.F.R. § 51.211(a).

clearly meets all four of the statutory criteria for inclusion in the list of supported services. Therefore, the Commission should add equal access to interexchange service to the list of core services supported by universal service mechanisms.

Respectfully submitted,

THE ORGANIZATION FOR THE PROMOTION AND ADVANCEMENT OF SMALL TELECOMMUNICATIONS COMPANIES

By: /s/ Stuart Polikoff
Stuart Polikoff
Director of Government Relations

By: /s/ Stephen Pastorkovich
Stephen Pastorkovich
Business Development Director/
Senior Policy Analyst

OPASTCO
21 Dupont Circle NW
Suite 700
Washington, DC 20036
(202) 659-5990

April 28, 2003

[24] NASUCA, p. 3. *See also* Nebraska Companies, pp. 7-9.

CERTIFICATE OF SERVICE

I, Stephen Pastorkovich, hereby certify that a copy of the comments 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 28th day of April, 2003, to those listed on the attached list.

By: /s/ Stephen Pastorkovich
Stephen Pastorkovich

SERVICE LIST
CC Docket No. 96-45

Kathleen Q. Abernathy,
Commissioner and Chair
Joint Board on Universal Service
Federal Communications Commission
445 12th Street, S.W., Room 8-B115
Washington, D.C. 20554

Kevin J. Martin,
Commissioner
Federal Communications Commission
445 12th Street, S.W., Room 8-A204
Washington, D.C. 20554

Jonathan Adelstein,
Commissioner
Federal Communications Commission
445 12th Street, S.W., Room 8-C302
Washington, D.C. 20554

Michael J. Copps,
Commissioner
Federal Communications Commission
445 12th Street, S.W., Room 8-A302
Washington, D.C. 20554

Bob Rowe,
Commissioner
Montana Public Service Commission
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601

Nanette G. Thompson,
Chair
Regulatory Commission of Alaska
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501-1693

Chairman Michael Powell
Federal Communications Commission
445 12th Street, S.W., Room 8-B201
Washington, D.C. 20554

Lila A. Jaber, Commissioner
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399-0850

J. Thomas Dunleavy, Commissioner
New York Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Greg Fogleman,
Economic Analyst
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399-0850

Mary E. Newmeyer,
Federal Affairs Advisor
Alabama Public Service Commission
100 N. Union Street, Suite 800
Montgomery, AL 36104

Joel Shifman,
Senior Advisor
Maine Public Utilities Commission
242 State Street
State House Station 18
Augusta, ME 04333-0018

Peter Bluhm,
Director of Policy Research
Vermont Public Service Board
Drawer 20
112 State Street, 4th Floor
Montpelier, VT 05620-2701

Charlie Bolle,
Policy Advisor
Nevada Public Utilities Commission
1150 E. Williams Street
Carson City, NV 89701-3105

Peter Pescosolido,
Chief, Telecom & Cable Division
State of Connecticut
Dept. of Public Utility Control
10 Franklin Square
New Britain, CT 06051

Jeff Pursley
Nebraska Public Service Commission
300 The Atrium, 1200 N. Street
P.O. Box 94927
Lincoln, NE 68509-4927

Larry Stevens,
Utility Specialist
Iowa Utilities Board
350 Maple Street
Des Moines, IA 50319

Carl Johnson,
Telecom Policy Analyst
New York Public Service Commission
3 Empire State Plaza
Albany, NY 12223-1350

Lori Kenyon,
Common Carrier Specialist
Regulatory Commission of Alaska
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501-1693

Jennifer Gilmore,
Principal Telecommunications Analyst
Indiana Utility Regulatory Commission
Indiana Government Center South
302 West Washington Street, Suite E306
Indianapolis, ID 46204

Michael Lee,
Technical Advisor
Montana Public Service Commission
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601

Billy Jack Gregg
Consumer Advocate Division
Public Service Commission of
West Virginia
723 Kanawha Boulevard, East
7th Floor, Union Building
Charleston, West Virginia 25301

Philip McClelland
Assistant Consumer Advocate
Pennsylvania Office of Consumer
Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Barbara Meisenheimer,
Consumer Advocate
Missouri Office of Public Counsel
301 West High Street, Suite 250
Truman Building
P.O. Box 7800
Jefferson City, MO 65102

Earl Poucher,
Legislative Analyst
Office of the Public Counsel
State of Florida
111 West Madison, Room 812
Tallahassee, FL 32399-1400

Brad Ramsay,
General Counsel
NARUC
1101 Vermont Avenue, N.W.
Suite 200
Washington, D.C. 20005

David Dowds,
Public Utilities Supervisor
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399-0850

Matthew Brill,
Legal Advisor
Federal Communications Commission
445 12th Street, S.W., Room 8-B115
Washington, D.C. 20554

Daniel Gonzalez,
Senior Legal Advisor
Federal Communications Commission
445 12th Street, S.W., Room 8-A204
Washington, D.C. 20554

Lisa Zaina,
Senior Legal Advisor
Federal Communications Commission
445 12th Street, S.W., Room 8-C302
Washington, D.C. 20554

Carol Mattey,
Deputy Bureau Chief
Federal Communications Commission
Wireline Competition Bureau
445 12th Street, S.W., Room 5-C451
Washington, D.C. 20554

Katherine Schroder,
Senior Advisor
Federal Communications Commission
Wireline Competition Bureau
445 12th Street, S.W., Room 5-A426
Washington, D.C. 20554

Sharon Webber,
Deputy Division Chief
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A425
Washington, D.C. 20554

Eric Einhorn,
Division Chief
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A426
Washington, D.C. 20554

Anita Cheng,
Assistant Division Chief
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A445
Washington, D.C. 20554

Shannon Lipp,
Attorney
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A523
Washington, D.C. 20554

Katie King,
Attorney
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-B544
Washington, D.C. 20554

Geoff Waldau,
Economist
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-B524
Washington, D.C. 20554

Dana Walton-Bradford,
Attorney
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A314
Washington, D.C. 20554

William Scher,
Assistant Division Chief
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-B550
Washington, D.C. 20554

Paul Garnett,
Attorney
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A623
Washington, D.C. 20554

Diane Law Hsu,
Deputy Division Chief
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 6-A360
Washington, D.C. 20554

Bryan Clopton,
Mathematician
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A465
Washington, D.C. 20554

Jennifer Schneider
Attorney
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 6-C212
Washington, D.C. 20554

Albert H. Kramer
Allan C. Hubbard
Dickstein Shapiro Morin & Oshinsky
2101 L Street, NW
Washington, DC 20037-1526

Mark C. Rosenblum
Lawrence J. Lafaro
Judy Sello
AT&T Room 3A229
One AT&T Way
Bedminster, New Jersey 07921

Richard Sbaratta
Bellsouth Corp.
Suite 4300
675 West Peachtree Street, NE
Atlanta, GA 30375-0001

Michael Altschul
Christopher R. Day
CTIA
1250 Connecticut Avenue, N.W.
Suite 800
Washington, D.C. 20036

Ronald Ripley
Dobson Commuications
14201 Wireless Way
Oklahoma City, OK 73134

Cynthia B. Miller, Esquire
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Frederic G. Williamson, President
Fred Williamson & Associates, Inc.
2921 East 91st Street, Suite 200
Tulsa, OK. 74137-3355

Jeffry H. Smith, Consulting Manager
GVNW Consulting, Inc.
8050 SW Warm Springs Street, Ste. 200
Tualatin, Oregon 97062

Christopher W. Savage
John C. Dodge
Cole, Raywid & Braverman, L.L.P.
1919 Pennsylvania Ave., N.W.
Suite 200
Washington, D.C. 20006

Qualex International
Portals II
Room CY-B402
445 12th Street, S.W.
Washington, D.C. 20554

Lori Wright
MCI
1133 19th Street, N.W.
Washington, D.C. 20036

Michael C. Strand
Counsel for MUST
2021 11th Avenue, Suite 12
Helena, Montana 59601

Robert S. Tongren
NASUCA
8300 Colesville Road, Suite 101
Silver Spring, MD 20910

David C. Bergmann
Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-348

Paul Schudel
James Overcash
Woods & Aitken LLP
301 South 13th Street, Ste. 500
Lincoln, NE 68508

Laura H. Phillips
Laura S. Gallagher
Jason E. Friedrich
Drinker Biddle & Reath LLP
1500 K Street, N.W., Suite 1100
Washington, D.C. 20005-1209

L. Marie Guillory
Daniel Mitchell
NTCA
4121 Wilson Boulevard, 10th Floor
Arlington, VA 22203

Dawn K. Jablonski
Kathleen H. Burgess
Public Service Commission
of the State of New York
Three Empire State Plaza
Albany, New York 12223-1350

Sharon J. Devine
Craig J. Brown
Qwest Communications Int.
Suite 700
1020 19th Street, N.W.
Washington, DC 20036

David Nace
David LaFuria
Pamela Gist
Lukas, Nace, Gutierrez & Sachs
1111 19th Street, NW, Suite 1200
Washington, DC 20036

Christopher M. Heimann
Gary L. Phillips
Paul K. Mancini
SBC Communications Inc.
1401 I Street, N.W., Suite 400
Washington, D.C. 20005

Norina Moy
Richard Juhnke
Sprint Corp.
401 9th Street, NW, Suite 400
Washington, DC 20004

Peter Connolly
Holland & Knight, LLP
2099 Pennsylvania Avenue, NW #100
Washington, DC 20006-6801

James Bachtell
Angela Campbell
Georgetown University Law Center
600 New Jersey Avenue, NW
Washington, DC 20001

Lawrence E. Sarjeant
Indra Sehdev Chalk
Michael T. McMenamin
Robin E. Tuttle
United States Telecom Association
1401 H Street, NW, Suite 600
Washington, D.C. 20005

William M. Ojile, Jr.
Valor Telecommunications, LLC
201 E. John Carpenter Freeway, Ste. 200
Irving, TX 75062

Leslie Owsley
Verizon Communications
1515 North Court House Road, St. 500
Arlington, VA 22201-2909

John T. Scott, III
Anne Hoskins
Patrick Donovan
Verizon Wireless
1300 I. Street, N.W., Suite 400 West
Washington, DC 20005

Gene DeJordy
Western Wireless Corp.
3650 131st Ave., SE, Ste. 400
Bellevue, WA 98066

Michele Farquhar
David Sieradzki
Hogan & Hartson LLP
555 Thirteenth Street, NW
Washington, DC 20554