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June 19, 2003

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**Ex Parte**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, NE  
Suite 110  
Washington, DC 20002

**Re: Notice of Ex Parte Presentation:  
CC Docket Nos. 95-116, 96-45**

Dear Ms. Dortch:

On June 19, 2003, counsel for the South Dakota Telecommunications Association, Inc. (SDTA) met with Matt Brill, Senior Legal Advisor to Commissioner Abernathy. On behalf of SDTA, Benjamin Dickens and Mary Sisak, its counsel, were in attendance.

In the meeting, SDTA's comments filed in the universal service proceeding and the CTIA Petition for Declaratory Ruling on local number portability, as reflected in the attachment to this notice, were discussed. In addition, the pending proceeding concerning whether equal access to interexchange service should be added to the list of supported services was discussed.

Consistent with section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we are filing one electronic copy of this notice in each of the above-captioned proceedings and request that you place it in the appropriate record of those proceedings.

Sincerely,

/s/  
Mary J. Sisak

cc: Matt Brill

Attachment

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**SDTA POSITION ON UNIVERSAL SERVICE**

- I. Support to rural ILECs should be provided based on the actual cost of total facilities.
- II. All lines must be supported.
- III. The identical support rule does not comply with the universal service principles.
  - a. It is not competitively neutral.
  - b. It results in excessive support.
- IV. High cost support should not be based on auctions.
- V. The public interest determination should include a cost/benefit analysis of supporting multiple carriers in rural areas.
  - a. This should include an analysis of whether quality services at affordable rates can continue to be provided by all ETCs if an additional ETC is designated, without relying on an increasing level of support.
  - b. The FCC and states should examine whether support will be used for supported services.
  - c. ETC status should be granted to competitors in rural areas only if they offer service throughout the ILEC's study area.

**SDTA POSITION ON CTIA LNP PETITIONS  
CC DOCKET NO. 95-116**

- I. Grant of CTIA's Petitions would have consequences beyond LNP
  - a. CTIA's petition could force changes in ILEC local calling areas and/or rating of calls, which could impact ILEC revenues.
  - b. CTIA's petition would create an unlawful disparity in numbering portability and give a significant competitive advantage to wireless carriers.
  - c. Interconnection agreements are necessary before number porting to ensure appropriate cost recovery.
  - d. The FCC should retain the bona fide request requirement.
  - e. A short porting interval as requested by CTIA is not possible today and would require significant and costly network modifications
- II. The FCC should implement a rulemaking proceeding to ensure a full analysis of the issues.