NTCA

NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION

The Voice of Rural Telecommunications

www.ntca.org

NTCA's Proposed 7- Point Public Interest Test

1. Is the additional ETC designation required to ensure that consumers living in the rural ILEC service area have access to comparable rates and services? (Sec. 254(b)(3))

2. Would the requesting ETC serve the entire rural ILEC's existing service area? (Sec. 214(e)(1) and (5))

3. Would the benefits of granting an additional ETC designation in the rural ILEC service area outweigh burdens on the federal/state funds? (Sec. 254(b)(5))

4. Is the carrier requesting ETC designation willing to demonstrate its cost to provide universal service to the rural ILEC service area? (Sec. 254(e))

5. Would the granting of ETC designation result in excessive support based on the identical support rule? (47 C.F.R. §54.307(a)(1)).

6. If the requesting carrier's services are already offered at comparable rates, why is the carrier asking for rural ILEC support? (Sec. 254(b)(3))

7. Is the carrier requesting ETC designation willing to adhere to additional quality-of-service or other state-specific requirements? (TOPUC v. FCC, 183 F.3d at 412 (U.S.C.A. 5th Cir. 1999))