

K R A S K I N, L E S S E & C O S S O N, L L C
ATTORNEYS AT LAW
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

2120 L Street, N.W., Suite 520
Washington, D.C. 20037

Telephone (202) 296-8890
Telecopier (202) 296-8893

FILED ELECTRONICALLY

November 5, 2003

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

Re: Notice of Ex Parte Presentation
of the Rural Independent Competitive Alliance in
CC Docket No. 96-45

Dear Ms. Dortch:

On November 4, 2003, David Cosson and I spoke via telephone with Alaska Regulatory Commissioner and Federal-State Joint Board ("FSJB") member Nan Thompson to discuss concerns of the Rural Independent Competitive Alliance ("RICA") with respect to the universal service "portability" proceeding currently ongoing at the Commission.

We summarized points we have made in comments, reply comments filed in this proceeding, as well as at the FSJB Denver forum held last July. At root, RICA strongly believes that the support that any eligible telecommunications carrier ("ETC") receives should be based on the network costs of the carrier, or class of carrier, receiving support, rather than on any other carrier's costs. We also stated the belief that the Commission could proceed to establish such a support paradigm without first determining precisely how to measure the costs of competitive ETCs ("CETCs") or classes of CETCs. Such a determination could be reserved for a subsequent proceeding. In addition, we discussed the problems inherent to the "primarily line" proposals, such as administrative burdens and the prospect of abuse by carriers improperly impelling customers to declare such carrier as the provider of the "primarily line."

This *ex parte* notice is being filed electronically pursuant to Commission rules 1.1206(b) and 1.49(f).

Please contact the undersigned with any questions related to this submission.

Respectfully submitted,

/Clifford C. Rohde/
Clifford C. Rohde
Counsel to RICA

cc: Nan Thompson (via email)