Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

PETITION FOR RECONSIDERATION

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SureWest Communications, by its attorney and pursuant to Section 1.429 of the Commission's rules, hereby petitions the Commission for reconsideration of those portions of the FCC's Order on Remand (FCC 03-249, released October 27, 2003, hereinafter "*Remand Order*") in the above-captioned proceeding which require only "rate review" and "certification" by states that their intrastate low cost and high cost rates are reasonably comparable, and that rely on use of a benchmark of 135% of nationwide urban rates. In order to fulfill the requirements of Section 254(b)(3) of the Communications Act, the FCC must induce states to affirmatively make low cost and high cost intrastate rates comparable, and establish a unified policy for intrastate rate comparability. SureWest believes that such a balanced approach would necessitate the use of a "Proper Zone of Reasonableness" ("PZOR") factor for comparability of intrastate rates. In addition, the FCC must revise the "non-rural" funding mechanism to remedy the improper placement of companies such as SureWest Telephone in the "non-rural" category.[1]

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[1] SureWest Communication's wholly-owned subsidiary SureWest Telephone is an incumbent local exchange carrier ("ILEC"). SureWest Telephone was formerly named Roseville Telephone Company ("RTC").

One approach would be to grant the long-pending RTC Petition for Reconsideration of the Tenth Report and Order in this proceeding. In any case, the FCC must move towards creating a unified mechanism for all carriers based on the above principles. Such a unified mechanism should avoid the implicit subsidies in the current system that result from uniform state rates.

I. Introduction

SureWest Communications ("SureWest") is a facilities-based provider of telecommunications services, based in Northern California. Through its subsidiary companies, SureWest provides incumbent local exchange, competitive local exchange, directory advertising, long distance, cable television, broadband and PCS services. SureWest's subsidiary SureWest Telephone is an ILEC serving subscribers in south Placer and northern Sacramento counties.

SureWest Telephone currently serves approximately 136,000 access lines. This figure places SureWest Telephone a mere 36,000 access lines above the definition of a "rural" telephone company. It is by far the smallest of the "non-rural" LECs with which SureWest Telephone has been co-classified for purposes of federal high-cost support. In comparison, the two largest LECs, SBC and Verizon (who both provide ILEC service in California), have approximately 57,083,000 and 57,973,000 access lines, respectively.[2] Verizon thus has approximately 426 times as many access lines as SureWest Telephone. Similarly, while each of these LECs have thousands of central offices, SureWest Telephone has only two: located in the towns of Roseville and Citrus

[2] As reported in USTA's Phone Facts 2004.

Heights. In sum, SureWest Telephone is exponentially smaller than these two LECs serving California, and as a result it lacks the economies of scale and scope of such carriers. For various reasons, including the fact that SureWest Telephone lacks these economies of scale and scope, SureWest Telephone is in fact a high cost carrier.

In its Initial Comments and Reply Comments on the Recommended Decision[3] that was the basis for the *Remand Order*, SureWest demonstrated that the *RD* failed to fulfill the requirements of Section 254(b)(3) to ensure that consumers "in rural, insular and high cost areas, should have access to [telecommunications services] that are reasonably comparable to those provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas (emphasis added)." SureWest specifically noted that the *RD* failed to fulfill the comparability requirement in a number of ways, including the fact that the *RD*'s proposed "supplemental" rate-based analysis to be performed by each state as part of a certification fails to actually compare intrastate rates with each other. The mere fact that all rates in a state are under some set benchmark does not, as a matter of logic or fact, mean that all of the rates under that benchmark are comparable to each other. That is, if one uses a benchmark of $32.00, the fact that two rates, $30.00 and $12.00, are both under the benchmark, does not mean that those rates are comparable to each other, since one rate is 250% greater than the other. SureWest Comments at pages 6-7.[4]

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[3] 17 FCC Rcd 20716 (2002) (hereinafter "*RD*").

[4] As a matter of fact, comparing only the flat residential rate of SureWest at $20.49 to the flat residential rate of SBC California at $10.69 shows a 192% differential.

SureWest also showed that use of the Commission's forward-looking proxy cost model as the basis for determining high-cost support is a deeply flawed policy. The use of the proxy model is not appropriate for carriers, such as SureWest, that lack the economies of scale and scope of BOCs, and which have only two wire centers, since there is little chance for discrepancies between the proxy and real costs to average out. The Joint Board and the Rural Task Force have recognized these principles.

Unfortunately, the *Remand Order* routinely followed the flawed proposals of the *RD*. As shown below, these actions do not fulfill the comparable rates provisions of Section 254 of the Act, nor do they fulfill the mandate of the Tenth Circuit's remand of the Ninth Report and Order

II. The *Remand Order* Does Not Fulfill the Requirements of the 10th Circuit Remand, or Section 254 Requirements, Regarding Comparable Rates.

Section 254(b)(3)of the Act states that:

> Consumers in all regions of the Nation, including low-income consumers, and those in rural, insular and high cost areas, should have access to telecommunications services ... that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.

There is no controversy over the fact that the rate comparability required under Section 254 includes local, intrastate rates. However, because Section 2(b) of the Act (47 U.S.C. §152(b)) limits the Commission's jurisdiction over intrastate rates, the Commission concluded in the Ninth Report and Order that it had no authority to specifically mandate comparability among rates within a state, but only had authority to ensure that the average rates of each of the different states were comparable to each

other. 14 FCC Rcd 20432 (1999) at paras. 37-38. Therefore, the mechanism established by the Commission therein relied on comparison of the average of all rates within a particular state, with a "national" average. States would be solely responsible for ensuing that a rate paid by a customer within a state is comparable to rates paid by other customers within that same state. *Id.* at paras. 45-46.

In reviewing the Ninth Report and Order, the Tenth Circuit referred to evidence in the record of states where there were 70 to 80 percent differences between the rates in high cost and low cost areas within a state, and held that such rates are not "reasonably comparable." Qwest Corp. v. FCC, 258 F.3d 1191,1201 (2001) (hereinafter "*Qwest*"). This is precisely the case for SureWest Telephone today. As mentioned previously, the SBC California residential rate would for all intents and purposes be the average rate in California. An over 90 percent difference between that rate and the rate of a high cost company like SureWest would certainly fall into the finding made by the Tenth Circuit. The Court also specifically reversed and remanded the Commission's conclusion that it had no jurisdictional authority to influence the comparability of rates within a state. Notwithstanding Section 2(b) of the Act, the Court held, the Commission "is nevertheless obligated to formulate its policies so as to achieve the [Section 254] goal of reasonable comparability by inducing 'sufficient ... state mechanisms' to do so." *Id.* at page 1200. The Court not only criticized the Commission for failing to enact such inducements, but it specifically held that the state "certification" process previously enacted by the Commission was "insufficient to meet [the Court's] concerns." *Id.* at page 1203 and note 10. The Court then went so far as to specifically criticize the Commission for adopting the Joint Board's proposal to abstain from conditioning receipt

of federal funding on a state's acting to ensure that intrastate rates are comparable. *Id.* Indeed, the Court specifically suggested that the Commission enact a rule so conditioning the receipt of federal support. *Id.* at page 1204.

In the *Remand Order*, the Commission appears to recognize the specific mandate of the Court, but essentially ignores it. The *Remand Order* merely "tweaks" the discredited certification process by requiring states to engage in a "rate review" prior to making their certification. *Remand Order* at para. 76. But the new rate review is fatally flawed. First, no details are given in Section 54.316(a) regarding the mechanism or criteria that states are required to use in doing such a review. This inexcusable vagueness was recognized by Commissioner Martin in his Separate Statement to the *RD*. 17 FCC Rcd at 20755-56. Even more flawed however, is the fact that in doing such a "review", states are not required to compare intrastate rates within the state with each other. Rather, under newly enacted Section 54.316(a) of the Commission's rules, states are to review the comparability of rural intrastate rates with "urban rates nationwide," and under Section 54.316(b) may use the FCC's "nationwide urban benchmark" rate for such a comparison. This process will allow states to ignore comparing rates within their borders, and would allow states to certify to "comparability" as long as all intrastate rural rates are below the nationwide benchmark. But, as noted by SureWest and others, this will result in state certifications even where some intrastate rates are 70 percent, 80 percent, or even more than other rates in the same

state,[5] a result that the Tenth Circuit explicitly stated does not meet the definition of comparable.

The Commission claims that the rate review requirement "will create significant pressure on states to take action to achieve reasonable comparability ... to avoid making repeated certifications that [their] rates are not reasonably comparable." *Remand Order* at para. 76. But this ignores the core flaw with the "rate review" requirement as enacted: it does not require actual comparison of intrastate rates. Accordingly, while there may be pressure on states to certify to "comparability", the basis for making that certification is itself invalid, and thus the certifications will be invalid as well, even if done in compliance with FCC rules. This self-certification mechanism has no "teeth" for enforcement or review by the FCC. There is no downside for self-certifying in error or in non-compliance with the Act, and in fact, the Commission's mechanism creates an incentive for certifying rate comparability even where there is none. There appears to be no process for challenging a state's certification.

Accordingly, it is unlikely that states will in fact be induced to "take action" on intrastate rate comparability.[6] The Commission's reasons for its decision not to induce states to affirmatively take action on intrastate rates are invalid. First, in directly

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[5] In California, this is the case where statewide averaged rates of SBC California are so much lower than the nationwide benchmark the disparity is exacerbated. The present benchmark was set at $32.28. SBC California rates are $10.69. The rate differential is 202% which is clearly not comparable.

[6] In footnote 147 of the *Remand Order*, the Commission states that it "does not agree with SureWest that such [an intrastate] rate discrepancy represents a problem of insufficient federal support." However, regardless of the impact of the level of federal support, such broad discrepancies among rates within a state certainly are a problem of comparability.

addressing SureWest's Comments on the *RD*, the Commission claims in paragraph 43 of the *Remand Order* that its methodology is sufficient because "the range of variability of rural and urban rates within most states ... is narrower than the range of variability of urban rates among states ...." Nevertheless, the Commission concedes that its response may not apply to all states, or even to the facts that SureWest provided regarding California. *Id.* at note 154 ("In some cases however, if urban rates were very low, rural rates could be below the benchmark but further from the urban rates in that state than they are from the nationwide urban rate. [citation to SureWest Comments]..."). Such concession invalidates the Commission's methodology: the Court's mandate, and the mandate of Section 254, is required to be applied in all states, not in just "most" states.

Perhaps in recognition of this problem, the *Remand Order* states (at para. 78) that the Commission is not foreclosing the option of conditioning the grant of federal support "in the future." Nevertheless, the Commission expresses concern that such an approach could have serious effects on rates paid by consumers. *Id*. at footnote 299. However, one wonders whether the "medicine" of such an approach would be worse for consumers than the "disease" of lack of rate comparability.

In light of the above, SureWest believes that the Commission failure to induce action by the states is an attempt to compromise with the Joint Board, which is largely made up of State members that cherish their independence from the FCC. However, the *Qwest* Court noted that FCC's job is not to come to a "reasonable compromise" among the participants to this proceeding, but rather to make rational decisions based on mandates of the Communications Act. 258 F.3d at 1202.

In sum, the newly enacted "rate review" process requires no actual comparison among intrastate rates within a state, and thus is meaningless for evaluating intrastate rate comparability requirements of the Act. Essentially, the *Remand Order* does no more than take the methodology discredited by the Court, and pass it off to the states. Yet, passing that methodology off on the States does nothing to address the Court's mandate, or to fulfill the comparability requirements of Section 254.

Similarly, the Commission's benchmark for measuring comparability remains fatally flawed. In the Ninth Report & Order, the Commission enacted a methodology which provided support for carriers in states where intrastate costs (as determined by the proxy model) exceed 135 percent of the national average cost per line for non-rural carriers. In the *Qwest* decision, the Tenth Circuit found that the Commission had failed to adequately explain how it arrived at this 135 percent figure, and how use of that figure would achieve the goals of Section 254 of the Act. The *Remand Order* revises the benchmark for measuring comparability to a rate that is two standard deviations above the average urban rate. Commissioner Bob Rowe ably demonstrated the flaws of this approach in his Separate Statement to the *RD*. Separate Statement of Commissioner Rowe, 17 FCC Rcd at 20763-20766. But the bottom line on the effect of such an approach is that federal funding will continue to be denied to almost all states. As Commissioner Rowe noted, nothing in the legislative history of the 1996 Telecommunications Act suggests that Congress intended universal service support to be available only to carriers or states in the top three percentiles of cost as reflected in the results of the standard deviation analysis. *Id.* at 20765.

SureWest urges the Commission to reconsider the proposal offered in SureWest's Comments to the *RD*. Therein, SureWest asserted that in order to meet the comparability goals and mandate of the Act, universal service must fund the difference between the current actual rates of a LEC and those of other LEC(s) in the same local market area. Further, universal service is an obligation that must be fulfilled in an integrated approach, as this obligation is shared jurisdictionally between federal and state support mechanisms. Accordingly, a national policy must be set that recognizes the delicate balance in providing predictable and sufficient federal and state universal service funding to conform to the Section 254 mandate that rates are reasonably comparable. In this regard, SureWest proposes that the FCC establish a national rate benchmark for the federal universal service fund support, with the states adjusting their own state universal service mechanisms to provide the remaining support to meet the Act's obligations. This integrated approach should be based on comparison of rates for the provision of basic local services in the state. For some states, that may be a combination of factors depending on their specific circumstances and the rate design adopted for providing basic local services. SureWest recommends a 120% factor be used for actual comparison of intrastate rates with each other for the application of federal high-cost support. SureWest is confident this "Proper Zone of Reasonableness" ("PZOR") would provide the appropriate mechanism for a comparability factor for the local market area. Further, since universal service is an obligation that is shared between federal and state support mechanisms, a similar or higher rate comparison

benchmark should be established by each state for that state's provision of its own universal service support. The difference between the state rate benchmark and the 120 percent national benchmark would be funded through federal universal service. SureWest Telephone asserts that the elements listed in this proposal would meet the requirements of the Act. Such an approach would enable the states to maintain reasonably comparable rates between LECs within their state, and would provide for specific, predictable and sufficient federal and state mechanism(s) that support the goals of preserving and advancing universal service.

III. The "Non-Rural" Mechanism Must be Revised or a Unified Mechanism for All Carriers Should be Enacted Rapidly.

As shown above, the revisions to the non-rural mechanism are in many ways inconsistent with the requirements of Section 254 of the Communications Act and are not responsive to the remand from the Tenth Circuit. In addition to flaws discussed above, the mechanism fails to appropriately address the needs of mid-sized ILECs such as SureWest Telephone, which have been classified as "non-rural" for purposes of federal high-cost support, but which in fact are exponentially smaller than the huge BOCs with which they are included. Subscribers in Roseville, California should not have federal support denied to them because of the arbitrary and improper classification of SureWest as a carrier equivalent to a BOC. Rather, the Commission should alter its rules and policies to exclude carriers such as SureWest Telephone from the category of

"non-rural" carriers, and treat SureWest Telephone and its subscribers in a manner similar to other high-cost companies.[7]

First, the use of the cost proxy model is not appropriate for carriers, such as SureWest Telephone, that lack the economies of scale and scope of BOCs. The Joint Board and the Commission have acknowledged this very principle in the *RD*. *See, e.g.,* paragraph 28 where the Joint Board states "[w]hile statewide averaging is appropriate for the high-cost mechanism providing support to non-rural carriers, it may not be appropriate for the high-cost mechanism providing support to rural carriers. [citation omitted] Many rural carriers lack the economies of scale and scope of the generally larger non-rural carriers."[8] Nevertheless, the Commission continues to apply this mechanism to SureWest Telephone, a carrier which lacks these economies of scale and scope. It is flatly arbitrary, discriminatory and unjust for the Commission to base the calculation of federal support for carriers such as SureWest Telephone on a mechanism that the Board itself admits is inappropriate in such a case.

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[7] The absurdity of the situation is an example that is very close in proximity to SureWest Telephone. Just as SureWest serves an area outside of Sacramento, so does Citizens Telecommunications Company of California. The city served is Elk Grove, California and Citizens provides about 80,000 access lines. Citizens serves about 127,000 total access lines in the state of California, which is remarkably close to the number of access lines SureWest Telephone services. With over 60 percent of the state-wide access lines located in Elk Grove, Citizens Telecommunications Company of California is still classified as "rural" and received $11,262,972 in 2002 high cost loop support. With a nearly identical type service area, SureWest received no high cost loop support because of its "nonrural" classification.

[8] *See also RD* at note 34 stating that because rural carriers have higher operating and equipment costs, due in part to a lack of economies of scale, the Commission has previously recognized that a separate approach was needed to determine support for rural carriers, and thus the Rural Task Force was established. Consistent with that analysis, the Rural Task Force Recommendation specifically lists differing economies of scale and scope as significant reasons why the FCC's forward-looking proxy model is not appropriate for rural carriers. *See* Rural Task Force Recommendation to the Federal-State Joint Board on Universal Service, at page 12.

In addition to being inappropriate for carriers such as SureWest Telephone due to lack of economies of scope and scale, use of the proxy cost model is similarly inappropriate for carriers like SureWest Telephone which have only two wire centers, since there is little chance for discrepancies between the proxy and real costs to average out. This issue was discussed by the Rural Task Force in its September 29, 2000 Recommendation to the Federal-State Joint Board on Universal Service. Therein, the RTF finds:

> "The aggregate results of this study suggest that, when viewed on an individual rural wire center or individual Rural Carrier basis, the costs generated by the Synthesis Model are likely to vary widely from reasonable estimates of forward-looking costs."[9]

In its White Paper 4, the RTF provides additional insight into why it reached its conclusion regarding the applicability of the model:

> "The 'Law of Large Numbers' suggests that for the RBOCs those wire centers where the support results are too high will tend to offset those which are too low, resulting in a reasonable result. This is not the case for many Rural Carriers who serve only a few wire centers, or in some cases, a single wire center."[10]

This same logic is equally applicable to SureWest Telephone, which has only two wire centers. Thus, while the large number of wire centers that BOCs have in a particular state may result in an averaging out of discrepancies between the proxy model and the real costs of all those wire centers, such averaging is unlikely in the case of a carrier like SureWest Telephone, which has only two wire centers. Accordingly, it is not

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[9] Rural Task Force Recommendation to the Federal-State Joint Board on Universal service, page 18.

[10] Rural Task Force White Paper 4. A Review of the FCC's Non-Rural Universal Service Fund Method and the Synthesis Model for Rural Companies, at page 7.

appropriate to use the cost proxy model to calculate federal support for SureWest Telephone.

Use of the forward looking costs as the basis for determining high-cost support for SureWest Telephone is also unwise because such "costs", as noted by Commissioner Martin, "have little, if any, nexus to the establishment of end-user retail rates ... [and result] in support being provided to some areas with low end user rates while certain areas that have high rates receive insufficient support." Separate Statement of Commissioner Martin, 17 FCC Rcd at 20754.[11] SureWest Telephone 's situation is a prime example of Commissioner Martin's critique: it has a high cost study area with resulting rates significantly higher than those of the surrounding SBC areas, but receives no federal high-cost support. Clearly this is not the intended result of a rational support policy, nor what was envisioned by the adoption of Section 254(b)(3) of the Act.

In sum, because carriers like SureWest Telephone lack the economies of scale and number of wire centers of typical "non-rural" LECs, and because proxy costs have no real nexus with end-user rates or the costs used by states to set local rates, the use of statewide averaged costs as affirmed in the *RD* is arbitrary, unjust, and does not meet the mandate of the Communications Act of comparable rates, especially as applied to carriers such as SureWest Telephone.

One way of remedying this problem would be for the Commission to grant RTC's long-standing Petition for Reconsideration of the Tenth Report & Order where the

[11] Commissioner Rowe similarly questions "the accuracy of the model." Separate Statement, 17 FCC Rcd at 20771.

Commission used the 100,000 access line definition of "rural telephone company" as the dividing line between different high-cost support mechanisms for "rural" and "non-rural" LECs.[12] RTC noted that Section 254 of the Communications Act does not require use of that definition, and that its use improperly places smaller mid-sized carriers in the same category as LECs hundreds of times their size, thus basing high-cost support for such companies on models designed for carriers with substantially greater economies of scale and scope. In addition, RTC noted that the loss of federal support resulting from use of that definition will put substantial pressure on the local rates of carriers such as RTC. RTC thus urged the Commission to revise that definition in a manner that treats the smaller mid-sized carriers in a manner more similar to the rural LECs.[13] RTC suggested that such a revision should either rely on the "two percent" definition of "rural carrier" in Section 251(f)(2) of the Communications Act, or should distinguish "non-rural"

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[12] In hindsight, the use of the terms "rural" and "non-rural" in the context of universal service reform, is unfortunate. Such terms create incorrect implications regarding the size and cost structure of a company based on the location of the company's service area. In addition, "non-rural" companies serve the majority of the rural areas, while some "rural" companies serve in urban areas.

[13] It should be noted that certain mid-sized ILECs such as Alltel (3.1 million total access lines according to USTA's Phone Facts 2004), Citizens Communications (2.4 million total access lines), CenturyTel (2.4 million total access lines) and TDS (672,000 total access lines) are significantly larger than SureWest. Yet, those larger companies are classified as "rural" and accordingly receive federal support, largely through their use of multiple subsidiaries with separate study areas, each of which is under the 100,000 access line threshold. By comparison, SureWest Telephone has not created subsidiary companies with multiple study areas. The arbitrariness of the current definition of "non-rural" federal support mechanism is demonstrated by the fact that these substantially larger companies receive federal support, while SureWest Telephone does not.

LECs as those with more than 200,000 access lines in a study area. The Commission has never acted on the RTC Petition.[14]

If the Commission and Joint Board are not willing to remedy the flaws in the current non-rural mechanism, then it should be abandoned and a new mechanism created. Indeed, it may be the case that the current federal support system can no longer be repaired though a patchwork of cumbersome and sometimes unlawful fixes that perpetuate the current problems. In that case, the Commission and Board should rapidly commence work on a unitary system for all carriers, rather than creating two new systems for rural and non-rural carriers, thus doubling the required work. Furthermore, working on a unitary system would allow the Commission and the Board to avoid repeating the mistakes of the past that led to the prohibited implicit subsidies resulting uniform state rates, and from differences between the rural and non-rural support mechanisms. The new support system should concentrate on future network configuration, and ensure that the costs of federal support to ensure comparable and affordable rates are equitably shared by the entire telecommunications industry.

IV. Conclusion

For the reasons discussed above, the *Remand Order* does not fulfill the mandate of the Tenth Circuit, or of Section 254 of the Act, to ensure that subscribers in high-cost areas receive service at rates reasonably comparable to those in other areas.

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[14] While the *Qwest* Court upheld the Tenth Report and Order, it never addressed the issue in RTC's Petition, *i.e.* the arbitrary use of the 100,000 access line definition of "rural telephone company" as the dividing line between different high-cost support mechanisms or "rural" and "non-rural" LECs.

The FCC must, through a unified federal/state policy, induce states to affirmatively make rural and urban intrastate rates comparable. In addition, the FCC must revise the "non-rural" funding mechanism to remedy the improper placement of companies such as SureWest Telephone in the "non-rural" category. One approach would be to grant the long-pending RTC Petition for Reconsideration of the Tenth Report and Order in this proceeding. Regardless, the FCC must continue to move towards creating a unified mechanism for all high cost carriers based on the above principles.

Wherefore, SureWest Telephone requests that the Commission reconsider and revise the actions taken in the *Remand Order* discussed above.

Respectfully submitted,

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