



Robert L. Connelly, Jr.  
Vice President – Deputy General Counsel

1801 California Street, 10<sup>th</sup> Floor  
Denver, Colorado 80202

Phone 303 383-6747  
Facsimile 303 296-4576

November 24, 2004

*EX PARTE*

**VIA ECFS**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, TW-A325  
Washington, DC 20554

RE: *In the Matter of Unbundled Access to Network Elements, WC Docket No. 04-313; Review of the Section 251 Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338*

Dear Ms. Dortch:

In its Comments and Reply Comments submitted in this docket, Qwest Communications International Inc. (“Qwest”) has discussed the need for the Federal Communications Commission (“Commission”) to consider the availability of special access circuits in its impairment analysis for high-capacity loops and transport, in light of the *USTA II*<sup>1</sup> decision. During recent meetings with Commission staff and Commissioners, Qwest explained that, in its most narrow application, the court’s decision compels a finding that carriers that are currently using special access services to serve a particular customer cannot be found to be impaired without access to unbundled network elements (“UNEs”) to serve that customer, and therefore cannot be permitted to convert their existing special access facilities to UNEs. This is because the facilities necessary to serve that particular customer already are in place and already being used to provide such service, and all that would be entailed by a switch from special access to a UNE is the repricing of an existing circuit. Using “impairment” to justify the repricing of existing special access circuits cannot be justified under the Act or the *USTA II* decision. The proper application of the impairment standard also prohibits, under any reasonable analysis, allowing other would-be entrants seeking to serve that customer from claiming the right to purchase special access services at UNE prices, so that such requesting carriers could not be found to be impaired and are not entitled to UNEs with respect to customers that are currently being served by special access services. As explained below and throughout Qwest’s Comments in this proceeding, these results are dictated by the *USTA II* decision.

---

<sup>1</sup> *United States Telecom Ass’n v. FCC*, 359 F.3d 554 (D.C. Cir. 2004) (*USTA II*), cert. denied, sub. nom. *NARUC v. USTA*, 125 S. Ct. 313 (2004).

If the Commission nevertheless fails to adopt a rule prohibiting conversions of existing special access facilities on a customer-specific basis, it can mitigate some of the ill effects of this action if it takes steps to prevent conversions or use of circuits used primarily for originating and/or terminating interexchange traffic. In this vein, Qwest herein proposes certain modifications to the service eligibility requirements adopted in the *Triennial Review Order*,<sup>2</sup> which are intended to strengthen those criteria without detrimentally affecting competitive local exchange carriers (“CLECs”) that intend to use UNEs to provide local services. Specifically, Qwest proposes the following three changes to the service eligibility criteria: (1) apply the service eligibility criteria to stand-alone DS1 and DS3 loops, as well as DS1 and DS3 enhanced extended links (“EELs”) and commingled DS1 and DS3 loop-transport circuits; (2) require the requesting carrier to provide limited documentation at the time of ordering to support its certification that it meets the service eligibility criteria; and (3) strengthen the self-certification requirements for conversions of existing special access circuits to UNEs. These suggestions are offered as a manner in which the Commission can mitigate some of the more harmful aspects of conversions of special access circuits to UNEs. Qwest does not concede that adoption of these rules would cure the unlawfulness of any Commission decision that permitted such conversions despite a clear lack of impairment.

**I. The Commission Should Rule That UNEs Are Not Available To Serve Customer Locations Already Served By Special Access Services**

In *USTA II*, the court concluded that “the Commission’s impairment analysis must consider the availability of tariffed ILEC [incumbent local exchange carrier] special access services when determining whether would-be entrants are impaired . . . . What the Commission may not do is compare unbundling only to self-provisioning or third-party provisioning, arbitrarily excluding alternatives offered by the ILECs.”<sup>3</sup> In the EELs context, the *USTA II* court found that a CLEC’s use of tariffed special access circuits to serve a particular customer is dispositive evidence that the CLEC is not impaired without access to those same circuits at the lower UNE prices, and the CLEC, therefore, cannot be permitted to convert its existing special access facilities to UNEs.<sup>4</sup> The court’s reasoning applies to all UNEs originally purchased as special access, not just EELs. Where a requesting carrier is already serving a customer via special access, the Commission has the best possible evidence that the carrier is not impaired by lack of the availability of UNEs to provide service using those circuits. The carrier’s actions demonstrate that it has made a business decision that it is economically feasible to serve that

---

<sup>2</sup> *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Deployment of Wireline Services Offering Advanced Telecommunications Capability*, Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, 18 FCC Rcd 16978 (2003), *vacated in part and remanded in part*, *USTA II*, 359 F.3d 554.

<sup>3</sup> *USTA II*, 359 F.3d at 577.

<sup>4</sup> *Id.* at 593 (carrier’s successful use of facilities obtained pursuant to special access tariffs “precludes a finding that the CLECs are ‘impaired’ by lack of access to the element under § 251(c)(3).”).

particular customer using the circuits purchased at special access prices. Thus, there is no legal basis for a finding that requesting carriers are impaired by not having the ability to convert their special access circuits to UNE prices. This is particularly true given the fact that, under *USTA I and II*, the burden is on the CLECs to show that they are impaired without access to UNEs. The concept that this burden could be met by complaining that the tariffed price at which a CLEC had purchased a special access circuit was too high, and that the Commission can use the impairment standard to reduce that price, is simply not consistent with the Act.

If a competitive carrier is serving a customer via special access, there also is no legal basis for allowing that or any other carrier to obtain additional UNEs to serve that customer. In *USTA II*, the court acknowledged that a rule prohibiting conversions of special access services to UNEs “might create anomalies, as CLECs hitherto relying on special access might be barred from access to EELs as unbundled elements, while a similarly situated CLEC that had just entered the market would not be barred.”<sup>5</sup> The court noted that the Commission could consider and resolve any potential anomaly on remand. The only reasonable way to resolve that anomaly is to find that the lack of impairment demonstrated by one carrier’s successful use of special access services to serve a customer extends to other circuits used by that carrier or another carrier to serve that customer. As the *USTA II* court held, “if history [has] show[n] that lack of access to EELs had not impaired CLECs in the past, that would be evidence that similarly situated firms would be equally unimpaired going forward.”<sup>6</sup>

Furthermore, extending the finding of non-impairment to all circuits used to serve a customer that is already served via special access would also eliminate the opportunity for arbitrage that may arise if some carriers pay more for the same circuit than others. Thus, if a competitive carrier serves a customer using special access services, and the customer switches to another carrier, the new carrier should be barred from purchasing UNEs to serve that customer. In addition, all requesting carriers, including the original carrier should be prohibited from purchasing UNEs to provide the customer with additional services. As Qwest has explained, the vast majority of special access circuits are used by carriers to provide inter and intraLATA toll traffic. If the carrier wins the customer’s local business, the carrier can add the local traffic to the special access circuit at a minimal marginal cost.

Qwest has already refuted the arguments that have been raised in favor of allowing requesting carriers to convert special access circuits to UNEs. *First*, the CLECs’ allegations that certain ILECs have wrongfully refused to provision UNEs does not provide a legitimate basis for allowing requesting carriers to convert special access circuits to UNEs with respect to all UNEs. Such issues should be addressed through an enforcement or complaint action with regard to the allegedly offending ILEC. The *USTA II* decision is clear that the Commission cannot order unbundling when there are more narrowly-tailored alternatives that address the perceived

---

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

problem without imposing all of the costs of unbundling.<sup>7</sup> Even if there were a legal basis – which there is not – for finding impairment based upon a particular ILEC’s refusal to provision UNEs when facilities exist, such an allegation certainly could not form the basis for finding impairment in the regions of other ILECs. *Second*, the fact that some CLECs have not been able to operate their entire business enterprises profitably and have filed for bankruptcy does not provide a basis for allowing those or “similarly situated” companies to obtain UNEs for customers already served by special access services. There are many reasons why companies fail to make a profit or file for bankruptcy, and most, if not all, of those reasons have absolutely nothing to do with the availability of UNEs. A company may be mismanaged; a company may take on too much debt; the market may have a temporary glut of unanticipated new entrants or excess capacity; or a company simply may not be able to sell as many services as it had anticipated. None of these reasons justify a legal finding of impairment.<sup>8</sup> More importantly, none of these reasons undermine the key fact about special access circuits – the carrier has made a business decision that, for that particular circuit to that particular customer at that particular location, it is economical to serve the customer at special access prices. *Third*, this proposal is responsive to the assertion of CLECs that the loop/transport impairment analysis should be customer-specific based upon the assumption that CLECs make decisions regarding facility deployment on a customer-by-customer basis. While Qwest disagrees with these assertions, and has refuted these arguments in its Comments and Reply Comments in this docket, Qwest notes that its narrowly-tailored proposed prohibition on conversions would be customer-specific.

The *USTA II* decision is clear – the Commission must adopt a rule specifying that existing circuits cannot be converted from special access prices to UNE prices, and that requesting carriers cannot obtain UNEs to serve customers that are already being served by a competitive carrier via special access. In this regard, the Commission can minimize the opportunities for disputes by carefully crafting its rules to avoid opportunities for gamesmanship.<sup>9</sup>

---

<sup>7</sup> *Id.* at 570. *See also id.* at 563 (“[T]he Commission is obligated to establish unbundling criteria that are at least aimed at tracking relevant market characteristics and capturing significant variation.”).

<sup>8</sup> It has been previously noted that some of the “business plans” described by CLECs would have no chance of succeeding no matter what the price of special access circuits. AT&T, for example, claims that it will not construct any facilities until after it has received a firm order for service from a customer, and then only construct such facilities as can be used to serve that customer. Another carrier claims that over 90% of its input costs for the service it provides are special access charges, a fact which, if true, would describe a business with no marketing and management at all.

<sup>9</sup> Qwest attached its proposed rule language as Attachment A to its November 10, 2004 *ex parte* letter.

## II. The Commission Should Revise Its Service Eligibility Criteria To Prevent The Use Of UNEs Solely To Provide Services For Which CLECs Are Not Impaired

Since the vast majority of special access circuits are used for interexchange services, the “no conversions” rule discussed above will prevent the conversion of special access services to UNEs solely to provide those services. No matter how else the Commission views its obligations under *USTA II*, it cannot permit carriers to demand special access circuits at UNE prices for long distance service and exchange access service. In the event the Commission fails to adopt such a rule, it must at a minimum ensure that the impairment rules are not completely bypassed by the use of UNE special access circuits to provide long distance service. In this regard, it must at the very least revise the service eligibility criteria adopted in the *Triennial Review Order* to prevent the use of UNEs solely to provide services, such as long distance voice and interexchange data services, for which requesting carriers undoubtedly are not impaired. Qwest proposes the following three changes to the service eligibility criteria to limit the availability of UNEs to requesting carriers that will use them to provide local services: (1) apply the service eligibility criteria to stand-alone DS1 and DS3 loops, as well as DS1 and DS3 EELs and commingled DS1 and DS3 loop-transport circuits; (2) require the requesting carrier to provide limited documentation, at the time of ordering to support its certification that it meets the service eligibility criteria; and (3) strengthen the self-certification requirements for conversions of existing special access circuits to UNEs. These changes would be applied in addition to the existing architectural safeguards in the Commission’s service eligibility rules.

As an initial matter, there can be no question that requesting carriers are not impaired in their ability to provide interexchange services without access to UNEs. The Commission recognized this fact in the *Triennial Review Order* when it defined long distance voice service and data services provided on an interexchange basis as “nonqualifying” services.<sup>10</sup> Although the *USTA II* court disagreed with the legal rationale underlying the qualifying/nonqualifying distinction, it recognized that proper application of the impairment test would very likely minimize the impact of its decision, and did not preclude the Commission from finding that requesting carriers are not impaired without access to UNEs for these services. On the contrary, the court stated that in light of robust competition in the long distance market, the Commission may well find no impairment with reference to long distance service.<sup>11</sup> The court noted that the CLECs had “pointed to no evidence suggesting that they are impaired with respect to the provision of long distance services,” and they “cannot generally be said to be impaired by having to purchase special access services from ILECs, rather than leasing the necessary facilities at UNE rates, where robust competition in the relevant markets belies any suggestion that the lack of unbundling makes entry uneconomic.”<sup>12</sup>

The following three modifications to the service eligibility criteria would align those requirements more closely with the Commission’s goal of limiting the availability of UNEs to

---

<sup>10</sup> *Triennial Review Order*, 18 FCC Rcd at 17070-71 ¶ 140 n.466.

<sup>11</sup> *USTA II*, 359 F.3d at 592.

<sup>12</sup> *Id.*

the provision of local exchange and other services traditionally within the exclusive or primary domain of the ILECs.

**A. The Commission Should Apply The Service Eligibility Criteria To All DS1 And DS3 Loops**

The Commission should extend the service eligibility criteria to stand-alone DS1 and DS3 loops, as well as EELs and commingled loop-transport circuits. In the *Triennial Review Order*, the Commission held that a requesting carrier seeking access to a UNE must provide a “qualifying service,” such as local exchange service, to the customer in order to obtain unbundled access to that facility. However, the Commission did not impose the service eligibility requirements on access to UNEs other than high-capacity EELs, based on a finding that the record did not “indicate concern over misuse of voice-grade UNE loops, high-capacity loops, or other UNEs.”<sup>13</sup> The Commission concluded that it need not provide more detailed eligibility rules for high-capacity loops and other UNEs and combinations at that time, “given the lack of controversy and the greater administrative burdens that enforcing such protections places on requesting carriers, incumbent LECs, and the Commission. Should there become an apparent need in the future, however, to guard against access to other parts of the network for the provision of non-qualifying services, we would revisit this decision.”<sup>14</sup> The time has come for the Commission to do so.

Since the *Triennial Review Order*, Qwest has experienced conversions, and requests for conversions, of thousands of special access channel terminations to UNE loops, which would result in the re-pricing of these circuits at TELRIC and, consequently, a significant loss of revenues for Qwest. Qwest suspects that at least some of these loops are not being used to provide local voices services, and would not meet the service eligibility criteria, but has no way to verify that is the case. As more of Qwest’s interconnection agreements are modified to replace the “local usage” requirements with the more permissive service eligibility criteria, Qwest potentially could see huge numbers of conversions of special access channel terminations. These conversions may be hastened by ongoing efforts by CLECs to arbitrage the difference in price between channel terminations and UNE loops. CLECs have interpreted the *Triennial Review Order* as allowing them to purchase UNE loops (connected to their own interoffice transport) solely to provide “access services” to interexchange carriers (“IXCs”) to originate and/or terminate their long distance traffic. Thus, an IXC is able to buy indirectly (through an intermediary CLEC) what it cannot buy directly, at a price somewhere between a UNE and special access service. It is unlikely that the Commission intended for its rules to promote such arbitrage.

The very substantial revenues at issue vastly outweigh any additional administrative burdens that would result from applying the service eligibility requirements to stand-alone DS1 and DS3 loops. In fact, these requirements should impose little additional administrative burden on requesting carriers and ILECs, since they already are required to have systems in place to

---

<sup>13</sup> *Triennial Review Order*, 18 FCC Rcd at 17351-52 ¶ 592.

<sup>14</sup> *Id.* (footnote omitted).

comply with the service eligibility criteria for DS1 and DS3 EELs and commingled circuits. For these reasons, the Commission should extend the service eligibility requirements to stand-alone DS1 and DS3 loops.

**B. The Commission Should Require Requesting Carriers To Provide Certain Minimal Documentation, At The Time Of Ordering, To Verify That The Carriers Satisfy The Service Eligibility Requirements**

The Commission should also require carriers to provide certain minimal documentation at the time of ordering, to support their certification of compliance with the service eligibility requirements. In the *Triennial Review Order*, the Commission relied exclusively on self-certifications and post-provisioning audits to enforce the service eligibility requirements. While the Commission required requesting carriers to maintain appropriate documentation to support their certifications,<sup>15</sup> it did not require requesting carriers to provide any documentation to the ILEC at the time of ordering.<sup>16</sup>

This omission dramatically undermines the effectiveness of the audit provision. It must be remembered that the requesting carrier is the one in possession of the data that shows whether the service eligibility safeguards have been met and whether the circuit is in fact carrying local traffic. Without the requested documentation, an ILEC has little ability to determine whether an audit is warranted. For example, if a requesting carrier does not disclose the phone number assigned to a circuit, how can the ILEC verify there actually is a phone number assigned to the circuit? Without cable facility assignment (“CFA”) information, how can the ILEC determine whether a circuit actually terminates in a collocation arrangement? In the absence of interconnection trunk and switch identification numbers, how can the ILEC confirm that the requesting carrier is in compliance with those related requirements? If the ILEC cannot verify compliance with each of the service eligibility requirements, one of two things will occur: ILECs will engage in “blind” audits that result in unnecessary costs on the requesting carrier and ultimately the ILEC, or, alternatively, ILECs will not engage in audits even when an audit would be warranted. This latter scenario, which is the most likely outcome, threatens to eliminate any deterrence effect from the possibility of a future audit in preventing requesting carriers from falsely certifying compliance with the service eligibility requirements. In the absence of such deterrence, the self-certification requirements are completely toothless.

Qwest proposes that the Commission require requesting carriers to provide the following documentation at the time of ordering a UNE or combination of UNEs that is subject to the service eligibility requirements:

- The CLLI code, or other appropriate identifying information, of the “switch capable of switching local voice traffic” that serves the circuit;

---

<sup>15</sup> *Id.* at 17370-71 ¶ 629.

<sup>16</sup> *Id.*

- Each of the telephone numbers assigned to the circuit and evidence that each circuit has 911 capability;
- Information, such as CFA, identifying the collocation arrangement to which the circuit terminates; and
- The “A” and “Z” location of the local interconnection trunks and an appropriate identifier for the interconnection trunk group.

This list represents a revision and update of the documentation requirements the Commission considered in the *Triennial Review* proceeding. Qwest has modified the previously-considered requirements to account for “variation in telecommunications systems and technology, and . . . provide flexibility to competitive LECs in establishing the most efficient architectural arrangements to provide local voice service,” which were the sole grounds for the Commission’s rejection of documentation requirements in the *Triennial Review Order*.

### **C. The Commission Should Strengthen The Self-Certification Requirements For Conversions Of Existing Special Access Circuits To UNEs**

For conversions of existing special access circuits to UNEs, the Commission should adopt a stronger certification requirement to ensure the UNEs will be used to provide local services. In particular, the Commission should require an officer of the requesting carrier to certify either that: (1) it complies with the “local usage” requirements adopted in the *Supplemental Order Clarification*,<sup>17</sup> or (2) it meets the alternative requirements identified below. This certification requirement would be in addition to the existing certification requirements in the Commission’s service eligibility rules.

“Local Usage” Test. In the *Supplemental Order Clarification*, the Commission specified three different sets of circumstances that would serve as safe harbors for demonstrating that a requesting carrier is providing a significant amount of local exchange service to a particular customer and therefore is entitled to purchase an EEL:

- (1) the requesting carrier certifies it is the exclusive provider of an end user’s local exchange service;
- (2) the requesting carrier certifies that it provides local exchange and exchange access service to the end-user customer’s premises and handles at least one-third of the end-user customer’s local traffic as measured as a percent of total end-user dialtone lines; for DS1 circuits and above, at least 50 percent of the activated channels on the loop portion of the loop-transport combination have at least 5 percent local voice traffic individually, and the entire loop facility has at least 10 percent local voice traffic; or

---

<sup>17</sup> *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Supplemental Order Clarification, 15 FCC Rcd 9587 (2000), *aff’d sub nom. CompTel v. FCC*, 309 F.3d 8 (D.C. Cir. 2002) (“*Supplemental Order Clarification*”).

(3) the requesting carrier certifies that at least 50 percent of the activated channels on a circuit are used to provide originating and terminating local dialtone service and at least 50 percent of the traffic on each of these channels is local voice traffic and the entire loop facility has at least 33 percent local voice traffic.<sup>18</sup>

For purposes of these safeguards, local voice traffic would include voice traffic carried as Voice Over Internet Protocol. Options (1) and (2) also require that the loop-transport combinations in question terminate at the requesting carrier's collocation arrangement in at least one ILEC central office. For DS1 to DS3 multiplexing, each of the individual DS1 circuits must meet these criteria.<sup>19</sup> The Commission also adopted a prohibition on the commingling of local exchange and access traffic as an additional means of preventing widespread conversion of special access circuits to UNEs.<sup>20</sup> Given the Commission's elimination of this prohibition in the *Triennial Review Order*, the Commission should require DS1 and DS3 loops, including those that are commingled, to meet the local usage criteria outlined above. These safe harbor requirements would ensure that a requesting carrier seeking to convert a special access circuit to a UNE or UNE combination will provide a significant amount of local exchange service to a customer.

Alternative Certification Requirements. In the alternative, a requesting carrier should be permitted to convert a special access circuit to a UNE (or UNE combination) if it certifies the following:

- the requesting carrier is the provider of the end user's local voice service;
- the requesting carrier will not use the UNE (or UNE combination) exclusively to provide long distance voice service and/or interexchange data service; and
- the requesting carrier is paying special access surcharges on the special access circuit pursuant to section 69.115(e)(6) of the Commission's rules.

It is reasonable to apply more stringent eligibility criteria to existing special access circuits, since many of those circuits carry little if any local traffic. In Qwest's experience, more than 65 percent of the existing special access circuits sold to carriers were purchased by traditional IXCs. Moreover, the D.C. Circuit instructed the Commission to consider the availability of special access services in its impairment test. Allowing the conversion of existing long distance special access circuits to UNE prices would be in direct violation of the Act and *USTA II*.

The first two requirements listed above would simply require the requesting carrier to certify that it will be using the UNE to provide local voice service, and not to provide exclusively long distance voice and/or interexchange data service, both of which the Commission classified

---

<sup>18</sup> *Id.* at 9603-04 ¶ 31.

<sup>19</sup> *Id.* at 9598-9600 ¶ 22.

<sup>20</sup> *Id.* at 9602 ¶ 28.

as nonqualifying services in the *Triennial Review Order* and with respect to which requesting carriers would not be impaired without access to UNEs, as recognized in the *Triennial Review Order*. The third requirement above relates to the fact that special access purchasers must pay a special access surcharge unless it certifies that the circuit cannot “leak” into the public switched telephone network. If a carrier is not paying the surcharge for an existing special access circuit, that circuit is presumptively used only for long distance service and therefore should not be eligible for conversion.

As a final matter, the Commission should also require the certification to be signed by an officer of the requesting carrier under penalty of perjury. In many contexts, the Commission has required carriers to submit certifications that the company is complying with a particular Commission rule.<sup>21</sup> Given the importance of these certifications addressed herein, the Commission should do the same here.

### **III. Conclusion**

Given the D.C. Circuit’s direction in the *USTA II* decision, the Commission cannot ignore the fact that requesting carriers seeking to convert special access services to UNEs have demonstrated a lack of impairment based on their very use of those circuits to serve the end-user customer. The Commission therefore should adopt a rule prohibiting the conversion of special access circuits to UNEs. The Commission should also extend the finding of non-impairment to all circuits used to serve a customer that is already served via special access. In addition – and particularly if the Commission allows carriers to convert special access circuits – the Commission should adopt the modifications to the service eligibility requirements discussed above in order to avoid the misuse of special access UNE circuits for interexchange voice and data services.

Sincerely,

/s/ Robert L. Connelly, Jr.

---

<sup>21</sup> For example, section 64.1310(a)(3) requires the chief financial officer of each “completing carrier” to submit quarterly to each payphone service provider (to which it pays compensation) a sworn statement that the amount tendered for that quarter is accurate and is based on 100% of all completed calls that originated from that payphone service provider’s payphones. 47 C.F.R. § 64.1310(a)(3). Similarly, section 64.1900 of the Commission’s rules requires a certification under oath by an officer of each nondominant IXC that the company is in compliance with its geographic rate averaging and rate integration obligations pursuant to section 254(g) of the Act.

Copies to:  
Christopher Libertelli ([Christopher.Libertelli@fcc.gov](mailto:Christopher.Libertelli@fcc.gov))  
Matthew Brill ([Matthew.Brill@fcc.gov](mailto:Matthew.Brill@fcc.gov))  
Scott Bergmann ([Scott.Bergmann@fcc.gov](mailto:Scott.Bergmann@fcc.gov))  
Alvaro Gonzalez ([Alvaro.Gonzalez@fcc.gov](mailto:Alvaro.Gonzalez@fcc.gov))  
Jessica Rosenworcel ([Jessica.Rosenworcel@fcc.gov](mailto:Jessica.Rosenworcel@fcc.gov))  
John Stanley ([John.Stanley@fcc.gov](mailto:John.Stanley@fcc.gov))  
Christopher Killion ([Christopher.Killion@fcc.gov](mailto:Christopher.Killion@fcc.gov))  
Jeffrey Carlisle ([Jeffrey.Carlisle@fcc.gov](mailto:Jeffrey.Carlisle@fcc.gov))  
Michelle Carey ([Michelle.Carey@fcc.gov](mailto:Michelle.Carey@fcc.gov))  
Thomas Navin ([Thomas.Navin@fcc.gov](mailto:Thomas.Navin@fcc.gov))