

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

|  |   |                     |
|--|---|---------------------|
| In the Matter of                         | ) |                     |
|  | ) |                     |
| Sandwich Isles Communications, Inc.      | ) | CC Docket No. 96-45 |
|  | ) |                     |
| Petition for Waiver of the Definition of | ) |                     |
| “Study Area” Contained in Part 36,       | ) |                     |
| Appendix-Glossary and Sections 36.611,   | ) |                     |
| And 69.2(hh) of the Commission’s         | ) |                     |
| Rules                                    | ) |                     |

**COMMENTS OF VERIZON<sup>1</sup>**

The Commission already has made findings regarding the relevant facts at issue in this petition; therefore, Verizon will not revisit them here.<sup>2</sup> However, it files these comments to encourage the Commission to ensure that any order on the waiver request set forth in the instant petition be specifically limited to the facts of this case. Verizon and other commenters have set forth a number of issues that need to be addressed in the context of broader rulemaking proceedings. Specifically:

- Universal service funding should be focused on meeting the goals of the Act – access to quality telecommunications service for all Americans at reasonably comparable and affordable rates;<sup>3</sup>

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<sup>1</sup> The Verizon telephone companies (“Verizon”) are the local exchange carriers affiliated with Verizon Communications Inc., and are listed in Attachment A.

<sup>2</sup> See *GTE Hawaiian Telephone Company, Inc., Application for Review of a Decision by the Common Carrier Bureau*, Memorandum Opinion and Order, 19 FCC Rcd 22268, ¶¶ 5, 9 (2004).

<sup>3</sup> *Verizon Reply Comments*, CC Docket No. 96-45, at 4-7 (filed Sept. 21, 2004) (“*Verizon Portability Reply*”).

- In order to ensure that telecommunications service remains “affordable” for all consumers, the Commission should take action to control growth of the universal service fund;<sup>4</sup>
- The rules regarding universal service support, and particularly the portability of such support, should be designed in such a way as to not create artificial incentives for non-economic investment.<sup>5</sup>

These principles, and many others, must be balanced and debated in the context of notice and comment proceedings, not in response to individual petitions.

Respectfully submitted,



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<sup>4</sup> See, e.g., *Verizon Comments*, CC Docket No. 96-45, at 3-9 (filed Aug. 6, 2004); *Verizon Portability Reply*, at 9-14.

<sup>5</sup> See, e.g., *Verizon Portability Reply*, at 12-14.

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States  
GTE Southwest Incorporated d/b/a Verizon Southwest  
The Micronesian Telecommunications Corporation  
Verizon California Inc.  
Verizon Delaware Inc.  
Verizon Florida Inc.  
Verizon Hawaii Inc.  
Verizon Maryland Inc.  
Verizon New England Inc.  
Verizon New Jersey Inc.  
Verizon New York Inc.  
Verizon North Inc.  
Verizon Northwest Inc.  
Verizon Pennsylvania Inc.  
Verizon South Inc.  
Verizon Virginia Inc.  
Verizon Washington, DC Inc.  
Verizon West Coast Inc.  
Verizon West Virginia Inc.