



Curtis
TELEPHONE CO.

102 CENTER AV. - P.O. BOX 8
CURTIS, NE 69025-0008
308-367-4151

June 10, 2005

VIA ELECTRONIC FILING

Marlene V. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Developing a Unified Intercarrier Compensation Regime, CC
Docket No. 01-92.**

Dear Ms. Dortch,

The purpose of this letter is to express Curtis Telephony Company's support for the guiding principles outlined by the Rural Alliance in its comments in CC Docket No. 01-92, *In the Matter of Developing a Unified Intercarrier Compensation Regime*, filed with the Commission on May 23, 2005.

The Rural Alliance principles are:

- Intercarrier compensation rates should be uniform and cost-based.
- Existing interconnection rules should be clarified consistent with statute.
- Retail service providers should pay for their network-usage.
- Transiting service should be cost-based and available under just and reasonable conditions.
- Local benchmark rates should be imputed in revenue replacement funds.
- Revenue replacement payments should be based on net revenue losses.
- Universal Service collections should be derived from the broadest possible contributor base.
- Infrastructure-based Universal Service and IP interconnection oversight are necessary.

Curtis Telephone Company is a small telephone company based in Curtis, Nebraska serving 783 access lines over an area of 416 square miles. We provide our customers with telephone service, cable television service and telecommunications hardware. The provision of service in high-cost, rural areas comes with a multitude of costs and operational differences not associated with service in other areas. These differences must be recognized in any forthcoming intercarrier compensation reforms. We believe the Rural Alliance successfully addresses these issues while still achieving the Commission's goals related to intercarrier compensation.

Curtis Telephone Company is acutely aware of the complexities associated with the telecommunications industry today. It realizes intercarrier compensation must be addressed with the interests of all parties involved. The Rural Alliance principles present the Commission with the only true opportunity to fully recognize all interested parties.

As a result of the above raised issues, Curtis Telephone Company reasserts its support for the intercarrier compensation principles articulated by the Rural Alliance. We believe the Commission should use these principles as the base of any intercarrier compensation reform plan created as a result of this docket.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ed Cole". The signature is written in a cursive style with a horizontal line underneath it.

Ed Cole
Chief Executive Officer
Curtis Telephone Company

CC:

Chairman Martin
Commissioner Copps
Commissioner Adelstein
Commissioner Abernathy
Daniel Gonzalez
Jessica Rosenworcel
Scott Bergmann
Matt Brill