

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

In the Matter of)	
)	
Fones4All Corp.)	
)	
Petition for Expedited Forbearance)	
Under 47 U.S.C. § 160(c) and Section 1.53)	WC Docket No. 05-261
from Application of Rule 51.319(d))	
To Competitive Local Exchange)	
Carriers Using Unbundled Local Switching)	
to Provide Single Line Residential)	
Service to End Users Eligible for State)	
or Federal Lifeline Service)	

REPLY COMMENTS OF COMPTTEL

COMPTTEL hereby submits these Reply Comments in support of the Fones4All Expedited Petition for Forbearance. In its Petition, Fones4All convincingly demonstrated that the policy goal it would have the Commission promote, through, grant of its Petition is the correct public policy goal for America: that consumers of telephone service through the Lifeline/Link-Up assistance programs have less options than most Americans, and thus benefit more than most Americans from competition for mass-market, circuit-switched phone service.¹ Moreover, as Fones4All notes, the customers it serves are particularly resistant to being served by duplicative facilities, or

¹ Petition at 2, 5-10.

by intermodal technologies such as VoIP.² Fones4All demonstrates that it satisfies all the criteria for forbearance under 47 U.S.C. § 160. Accordingly, the public interest would best be served by the Commission's expeditious grant of this Petition.

The Bells most common argument in opposition to this Petition is that the Petition, if granted, will not provide Fones4All the relief it requests. COMPTTEL disagrees with this analysis, and, like Fones4All, believes that a grant of this Petition would serve to reinstate UNEP availability for carriers serving Lifeline eligible customers. Moreover, many of COMPTTEL's members support this contention, but will not participate in support of Fones4All for fear of violating the bad faith terms (preventing the competitors from engaging in regulatory advocacy promoting UNEP) the Bells have inserted into their "commercial" agreements.

Regardless, though, the Bells have hardly articulated a reason to reject the Petition at hand. The Commission, in its order, can easily explain the limits, if any, of its grant of the Fones4All Petition. While COMPTTEL and Fones4All disagree with the Bells' contention, if the Bells are correct, then the Commission should immediately begin a rulemaking proceeding to expeditiously provide the limited, and socially-optimal, relief sought by Fones4All.

Respectfully submitted,

_____/s/_____

² Id. at 9, 11.

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