BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of:	)	
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	
	)	FCC 05-2711
Petition by	)	
RSA 7 Limited Partnership,	)	
Iowa 8 – Monona Limited	)	
Partnership and Iowa RSA 10	)	
General Partnership	)	

COMMENTS OF THE IOWA UTILITIES BOARD

Introduction

On September 30, 2005, RSA 7 Limited Partnership, Iowa 8 – Monona Limited Partnership and Iowa RSA 10 General Partnership ("Iowa Petitioners") filed a petition before the Federal Communications Commission ("Commission") pursuant to section 54.207 of the Commission's rules, requesting the Commission's concurrence with prior decisions of the Iowa Utilities Board ("Board") regarding each of the Iowa Petitioners' eligible telecommunications carrier ("ETC") status and their service areas for universal service purposes. On October 17, 2005, the Commission issued a public notice seeking comment on the aforementioned petition.

Discussion

The Iowa Petitioners' appropriately contend that the Board's rules[1] provide a basis for each of its decisions to designate the Iowa Petitioners as ETCs and specify their service areas as the Commission licensed service areas for cellular

service. The Iowa Petitioners' ETC applications were unopposed. The Iowa Petitioners correctly assert that the Board has complied with the Communications Act by rendering a reasoned decision for each of the ETC applicants. The Board agrees with Iowa Petitioners' conclusion that its decisions at issue here reflect a well-reasoned administrative procedure that is specific to the unique requirements and characteristics of Iowa.[2]

Overall, the Board stands behind its decision to grant ETC status to the Iowa Petitioners. The proceedings were unopposed and followed the requirements of the federal universal service rules. These Board decisions reflect the unique nature of the telecommunications industry in Iowa. The Board supports the Iowa Petitioners' request for Commission concurrence with its prior decisions granting ETC status to and specifying the service areas of the Iowa Petitioners.

October 28, 2005

Respectfully submitted,

_____/s/_____
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Telecommunications Mgr.

_____/s/_____
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[1] Iowa Administrative Code, 199 IAC 39.2(5)(c).

[2] Iowa is an agricultural state with more than 150 rural incumbent local exchange providers that predominantly serve small communities and rural areas. With consideration to the large number of rural ILECs and the administrative issues that would arise from conducting a separate redefinition proceeding for every new wireless ETC applicant, Iowa decided to craft rules that establish a safe harbor to process the uncontested ETC applications. This petition involves such uncontested ETC applications.