



UNIVERSITY OF SOUTH FLORIDA

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February 13, 2006

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Ex Parte Presentation
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Federal-State Joint Board on Universal Service, CC Docket
No. 96-45

Dear Ms. Dortch:

The University of South Florida writes this letter to offer our concerns that a number-based contribution mechanism would have a considerable detrimental effect on this institution.

We have calculated that our per-year federal universal service obligation would increase from \$18,000 per-year to over \$180,000 per-year if a number-based approach were adopted, assuming that the monthly per-number fee was \$1.00.

Our Institution does not have budget to offset this substantial increase. If implemented, the FCC's action would require difficult decisions with respect to institutional programs, including, but not limited to,

- the return of number resources over semester breaks and the elimination of number reserves earmarked for future campus priorities. The shift in policy with respect to maintaining number blocks would significantly impact campus community (and pose potential public safety concerns) with the elimination of the traditional four-digit dialing within the campus.
- the transition of budgeted funding from education and research-based programs to the telecommunications budget.
- delays in efforts to upgrade and modernize telecommunications facilities on campus, limiting our ability to invest in research networks, i.e., Internet2, and new innovative services/technologies.

We are particularly concerned with any reform that requires enterprise customers such as colleges and universities to shoulder a heavier universal service burden than they do today in comparison to residential customers. The FCC should reject any efforts to establish a residual funding mechanism under which enterprise customers are responsible for all funding above a certain per-number fee for residential customers.

We fully support the goals of universal service, and commend the FCC for their efforts to extend telecommunications services to all Americans. It is, nevertheless, essential that the Commission also address universal service distribution issues by controlling future fund growth and limiting any waste within the program. Further, the contribution factor for the universal service program has been stable for the last three quarters, which calls into question the need for immediate reform of the current revenue-based approach.

The University of South Florida asks the FCC to proceed with caution in adopting a number-based plan that does not account for the specific concerns of colleges and universities. We believe that any reform in this proceeding should not substantially disadvantage any particular class of customers, including enterprise customers in higher-education and low-volume residential customers.

USF hopes the Commission modifies its universal service policies in a manner that reflects the potential impact on colleges and universities, and suggest that no reform proposals be formally adopted by the Commission until such time as to the full impact of those proposals is studied and understood.

Respectfully submitted,



George W. Ellis
Associate Vice President
Information Technologies

Cc: Kate Nidasio