



October 12, 2006

Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re In the Matter of Federal-State Joint Board on Universal Service  
Use of Auctions to Determine High-Cost Universal Service Support  
WC Docket 05-337**

**In the Matter of Federal State Joint Board on Universal Service  
CC Docket No. 96-45**

**Comment to the Docket**

Dear Commission:

The American Association of People with Disabilities (AAPD)<sup>1</sup> appreciates the opportunity to provide comments on the proposal to use reverse auctions to determine high cost universal service funding to eligible telecommunications carriers, pursuant to the Public Notice issued by the Federal-State Joint Board on Universal Service (FCC 06J-1).

AAPD has a keen interest in ensuring the continued viability of the Universal Service Fund (USF). People with disabilities reap tremendous and empowering benefits from telecommunications services, finding opportunities for employment, health care, education and community involvement. At the same time, many Americans with disabilities live on fixed or limited incomes and are highly sensitive to fees on their phone bills, including those associated with universal service. AAPD's Board endorsed a policy resolution June 16, 2006 resolving that affordability of telecommunications is essential to the full inclusion of persons with disabilities.<sup>2</sup>

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<sup>1</sup> AAPD is the largest national nonprofit cross-disability member organization in the United States, dedicated to ensuring economic self-sufficiency and political empowerment for the more than 51 million Americans with disabilities. AAPD works in coalition with other disability organizations for the full implementation and enforcement of disability nondiscrimination laws, particularly the Americans with Disabilities Act (ADA) of 1990, the Rehabilitation Act of 1973, and other statutes.

<sup>2</sup> AAPD Policy Resolution On Telecommunications and Technology For Persons With Disabilities-- Given that telecommunications and technology are fields that are rapidly changing, and this will impact the integration of persons with disabilities in all aspects of daily living, be it resolved that: With regard to telecommunications equipment and services, accessibility and usability are critical, **and affordability is essential**, for the full inclusion of persons with disabilities; and With regard to technology, barriers to usability and availability should be removed; all technologies should incorporate the concepts of accessibility and usability in design, development, production and

On this basis, AAPD has serious concerns about proposals that would shift the contribution formula for the USF from the current “pay for what you use” fee on long-distance calls to a “numbers” or “connections” fee because of the impact such fee shifting could have on our community.

The Universal Service Fund is vital for many reasons and should be maintained and supported so that it continues to help those consumers who benefit. AAPD is intrigued by the potential of a reverse auction system as a way to control the costs of providing universal service in rural communities, while at the same ensuring the continued viability of the Fund. We commend Chairman Martin, the full Commission and the Joint Board for exploring approaches that may bring lower costs, more competition and greater innovation to the USF system, since these may result in lower consumer costs.

AAPD will continue to study the details of the proposed reverse auction system, but our initial outlook is that any approach that invites communications providers to compete for universal service subsidies by bidding for such a subsidy has the potential to inject more competition into the marketplace and that could lead to more efficient service provision resulting in less costs for consumers.

We look forward to reviewing the comments submitted by others and offering more detailed comments during the response period.

Sincerely,

*Jenifer Simpson*

Jenifer Simpson  
Senior Director, Telecommunications and Technology Policy

**American Association of People with Disabilities**

1629 K Street NW, Suite 503 • Washington, DC 20006

phone 202-457-0046 (V/TTY) • 800-840-8844 (V/TTY) • fax 202-457-0473 • [www.aapd-dc.org](http://www.aapd-dc.org)