

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

In the Matter of)	
)	
Developing a Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Missoula Intercarrier Compensation Reform Plan)	

TO: The Commission

**COMMENTS OF
THE WESTERN TELECOMMUNICATIONS ALLIANCE
REGARDING FEDERAL BENCHMARK MECHANISM**

The Western Telecommunications Alliance (“WTA”) submits its comments with respect to the Public Notice (Pleading Cycle Extended for Comment on Amendments to the *Missoula Intercarrier Compensation Proposal to Incorporate a Federal Benchmark Mechanism*), CC Docket No. 01-92, DA 07-1337, released March 16, 2007.

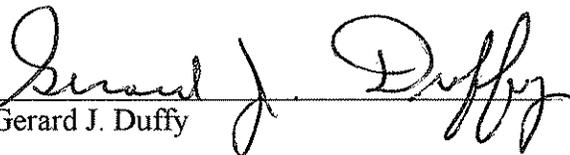
In its October 25, 2006 comments in this proceeding, WTA supported the basic approach and framework of the Missoula Plan. It applauded the efforts of the National Association of Regulatory Utilities Commissioners (“NARUC”) Task Force on Intercarrier Compensation (“NTFIC”) and of representatives of large and small carriers (including Regional Bell Operating Companies, mid-sized local exchange carriers, rural telephone companies, long distance toll service providers, competitive local exchange carriers and wireless carriers) to develop a broad-based industry proposal for intercarrier compensation reform. WTA noted that negotiation of the Missoula Plan was continuing, and that it might comment in the future upon additions, deletions and modifications to various proposals.

The Federal Benchmark Mechanism (“FBM”), which was proposed by the Missoula Plan Supporters and the Indiana, Maine, Nebraska, Vermont and Wyoming commissions on January 30, 2007, is one such additional proposal for which WTA wishes to indicate its support. As WTA understands it, the proposed FBM addresses the complexities and equities of the fact that some states (“early adopter states”) have already substantially reduced intrastate access charges by shifting cost recovery to increased local service rates, state universal service funds and/or other mechanisms. The FBM includes: (a) Category A Funding, which will replace some or all of the potential Missoula Plan subscriber line charge (“SLC”) increase in states where cost recovery has already been shifted from interstate access rates to end user charges; (b) Category B Funding, which will be used to provide intrastate universal service contribution relief and interstate SLC reductions in states with residential service rates that are significantly higher than the national average; (c) Category C Funding, which will be used to reduce contributions to explicit state universal service funds; and (d) a Low Rate Adjustment, which will reduce reliance on the proposed Restructure Mechanism in states that have not had significant “early adopter” activity.

WTA supports the FBM as a reasonable and equitable attempt to recognize that states which have previously restructured or rebalanced intrastate access rates are in a different position vis-à-vis the Missoula Plan proposals than states which have not yet done so. The FBM has been developed and designed to minimize any potential adverse impacts of the Missoula Plan upon end users and carriers in the early adopter states. In addition, by attempting to reduce the differences between the combined local service rates and SLCs paid by end users in the various states, the FBM will enhance state-by-state comparability of the rates paid by consumers throughout the nation.

Whereas neither WTA nor any other interested party may be pleased with each and every provision thereof, the Missoula Plan, as modified by the FBM, constitutes an intricate and workable compromise among a broad cross-section of affected carriers that addresses many of the problems of interconnection and intercarrier compensation in both the existing and future telecommunications industry. On balance, WTA continues to believe that this broad-based industry compromise should be adopted and implemented by the Commission.

Respectfully submitted,
WESTERN TELECOMMUNICATIONS ALLIANCE

By 
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