

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
High-Cost Universal Service Support) CC Docket No. 96-45
Federal-State Joint Board on Universal Service) WC Docket No. 05-337

**REPLY COMMENTS OF QWEST
COMMUNICATIONS INTERNATIONAL INC.**

Qwest Communications International Inc. (“Qwest”) files these reply comments in accord with the Federal Communications Commission’s (“Commission”) *Notice of Proposed Rulemaking*¹ (“Notice”) seeking comment on the Federal-State Joint Board on Universal Service’s (“Joint Board”) recent recommendation to impose an interim cap on the amount of high-cost support that competitive eligible telecommunications carriers (“CETCs”) may receive. Qwest supports the Joint Board’s recommendation.

The Joint Board recommends that the Commission place an interim emergency cap on the amount of high-cost support that all CETCs may receive for each state based on the average level of CETC support distributed in that state in 2006. The cap would apply to all of the seven existing high-cost support mechanisms. The Joint Board intends that the cap would be an interim mechanism to stop growth in CETC support until more comprehensive reform measures can be put in place. As proposed, the cap would expire one year after any Joint Board recommended decision for comprehensive reform, which the Joint Board commits to provide by November 1, 2007.

The Joint Board recognizes that the imposition of the interim cap will not address the current disproportionate distribution of CETC support among the states. The Joint Board

¹ *In the Matter of High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, Notice of Proposed Rulemaking, WC Docket No. 05-337, CC Docket No. 96-45, FCC 07-88 (May 14, 2007); 72 Fed. Reg. 28936 (May 23, 2007); *see also* Order, DA 07-2565 (June 12, 2007).

proposes limiting the cap to support for CETCs, as opposed to placing the cap on high-cost support to all ETCs, because data suggest that high-cost support to incumbent local exchange carriers (“ILECs”) has not been a significant cause of growth of the fund. The Joint Board recommends against limiting the cap to just wireless CETCs as that would be an exemption based on technology, not legal status.

Qwest is in favor of the Joint Board’s recommendation. Qwest has long advocated that the size of the high-cost fund must be contained. There is clear data that high-cost support to CETCs has been the primary cause of the significant growth of the high-cost support fund in recent years. The cap proposed by the Joint Board would be an effective interim measure for containing the size of the high-cost universal service fund until more comprehensive, longer-term reform can be put in place.

The Joint Board and the Commission need to accomplish comprehensive reform of the high-cost fund and the universal service program as a whole as soon as possible. Thus, Qwest appreciates the Joint Board’s commitment to have further recommendations on long-term, comprehensive high-cost universal service reform not later than November 1st of this year.

Respectfully submitted,

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June 21, 2007

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **REPLY COMMENTS OF QWEST COMMUNICATIONS INTERNATIONAL INC.** to be 1) filed with the FCC via its Electronic Comment Filing System in WC Docket No. 05-337 and CC Docket No. 96-45; 2) served via e-mail on Ms. Antoinette Stevens, Telecommunications Access Policy Division , Wireline Competition Bureau at Antoinette.Stevens@fcc.gov; 3) served via e-mail on the FCC's duplicating contractor Best Copy and Printing, Inc. at fcc@bcpiweb.com; and 4) served via First Class United States Mail, postage prepaid, on the parties listed on the attached service list.

/s/Richard Grozier

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