

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

In the Matter of)
)
Federal-State Joint Board on)
Universal Service; Promoting Deployment) CC Docket No. 96-45
And Subscribership in Unserved and)
Underserved Areas, Including)
“Near Reservation” Areas)

REPLY COMMENTS OF VERIZON¹

The Wireline Competition Bureau seeks to refresh the record regarding a potential expansion of Lifeline and Link-Up eligibility on tribal lands to “near reservation” areas.² The National Telecommunications Cooperative Association (“NTCA”) opposes such an expansion and was the only party to file initial comments.³ The Commission last sought comment on this universal service issue in 2003.⁴ The Commission’s 2003 *Further Notice* followed its 2000 order staying application of new Lifeline and Link-Up regulations that would expand program

¹ The Verizon companies participating in this filing are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

² *Wireline Competition Bureau Seeks Additional Comment on Promoting Deployment and Subscribership in Underserved Areas, Including “Near Reservation” Areas*, 22 FCC Rcd 4862 (2007).

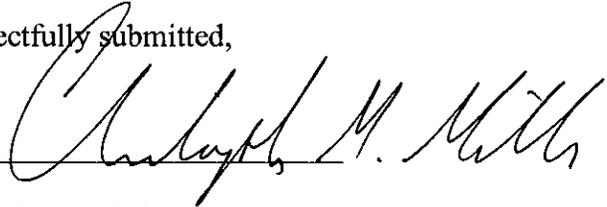
³ Comments of NTCA, CC Docket No. 96-45 (Aug. 6, 2007).

⁴ *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, Twenty-Fifth Order on Reconsideration, Report and Order, and Further Notice of Proposed Rulemaking, 18 FCC Rcd 10958 (2003) (“*Twenty-Fifth Report and Order*” or “*Further Notice*”).

eligibility to “near reservation” areas.⁵ Shortly after adopting the enhanced Lifeline and Link-Up regulations the Commission stayed application of the rules because it was determined that no definition of the term “near reservation” was workable. *Id.* Nothing has changed. No party has come forward with a viable way to define “near reservation” that would avoid inclusion of “wide geographic areas that do not possess the same characteristics that warrant the targeting of [Lifeline and Link-Up] support to reservations.” *Twenty-Fifth Report and Order* at ¶33. In addition, no party has identified factors that would justify treating “near reservation” areas different than other low income areas that do not receive enhanced Lifeline and Link-Up support, nor has the cost of expanding Lifeline and Link-Up to “near reservation” areas today been quantified.

For these reasons, the Commission should continue to apply the *Tribal Stay Order*, and Lifeline and Link-Up eligibility on tribal lands should not be expanded to include “near reservation” areas.

Respectfully submitted,

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⁵ *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, 15 FCC Rcd 17112 (2000) (“*Tribal Stay Order*”).