



**INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE**

Honorable Ray Baum  
Oregon Public Utilities Commission  
550 Capitol Street, NE, Suite 215  
PO Box 2148  
Salem, Oregon 97308

Honorable Deborah Taylor Tate  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

October 25, 2007

**Re: Federal-State Joint Board on Universal Service  
High Cost Universal Service Support  
CC Docket No. 96-45  
WC Docket No. 05-337**

Dear Commissioner Baum and Commissioner Tate:

The Independent Telephone & Telecommunications Alliance (ITTA) takes this opportunity to elaborate on positions set forth in its filed comments in the above-referenced proceedings. ITTA represents mid-sized carriers that collectively serve 13 million customers in 43 states, and is an active participant in the docket.

In an *ex parte* filing, General Communication, Inc. (GCI) has suggested that tribal lands and Alaska Native Regions be excluded from the proposed interim cap on support to competitive eligible telecommunications carriers (CETCs). See, *ex parte* filing of GCI, September 25, 2007. While ITTA is sensitive to the special needs of Alaska and tribal areas, ITTA submits that the GCI proposal does not appear to contemplate a fundamental element of the CETC structure.

Specifically, by definition a CETC exists in an area already served by another carrier. Therefore, imposition of a temporary cap will not visit upon Alaska or tribal areas either a decrease or cessation of telephone service. Rather, the proposed interim cap is a rational measure intended to bring stability to the Fund while long-term modifications are developed and adopted. The proposal is rational because it addresses the issue of multiple carriers receiving support in an area that is unable to support economically a single carrier.

ITTA urges the FCC to adopt the proposed interim cap and looks forward to working with the Joint Board as long-term solutions are developed and implemented.

Sincerely,

*s/ Joshua Seidemann*  
Joshua Seidemann  
Director, Regulatory Policy