



N A R U C
National Association of Regulatory Utility Commissioners

December 21, 2007

NOTICE OF WRITTEN EX PARTE CONTACTS

Chairman Kevin Martin
Commissioner Michael Copps
Commissioner Jonathan Adelstein
Commissioner Deborah Tate
Commissioner Robert McDowell
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

Re: NARUC Request for the FCC to Expediently Seek Comment on the November 20, 2007 released Federal State Joint Board on Universal Service's Recommended Decision.

Ex Parte Notice filed electronically in the proceeding captioned: In the Matter of High Cost Universal Service Support, WC Docket No. 05-337, and Federal State Joint Board on Universal Service, CC Docket No. 96-45.

Commissioners,

On November 20, 2007, after months of conference calls under the able leadership of Federal Joint Board Chairman Tate and the assistance of State Chairman Oregon Commissioner Ray Baum, the Board members kept their promise to provide a more comprehensive reform recommendation for the federal high cost universal service program before the end of the year.

It is clear from the separate statements attached to the Recommended Decision, that all Board members recognize that there is some urgency to (and a statutorily constrained time frame for) completing the process.

47 U.S.C. § 410(c) indicates Congress's desire that any joint board's recommended decisions be presented for "prompt review and action" by the FCC. 47 U.S.C. § 254(a) goes even further, specifying that, in the case of the Universal Service Joint Board, the FCC "shall complete any proceeding to implement subsequent recommendations from any joint board on universal service within one year after receiving such recommendations."

While NARUC has not taken a position on the specific elements contained in the Recommended Decision, we do understand that eleven months is, in administrative terms, a relatively short window for the FCC to “complete any proceeding to implement” the Board’s recommendations. Accordingly, NARUC respectfully requests the FCC expeditiously seek comment on the Recommended Decision. All parties, including consumers, the industry and state and federal policy makers will benefit from having a fully developed record on these critical issues.

Please do not hesitate to contact Brad Ramsay at 202.898.2207 or jramsay@naruc.org if you have any questions about this letter or any other NARUC position.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Clark". The signature is fluid and cursive, with the first name "Tony" and last name "Clark" clearly distinguishable.

Tony Clark
Chair
NARUC Committee on Telecommunications