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April 24, 2008

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th St., S.W.
Room TW-A325
Washington, D.C. 20554

**Re: In the Matter of: Nomination for Universal Service Administrative Company
Board of Directors, CC Docket Nos. 97-21 and 96-45.**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of March 24, 2008, DA 08-668, the Rural Independent Competitive Alliance ("RICA") nominates R. Paul Waits for appointment as the member of the Board of Directors of the Universal Service Administrative Company ("USAC") representing competitive local exchange carriers.

Mr. Waits, is a member of the RICA Board of Directors, and currently serves as the organization's Chairman. Mr. Waits is also the President of Ritter Communications Holdings, Inc. in Jonesboro, Arkansas where he is responsible for all communications businesses and business units affiliated with E. Ritter & Co., including its competitive local exchange carrier ("CLEC") operations.

As shown in detail on the attached resume, Mr. Waits has not only had extensive experience in operating telecommunications business, but also has been deeply involved in regulatory and policy issues in industry positions. Mr. Waits has also served as a regulator and Joint Board staff member. This broad experience makes him exceptionally well qualified to provide guidance to USAC as a Board member during a period of potentially significant change.

Since the inception of USAC, the CLEC Board Member position has been held by a representative of large and urban CLECs. The most recent Board Member representing competitive local exchange carriers concurrently held the position of Senior Vice President for Regulatory Affairs of Comptel, an industry association whose members are primarily competitive carriers serving more urban areas in contrast to RICA's membership.

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
Page 2

RICA is a national association of CLECs whose members are primarily facilities based providers that have brought substantial improvements in telecommunications services to remote, high cost rural areas long neglected by the large incumbents which historically served these areas. The large per subscriber capital investments required to provide the supported services necessitates effective and efficient administration of the Universal Service support mechanisms. Mr. Waits' significant involvement in rural telecommunications and his position as a member of the RICA Board make him ideally suited to contribute substantially as a member of the USAC Board.

Please contact me with any questions regarding this nomination.

Respectfully submitted,

The Rural Independent Competitive Alliance

By Stephen G. Kraskin
Stephen G. Kraskin
Its Attorney

Tecora Sollers, Office of the Managing Director

Attachment



PAUL WAITS – BIOGRAPHICAL AND PROFESSIONAL INFORMATION

CONTACT INFORMATION

Paul Waits, President
Ritter Communications Holdings, Inc.
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Jonesboro, AR 72404
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Paul Waits is President of Ritter Communications Holdings, Inc., and presently chairman of the board of the Rural Independent Competitive Alliance (RICA). Ritter Communications, headquartered in Jonesboro, Arkansas, is a diversified telecommunications holding company, operating ILEC, CLEC, ISP, cable TV and wireless services in Northeast and North central Arkansas. Paul is a twenty-four year veteran of the telecommunications industry, having served in executive management, regulatory & legislative advocacy, strategic planning, marketing and new business development.

Mr. Waits' diverse experience includes the management of rural telephone operations, as well as assisting large, urban companies improve their marketing practices and processes. He has presented testimony in numerous regulatory and legislative forums, as well as assisted companies with product development and strategic planning. More recently, he built a CLEC into a profitable operation, and is currently leading Ritter through the acquisition and assimilation of traditional cable TV operations, as well as business expansion utilizing IP technologies and integrated services.

Throughout his career, Paul has served on various government, industry and civic boards and associations, and has been involved in the formulation and implementation of universal service policies. For example, as Manager of the Telecommunications Section of the Arkansas Public Service Commission in the mid-1980s, during a time that the industry was being restructured in response to the Divestiture of A.T.&T, he served on the NARUC Staff Subcommittee on Telecommunications, as well as the Federal-State Joint Board Staff. Later as an industry advocate, he was involved in the creation and advocacy of the Federal Telecommunications Reform Act of 1996, as well as the companion Arkansas Telecommunications Reform Act of 1997.

Currently, Mr. Waits serves as Chairman of the Board of the Rural Independent Competitive Alliance (RICA), which is a national trade association of independent telephone companies that are proactively engaged in competitive activities such as CLEC, video and/or wireless. He also serves on the board of directors and executive committee of the Jonesboro Chamber of Commerce, as well as on the board of directors of the Jonesboro Church Health Center and of Connect Arkansas, a recently-formed, statewide organization to promote universal broadband connectivity. Previously, he served on the Highland School Board, and the Foundation Board of Ozarka Technical College. He is a graduate of Hendrix College, and lives in Jonesboro with his wife, Ann. They have a daughter and two grandchildren in Fort Smith, Arkansas.