

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Request for Review by AT&T Inc. of)	WC Docket No. 03-109
Decision of Universal Service)	
Administrator)	

COMMENTS OF SPRINT NEXTEL CORPORATION

Sprint Nextel Corporation, in response to the Public Notice released April 14, 2008 (DA 08-855), hereby respectfully submits its comments in support of AT&T's above-captioned request for review. In its petition, AT&T seeks review of a finding by the Universal Service Administrative Company (USAC) that an eligible telecommunications carrier (ETC) must use Line 9 of FCC Form 497 if the ETC gains or loses Lifeline customers mid-month, regardless of whether the ETC seeks partial or pro-rata Lifeline support from USAC.

Sprint Nextel agrees with AT&T that ETCs should not be required to use Line 9, because reporting of mid-month Lifeline subscriber additions and subtractions for USF reporting purposes is optional, not mandatory, under the Commission's rules, and because tracking these mid-month changes is an administrative burden whose costs outweigh the benefits. As AT&T correctly explained (AT&T Request, p. 4), the Form 497 currently in effect allows,¹ not requires, ETCs to report partial-month Lifeline counts; the proposed revision to Form 497 that would have required ETCs to report

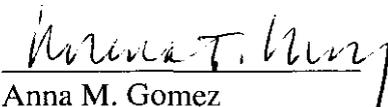
¹ The instructions to the effective Form 497 state that Line 9 must be checked "*if*" (emphasis added) the ETC is claiming partial or pro-rata dollars.

partial-month Lifeline subscribers has never been implemented and thus cannot be cited as justification for mandatory partial-month reporting.

Rather than trying to manage pro-rata Lifeline support, this support should be based on Lifeline subscriber counts as of a date certain (*e.g.*, the last day of each quarter). This approach is consistent with the high-cost USF program (which is more than five times larger in dollar terms than is the Lifeline program), which requires ETCs to submit quarterly line counts as of the last day of each quarter, and which does not issue partial-month support. Using end-of-quarter Lifeline counts is administratively efficient for both ETCs (which would not have to track mid-month fluctuations) and USAC (which would not have to compute pro-rata Lifeline support payments), and could potentially reduce the number of revisions and true-ups. There is nothing to suggest that any ETC would earn a windfall by using end-of-period Lifeline subscriber counts for USF reporting purposes, or that the overall impact of this approach would have a material impact on Lifeline fund size.

Respectfully submitted,

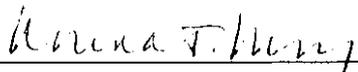
SPRINT NEXTEL CORPORATION


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May 14, 2008

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing comments of Sprint Nextel Corp. was filed electronically or via US Mail on this 14th day of May 2008 to the parties listed below.



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