



MINNESOTA
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ALLIANCE

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October 23, 2008

FILED VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

RE: *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92
Intercarrier Compensation for ISP-Bound Traffic, CC Docket No. 99-68
High-Cost Universal Service Support, WC Docket No. 05-337
Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

The Minnesota Telecom Alliance ("MTA")¹ makes this filing on behalf of its members, joining in with many other telecommunications industry representatives whom have already voiced serious concerns regarding the impact of the pending draft FCC order that addresses critical intercarrier compensation issues and universal service reform. The MTA, in particular, concurs with the comments filed October 22, 2008 by the Minnesota Independent Coalition, which outline significant areas of concern shared by the MTA membership.²

Predictably, a plan designed and promoted by primarily urban carriers does not address the challenges faced by the many carriers serving a diverse population and geographic base. The MTA's membership ranges from very small incumbent carriers serving entirely rural areas to competitive carriers operating in Minnesota's cities. Their costs of providing service, and the costs they will incur to upgrade their networks to support broadband services, differ greatly from those of AT&T and Verizon. Inevitably, even the costs incurred and expected for upgrades by the different members of the MTA are varied.

¹ The MTA is an alliance with over 400 members formed by and advocating the interests of Minnesota's telecommunications industry.

² Letter filing by Minnesota Independent Coalition, CC Docket No. 01-92; CC Docket 99-68; WC Docket 05-337; CC Docket 9645 (October 22, 2008).

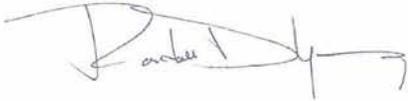
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The AT&T and Verizon plan lacks the flexibility necessary to effectively take these differences into account. While very large carriers serving primarily an urban base of customers may benefit from a single, nationwide rate set at \$0.0007 per minute of use, this rate is below cost levels incurred by many carriers providing service to rural areas and to small to mid-size communities in Minnesota.

The MTA agrees that intercarrier compensation is in need of reform, but encourages the FCC to reject a "one size fits all" approach. The MTA encourages adoption of a plan that provides for flexibility, in recognition of the diversity between carriers, and that addresses the unique circumstances of consumers in rural and small communities and the carriers that serve them.

Respectfully submitted,

MINNESOTA TELECOM ALLIANCE

A handwritten signature in black ink, appearing to read "Randall D. Young", written over a horizontal line.

By: Randall D. Young
Its President