



Public Service Commission of Wisconsin

Eric Callisto, Chairperson
Mark Meyer, Commissioner
Lauren Azar, Commissioner

610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

October 27, 2008

Mr. Kevin J. Martin, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Reforms of Intercarrier Compensation and the Universal Service Fund

Dear Chairman Martin:

I am writing to support and echo the comments submitted to you on October 21, 2008, by several other state regulatory commissioners through the National Association of Regulatory Utility Commissions (NARUC). The Federal Communications Commission (FCC) is expected to consider actions on November 4, 2008, that will address the nation's intercarrier compensation (ICC) system for telecommunications that would change administration of the federal Universal Service Fund (USF). I respectfully join those asking that you not rush to major decisions on these matters without an opportunity for further input as to the detailed plan included in your draft ICC/USF proposal.

The Public Service Commission of Wisconsin has recognized that ICC and USF reforms are needed¹ and that it is a conceptual position to which most parties agree. Obviously, "the devil is in the details." However, when billions of dollars are at risk because of those details, a rush to judgment should be avoided. The FCC has been scrutinizing ICC and USF for years. With important issues at stake such as impacts on consumer rates and affordable services, USF support purposes and administration, broadband deployment, competitive sustainability and clarifications of and changes to federal and state jurisdictional authority, it is critically important that the FCC take all the input it can to ensure the issues are fully vetted and the implications of such drastic changes are fully understood. Changes to ICC and USF are complex and very important; that is why they have been under review for so long. Your willingness to tackle these matters is commendable. The need to do so without taking some additional input is not necessary.

I urge you to provide interested parties an opportunity to weigh in one more time through another process besides the *ex parte* process that has been so widely used these past few weeks, so that the details and impacts of major potential changes to ICC and USF are fully explored and evaluated.

Thank you for your consideration.

Sincerely,

Mark Meyer
Commissioner

MM:CBO:ash:k:\ltr\2008\martin fcc icc usf reforms

cc: Commissioners Copps, Adelstein, Tate and McDowell

¹ CC Docket 01-92; Initial Comments of the Public Service Commission of Wisconsin, dated October 25, 2006; Page 13