COMSTOCK CONSULTING LLC

November 21, 2008

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: High Cost Universal Service Support, WC Docket No. 05-337; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link Up, WC Docket 03-109; Universal Service Contribution Methodology, WC Docket 06-122; Numbering Resource Optimization, CC Docket 99-200; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket 96-98; Developing a Unified Intercarrier Compensation Regime, CC Docket 01-92; Intercarrier Compensation for ISP-Bound Traffic; and IP-Enabled Services, Docket 04-36

Dear Ms. Dortch:

On November 20, 2008 Bill Roughton of Centennial Communications and the undersigned met with Nicholas Alexander of Commissioner McDowell's office to discuss the Further Notice of Proposed Rulemaking (FNPRM) in the above referenced dockets. Centennial expressed support for the approach taken in Appendix C of the FNPRM with respect to funding support for CETCs, except that the transition period needed to be made a full five years, with 100% of the existing CETC support being provided in year 1 of the transition. Centennial pointed out that CETC funding had already been reduced by 50% under the Commission's May order reducing CETC support, so an immediate further reduction of CETC by 20% was unfair and could result in significant adverse stock consequences for the remaining independent wireless carriers serving rural areas.

Centennial reiterated their strong support for the exclusion of insular areas from the scope of any final order resulting from the FNPRM, and also raised legal concerns with aspects of the FNPRM that appear to contradict the statutory language of section 214(e) of the Act. In particular, Centennial said it was not clear how the FCC could legally relieve CETCs of their obligations under section 214 once a State commission has designated them as a CETC, nor how the FCC could exclude State commission designated CETCs that comply with the requirements of section 214 from universal service payments made under section 254.

Centennial also voiced concern about the potential impact of classifying IP-PSTN and PSTN-IP traffic as an information service on carriers' interconnection rights under sections 251 and 332(c), and urged that any final order include a clear statement of the Commission's reasoning and intent with respect to maintaining interconnection rights under those two sections for competitive carriers and wireless carriers regardless of the technology used to transmit and exchange traffic between carriers.

Finally, Centennial expressed concern about the impact of the new contribution methodology on family wireless plans, and suggested that the contribution amount for family members participating under the same plan should be capped at something less than the per line amount times the number of lines.

Respectfully,

/s/ Earl Comstock

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