

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
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 No. 03-109
)	
Universal Service Contribution Methodology)	WC Docket No. 06-122
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Implementation of the Local Competition Provisions of the Telecommunications Act Of 1996)	CC Docket No. 96-98
)	
Developing a Unified Inter-carrier Compensation Regime`)	CC Docket No. 01-92
)	
Inter-carrier Compensation for ISP-Bound Traffic)	CC Docket No. 99-68
)	
IP-Enabled Services)	WC Docket No. 04-36

COMMENTS OF THE FOUR STATE COMMISSIONS

The undersigned state regulatory commissions (“the Four State Commissions”)¹ have individually and as a group, timely filed a series of comments and/or reply comments in several of the above-captioned dockets, during comment cycles established by the Federal Communications Commission (FCC).

¹ The [NAMES] supporting filing these Comments.

On November 5, 2008, the FCC issued an Order on Remand and Order and Further Notice of Proposed Rulemaking (Intercarrier Compensation Decision or ICC Decision). The ICC Decision addressed several filings made in recent weeks, primarily by industry representatives, either advocating their positions on the critical issues of intercarrier compensation (ICC) and Universal Service Fund (USF) reform. Some of these filings also contained entirely new or modified proposals for reform.

On November 12, 2008, the FCC published notice of the ICC Decision in the Federal Register. The Federal Register notice established Comment and Reply Comment deadlines of November 26, 2008 and December 3, 2008, respectively.

The Four State Commissions have serious concerns with the extremely compressed deadlines given the complexity of the issues. The issues at hand include, but are by no means limited to, possible preemption of state authority to set intrastate access rates, the conclusion that changes in protocol for transmissions into an Internet Protocol (IP) format preclude state involvement, and resolution of intercarrier compensation and universal service. Decisions on these issues will have a large impact in the Four States.

Consequently, the Four State Commissions submit this filing in addition to any separately filed Comments. The Four State Commissions may also file Reply Comments, either individually or collectively as well.

On behalf of the Delaware Public Service Commission:

/s/ Arnetta McRae
Chair

/s/ Joann T. Conaway
Commissioner

/s/ Jaymes B. Lester
Commissioner

/s/ J. Dallas Winslow
Commissioner

/s/ Jeffrey J. Clark
Commissioner

On behalf of the Public Service Commission of the District of Columbia:

/s/ Agnes A. Yates
Chairperson

/s/ Richard E. Morgan
Commissioner

/s/ Betty Ann Kane
Commissioner

On behalf of the New Jersey Board of Public Utilities:

/s/ Jeanne M. Fox
President

/s/ Frederick F. Butler
Commissioner

/s/ Joseph L. Fiordaliso
Commissioner

/s/ Nicholas Asselta
Commissioner

/s/ Elizabeth Randall
Commissioner

On behalf of the Commonwealth of Pennsylvania,
Public Utility Commission:

/s/ James W. Cawley,
Chairman

/s/ Tyrone J. Christy,
Vice Chairman

/s/ Robert F. Powelson,
Commissioner

/s/ Kim Pizzingrilli,
Commissioner

/s/ Wayne E. Gardner,
Commissioner

/s/ Joseph K. Witmer, Esq.
Assistant Counsel