

UNIVERSAL SERVICE FUND REFORM COMPREHENSIVE INTERCARRIER
COMPENSATION

COMMENTS ON COMPREHENSIVE INTERCARRIER COMPENSATION AND
UNIVERSAL SERVICE FUND REFORM FURTHER NOTICE OF PROPOSED
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CC Docket Nos. 96-45, 96-98, 99-68, 99-200, 01-92,

WC Docket Nos. 03-109, 04-36, 05-337, 06-122

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NFIB

The Voice of Small Business.

Member Fax

Date: 10/24/08

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Alabama

October 24, 2008

The Honorable Kevin J. Martin, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Dear Chairman Martin:

NFIB/Alabama members have contacted me concerning recent news accounts that the Commission plans to consider a comprehensive proposal to reform the intercarrier compensation regime and universal service fund at the November 4th Agenda meeting. It is our understanding from news stories that the proposal would make sweeping changes to intercarrier compensation and universal service. Small business believes that the Commission needs to ensure that these proposed changes be thoroughly examined to ensure that small businesses are not adversely impacted by increased telephone rates or slowed broadband deployment especially in rural states such as Alabama.

We are very concerned that this proposal comes at a time when our country is undergoing a serious economic crisis. Small businesses, like the rest of America, are struggling right now, and we believe that the FCC should not be rushing to make significant changes in telecommunications services. The last thing small businesses want or need to worry about is the potential for telecommunications problems caused by significantly higher rates, stifled telecommunications investment and stymied economic growth in Main Street rural America. Main Street provides the majority of the jobs in America and 97.3 percent of businesses in Alabama are small businesses.

NFIB/Alabama members are also deeply troubled by the fact that the Commission has not released the full proposal for public review and comment. The taxpaying public deserves the opportunity to provide fully informed comments, and the Commission stands to benefit from understanding the impacts on all parties, consumers and small businesses, interested in this potentially sweeping decision. Only with a fully developed record can the Commission make an educated decision that truly serves the public interest.

The Honorable Kevin J. Martin

October 24, 2008

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Instead of hastily moving ahead with this proposal, the Commission should act deliberately and cautiously to ensure that any changes in telecommunications services don't fall on the shoulders of small businesses and preserve services to rural parts of the country. We respectfully request that you not vote for this intercarrier compensation order in its present form until more steps have been taken to vet thoroughly the full ramifications for small businesses, ratepayers, investment, and economic development especially in rural towns. Therefore we urge the Commission to put the full proposal on record and seek public comment. We appreciate your consideration on this important matter and look forward to hearing your response.

Sincerely,



Rosemary Elebash
NFIB/Alabama State Director

cc: U.S. Senator Richard Shelby
U.S. Senator Jeff Sessions
Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell