

UNIVERSAL SERVICE FUND REFORM COMPREHENSIVE INTERCARRIER
COMPENSATION

COMMENTS ON COMPREHENSIVE INTERCARRIER COMPENSATION AND
UNIVERSAL SERVICE FUND REFORM FURTHER NOTICE OF PROPOSED
RULEMAKING - COPY FORWARDED TO SECRETARIES OFFICE

CC Docket Nos. 96-45, 96-98, 99-68, 99-200, 01-92,

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

http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-08-2486A1.pdf

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FEB 11 2009

Federal Communications Commission
Office of the Secretary



Wisconsin

FAX Memorandum

To: Commissioner Robert McDowell
Federal Communications Commission
866/418-0232

From: Bill G. Smith, State Director

Fax: 608/255-4909

Date: October 28, 2008

Re: NFIB Letter

You should receive 3 page(s), including this cover sheet.
If you do not receive all the pages, please call 608/255-6083.

Message:

Please see attached letter.

Thank you.



October 28, 2008

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

Dear Chairman Martin:

We have recently heard 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 and staff briefings that the proposal would make sweeping changes to intercarrier compensation and universal service which in many instances will raise subscribers' telephone rates and hinder broadband deployment for small businesses.

The timing of this proposed order could not have come at worse time. The country is undergoing a serious financial crisis which is affecting every facet of our nation's economy. To advance such a monumental reform for telecommunications services at this time ignores the hardships small businesses are experiencing today in a struggling economy. The last thing small businesses want or need is a telecommunications crisis caused by higher rates, stifled telecommunications investment and stymied economic growth in Main Street rural America.

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

-- continued

The Honorable Kevin J. Martin, Chairman
October 28, 2008
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Instead of hastily moving ahead with this proposal, we should act deliberately and cautiously to develop a more balanced approach on intercarrier compensation and universal service reform which would minimize the impact on businesses and ratepayers while preserving telecommunications investment 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. 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,



Bill G. Smith
State Director

cc: Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
✓ Commissioner Robert M. McDowell