

GVNW Consulting, Inc.
CC Docket No. 80-286, CC Docket No. 96-45, and WC Docket No. 05-337
May 5, 2009

Before the
FEDERAL COMMUNICATION COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Jurisdictional Separations and Referral To the Federal-State Joint Board)	CC Docket No. 80-286
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Petition For Clarification of Sections 36.125 and 54.301 of the Commission's Rules Concerning Local Switching Universal Service Support)	WC Docket No. 05-337
)	

REPLY COMMENTS OF GVNW CONSULTING, INC.

GVNW Consulting, Inc.
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INTRODUCTION AND BACKGROUND

GVNW Consulting, Inc. (GVNW) is a management consulting firm that provides a wide variety of consulting services, including regulatory and advocacy support on issues such as universal service, jurisdictional separations, intercarrier compensation reform, and strategic planning for communications carriers in rural America. GVNW provides the following reply comments in support of the Petition filed by the Coalition for Equity in Switching Support and in response to the Commission's request for comments in DA 09-634 released March 19, 2009.

COE Category 3 Factor

On November 30, 2006 GVNW provided reply comments agreeing with ITTA, NECA, NTCA, OPASTCO, ERTA, and other parties that requested the Commission modify the one way "ratcheting" rule for DEM Weighting. (See Reply comments in CC Docket No. 80-286 Ref. FCC 06-70). GVNW continues to hold this view and we support the other parties that have asked the Commission to either provide an interpretation that will result in equitable treatment of companies with similar line counts, or make the appropriate changes to the rules to provide an equitable resolution to this situation.

LSS Factor

The Local Switching Support Factor in Part 54.301 should correspond directly to the methodology adopted for the COE Category 3 weighting as provided in Part 36.125. Accordingly, GVNW believes that the rule should be interpreted or changed so that a

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company's line count dictates the weighting applied to the factor regardless of what the line count may have been in prior years.

Conclusion

GVNW believes the Separation Procedures and the Universal Service procedures for Local Switching Support should be administered in such a way that companies with similar line counts are treated similarly and are allowed the same weighting based on the table contained in Part 36.125 of the Separations rules. We urge the Commission to provide an interpretation and instruction to the administrators to use the table contained in the rules, or to change the rules so that the table is used consistently for all incumbent small carriers regardless of prior line counts.

Respectfully Submitted

Via ECFS at 5/5/09

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