

**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)	CC Docket No. 96-45
Service)	
_____)	

**REPLY COMMENTS OF
SOUTHERN COMMUNICATIONS SERVICES, INC.
D/B/A SOUTHERNLINC WIRELESS**

Southern Communications Services, Inc. d/b/a SouthernLINC Wireless (“SouthernLINC Wireless”), by its attorneys, hereby provides these reply comments in support of Centennial Communications Corp.’s (“Centennial”) Petition for Waiver of the December 31, 2008 deadline for submitting changes to Centennial’s March 2008 High-Cost Support data submitted to the Universal Service Administrative Company (“USAC”).¹ SouthernLINC Wireless shares the concern expressed by Centennial, the Rural Cellular Association (“RCA”) ² and the United States Cellular Corporation (“U.S. Cellular”) ³ about the lack of transparency in

¹ *Waiver-Expedited Action Requested; Petition for Waiver of the December 31, 2008 Deadline For Submitting to USAC Changes to the Interim High Cost Cap Data of Centennial Communications Corp. and its CETC Subsidiaries*, WC Docket No. 05-337; CC Docket No. 96-45 (filed Dec. 31, 2008) (“*Petition*”). See also, *Public Notice: March 2008 Capped Universal Service High-Cost Support for Competitive Eligible Telecommunications Carriers*, DA 08-2684 (rel. Dec. 10, 2008) (“*Interim Cap Public Notice*”).

² See Comments of Rural Cellular Association, WC Docket No. 05-337 and CC Docket No. 96-45 (filed April 20, 2009).

³ See Comments of the United States Cellular Corporation, WC Docket No. 05-337 and CC Docket No. 96-45 (filed April 20, 2009).

the administration of high-cost support, which has been exacerbated by imposition of the cap on funding for competitive eligible telecommunications carriers (“ETCs”).

I. INTRODUCTION

SouthernLINC Wireless operates a commercial digital 800 MHz ESMR system using Motorola’s proprietary integrated Digital Enhanced Network (iDEN) technology to provide dispatch, interconnected voice, Internet access, and data transmission services over mobile phone handsets. SouthernLINC Wireless is licensed by the Commission to provide cellular communications services in Alabama, Florida, Georgia, and Mississippi, where it serves nearly 250,000 subscribers over 127,000 square miles. SouthernLINC Wireless offers the most comprehensive geographic coverage of any mobile wireless provider in Alabama and Georgia, servicing extensive rural territory along with major metropolitan areas and highway corridors, and as such is widely used by local and statewide governmental institutions, public utilities and emergency services.

SouthernLINC Wireless is committed to offering high-quality telecommunications services in rural and underserved areas, and approximately half the total handsets SouthernLINC Wireless serves are used by subscribers located outside of major metropolitan areas. SouthernLINC Wireless is also the wireless service provider to the state of Alabama and to many government agencies in Georgia. In fact, approximately 30% of the handsets SouthernLINC Wireless serves are used by public employees, first responders or utility personnel,⁴ which illustrates how important the services of SouthernLINC Wireless are to residents in those areas, particularly in times of crisis. During the emergency conditions created by the twenty-two named hurricanes and countless ice storms that have struck its service territory

⁴ The services provided to utility personnel facilitate the continued availability of power during emergencies.

since SouthernLINC Wireless began operating in 1995, SouthernLINC Wireless was often the only available means of communication. In the aftermath of Hurricane Katrina, for example, SouthernLINC Wireless in many instances provided the only immediate means of communication in Mississippi and Alabama. Accordingly, SouthernLINC Wireless is the type of competitive ETC Congress intended the universal service fund to support and, therefore, has a vested interest in ensuring the fundamental fairness and long-term stability of the fund.

SouthernLINC Wireless agrees with the concerns Centennial expressed in its *Petition* regarding the inability of competitive ETCs to perform a meaningful review of USAC high-cost support determinations due to the lack of transparency in the process and data USAC uses to make those determinations. Therefore, SouthernLINC Wireless joins RCA and U.S. Cellular in urging the Commission to grant Centennial's *Petition*. For the reasons discussed below, SouthernLINC Wireless also urges the Commission to address the fundamental lack of transparency in the process USAC uses to make high-cost support determinations, which makes it difficult, if not impossible, for competitive ETCs to conduct a meaningful review of the amount of high-cost support they receive.

II. GRANT OF CENTENNIAL'S PETITION FOR WAIVER IS WARRANTED

SouthernLINC Wireless agrees with Centennial, RCA and U.S. Cellular that greater transparency in the way that the high-cost support program is administered by USAC is critically needed, particularly in light of the recent cap on high-cost support provided to competitive ETCs.⁵ Centennial filed its *Petition* in response to the Commission's notice reminding CETCs that future high-cost support amounts would be capped at the CETC amounts

⁵ *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, 23 FCC Rcd 8834 (2008) ("*Interim Cap Order*").

states received during March 2008.⁶ The *Interim Cap Public Notice* also advised CETCs to confirm the accuracy of their March 2008 high-cost support amounts and file any corrections by December 31, 2008.⁷ However, as Centennial, RCA and U.S. Cellular explain in their filings, it is difficult, if not impossible, for competitive ETCs to confirm the accuracy of their March 2008 high-cost support amounts without additional information regarding the methodology USAC uses to determine high-cost support, as well as the data upon which USAC has relied to make such determinations.⁸

USAC bases high-cost support determinations upon a number of data sources, many of which are not available to competitive ETCs. For example, USAC considers not only timely-filed line count data from competitive ETCs and incumbent local exchange carriers (“ILECs”), but also other types of data, including, but not limited to, late-filed data, data relating to pending waiver requests, and data filed by state commissions.⁹ USAC’s support determinations also are affected by the failure by an ETC to make a required filing. As Centennial explained, if one or more competitive ETCs failed to make a certain mandatory filing, the total funding provided for a given state in March 2008 would be lessened, which would in turn lessen the support available to all competitive ETCs in that state under the support cap.¹⁰ Without access to all of the relevant data, as well as an explanation of exactly how USAC used

⁶ See generally *id.*

⁷ *Id.*

⁸ See *Centennial Petition* at 1, RCA Comments at 2, U.S. Cellular Comments at 2-3.

⁹ See *Letter to Karen M. Majcher, USAC from Danielle Frappier, Counsel to Centennial* dated Dec. 31, 2008 (attached to *Centennial Petition*) at 2 (“*Centennial Petition Attachment*”) (noting that in some cases state regulatory commissions must file certifications with USAC attesting to compliance with regulations governing support funding).

¹⁰ See *Centennial Petition Attachment* at 2. See *Interim Cap Order*, ¶ 27.

such data, competitive ETCs are not able to evaluate the accuracy of USAC's determinations regarding support.

RCA and U.S. Cellular both correctly observe that the competitive ETC support levels and support disbursement data disclosed by USAC is insufficient for the purposes of reviewing the accuracy of disbursement to individual ETCs because USAC does not identify any "true-ups" or other adjustments made during the support determination process.¹¹ As RCA and U.S. Cellular further explained, USAC also refuses to provide information regarding competitive ETC eligibility that is necessary to verify the accuracy of March 2008 support levels.¹² Consequently, competitive ETCs cannot accurately "reverse engineer" USAC's support determinations and thus cannot verify the accuracy of USAC's calculations and the underlying data. Therefore, the Commission should require USAC (1) to disclose publicly, subject to appropriate privacy protections, all data upon which USAC relies to make any high-cost support determinations for competitive ETCs, and (2) to provide a detailed explanation of the calculation methodology used to make each determination, including, when relevant, consideration of missing or late-filed data.

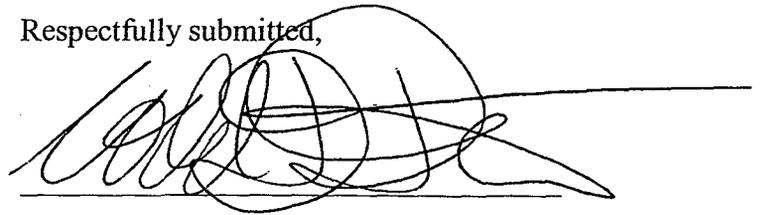
¹¹ RCA Comments at 7, U.S. Cellular Comments at 7.

¹² *Id.*

III. CONCLUSION

For the reasons set forth above, SouthernLINC Wireless urges the Commission to grant Centennial's *Petition* and address the lack of transparency in the process and data used to determine high-cost support to competitive ETCs.

Respectfully submitted,



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