

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Alexicon Telecommunications Consulting Petition) WC Docket No. 06-122
for Change of FCC Form 499-A Reporting Date)
)
)

**COMMENTS
of the
NATIONAL EXCHANGE CARRIER ASSOCIATION, Inc.**

On April 21, 2009, Alexicon Telecommunications Consulting (Alexicon) filed a petition seeking to change the filing date for the annual Telecommunications Reporting Worksheet (FCC Form 499-A) from April 1st to September 1st.¹ Alexicon asserts changing the filing date would allow for greater initial accuracy on the forms, and would reduce administrative burdens on incumbent local exchange carriers, which are subject to other reporting requirements during the first quarter of the year.²

NECA does not object to a change in the reporting date for Form 499-A submissions. In considering Alexicon's request, however, the Commission should recognize the impact this revision would have on other programs that rely on data obtained from Form 499 submissions. These include the interstate Telecommunications Relay Service (TRS) fund, the cost recovery

¹ Alexicon Telecommunications Consulting Petition for Change of Form 499-A Reporting Date, WC Docket No. 06-122 (Apr. 21, 2009) (*Alexicon Petition*).

² *Id.* at 2-3.

mechanism for numbering administration, and the cost recovery mechanism for shared costs of long-term number portability.³

As administrator of the interstate TRS fund, NECA utilizes Form 499-A data submitted in April to prepare its annual TRS filings, which are submitted on May 1 of each year.⁴ The TRS funding period commences on July 1 and ends June 30 of the following calendar year.⁵ Delaying the Form 499-A submission date to September would potentially require a delay in TRS filings and funding periods until the fourth Quarter of each year.⁶

Accordingly, if the Commission decides to grant Alexicon's request to modify the reporting date for FCC Form 499-A, it must take the necessary steps to alter the annual funding cycles for the Interstate TRS Fund (and the cycles for other funds reliant on the current April

³ See Telecommunications Reporting Worksheet, FCC Form 499-A (2009), Instructions at 1.

⁴ Similarly, funding for administration of the North American Numbering Plan (NANP) is in part derived from the revenue information reported on the Form 499-A in April of each year. See, e.g., Letter from Faith Marcotte, Partner, Welch LLP, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 92-237 (May 4, 2009) (*Fiscal Year 2009 Contribution Factor Filing*) at 3. ("The revenue numbers used by the NANP B&C Agent to calculate the individual fees are obtained from the data collection agent, Universal Service Administrative Company (USAC). USAC collects the data from the Form 499A prepared by the telecommunication service providers...".)

⁵ See 47 C.F.R. § 64.604 (c)(5)(iii)(H).

⁶ Alternatively, the Commission could direct NECA, as TRS fund administrator, to estimate carrier contribution levels in advance of each annual filing for purposes of preparing contribution estimates. This approach may, however, require submission of corrective filings and adjustments to the associated contribution factor once actual 499-A data is submitted in September, which in turn would increase fund administrative expenses.

reporting date) or institute other measures to permit calculation of contribution levels in advance of receiving 499-A data submissions for the relevant period.

Respectfully submitted,

July 6, 2009

NATIONAL EXCHANGE CARRIER
ASSOCIATION, Inc.

By:

A handwritten signature in black ink, appearing to read "Richard A. Askoff", written over a light gray rectangular background.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of NECA's Comments was served this 6th day of July, 2009 by electronic filing and email to the persons listed below.

By: /s/ Elizabeth R. Newson
Elizabeth R. Newson

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