

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

_____)	
In the Matter of)	
)	
High Cost Universal Service Support)	WC Docket No. 05-337
)	
Universal Service Contribution Methodology)	WC Docket No. 06-122
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
_____)	

REPLY COMMENTS OF VERIZON AND VERIZON WIRELESS

Michael E. Glover,
Of Counsel

Karen Zacharia
Christopher M. Miller
VERIZON
1320 North Courthouse Road – 9th Floor
Arlington, VA 22201-2909
(703) 351-3071

Colin Stretch
KELLOGG, HUBER, HANSEN, TODD,
EVANS & FIGEL, P.L.L.C.
1615 M Street, N.W. – Suite 400
Washington, D.C. 20036
(202) 326-7968

John T. Scott, III
Tamara L. Preiss
VERIZON WIRELESS
1300 I Street, N.W. – Suite 400 West
Washington, D.C. 20005
(202) 589-3760

Counsel for Verizon and Verizon Wireless

November 12, 2009

TABLE OF CONTENTS

- I. INTRODUCTION AND SUMMARY 1
- II. THE UNIVERSAL SERVICE CONTRIBUTION SYSTEM MUST BE REFORMED... 2
- III. THE COMMISSION SHOULD PROVIDE PROMPT GUIDANCE TO USAC..... 4
 - A. In the Absence of Retail Data, Carriers Should Take Reasonable Steps to Approximate the Sales Price of Prepaid Calling Cards 4
 - B. Services That Employ ATM and/or Frame Relay Technologies or That Can Be Labeled a VPN Must Be Evaluated Based on Their Statutory Classification 6
 - 1. For Universal Service Purposes, Services That Incorporate ATM and/or Frame Relay Technologies, or That Can Be Labeled a VPN, Should Be Assessed Only Where the Service in Question Is a Telecommunications Service6
 - 2. At Most, the Commission Could Conclude that Revenues From Services That Use ATM or Frame Relay Technologies or That Can Be Labeled a VPN Are Assessable Based on the Commission’s Permissive Statutory Authority, and Then Only on a Prospective Basis 8
 - C. The Commission Cannot Now Implement the Alltel ETC Cap Retroactively 12
 - D. ETCs Are Not Required to Separately Advertise Supported Services and Functionalities..... 13
- IV. CONCLUSION..... 14

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REPLY COMMENTS OF VERIZON¹ AND VERIZON WIRELESS

I. INTRODUCTION AND SUMMARY

The comments filed in this proceeding reveal broad consensus on several points related to universal service fund (“USF”) funding and administration. First, commenters overwhelmingly agree that the current revenue-based system for USF funding creates confusion and uncertainty. The proper response is not to continue to tinker with that regime, but rather to replace it with a numbers-based system. Second, the Commission should provide guidance to Universal Service Administrative Company (“USAC”) on the issues raised in its letters. In particular, the Commission should advise USAC that (1) carriers should take reasonable steps to approximate prepaid calling card retail revenues; (2) whether a given service is assessable for USF purposes turns on the capabilities of the service offered to customers; (3) the Alltel-specific high-cost cap that was expressly superseded by the industry-wide cap cannot now be retroactively implemented; and (4) eligible telecommunications carriers (“ETCs”) are not required to advertise the specific services and functionalities set out in the Commission’s rules.

¹ In addition to Verizon Wireless, the Verizon companies participating in this filing (“Verizon”) are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

II. THE UNIVERSAL SERVICE CONTRIBUTION SYSTEM MUST BE REFORMED

The current revenue-based system for USF funding is broken, and the time to fix it is now. The current regime relies on distinctions – between telecommunications services and information services, and between intrastate and interstate service – that make less and less sense as customers move to broadband and IP-based, “any distance” services. The difficulty in drawing these meaningless distinctions, when coupled with a declining interstate revenue base overall, makes the fund unsustainable and incapable of meeting the needs of the consumers and organizations it is designed to support. As it stands, the contribution factor will likely set another new record next quarter at approximately 14%.² The Commission should move promptly to an objective, predictable mechanism for USF funding that would create certainty. A numbers-based regime – which assesses a small charge for each working telephone number – is the best alternative.

No commenter disputes any of these points, and many commenters confirm them. AT&T, for example, agrees that the confusion and uncertainty that characterize the status quo “emphasize the need for reform.”³ As AT&T explains, “USAC’s contribution-related requests for Commission guidance,” the plethora “of contributor appeals pending before the Commission,” and the “ever-shrinking interstate telecommunications revenues base and growing contribution factor” all underscore the need for reform.⁴ Qwest Communications International Inc. (“Qwest”) stresses that “classifying the revenues” associated with various services “is not a

² See Universal Service Administrative Company, *Federal Universal Serv. Support Mechanisms Fund Size Projections for First Quarter 2010* (FCC filed Nov. 2, 2009).

³ AT&T Comments at 5.

⁴ *Id.*

clear or simple task” under the current regime and accordingly urges reform.⁵ Sprint Nextel Corp. (“Sprint”) too highlights the confusion and inequities in the current contribution methodology, which “underscore[] the importance of Commission action to adopt a new one.”⁶

There is likewise widespread support for the numbers-based regime that Verizon and others have proposed. Virtually every industry segment – including wireline telephone companies, cable telephony providers, wireless carriers, equipment manufactures, VoIP providers, and state regulators – have previously expressed support for a numbers-based mechanism for USF funding.⁷ In this proceeding, AT&T and United States Telecom Association (“USTelecom”) do the same.⁸ As USTelecom notes, a numbers-based regime will distribute the contribution burden more equitably among providers and will help reduce administrative expenses for the Commission, USAC, and contributors.⁹ And, as AT&T emphasizes, by tying contributions to a resource (telephone numbers) that is not only easy to track but also is expected to grow consistently, a numbers-based regime would redress the vicious cycle that now characterizes USF funding – *i.e.*, as the interstate telecommunications revenue base decreases, the contribution factor increases, which in turn pushes consumers to non-contributing services, thus shrinking the contribution base still further.

Finally, pending reform, the Commission should take steps to limit the confusion and uncertainty that now characterize USF funding by ensuring that any changes to Form 499-A and its accompanying instructions are subject to notice and comment review by all interested parties.

⁵ Qwest Comments at 6-7.

⁶ See Sprint Comments at 6-7.

⁷ See Verizon Comments at 5 n.3 (citing Reply Comments of Verizon at 2, *In re Universal Serv. Contribution Methodology*, WC Dkt. No. 06-122 (FCC filed Sept. 8, 2006)).

⁸ See AT&T Comments at 5; USTelecom Comments at 6.

⁹ See USTelecom Comments at 6.

The Commission could accomplish this by identifying, on an annual basis, any proposed changes to the 499-A Form or its Instructions, and publishing those changes for comment before they take effect. Allowing for comment would permit the Commission to resolve confusion or ambiguity ahead of time, thus removing a recurring source of uncertainty and limiting the instances in which USAC must seek guidance from the Commission. On this point as well, commenters agree.¹⁰

III. THE COMMISSION SHOULD PROVIDE PROMPT GUIDANCE TO USAC

A. In the Absence of Retail Data, Carriers Should Take Reasonable Steps to Approximate the Sales Price of Prepaid Calling Cards

With respect to revenue from prepaid calling cards sold through third-party distributors, Verizon suggests a two-step approach. First, where the calling card provider knows how much the end-user paid for a calling card, it should use that amount in calculating its contribution base. Second, where the amount paid by the end user is not known, providers should take reasonable steps to approximate that amount. In this latter scenario, the Commission should adopt a 35% markup on the wholesale price as a “safe harbor” estimate of the resulting retail price. This approach is consistent with Internal Revenue Service regulations promulgated in order to estimate retail revenue from prepaid calling cards sold through third-party distributors.

Commenters offer several competing proposals to address this issue – from exempting distributor calling card revenue from USF fees altogether,¹¹ to suggesting that the Commission allow prepaid card providers “to deduct the difference between the face value of the prepaid card and the revenues actually received as ‘uncollectible’ revenue on Lines 421 and 422 of the FCC

¹⁰ See USTelecom Comments at 8; Level 3 Communications, LLC (“Level 3”) Comments at 6; AT&T Comments at 4.

¹¹ See Ad Hoc Coalition of International Telecommunications Companies (“Ad Hoc Coalition”) Comments at 2.

Form 499-A.”¹² Although these proposals differ, commenters agree that using the face value of a calling card to calculate revenue, where the provider does not know what the end user actually paid, is not the correct approach. As detailed in STi Prepaid’s comments, the face value approach fails to take into account the widespread use of discounts that now characterizes this segment of the industry. Insofar as using the face value of cards would overstate revenues, to report these overstated amounts as actual revenues earned would violate Generally Accepted Accounting Principles (GAAP), would be inconsistent with ordinary tax law, and would “distort[] the meaning of ‘end user’ in the context of telecommunications services.”¹³

If the Commission decides to do more than simply clarify how a provider should calculate prepaid calling card revenue when actual revenue from an end-user is unknown, Verizon supports AT&T’s proposal, echoed by others, that only actual revenue received from prepaid calling cards should be used in the contribution base.¹⁴ Under this proposal, revenue from cards sold to third-party distributors would be calculated based on the revenue received from the third party, in effect treating the reseller as the “end-user customer” for purposes of the prepaid calling card reporting requirement. This proposal has the advantage of simplicity and certainty and would resolve this issue.

On the other hand, the Commission should reject the Ad Hoc Coalition’s request that prepaid calling card providers pay *nothing at all* on revenue from cards sold through third-party distributors.¹⁵ The Ad Hoc Coalition’s request would unfairly remove interstate calling card revenues from the USF contribution base. Indeed, under the Ad Hoc Coalition’s proposal,

¹² STi Prepaid, LLC (“STi Prepaid”) Comments at 8.

¹³ *Id.* at 5.

¹⁴ *See* AT&T Comments at 8-9; STi Prepaid Comments at 4-5.

¹⁵ *See* Ad Hoc Coalition Comments at 2.

providers would have a significant incentive to sell cards exclusively through third-party distributors instead of directly to the consumer. It makes no sense to put in place rules that would so obviously favor one type of business arrangement over another, which would encourage calling card providers to game the system in order to avoid universal service contributions. The result of such a shift would also be to further strain the contribution base (because prepaid calling card revenue would almost certainly disappear from the contribution base) and therefore increase the contribution factor beyond what is already projected to be a new record of approximately 14% next quarter.¹⁶ The Ad Hoc Coalition’s proposal, in short, would skew competition and further destabilize USF support, and it should be rejected out-of-hand.

B. Services That Employ ATM and/or Frame Relay Technologies or That Can Be Labeled a VPN Must Be Evaluated Based on Their Statutory Classification

1. For Universal Service Purposes, Services That Incorporate ATM and/or Frame Relay Technologies, or That Can Be Labeled a VPN, Should Be Assessed Only Where the Service in Question Is a Telecommunications Service

With respect to USAC’s request for guidance on the appropriate treatment of revenues from services that incorporate ATM and/or Frame Relay transmission technologies, or that can be labeled a “VPN,” the comments reveal consensus on three key points. *First*, as several commenters explain, the revenue from such services is assessable only if and to the extent the services are properly classified as “telecommunications services.”¹⁷ *Second*, whether a *particular* service meets the statutory definition of “telecommunications service” depends on the *particular* capabilities of the service that is offered to customers.¹⁸ *Third*, there is a wide range

¹⁶ See *supra* n.2.

¹⁷ See Verizon Comments at 9-11; AT&T Comments at 12-13; Qwest Comments at 5-8.

¹⁸ See, e.g., Qwest Comments at 6-8; Sprint Comments at 6; Level 3 Comments at ii, 2.

of services that use ATM and/or Frame Relay technologies or that can be labeled a VPN; in some instances such a service will be an “information service,” and in others it may be a “telecommunications service,” rendering it impossible for the Commission in this proceeding to dictate uniform contribution rules that would apply to all services that use ATM or Frame Relay technologies or can be labeled VPN.¹⁹

The only commenter that appears to dispute any of this is National Exchange Carrier Association, Inc. (“NECA”). NECA asserts that the “Commission should clarify that revenues from ATM, Frame Relay, Virtual Private Network, [and] ‘Dedicated Internet Protocol [telecommunications services]’ and other similar services are properly classified as ‘telecommunications’ revenues for USF contribution reporting purposes.”²⁰ NECA reasons that such services cannot be “‘information services’ *if they merely offer transmission of data or voice information . . . without change in the form or content of the information as sent and received.*”²¹ NECA’s conclusion is wrong. When a service that employs ATM and/or Frame Relay technologies, or that can be labeled a VPN, enables the transmission of data in the same format across the network on an end-to-end basis without offering any additional “enhanced” capabilities, it could satisfy the definition of a “telecommunications service,” and the revenue associated with that service would in that case be assessable.²² At the same time, however, as Verizon and other commenters made clear, not all services that use ATM and/or Frame Relay

¹⁹ See, e.g., Level 3 Comments at 10 (stating that “at least some VPN services provide features and functionalities that qualify them as information services”); USTelecom Comments at 7 (stating that given the variation in product offerings across the industry, it would “be inappropriate – and incorrect – for the Commission to conclude generally here that all ‘ATM/Frame Relay,’ ‘VPN,’ and ‘Dedicated [IP] telecommunication services,’ however these terms are used in the industry, must contribute to the fund”).

²⁰ NECA Comments at 3.

²¹ *Id.* (first emphasis added, second emphasis in original).

²² Verizon Comments at 15.

technologies meet that criteria, and the same is true of services that can be labeled VPN.²³ On the contrary, many such services offer customers enhanced functionality, protocol processing, or other features or capabilities and accordingly qualify as “information services.”²⁴ NECA’s broad conclusion – that all such services are assessable – is thus unsupported by its own reasoning and is incorrect.

2. At Most, the Commission Could Conclude that Revenues From Services That Use ATM or Frame Relay Technologies or That Can Be Labeled a VPN Are Assessable Based on the Commission’s Permissive Statutory Authority, and Then Only on a Prospective Basis

Because many services that use ATM and/or Frame Relay transmission technologies or that can be labeled a VPN qualify as “information services,” they are non-assessable under the statute, the Commission’s rules, and long-standing Commission precedent. To the extent the Commission wants to change that – by putting in place a regime in which all such services are assessable *regardless* of whether they are properly classified as “enhanced” or “information” services – the Commission could act only prospectively, pursuant to its permissive authority under 47 U.S.C. § 254(d).

Section 254(d) provides the Commission with two ways to impose USF contribution obligations. First, § 254(d) mandates that “[e]very telecommunications carrier that provides interstate *telecommunications services* shall contribute, on an equitable and nondiscriminatory basis, to the specific, predictable, and sufficient mechanisms established by the Commission to preserve and advance universal service.”²⁵ This provision, by its express terms, requires

²³ See, e.g., AT&T Comments at 13 (“where [Frame Relay or ATM] are used on an interworked basis to provide a service that . . . entails a net protocol conversion, the service is an information service under long-standing Commission precedent and is not subject to USF contribution”); Verizon Comments at 11-12.

²⁴ See Verizon Comments at 13; AT&T Comments at 13; Sprint Comments at 6.

²⁵ 47 U.S.C. § 254(d) (emphasis added).

contributions from “telecommunications service” providers, but excludes information service providers. Second, § 254(d) vests the Commission with “permissive authority” to require “[a]ny other provider of interstate *telecommunications* . . . to contribute to the preservation and advancement of universal service if the public interest so requires.”²⁶ This is known as the Commission’s “permissive authority,” and is the only way the Commission may impose USF obligations on an “information service.”

To exercise its permissive authority to require providers to contribute on the basis of services that do not qualify as “telecommunications services,” the Commission must conclude that (1) the service in question includes an interstate telecommunications component; and (2) the public interest is served by subjecting the service to USF contributions.²⁷ To make these determinations, the Commission must employ a fact-driven proceeding focused on future effect. Indeed, the Commission’s “permissive authority” provides that additional entities “*may* be required to contribute” if the FCC makes the necessary determinations – not that the entities *are* required to contribute.²⁸ This necessarily refers to potential future obligations. Moreover, among the 1996 Act’s core “Universal Service Principles” is that USF support mechanisms “be specific [and] *predictable*.”²⁹ It would run contrary to that mandate to permit the Commission to expand the scope of assessable services and then apply that determination retroactively. As the Commission itself has made clear, action taken pursuant to its permissive authority “extend[s] universal service contribution obligations to [new] classes of providers,”³⁰ requiring them “now”

²⁶ *Id.* (emphasis added).

²⁷ *See id.*

²⁸ *Id.* (emphasis added).

²⁹ *Id.* § 254(b)(5) (emphasis added).

³⁰ *See, e.g.,* Report and Order and Notice of Proposed Rulemaking, *Universal Serv. Contribution Methodology*, 21 FCC Rcd 7518, ¶¶ 43-44 (2006) (“*Interim Contribution Order*”).

– but not retroactively – to begin “report[ing] interstate and international revenues.”³¹

Accordingly, to the extent the Commission were to decide to assess revenues from all services that use ATM and/or Frame Relay transmission technologies or that can be labeled a VPN, it could do so only prospectively pursuant to its “permissive” authority under § 254(d).

Before the Commission could take such action, moreover, it would be required to provide notice to interested parties and permit an opportunity for comment – as it has each time it has invoked its permissive authority under the 1996 Act,³² and which has not occurred here.³³

Nor, finally, could the Commission avoid the limits on its ability to act retroactively by “interpreting” its precedent to permit assessment of all services that employ ATM or Frame Relay technology or that can be labeled a VPN. For the reasons explained above and in Verizon’s opening comments, Commission precedent stands squarely for the proposition that, in some circumstances – as, for example, where the service in question includes a net protocol conversion as an integrated portion of the service offered to customers – such services are “information services” and therefore non-assessable under the Commission’s current rules. Moreover, even if the Commission could interpret its precedent to permit assessment of such services – which it cannot – any effort to apply such an interpretation retroactively “would lead

³¹ *Id.* ¶ 50.

³² *See id.* ¶ 13 (noting that the Commission had expressly sought comment on the Commission’s authority to impose USF contribution requirements on VoIP and, if so, whether it should exercise that authority); Notice of Proposed Rulemaking and Order Establishing Joint Board, *Federal-State Joint Bd. on Universal Serv.*, 11 FCC Rcd 18092, ¶ 119 (1996) (soliciting comment on whether additional providers of interstate telecommunications should be assessed universal service contribution obligations and, if so, which ones).

³³ The Public Notice on this issue solicited comment on USAC’s August 19, 2009 letter to the Wireline Competition Bureau, which in turn sought guidance on the “proper categorization” of various services under current rules. *See* Public Notice, *Comment Sought on Request for Universal Serv. Fund Policy Guidance Requested by the Universal Service Administrative Co.*, DA 09-2117 (Sept. 28, 2009); Letter from Richard Belden, USAC, to Julie Veach, FCC, at 2-4 (Aug. 19, 2009). Neither USAC’s letter nor the Commission’s Public Notice provided any indication that the Commission might consider invoking its permissive authority.

to ‘manifest injustice’” and would accordingly be unlawful.³⁴ As AT&T explains, providers have long treated certain services incorporating Frame Relay and ATM technologies as non-assessable “information services,” and the Commission has long been on notice of that fact.³⁵ As Verizon, AT&T, and others have explained in detail, moreover, that treatment is consistent with long-standing Commission precedent.³⁶ If the Commission were to foreclose that treatment here, it would disrupt settled industry practice and conflict with established Commission rulings. In these circumstances – and consistent with Commission precedent in comparable circumstances³⁷ – equity and fairness bar retroactive application of any new USF obligations.³⁸

³⁴ See *Qwest Serv. Corp. v. FCC*, 509 F.3d 531, 539 (D.C. Cir. 2007) (quoting *AT&T v. FCC*, 454 F.3d 329, 332 (D.C. Cir. 2006)); see also *Cassell v. FCC*, 154 F.3d 478, 486 (D.C. Cir. 1998); *Public Serv. Co. of Colo. v. FERC*, 91 F.3d 1478, 1490 (D.C. Cir. 1996); *Health Ins. Ass’n of Am. v. Shalala*, 23 F.3d 412, 424 (D.C. Cir. 1994); *Clark-Cowlitz Joint Operating Agency v. FERC*, 826 F.2d 1074, 1081 (D.C. Cir. 1987) (en banc).

³⁵ AT&T Comments at 19.

³⁶ See Verizon Comments at 12-14, 16; AT&T Comments at 15-19; Sprint Comments at 6; Level 3 Comments at 11-12.

³⁷ See Order, *Request for Review by InterCall, Inc. of Decision of Universal Serv. Administrator*, CC Dkt. No. 96-45, FCC 08-160, ¶¶ 23-24 (rel. June 30, 2008) (rejecting argument that audio bridging service was non-assessable but applying decision only prospectively because “it was unclear to InterCall, as well as to the industry, that stand-alone providers of audio bridging services have a direct USF contribution obligation”).

³⁸ This situation is different from *Qwest*. The court in *Qwest* determined on the facts of that case that the equities weighed in favor of retroactive application of the Commission’s declaratory order on the proper classification of services offered by various IP-transport and menu-driven prepaid calling card providers. There, however, the court acknowledged that the proper classification of the services at issue “ha[d] been long the subject of active debate” and therefore no carrier could possibly have reasonably relied upon its own view of the law or claimed that it was surprised by the Commission’s decision. 509 F.3d at 540. Here, the opposite is true. In addition, in *Qwest*, the court relied upon the fact that the Commission had already decided issues closely related to classification of the prepaid calling card services at issue there, and it viewed the carriers contesting the Commission’s actions in that case as simply testing the limits of those prior decisions. Here, if the Commission were to decide that all services that use ATM and/or Frame Relay technologies or that can be labeled a VPN are assessable, it would be a significant change in Commission policy that could not have been (and indeed was not) foreseen by providers. Finally, in *Qwest*, the court emphasized that giving the Commission’s decision retroactive effect would ensure that carriers that had performed access services would be paid their due, rather than providing a windfall to those providers that had tested the limits of the Commission’s decisions. No comparable concerns would be raised here, where there is no private payor/payee relationship, and where

C. The Commission Cannot Now Implement the Alltel ETC Cap Retroactively

The Commission may not lawfully rescind high-cost support payments made to Alltel during the period after approval of the Alltel/Atlantis merger and before the Commission adopted the industry-wide CETC cap.³⁹ By its terms, the 2008 industry-wide CETC cap *expressly superseded* prior company-specific caps, which had the effect of nullifying the company-specific caps as a matter of law. Beyond that, as Verizon, AT&T, and Rural Telecommunications Group, Inc. (“RTG”) all emphasize, the FCC ordered USAC *not to implement* the company-specific caps.⁴⁰ As a practical matter, retroactively implementing the caps now would force Verizon Wireless (as successor to Alltel) to pay funds that Alltel was required to, and did, expend “for the provision, maintenance, and upgrading of facilities and services for which the support [wa]s intended.”⁴¹

Alone among commenters – and presumably interested in reducing their own USF obligations and burdening a competitor – Qwest and Sprint support a more punitive result. But neither commenter offers any coherent reasoning supporting its position on this issue. Qwest asserts – based solely on the *ALLTEL/Atlantis Order*,⁴² and without acknowledging the terms of the subsequent *Industry CETC Cap Order*⁴³ – that “Alltel[’s] . . . CETC support should be capped at [its] June 2007 support annualized until the effective date of the [*Industry CETC Cap*

the application of a Commission decision solely on a prospective basis would have no competitive implications.

³⁹ See Verizon Comments at 17-29.

⁴⁰ See *id.* at 22; AT&T Comments at 26; RTG Comments at 4-5.

⁴¹ 47 U.S.C. § 254(e); see Verizon Comments at 25-26.

⁴² See Memorandum Opinion and Order, *Applications of ALLTEL Corp., Transferor, and Atlantis Holdings, LLC, Transferee, For Consent to Transfer Control of Licenses, Leases and Authorizations*, 22 FCC Rcd 19517 (2007) (“*ALLTEL-Atlantis Order*”).

⁴³ See Order, *High-Cost Universal Serv. Support*, 23 FCC Rcd 8834 (2008) (“*Industry CETC Cap Order*”).

Order].”⁴⁴ Sprint similarly concludes that there is “no basis for exempting either AT&T or Alltel from the obligation imposed upon them in their respective cap orders,”⁴⁵ with no further reasoning whatsoever. The *Industry CETC Cap Order*, however, provides precisely that basis. It states, in language neither Qwest nor Sprint acknowledges much less addresses, that the “interim cap adopted in this Order *supersedes* the interim caps on high-cost, competitive ETC support adopted in the *ALLTEL-Atlantis Order* and the *AT&T Dobson Order*.”⁴⁶ This unequivocal statement made clear that the industry-wide cap would apply *instead of* the company-specific caps that had never been implemented – an interpretation the Commission expressly validated by directing USAC not to implement the company-specific caps.⁴⁷

D. ETCs Are Not Required to Separately Advertise Supported Services and Functionalities

There is universal agreement among commenters that there is no requirement to advertise separately the availability of each of the services and functionalities listed in 47 C.F.R. § 54.101 of the Commission’s rules, and that any such requirement would make no sense. Section 54.101 lists services and functionalities that have no meaning to customers. As Verizon and others explained, to advertise “dual tone multi-frequency” and other similarly cryptic terms would simply cause confusion among end-users, thus undermining the purpose of the advertising requirement.⁴⁸ Beyond that, the text of the Commission’s rules does not require listing each

⁴⁴ Qwest Comments at 5 (as modified by November 11, 2009, Erratum).

⁴⁵ Sprint Comments at 5.

⁴⁶ *Industry CETC Cap Order* ¶ 5 n.21 (emphasis added); *see* Verizon Comments at 19.

⁴⁷ *See* Verizon Comments 26-27.

⁴⁸ *See, e.g.*, Verizon Comments at 30; ITTA Comments at 11; Nebraska Rural Independent Cos. Comments at 4; AT&T Comments at 29-30; National Telecommunications Cooperative Ass’n Comments at 5; RTG Comments at 2.

service or functionality separately when advertising “the availability” of supported services.⁴⁹

Provided the carrier in question sufficiently advertises the availability of local telephone service, and provided it in fact provides each of the services and functionalities enumerated in § 54.101, both the letter and the spirit of the Commission’s rules are satisfied.

IV. CONCLUSION

The Commission should replace the current USF contribution system with a numbers-based regime that would eliminate the uncertainty that now characterizes USF funding and position the fund for success in the broadband era. In addition, the Commission should provide guidance to USAC consistent with Verizon’s comments herein.

⁴⁹ See Nebraska Rural Independent Cos. Comments at 4; Verizon Comments at 30-31.

Respectfully submitted,

/s/ Chris Miller

Michael E. Glover,
Of Counsel

Karen Zacharia
Christopher M. Miller
VERIZON
1320 North Courthouse Road – 9th Floor
Arlington, VA 22201-2909
(703) 351-3071

Colin Stretch
KELLOGG, HUBER, HANSEN, TODD,
EVANS & FIGEL, P.L.L.C.
1615 M Street, N.W. – Suite 400
Washington, D.C. 20036
(202) 326-7968

John T. Scott, III
Tamara L. Preiss
VERIZON WIRELESS
1300 I Street, N.W. – Suite 400 West
Washington, D.C. 20005
(202) 589-3760

Counsel for Verizon and Verizon Wireless

November 12, 2009