

September 13, 2010

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation-WC Docket No. 80-286 on with FCC and Joint Board Members on Separations

Dear Secretary Dortch:

On September 10, 2010 representatives of the National Association State Utility Consumer Advocates (“NASUCA”) (Executive Director Charles Acquard; Regina Costa of TURN in California; Kathy Hagans of the Ohio Office of the Consumers’ Counsel; Christopher White, of the New Jersey Division of Rate Counsel; and consultant Susan M. Baldwin) had a telephone conference call with Dan Ball and various members of the Federal-State Joint Board on Separations. The parties to the call discussed matter relating to separations reform, including the following questions poised to NASUCA. 1) If the Commission does separations reform, how should they do it? 2) What will be the effect of state members’ proposal on deployment and adoption? 3) What are the cost/benefits before and after on USF, ICC and special access? 4) What should comprehensive reform look like?

In response to these questions, the NASUCA representatives offered the following responses.

1. There should be no more extensions of the separations freeze. The best options are to come up with a comprehensive proposal in time to have in place by end of the freeze, or adopt the interim proposal offered already by the Joint Board state members (the one proposed in the last freeze).
2. This is a red herring; there should be no impact. At this time, intrastate services are overpriced, and insufficient costs are assigned to interstate services.
3. NASUCA has consistently said that separation reform needs to be part of USF, ICC

and special access reform.

4. All areas need to be done and soon.

In addition, so that the data is available to determine the effects of separations reform, ARMIS reporting should be reimposed on Regional Bell Operating Companies and expanded to include all telecommunications carriers.

Please contact the undersigned if you have any questions regarding this matter.

Respectfully submitted,

/s/ David C. Bergmann *

David C. Bergmann
Assistant Consumers' Counsel
Chair, NASUCA Telecommunications
Committee
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
Phone (614) 466-8574
Fax (614) 466-9475
bergmann@occ.state.oh.us

NASUCA
8380 Colesville Road, Suite 101
Silver Spring, MD 20910
Phone (301) 589-6313
Fax (301) 589-6380

* Submitted by Christopher White per authorization.