Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51
	)	
Establishing Just and Reasonable Rates for	)	WC Docket No. 07-135
Local Exchange Carriers	)	
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Developing an Unified Intercarrier	)	CC Docket No. 01-92
Compensation Regime	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109
	)	
Universal Service Reform – Mobility Fund	)	WT Docket No. 10-208

REPLY COMMENTS OF CARRIERS FOR PROGRESS IN RURAL AMERICA

Introduction and Summary

While the members of Carriers for Progress in Rural America ("CPRA")[1] have positions on many issues pertaining to the implementation of the *USF/ICC Transformation Order &*

[1] CPRA includes the following carriers: Bluffton Telephone Company, MGW Telephone, Inc., Piedmont Rural Telephone Cooperative, Public Service Telephone Company, Smithville Communications, Inc., Star Telephone Membership Corporation, and Valley Telephone Cooperative, Inc.

FNPRM,[2] the CPRA is focusing its reply comments on an issue of particular importance to its members: the proposed framework for limiting reimbursable capital expenses (capex) and operating expenses (opex) under the High Cost Loop Support ("HCLS") mechanism based on unpredictable and retroactively imposed caps. As CPRA explained in its initial comments in this proceeding, the imposition of retroactive, regression-based caps will introduce levels of uncertainty and unpredictability that will make it nearly impossible for carriers to make efficient investment decisions in their networks.[3] Uncertainty and unpredictability chills investment and directly impacts entire communities by stalling economic growth and job creation.

A large number of other commenters in this proceeding shared this concern about the Commission's proposal to limit capex and opex based on retroactive regression-based caps. For example, the United States Telecom Association ("USTA") described the difficulty that companies will face in making investment decisions against a backdrop of caps subject to annual change, as well as identified significant questions relating to the reliability of the proposed regression model.[4] As USTA and the other commenters have explained, the imposition of retroactive caps, based on an unreliable and flawed regression model, will introduce levels of uncertainty and unpredictability that will make it nearly impossible for a carrier to plan or

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[2] *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10- 208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (Nov. 18, 2011) ("*USF/ICC Transformation Order & FNPRM*").

[3] Comments of Carriers for Progress in Rural America (CPRA), filed Jan. 18, 2012, at 3.

[4] Comments of the United States Telecom Association (USTA), filed Jan. 18, 2012, at 19-20*; see also* Comments of the Nebraska Rural Independent Companies (NRIC), filed Jan. 18, 2012, at 68-69.

implement network upgrades and expense outlays in support of providing customers a robust broadband network.[5] These concerns are especially acute to the extent that the caps are based on a regression model that has numerous technical and conceptual flaws and will thus produce unpredictable and even arbitrary caps. Several commenters identified serious problems with the reliability of the model proposed by the Commission and a number of important cost drivers that the Commission's model unreasonably, and unlawfully, ignores. Put simply, the proposed regression model relies heavily on a single, simplistic measure — line count — and does not provide the Commission legally sufficient information about a carrier's costs that could be the basis for final agency action. The Bureau must resolve these issues and implement appropriate testing and verification controls to assure the reliability of any regression model on which substantial support is based before implementing the proposed model.

In addition, the Commission has proposed to set caps on support for eleven separate cost categories based on an arbitrary threshold of the 90th percentile. There is no support in the record for the proposition that those carriers whose costs for any of eleven separate cost categories are in the 91st (or even 96th) percentile are investing unreasonably. Yet the Commission has decided to use that arbitrary level to change how carriers receive support. To the extent the Commission plans to eliminate significant sums of support for approximately 40 percent of rate-of-return carriers using this threshold, it must show that these expenditures do not support efficient investments. The connection between a carrier operating in the 91st (or 96th) percentile and a Commission determination that such expenses are "unreasonable," not

[5] CPRA Comments, at 3.

"prudent[]," and not efficient[]"[6] is simply not made in the *USF/ICC Transformation Order*.[7] Further, to the extent that the Commission establishes caps on support, it should use just two cost categories — one cap for all capital expenses and one cap for all operating expenses — rather than eleven separate categories.

Finally, the Commission should not extend its flawed methodology to Interstate Common Line Support ("ICLS"). In addition to increasing the size of the problem, the ICLS mechanism is completely different in design than HCLS, and the Commission has not even put forward for comment a specific proposal explaining how it would cap ICLS support.

I. THE COMMISSION MUST REMEDY ERRORS IN ITS REGRESSION ANALYSIS THAT WILL OTHERWISE LIMIT CAPEX AND OPEX IN AN ARBITRARY AND CAPRICIOUS MANNER.

To the extent that the Commission uses regression-based caps, it must use a reliable methodology that is in fact predictive of carriers' costs. To be clear, the members of CPRA are deeply concerned about any framework that retroactively limits the reimbursement of costs that carriers have already incurred based on factors that are unknown and unknowable to a carrier at the time it is making financial and operating decisions to serve customers. However, if the Commission were to impose regression-based caps on reimbursable costs, it would be both arbitrary and inconsistent with the Commission's own objectives to use a flawed regression model.

A. The Regression Methodology Must Reflect The Relevant Cost Drivers.

[6] *USF/ICC Transformation Order & FNPRM*, at ¶219 ("We conclude that establishing reasonable limits on recovery for capital expenses and operating expenses will provide better incentives for carriers to invest prudently and operate efficiently than the current system.").

[7] *Id*. at ¶¶ 214-226 (discussion of use of regression analysis to cap opex and capex but no analysis as to why a carrier operating at the 91st (or 96th) percentile is acting unreasonably).

Fundamentally, the Commission's methodology must account for the universe of cost drivers that affect capital and operating expenses incurred by rate-of-return carriers. However, as a number of commenters noted, the independent variables selected by the Commission fail to account for the range of factors that affect the costs of providing service in high cost areas.[8] For example, in its initial comments in this proceeding, CPRA identified three significant factors ignored under the Commission's proposed methodology: "(a) the rate of population growth in a study area, (b) the status of a rural carrier's network (e.g., fiber versus copper), and (c) environmental, legal and regulatory costs that greatly affect construction and operating expenses and may vary significantly across study areas."[9] As the Nebraska Rural Independent Companies ("NRIC") noted, "[p]redictable USF recovery is . . . an issue since the caps are not well connected to real cost drivers, and carriers will not be able to predict how changes . . . are likely to affect their cost caps."[10]

The Commission also must address serious questions that have been raised about whether the independent variables selected by the Commission appropriately capture the drivers of a carrier's costs. The Commission has proposed that its model should account for the number of loops, stating that "the more loops a carrier is serving, the higher its expenses will be."[11] However, as commenters noted, this approach may give "too much weight to the absolute

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[8] *See, e.g.,* Comments of Moss Adams LLP *et al.*, filed Jan. 18, 2012, at 8.

[9] CPRA Comments, at 2; *see also* Comments of Accipter Communications Inc., filed Jan. 18, 2012, at 23-25 (arguing that additional variables that should be considered include change in loops over time and other terrain variables). The Moss Adams Commenters also identified a number of independent variables for terrain that may impact a carrier's costs, including terrain such as mountains and valleys, soil types such as loam or rock, the length of the construction season, the water table, and weather patterns. Moss Adams Comments, at 12.

[10] NRIC Comments, at 50.

[11] *USF/ICC Transformation Order & FNPRM*, at Appendix H, ¶ 23.

number of loops."[12] The Commission also has failed to distinguish between residential and business loops.[13]

The Commission has expressed a preference for adopting a methodology that only uses independent variables that are publicly available.[14] While the Bureau must ensure that the program is administrable, unless the model accounts for the relevant cost drivers, the regression model will cause capex and opex to be limited in an arbitrary and capricious manner. Carriers simply will not be in a position to make efficient investment decisions to serve customers on the basis of a regression model that fails to account for relevant cost drivers and therefore is not predictive of a carrier's reasonable costs.

B. The Bureau Must Resolve Various Technical Problems With The Commission's Model Before Implementation of the Proposal.

Like many of the commenters in this proceeding, the members of the CPRA also are deeply concerned about numerous anomalies that result under the Commission's proposed model and other apparent technical errors. As a result of these errors, the proposed model will lead to unpredictable support across the board and reduce support for a number of carriers to levels that are insufficient to continue serving existing customers. Carriers will not be in a position to make efficient investment decisions on the basis of a flawed regression model that results in incongruous and plainly incorrect outcomes.

The Commission should address technical errors identified by commenters that will otherwise limit reimbursable capex and opex in an arbitrary and capricious manner. For

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[12] Moss Adams Comments, at 11.

[13] USTA Comments, at 19.

[14] *USF/ICC Transformation Order & FNPRM*, at ¶¶ 216, 224, 1083; *see also id.* at Appendix H, ¶ 1.

example, commenters have identified significant inaccuracies with respect to estimated study area boundaries and the mapping of census blocks.[15] In addition, the Moss Adams Commenters identified irregular results under two of the most important of the eleven limitations: the limitation on Cable & Wire Facilities ("CW&F") (algorithm line 1) and the limitation on Central Office Equipment ("COE") (algorithm line 2).[16] The anomalous results produced by the regression model raise serious questions about the reliability of the regression model that must be addressed by the Bureau prior to implementing the proposed framework and thus limiting HCLS in an arbitrary manner.

The likelihood that inadequate support will result from implementation of a flawed regression model is made more pronounced by the overall thrust of the *USF/ICC Transformation Order*, which takes many actions to deny support to rural carriers and the customers they serve. For just one example, immediate elimination of the "safety net additive" rule results in many carriers losing a legitimate source of support. Companies that invested in their network on the basis that safety net additive support would be provided already are imperiled by the loss of significant support and are now likely to face additional losses in anticipated support, including for capital expenditures that such carriers have already incurred. The cumulative effects of these changes will impair the ability of many rural carriers to provide quality telephone service to their customers, much less further deployment or upgrades to broadband service. This underscores why the Commission needs to proceed carefully with

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[15] Initial Comments of the National Exchange Carrier Association, Inc.; National Telecommunications Cooperative Association; Organization for the Promotion and Advancement of Small Telecommunications Companies; and the Western Telecommunications Alliance ("Rural Associations Comments"), filed Jan. 18, 2012, at 65-66; NRIC Comments, at 27-33.

[16] Moss Adams Comments, at 14.

implementing a regression analysis methodology to deny even more support to rate-of-return carriers.

C. The Commission Should Not Implement Regression-Based Caps Unless And Until The Proposal Successfully Withstands Testing And Review.

As USTA notes, "[t]he Commission's methodology requires further review and evaluation before being implemented."[17] Even if the Bureau is able to address each of the specific errors identified by commenters in this proceeding, the large number of significant problems identified by the commenters highlight the need for further review and thorough testing. USTA thus points to the same concern that CPRA raised in its initial comments: the Commission should run the regression analysis and divulge the results but should not use it to reduce support in the first year.[18] This "test run" serves two important public interest purposes. First, as USTA puts it, the methodology needs review and evaluation before being implemented, and it would be a mistake for the Commission to "experiment" with the regression analysis while using its results to impose significant hardship on some carriers. Second, the Commission stated that the regression analysis is designed to "give[] carriers an incentive to constrain their capital and operating costs." But the withdrawal of support with no advance notice, and no ability for a carrier to respond, is not an incentive, it's a penalty. A trial run of the regression model, by contrast, would enable the Commission to identify flaws and also would accomplish the Commission's goal, to send signals to carriers so that "carriers will be more mindful of the cost of their future capital expenditures, [and] they will need to be mindful of future operating expenses associated with new investment."[19] CPRA agrees with USTA and other commenters

[17] USTA Comments, at 19.

[18] CPRA Comments, at 12.

[19] *USF/ICC Transformation Order & FNPRM*, at ¶ 219 n.351.

on the need for the Commission to further review and evaluate the regression methodology before it is fully implemented.

II. The Commission's Assumption That Costs Above A Certain Percentile Threshold Are "Unreasonable" Is Unjustified And Arbitrary.

In adopting proposed caps, the Commission explained that it was seeking to limit reimbursable costs to those levels that are "appropriate" and "prudent."[20] Yet, as the Rural Associations have stated, "[t]he 90th percentile is an arbitrary figure that has no demonstrable link to a threshold at which costs become unreasonable."[21] Indeed, even if the resulting facilities actually are used and useful in serving the public, costs exceeding a certain threshold will be deemed imprudent.

A. Tying Caps To An Arbitrary Percentile Threshold Is Unlawful.

CPRA shares the Rural Associations' concern that, "[t]he Commission has failed to provide a rationale connecting <u>*any*</u> percentile with a threshold above which costs might rationally be considered excessive or unnecessary."[22] Indeed, the only justification offered by the Commission for its proposal to cap reimbursable expenses at the 90th percentile is that "carriers with costs exceeding 90 percent of their similarly-situated peers *may raise questions* about the prudence of such expenditures."[23] But aside from this conclusory and unsupported suggestion, the Commission fails to explain, much less justify, a 90th percentile threshold. The Commission has not pointed, for example, to any evidence or theory that indicates a carrier with costs in the 91st percentile (or even the 96th percentile) has made investments that are not

[20] *See USF/ICC Transformation Order & FNPRM*, at ¶¶ 210, 212.

[21] Rural Associations Comments, at 66.

[22] *Id.*

[23] *USF/ICC Transformation Order & FNPRM*, at Appendix H, ¶ 12 (emphasis added).

reasonably necessary to serve customers. This omission raises serious concerns about the legitimacy of the proposed framework under applicable administrative law principles.

The absence of any explanation or support for the notion that costs should be treated as unreasonable once they exceed the 90th percentile is all the more concerning in light of the draconian consequences that a rate-of-return carrier will face if it exceeds any of the proposed caps. As an initial matter, hitting the 90th percentile cap for any of eleven categories of reimbursable costs will cause a severe impact on high-cost loop support. As the Nebraska Rural Independent Companies ("NRIC") explain in their comments, carriers that exceed any of eleven caps by just $0.01 face a "financial cliff": support will decline by at least $2.76 per line per month.[24] This will amount to millions of dollars in lost support (and thus cause millions of dollars in foregone investment) in those study areas that need it most.

Moreover, the Commission proposes to use the percentile threshold as a hard cap on reimbursable expenses; it is not simply a screening mechanism. In effect, costs that exceed the proposed 90th percentile threshold will be deemed *per se* unreasonable. A carrier that exceeds the proposed cap because of costs that are perfectly legitimate, but not shared by carriers in other regions and circumstances, simply will not be able to recover appropriate levels of support. USTA offered the following example: "[a] coastal provider who may get its poles knocked down a lot by storms but cannot bury its lines due to a water table issue is probably going to be in a different capex investment category than a similar peer who has very stable plant structure type investments."[25] Even though the coastal provider will incur greater costs than its "similar" peers for *legitimate* reasons, under the Commission's proposal, that portion of the

[24] NRIC Comments, at 68-69.

[25] USTA Comments, at 21.

carrier's costs that exceed those incurred by "similar" peers will be deemed *per se* unreasonable. It is true that the Commission has stated that such "companies are free to file a petition for waiver to seek additional support."[26] However, "[t]he Commission's onerous waiver process is vastly out of proportion to what may very well be legitimate situations experienced by more than a few small companies."[27] In the absence of some sort of relief mechanism or even a meaningful waiver process, carriers that face idiosyncratic costs will lose significant amounts of support due to legitimate and reasonable expenses. In light of the enormous import of the threshold, which is likely to reduce support for more than 40 percent of rate-of-return carriers,[28] it is especially concerning that the Commission has not offered a meaningful rationale for a 90th (or 85th or 95th) percentile threshold.

B. Only Unreasonable Costs Should Be Excluded From Support Mechanism.

The use of a percentile threshold to automatically deny support also ignores the longstanding principle that utilities generally should be able to recover at least the cost of equipment that is "used and useful" in providing service to the public.[29] The Commission's proposed threshold assumes that equipment costs exceeding an arbitrary threshold are presumptively *imprudent* even if the resulting equipment actually is used and useful in serving the public.[30] The perverse effect of this assumption is that many carriers will be punished for making investments that genuinely benefit their customers.

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[26] *USF/ICC Transformation Order & FNPRM*, at ¶ 222.

[27] USTA Comments, at 21.

[28] *See* Rural Associations Comments, at 71.

[29] *See Verizon Commc'ns Inc. v. FCC*, 535 U.S. 467, 483-86 & n.6 (2002) (tracing history of rate setting methodology).

[30] *Cf. id*. at n.6 (describing "used and useful" principle and common prudent-investment rule).

Even a cap of 98 percent would cause a number of carriers to lose support for "used and useful" investments and would dampen network investments (including prudent investments) by carriers. As noted above, CPRA believes that, at a minimum, the Commission should perform the regression analyses at different thresholds and divulge the results before using it to reduce support. This also would be an opportunity to supplement the record with respect to the question of what, if any, percentile would not be an arbitrary threshold. The present record fails to justify any particular percentile threshold cap.

III. THE COMMISSION'S OBJECTIVES ARE BETTER ACHIEVED BY IMPOSING TWO CAPS RATHER THAN ELEVEN SEPARATE CAPS.

The Commission's proposal to impose eleven separate caps will actually contravene its goal of promoting efficient investment. Under the Commission's proposed methodology, eleven of the twenty-six algorithm lines used for calculating HCLS would be limited, each by a separate quantile regression model. As several commenters noted, this would result in the Commission's proposal reducing support for a far more significant number of carriers than it may realize.[31] Moreover, it would cause carriers to shift investments to less efficient cost categories in order to preserve shrinking HCLS support. Instead, CPRA proposes that the Commission's model be redesigned to maximize carriers' overall incentives to increase operating efficiency.[32] This could be accomplished by reducing the eleven cost categories to just two categories: a limit on capex and a limit on opex.

The use of eleven separate cost categories would cause arbitrary, yet significant, reductions in support for a substantial number of carriers. As the Rural Associations explained, "while each quantile model is designed to limit data associated with 10 percent of study areas,

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[31] Rural Associations Comments, at 68-69.

[32] *See* Accipter Comments, at 18-19.

different study areas are affected by each model differently, resulting in well over a third of the study areas being limited by one or more models."[33] In total, 283 of 720 study areas would receive lower payments because of caps on support. Clearly, the use of eleven separate cost categories will capture a much broader universe of carriers than those "with costs exceeding 90 percent of their similarly-situated peers."[34] It also means that a carrier that is in the 91st percentile in one cost category, but a low percentile for the other ten cost categories, will face a substantial reduction in HCLS support.

Further, the Commission failed to consider that the eleven cost categories implicated by its proposal include a number of substitutable costs. As Accipter Communications explains, the FCC's proposed model fails to consider "the interaction between the cost categories. So a carrier which spent more on [the Cable & Wire Facilities category (C&WF)] could be limited in that category without getting consideration for the cost reductions realized in other cost categories such as COE or maintenance."[35] Indeed, under this proposed framework, carriers are likely to change their investment decisions to avoid exceeding the 90th percentile threshold in any one cost category. At best, this will result only in "gaming" by carriers seeking to maximize their shrinking HCLS support. At worst, this will cause carriers to make less efficient investment decisions and reduce carriers' service to customers. "For example, spending more in C&WF often reduces costs for the ongoing maintenance of that facility. Additionally,

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[33] Rural Associations Comments, at 71.

[34] *USF/ICC Transformation Order & FNPRM*, at Appendix H, ¶ 12.

[35] Accipter Comments, at 18-19; *see also* NRIC Comments, at 56. ("If a ROR ETC can decrease overall costs by deploying fiber and thereby eliminating costly maintenance of old copper cable, even though cable investment may increase, then the cable should [be] replaced. Similarly, if a ROR ETC can greatly decrease Cable and Wire Facilities Cost by slightly increasing Central Office costs, that too should be encouraged.").

an extra expenditure on C&WF can reduce costs related to Central Office Equipment (COE)."[36] However, under the Commission's proposal, carriers may have incentives to not make such pro-efficiency expenditures on C&WF and to otherwise shift spending among cost categories to avoid hitting the 90 percentile threshold cap, but at the expense of efficient network development and customer benefit. As NRIC explained, "[b]y creating so many caps, the Commission is specifying how carriers should deliver services and thus is regulating production technology. . . . [S]uch rigorous regulation does not promote economic efficiency or innovation. Indeed, capping . . . will neither ensure sufficient universal payments nor promote efficient operations."[37]

Accordingly, to the extent the Bureau implements the Commission's framework, CPRA urges the Bureau to combine the eleven separate caps into two, common sense caps: one overall cap for capital investment and another for operating expense.

IV. THE COMMISSION SHOULD NOT EXTEND ITS FLAWED APPROACH TO ICLS.

For the reasons provided in its initial comments, CPRA urges the Commission not to adopt a similarly ill-advised framework with respect to Interstate Common Line Support ("ICLS"). Having injected substantial uncertainty into the HCLS funding mechanism, the Commission and Bureau should not similarly destabilize ICLS, a mechanism far different in design and purpose than HCLS, particularly without having published and received comment on a specific proposal.

The HCLS and ICLS support mechanisms are substantially different, rely on different sets of data, and serve distinct purposes. Unlike HCLS, ICLS was intended to recover a

[36] Accipter Comments, at 18.

[37] NRIC Comments, at 55; *see also id.*, at 56 ("[I]f 11 separate caps were adopted, the Commission would be intruding unnecessarily into the management of carriers, which may not result in lower costs.").

specific interstate revenue deficiency – notably the revenue lost when minute based common line charges were eliminated and the subscriber line charge ("SLC") caps were met. If ICLS is capped through some as of yet undisclosed methodology, there will be no mechanism for carriers to recover shortfalls. ICLS relates only to the interstate jurisdiction, such that shortfalls in support are not shifted to the state jurisdiction as they are with HCLS. Nor will carriers be able to increase end user charges to make up the difference.[38] Simply put, an ICLS cap would limit the recovery of certain expense and capital costs and would create a giant "hole" in the interstate common line revenue requirement.

Further, the Commission should not introduce the numerous technical and conceptual flaws with the proposed regression-based caps into the ICLS mechanism. Extending the regression methodology to ICLS would merely compound the negative impacts on network investments and carrier service in high cost areas, particularly given the lack of specificity in the Further Notice. ICLS is completely different in design and intent from HCLS and the Commission must put forth a more detailed proposal for ICLS before blindly extending an already flawed HCLS methodology.

Conclusion

The reforms to the USF framework are numerous and complex, with yet-unknown financial effects on carriers serving rural America, so the proposed regression-based caps on HCLS should not be implemented out of expediency. There are serious problems with the proposed regression model, which will result in approximately 40 percent of carriers and their

[38] For the reasons explained in CPRA's initial comments, carriers also will face substantial difficulty in recovering lost HCLS support by increasing local rates. *See* CPRA Comments, at 11. Companies face significant restrictions with regard to increasing local rates. *Id.* at 11-12.

customers losing substantial sums of high cost support on the basis of the retroactive application of unpredictable and arbitrary caps .

At a minimum, the Commission must remedy the serious technical flaws identified by commenters before implementing the regression methodology and tie any cap to a percentile threshold that is demonstrably linked to imprudent investment decisions. Moreover, if the caps are to have any bearing on carriers' investment decisions, there should be a single cap on capital expenses and a single cap on operating expenses or a total cap on average loop costs, rather than eleven separate, arbitrary caps.

Uncertainty and unpredictability experienced by carriers in rural America trickles down and is felt by the entire community, stalling economic recovery and job growth. It is important that recovery be allowed for "used and useful" investments required to serve customers in rural America with robust broadband networks. The Commission's failure to allow this would have negative impacts on services demanded by customers of rural rate-of-return carriers.

Respectfully submitted,

/s/

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