

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

<i>In the Matter of</i>)	
)	
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 Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
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

**GENERAL COMMUNICATION, INC.’S REPLY TO OPPOSITIONS TO
PETITIONS FOR RECONSIDERATION**

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**GENERAL COMMUNICATION, INC.’S REPLY TO OPPOSITIONS TO
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INTRODUCTION AND SUMMARY

General Communication, Inc. (“GCI”) hereby replies to the Oppositions to Petitions for Reconsideration of the Commission’s October 27, 2011, *Report and Order*, which sought to reform and modernize the universal service and intercarrier compensation systems (“*Order*, “*FNPRM*” or “*Further Notice of Proposed Rulemaking*”).¹ No party substantively opposes

¹ *Connect America Fund; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Lifeline and Link-Up; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; A National Broadband Plan for Our Future; Universal Service Reform – Mobility Fund, Report and Order and Further Notice of Proposed Rulemaking, WC Docket Nos. 10-90, 07-*

GCI's proposal, on reconsideration, that the Remote Alaska mechanism should include all Alaska Competitive Eligible Telecommunications Carrier ("CETC") support currently flowing to these areas, not just the support flowing to entities that filed certifications that they were serving covered locations. Similarly, no party substantively opposes GCI's proposal to calculate the funding subject to the Remote Alaska mechanism based on September 30, 2011, lines (as reported March 30, 2012) multiplied by frozen end of 2011 per-line support in the Remote Alaska areas. Although Alaska Communications Systems Group, Inc. ("ACS") opposes GCI's proposal to use annualized June 2014 support levels to initialize the CETC phase-down in these areas rather than Calendar Year 2013 support, ACS does not reconcile its position with the purposes of the Remote Alaska mechanism. The simple fact remains that, because of reporting lags, basing the 2014 phase-down support on a Remote Alaska CETC's Calendar Year 2013 support means calculating the phase-down using 2012 lines served—which substantially blunts any incentive for continued deployment and service improvements in Remote Alaska beyond 2012. These three reconsideration requests will benefit Remote Alaska as a whole, and do not change the relative amounts of Remote Alaska support received by each Remote Alaska CETC.

Both GCI and ACS agree with the State of Alaska, which warns that "[m]ajor 2012 calendar year investment and construction will be lost if these rules and mechanisms are not changed within weeks of this filing."² The Commission should "make every effort to resolve the Petitions for Reconsideration, at least to the extent that they affect Alaskan carriers, by the end of

135, 05-337, 03-109; CC Docket Nos. 01-92, 96-45; GN Docket No. 09-51; WT Docket No. 10-208, (rel. Nov. 18, 2011) ("*Order*").

² Letter from Becky Hultberg, Commissioner, Department of Administration, State of Alaska to Hon. Julius Genachowski, Chairman, FCC, at 4, WC Docket Nos. 10-90 et al. (filed Feb. 17, 2012).

March ... so that Alaska CETCs may take advantage of the limited construction season in 2012.”³

A few Competitive Local Exchange Carriers (“CLECs”) oppose GCI’s request to reconcile the access transition for areas in which the rates for Transitional Intrastate Access services are below the levels of functionally-equivalent interstate access services.⁴ Although these CLECs understandably seek to avoid further access revenue reductions, their opposition is unprincipled. They completely fail to address why LECs in areas in which interstate access rates exceed intrastate access rates should remain saddled with a terminating access regime, including for dedicated and switched transport, that has different intrastate and interstate rates unless and until the Commission takes action on the *Further Notice of Proposed Rulemaking*. Such a distinction is wholly arbitrary.

Finally, GCI again supports Verizon’s call to require compliance with call signaling rules only when doing so is technically feasible and consistent with industry standards.

I. THE COMMISSION SHOULD INCLUDE ALL CETCS IN THE REMOTE ALASKA INTERIM CETC CAP, CALCULATE THE REMOTE ALASKA MECHANISM BASED ON LINES SERVED AS OF SEPTEMBER 30, 2011, AND CALCULATE THE BASELINE FOR ANY DELAYED PHASE-DOWN OF REMOTE ALASKA SUPPORT ACCORDING TO LINE COUNTS AS THEY EXIST AT THE END OF THE DELAY.

In its Petition for Reconsideration (“Petition”), GCI proposed three specific changes to the Remote Alaska mechanism to better align the mechanism with its purposes:

³ See Opposition of Alaska Communications Systems Group, Inc. at 6, WC Docket Nos. 10-90 et al. (filed Feb. 9, 2012) (“ACS Opposition”); see also General Communication, Inc. Petition for Reconsideration at 4, WC Docket Nos. 10-90 et al. (filed Dec. 23, 2011) (“GCI Petition for Reconsideration”).

⁴ See Comments of C-Beyond, Earthlink, Integra Telecom and TW Telecom at 2, WC Docket Nos. 10-90 et al. (filed Feb. 9, 2012) (“C-Beyond et al. Comments”).

- (1) Include all CETC support for Remote Alaska areas within the Remote Alaska mechanism, including approximately \$19 million that non-certifying CETCs received for service provided in Remote Alaska;⁵
- (2) Calculate the initial level of support subject to the Remote Alaska mechanism based on lines served as of September 30, 2011, times frozen December 31, 2011, per-line support (not to exceed \$250 per line per month);⁶
- (3) Calculate the level of each CETC's support for the ultimate CETC phase-down in Remote Alaska (to begin July 2014 unless the Mobility Fund Phase II, including its Tribal component, have not been implemented) using June 2014 lines (or if later, the last month before the transition) times the frozen December 31, 2011, per-line support (not to exceed \$250 per line per month).⁷

The National Cable and Telecommunications Association ("NCTA") specifically supports these changes,⁸ and no party other than the National Association of State Utility Consumer Advocates, et al. ("NASUCA") opposes the first two changes GCI proposed—with NASUCA's opposition entirely (and erroneously) procedural. With respect to the third change only, ACS objects, but never explains why it would be better to base the 2014 phase-down on line counts from 2012.

NASUCA erroneously claims that these Remote Alaska issues can and should be addressed either through a waiver or in the *FNPRM*.⁹ In fact, interim Remote Alaska support prior to Mobility Fund Phase II is not at issue in the *FNPRM*. With respect to submitting a waiver, inasmuch as GCI's Petition addresses the specific rules in question and applies to all affected carriers, reconsideration is a more appropriate way of proceeding than a waiver. More

⁵ See GCI Petition for Reconsideration at 9-14.

⁶ See *id.* at 7-9.

⁷ See *id.* at 14-16.

⁸ See Comments of the National Cable & Telecommunications Association at 3 n.8, WC Docket Nos. 10-90 et al. (filed Feb. 9, 2012).

⁹ See Comments on Request for Reconsiderations by the National Association of State Utility Consumer Advocates and the New Jersey Division of Rate Counsel at 6-7, WC Docket Nos. 10-90 et al. (filed Feb. 9, 2012).

critically, timely action is needed so that carriers can plan their activities for the short 2012 summer construction season. NASUCA's meritless procedural objections should therefore be disregarded.

A. Include All Remote Alaska CETC Support in the Remote Alaska Mechanism.

ACS specifically supports GCI's first proposal, to include all CETC support to Remote Alaska within the Remote Alaska mechanism, and no party raises a substantive objection.¹⁰ This change would fulfill the language and intent of the *Order* by ensuring that all Alaska providers receive support based on actual lines served, and not exclude from the Remote Alaska cap an estimated \$19 million of current CETC high-cost support. As GCI explained in its Petition for Reconsideration, this change increases the incentives for providers to make the investments in unserved and underserved areas that the Remote Alaska mechanism was meant to preserve, and failing to make this change will reduce those positive incentives.¹¹

GCI also notes that with the change made in the February 6, 2012, Erratum to 54.307(e)(3)(v),¹² the Commission and USAC can readily implement this change in the same manner as described in GCI's Petition.¹³ The rule now states that a CETC receives "the support, as calculated by the Administrator, each competitive eligible telecommunications carrier would have received under the frozen per-line support amount as of December 31, 2011 capped at \$3,000 per year," adjusted by a factor to stay within the Remote Alaska cap. This new language

¹⁰ See ACS Opposition at 5. As discussed above, text accompanying n.9, NASUCA's opposition is procedural only and meritless.

¹¹ See GCI Petition for Reconsideration at 11-12.

¹² *Connect America Fund*, Erratum, ¶ 180, WC Docket Nos. 10-90 et al. (filed Feb. 6, 2012) ("Feb. 6 2012 Erratum").

¹³ See GCI Petition for Reconsideration at 12-14.

permits a CETC that did not certify that it served covered locations to receive the frozen per-line support amount it would have been paid as of December 31, 2011, which was subject to a CETC cap's statewide reduction factor, while the CETC that certified that it served covered locations would receive the full frozen December 31, 2011, per-line support amount to which the CETC cap's statewide reduction factor was not applied. The Commission can thus readily include all CETCs that served Remote Alaska in the Remote Alaska mechanism, regardless of whether those CETCs certified that they served covered locations.

B. Base the Remote Alaska Mechanism on Near-Current Lines.

No party substantively opposes GCI's proposal to base the size of the Remote Alaska support mechanisms on September 30, 2011, lines times the December 31, 2011, frozen per-line support (capped at \$3,000 per line per year or \$250 per line per month).¹⁴ As described in GCI's Petition, this change is more consistent with the purpose of the Remote Alaska mechanism, which was to "preserve newly initiated services and facilitate additional investment in still unserved and underserved areas."¹⁵ As written, the rules do not preserve funding for newly initiated services, but instead exclude an estimated \$4 to \$5 million of CETC high-cost support that was necessary to bring modern wireless service to many villages in Remote Alaska.¹⁶ As GCI explained, this reduction results from the lag between the time that a CETC begins serving

¹⁴ Again, NASUCA's objection is entirely procedural. See text accompanying n.9.

¹⁵ *Order*, ¶ 529. This specifically stated purpose of the Remote Alaska mechanism distinguishes GCI's Petition from that of T-Mobile, which has requested reconsideration of the general base period for determining CETC support during the phase-down that commences July 1, 2012. See T-Mobile, Inc., Petition for Reconsideration or Clarification, WC Docket Nos. 10-90 et al. (filed Dec. 29, 2011) ("T-Mobile Petition for Reconsideration"). Nothing in GCI's Petition affects the phase-down of legacy CETC support outside of Remote Alaska.

¹⁶ See GCI Petition for Reconsideration at 8.

lines, when they are reported, and when USAC then uses those lines to determine support levels—a cumulative delay of nine months to one year. The Remote Alaska rules, as written, thus fail to fully reflect the new deployments to 35 Remote Alaska villages that occurred in the spring and summer of 2010 and 2011.¹⁷

C. Set the 2014 Phase-Down Support Based on Then-Current Lines Served.

The Commission should grant GCI’s Petition to set the Remote Alaska per-carrier/per-study-area baseline of support based on line counts and per-line support amounts as they exist at the end of the two-year delay before any phase-down. Notably, GCI’s Petition did not affect the calculation of the CETC phase-down support outside of Remote Alaska. Currently, the rules fix the per-study-area support levels *six months before* the start of the delayed Remote Alaska support phase-down, and set the delayed phase-down baseline on amounts *disbursed* in 2013, which reflects lines served in 2012. GCI proposes instead to base the level of CETC phase-down support in Remote Alaska on the lines actually *in service* immediately prior to the commencement of the phase-down. GCI’s proposal would provide Remote Alaska CETCs with incentives to invest in new deployments throughout the entire two-year delay period.¹⁸ ACS opposes this change, apparently supporting use of 2013 disbursements (based on 2012 lines in service) to determine the 2014 phase-down support.¹⁹ ACS, however, does not address how the use of support based on 2012 lines in service is consistent with “facilitat[ing] additional

¹⁷ GCI also notes that this change does not change the relative amount of Remote Alaska support received by each Remote Alaska CETC, as that is now governed by 54.307(e)(3)(v), as clarified by the February 6, 2012, Erratum.

¹⁸ See GCI Petition for Reconsideration at 15.

¹⁹ See ACS Opposition at 5-6. It is unclear, however, exactly what ACS is opposing, as ACS states that it does not agree with calculating phased-down CETC support based on *2011* line counts, which GCI did not propose.

investment in still unserved and underserved areas.”²⁰ Indeed, truncating the incentive to make additional investments at the end of 2012 (and effectively prior to that date) is inconsistent with creating a two-year period for further investment in unserved and underserved areas to facilitate transition to Mobility Fund Phase II. The Commission therefore should grant this aspect of GCI’s petition.

II. THE COMMISSION SHOULD HARMONIZE INTERSTATE AND INTRASTATE ACCESS RATES ON THE SAME SCHEDULE AND TO THE SAME EXTENT WHEN INTRASTATE ACCESS RATES ARE BELOW INTERSTATE ACCESS RATES

A group of CLECs opposes GCI’s Petition to the extent that it asks the Commission to harmonize access reductions in areas in which interstate access rates exceed intrastate access rates, with those that the *Order* addresses in which interstate access rates are below intrastate access rates.²¹ These carriers argue that CLECs already face the challenge of adjusting to substantial access decreases in the states in which intrastate access rates exceed interstate access, and that extending reductions to those areas in which intrastate access rates are below interstate access rates would add to the difficulty.²² GCI certainly appreciates the difficulty that all carriers are facing in implementing the *Order*’s intercarrier compensation provisions.²³ However, in erroneously suggesting that the existing transition will cure the disparities between intrastate and

²⁰ *Order*, ¶ 529. This specifically stated purpose of the Remote Alaska mechanism distinguishes GCI’s Petition from that of T-Mobile, which has requested reconsideration of the general base period for determining CETC support during the phase-down that commences July 1, 2012. *See supra*, n.15.

²¹ *See* C-Beyond et al. Comments at 9-10.

²² *See id.*

²³ GCI never represented that the impacts of its Petition on this point were limited to Alaska, and recognizes that there are other areas of the country where interstate access rates exceed intrastate access rates.

interstate access rates in areas in which interstate access rates exceed intrastate access rates, these CLECs demonstrate an incomplete grasp of the access reform provisions of the *Order*. In fact, in areas in which interstate access rates exceed intrastate access rates, the current transition will leave jurisdictionalized access rates in place for some terminating Tandem-Switched Transport Access Service and all originating and terminating Dedicated Transport Access Service, and will even permit separate intrastate and interstate End Office Access rates. Such a result is wholly arbitrary.

The first two steps of the access transition in all areas in which intrastate access rates exceed interstate access rates covers all parts of Transitional Intrastate Access Service, including terminating End Office Access Service,²⁴ terminating Tandem-Switched Transport Access Service²⁵ and originating and terminating Dedicated Transport Access Service.²⁶ Over the course of the first two steps (*i.e.*, by July 1, 2013), all rates comprising Transitional Intrastate

²⁴ “End Office Access Service” is defined in 47 C.F.R. § 51.903(d) as:

“(1) The switching of access traffic at the carrier's end office switch and the delivery to or from of such traffic to the called party's premises;

“(2) The routing of interexchange telecommunications traffic to or from the called party's premises, either directly or via contractual or other arrangements with an affiliated or unaffiliated entity, regardless of the specific functions provided or facilities used; or

“(3) Any functional equivalent of the incumbent local exchange carrier access service provided by a non-incumbent local exchange carrier.”

²⁵ “Tandem-Switched Transport Access Service” is defined in 47 C.F.R. § 51.903(i) as:

“(1) Tandem switching and common transport between the tandem switch and end office; or

“(2) Any functional equivalent of the incumbent local exchange carrier access service provided by a non-incumbent local exchange carrier via other facilities.”

²⁶ “Dedicated Transport Access Service” is defined in 47 C.F.R. § 51.903(c) as:

“originating and terminating transport on circuits dedicated to the use of a single carrier or other customer provided by an incumbent local exchange carrier or any functional equivalent of the incumbent local exchange carrier access service provided by a non-incumbent local exchange carrier.”

Access Service are migrated from the higher intrastate rate levels to the lower intrastate rate levels, and to the interstate access rate structure.²⁷ After that, the only access rate changes that occur are with respect to End Office Access Service—not Dedicated Transport Access Service—and, only for the subset of traffic traversing a price-cap LEC tandem that the terminating price-cap LEC owns, Tandem-Switched Transport Access rates.²⁸ Dedicated Transport Access Service rates and Tandem-Switched Transport Access rates in all other situations are never reduced under current rules. Thus, interstate and intrastate access rates for these services will never be unified in areas in which interstate access rates exceed intrastate access rates, at least pending any further rulemaking.

Moreover, even with respect to End Office Access Service, there is no requirement that the price-cap LEC or rate-of-return LEC ever unify its interstate and intrastate access rates when interstate access rates exceed intrastate access rates, in contrast to the Step 2 requirement that LECs use their interstate access rates when intrastate access rates exceed interstate access rates. From Step 3 onwards, all reductions to End Office Access Service are implemented using an annual Target Composite Terminating End Office Access Rate, which is an average terminating End Office Access Service revenue per-minute.²⁹ A carrier could maintain different intrastate and interstate End Office Access Service rates consistent with the mandated reductions in the annual Target Composite Terminating End Office Access Rate.

²⁷ See 47 C.F.R. §§ 51.907(c) (price cap incumbent LECs); 51.909(c) (rate-of-return incumbent LECs); 51.911(c) (CLECs).

²⁸ See 47 C.F.R. §§ 51.907(d)-(h) (price cap incumbent LECs); 51.909(d)-(k) (rate-of-return incumbent LECs); 51.911(c) (CLECs, that are benchmarked to the competing ILEC rates).

²⁹ See *e.g.* 47 C.F.R. §§ 51.907(d)(2), 51.909(d)(3).

In the end, these CLECs articulate no rational basis for treating areas where the interstate access rates exceed intrastate access rates differently from areas in which the intrastate access rates exceed in the interstate access rates. And there is none, because of the administrative costs and inefficiencies from continued jurisdictional disputes are the same in all areas in which intrastate and interstate access rates are different. Arbitrage will exist wherever those rates are different, not just where intrastate access rates exceed interstate access rates. In all areas, therefore, the first two steps of the access transition should be to harmonize interstate and intrastate access rates. The only way that this can be done without raising access rates is to harmonize all Transitional Intrastate Access Service rates at the lower of the interstate and intrastate access rate levels, as GCI has suggested in its Petition.

III. THE COMMISSION’S CALL SIGNALING RULES SHOULD REQUIRE COMPLIANCE ONLY WHERE TECHNICALLY FEASIBLE OR CONSISTENT WITH INDUSTRY STANDARDS.

Finally, in response to various opposing commenters,³⁰ GCI again supports Verizon’s call to require compliance with call signaling rules only when doing so is technically feasible and consistent with industry standards.³¹ As GCI noted in its Comments on Petitions for Reconsideration, “Alaska presents unusual call signaling challenges that do not permit simple compliance with the proposed call signaling rules,”³² and “[a]dopting a general technical

³⁰ See Opposition of Frontier Communications Corporation to Petitions for Reconsideration, WC Docket Nos. 10-90 et al. (filed Feb. 9, 2012); Opposition of Windstream Communications, Inc., WC Docket Nos. 10-90 et al. (filed Feb. 9, 2012); Opposition of NECA et al., WC Docket Nos. 10-90 et al. (filed Feb. 9, 2012).

³¹ See Petition for Clarification or, In the Alternative, for Reconsideration of Verizon at 8-12, WC Docket Nos. 10-90 et al. (filed Dec. 29, 2011).

³² Comments of General Communication, Inc. on Petitions for Reconsideration at 3, WC docket Nos. 10-90 et al. (filed Feb. 9, 2012).

feasibility exception will provide carriers with immediate certainty and avoid spending scarce Commission resources on the review of waiver requests....”³³

Respectfully submitted,



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³³ *Id.* at 4-5.

CERTIFICATE OF SERVICE

I, John T. Nakahata, hereby certify that on this 21st day of February 2012, I served a copy of the foregoing Reply to Oppositions to Petitions for Reconsideration by first-class U.S. mail, postage prepaid, on the following parties:

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