

**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Lifeline and Link Up Reform and
Modernization

WC Docket No. 11-42

Lifeline and Link Up

WC Docket No. 03-109

Federal-State Joint Board on Universal
Service

CC Docket No. 96-45

Advancing Broadband Availability Through
Digital Literacy Training

WC Docket No. 12-23

**COMMENTS
OF
THE WASHINGTON INDEPENDENT TELECOMMUNICATIONS ASSOCIATION
ON
PETITION FOR WAIVER AND CLARIFICATION
OF THE UNITED STATES TELECOM ASSOCIATION, ET AL.**

March 16, 2012

INTRODUCTION AND SUMMARY

The Washington Independent Telecommunications Association (WITA) is a trade association representing the incumbent local exchange carriers in the State of Washington. A list of WITA's members is attached as Appendix A.

WITA strongly supports the Petition for Waiver and Clarification filed by United States Telecom Association, et al.

DISCUSSION

On March 9, 2012, the United States Telecom Association, the Independent Telephone and Telecommunications Alliance, the National Telecommunications Cooperative Association, the Organization For the Promotion and Advancement of Small Telecommunications Companies, the Western Telecommunications Alliance and the Eastern Rural Telecom Association filed a Petition for Waiver and Clarification ("Petition") of the Commission's Order reforming the Lifeline program.¹ That same day, March 9, 2012, the Commission issued the Public Notice calling for comment on the Petition by March 20, 2012.²

First and foremost, WITA supports the Commission's Order as to its long-term outcome. However, as explained in the Petition, the short term implementation is almost impossible to meet.

In the Petition, the request is made to the Commission to waive the effective date of several rules adopted in the Order. These rules include the April 2, 2012, effective date for establishment of the new flat-rate Lifeline reimbursement amount for subscribers on non-Tribal lands, the elimination of Link Up discounts on non-Tribal lands and changes to the Link Up

¹ Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 11-42, FCC 12-11 (rel. February 6, 2012) (the "Order").

² Comment Sought on USTelecom, et al. Petition for Waiver and Clarification of Lifeline Reform Order, DA 12-387.

discount on Tribal lands. The request is for the effective date to be extended to October 1, 2012. The Petition also requests clarification of certain aspects of Section 54.407(d) of the revised Lifeline rules.

As explained in the Petition, in order to implement the Order there may be tariff changes, customer notice requirements, changes to billing systems, updates to manual procedures and new employee training.³ WITA agrees that these tasks cannot be realistically completed within the implementation period currently allowed by the Commission's Order.

In Washington, WITA's member companies will need to modify their existing tariffs that describe the Lifeline and Link Up programs. This will not be possible to accomplish by April 1, 2012. In addition, there may be changes needed to modify member company billing systems.

The new rules will require additional verification steps and add additional eligibility opportunities. Thus, there is certainly a requirement to change their internal procedures and provide employee training on the new rules.

All of those steps are very difficult to train and implement within a very short period of time.

CONCLUSION

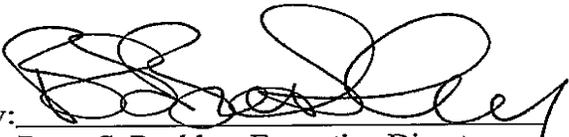
For the reasons set forth in the Petition and the reasons set forth in these Comments, WITA respectfully requests that the Commission grant the Petition.

[Signature next page]

³ Petition at p. 2.

Respectfully submitted this 16th day of March, 2012.

WASHINGTON INDEPENDENT
TELECOMMUNICATIONS ASSOCIATION

By: 
Betty S. Buckley, Executive Director

APPENDIX A

Asotin Telephone Company d/b/a TDS Telecom
CenturyTel of Cowiche, Inc., d/b/a CenturyLink
CenturyTel of Inter-Island, Inc., d/b/a CenturyLink
CenturyTel of Washington, Inc., d/b/a CenturyLink
Ellensburg Telephone Company d/b/a FairPoint Communications
Frontier Communications Northwest, Inc.
Hat Island Telephone Company
Hood Canal Telephone Co., Inc. d/b/a Hood Canal Communications
Inland Telephone Company
Kalama Telephone Company
Lewis River Telephone Company, Inc. d/b/a TDS Telecom
Mashell Telecom, Inc. d/b/a Rainier Connect
McDaniel Telephone Co. d/b/a TDS Telecom
Pend Oreille Telephone Company, d/b/a RTI Pend Oreille Telecom
Pioneer Telephone Company
St. John Co-operative Telephone and Telegraph Company
Tenino Telephone Company
The Toledo Telephone Co., Inc.
Western Wahkiakum County Telephone Company d/b/a Wahkiakum West
Whidbey Telephone Company
YCOM Networks, Inc. d/b/a FairPoint Communications