

GVNW Consulting, Inc.  
Comments in CC Docket No. 80-286 FCC 12-27  
April 5, 2012

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington D.C. 20554

In the Matter of )  
 )  
Jurisdictional Separations and Referral to the ) CC Docket No. 80-286  
Federal-State Joint Board )

**COMMENTS OF GVNW CONSULTING, INC.**

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## **INTRODUCTION AND BACKGROUND**

GVNW Consulting, Inc. (GVNW) is a management consulting firm that provides a wide variety of consulting services, including regulatory and advocacy support on issues such as universal service, jurisdictional separations, intercarrier compensation reform, and strategic planning for communications carriers in rural America. The purpose of these comments is to respond to the Notice of Proposed Rulemaking in the above referenced proceeding which was released on March 14, 2012 (FCC 12-27).

GVNW has participated in many of the earlier proceedings regarding separations reform, often with data illustration impacts of proposed rule changes on rural incumbent local exchange carriers. While the extension of the current freeze does not require a specific price out, GVNW stands ready to evaluate specific changes that the Commission may propose as it further evaluates the long term approach to jurisdictional separations.

## **GVNW SUPPORTS THE PROPOSED EXTENSION**

GVNW supports the proposed extension of the separations freeze with the same recommendations for modifications that were included in our 2011 extension freeze comments that were filed on March 28, 2011 in FCC 11-34. The following recommendations fell within the referral to the Joint Board in the 2009 Separations Freeze Extension Order as per paragraph 15 of FCC 11-71 released on May 4, 2011.

1. Consider a longer time frame for the extension order. (We appreciate the Commission's new proposal which does extend the freeze for a longer period than prior extensions.

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2. Allow rural local exchange carriers a one-time option to change their categorization decision.
3. Allow exchange carriers a one-time option to update their separations factors.
4. If it was the Commission's intent to change the use of contacts and revenues from categorization of costs to the development of jurisdictional assignment "factors" that it go through the appropriate administrative process to codify those changes.

Respectfully Submitted

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