



comprehensive basis during the period of the freeze.<sup>3</sup> During this time, there have been continual changes to the telecommunications landscape. Aside from the significant changes to the network infrastructure and services provided over that infrastructure, we have also witnessed landmark changes to the policies of universal service and intercarrier compensation.<sup>4</sup> As these significant and important reforms are implemented, there is an opportunity to engage in comprehensive reform of separations.

This opportunity, however, cannot and should not be rushed. While a one-year extension may appear to be sufficient time to engage in reforms and keep all interested parties working to address separations issues in the near-term, the reality is that a one-year extension provides little opportunity for a full investigation of all the issues. In light of the significant changes to intercarrier compensation and universal service, Joint Board members will likely spend significant time and effort to educate themselves about the impacts of these reforms on separations. This educational effort may take the better part of a year in and of itself, leaving little time to develop and properly vet separations reform proposals. Indeed, since significant time is involved in obtaining any extension, a one-year extension seems inefficient. Therefore, the PSCW encourages the FCC to adopt a two-year extension.

The PSCW raises the issue that the combination of intercarrier compensation reform and increasing deregulation of state commission authority over local rates (as has occurred in Wisconsin and other states) may reduce importance of the separations process in general. This is an issue that should be investigated; however, this investigation will require additional research and consideration. Regardless, it is clear that an extension of the status quo is necessary to avoid the unintended consequences of reverting to an even more antiquated separations system. The

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<sup>3</sup> *Further Notice*, paras. 9-11.

<sup>4</sup> *Id.*, para. 5.

PSCW believes that a two-year period should provide sufficient time to both educate policy makers and develop and scrutinize any reform proposals and encourages the FCC to adopt this extension.<sup>5</sup>

Dated at Madison, Wisconsin, on April 5, 2012.

By the Commission:



Sandra J. Paske  
Secretary to the Commission

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<sup>5</sup> The *Further Notice* identifies and seeks comment on a concern that a two-year period may not be sufficient to complete the process of separations reform and should therefore be longer. *Further Notice*, para. 13. The PSCW believes that, at this time, a two-year extension strikes a good balance between the time needed to properly develop rational reform proposals and the need to have a timeline that encourages action.