

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
High-Cost Universal Service Support)	WC Docket No. 05-337

**APPLICATION FOR REVIEW
OF THE
UNITED STATES TELECOM ASSOCIATION**

Pursuant to section 1.115 of the Commission’s Rules, 47 C.F.R. §1.115, and to the Public Notice released by the Wireline Competition Bureau on May 31, 2012,¹ the United States Telecom Association (USTelecom)² respectfully requests the Commission review the *Order* issued April 25, 2012, by the Chief, Wireline Competition Bureau, in the above-captioned proceeding³ and briefly delay its implementation until the concerns raised in this Application for Review are suitably addressed. Uncertainty and lack of clarity around present and future effects of benchmarks based on the Quantile Regression Analysis (QRA) adopted by the Wireline Competition Bureau’s *Order* pose risks to the delivery and expansion of rural broadband availability.

¹ See Public Notice, Wireline Competition Bureau Reminds Parties of Deadlines for Filing and Commenting on Applications of Review of the *HCLS Benchmarks Order*, WC Docket Nos. 10-90, 05-337 (DA 12-852 (released May 31, 2012)).

² USTelecom is the premier trade association representing service providers and suppliers for the telecommunications industry. USTelecom members provide a full array of services, including broadband, voice, data and video over wireline and wireless networks.

³ *Connect America Fund*, WC Docket No. 10-90, *High-Cost Universal Service Support*, WC Docket No. 05-337, *Order*, DA 12-646 (released April 25, 2012) (*Order*).

The QRA-based benchmarks impact not only those carriers affected by reductions this year, but also result in a chilling effect on investment for rate-of-return ILECs whose support is *currently* unchanged by the QRA. If companies cannot understand the operation of the QRA, as appears to be the case, it will not be effective in providing incentives for prudent investment. The Commission itself has acknowledged that greater certainty and predictability with regard to revenues enables carriers to invest in modern, IP networks.⁴ Unfortunately, the current iteration of the QRA diminishes that certainty and predictability for rate-of-return carriers.

The Commission should assess the issues raised by USTelecom's Application for Review and, if necessary, briefly postpone implementation of the *Order* until such issues have been suitably resolved. Taking the time to resolve questions and concerns relating to the accuracy, transparency and predictability of the QRA would be time well spent by the Commission. It would best serve the goals of the *USF/ICC Transformation Order*⁵ to encourage the efficient expansion and improvement of broadband service to consumers in rural areas served by rate-of-return ILECs. A stable and predictable QRA would provide a better environment for investment and accelerate the transition from circuit-switched to IP networks. It would be more fiscally responsible, as it would accurately target those spending excessively; it would make all rate-of-return companies more accountable for their USF-supported investments and would provide incentives to maximize the value of scarce program resources. Moreover, a brief postponement

⁴ See para. 9 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 a Unified Intercarrier Compensation Regime: Report and Order and Further Notice of Proposed Rulemaking*, 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, FCC 11-161 (2011) (*USF/ICC Transformation Order*).

⁵ *Id* at para. 11.

would not interfere with the Commission’s goal of ensuring that high-cost universal service funding is spent efficiently and constrained within a budget. Unfortunately, the current QRA does not forward the goal of efficient and effective universal service funding in high-cost areas served by rate-of-return companies.

The lack of confidence in the predictability and accuracy of the QRA creates concern that the *Order* may be missing its intended targets, those who may have taken advantage of the rules which encouraged the “race to the top” identified by the Rural Carriers.⁶ There is a widespread perception that the *Order* is not only likely to adversely impact the customers of companies that may have unique conditions in their service areas to which their higher costs are attributable; it is also likely to adversely affect those companies whose HCLS is not immediately reduced by the QRA but who fear future instability in the QRA-based benchmarks and are therefore pulling back on their future broadband investment plans. If the QRA is inaccurately identifying companies that did not participate in the “race to the top,” there is an equal possibility that it is not identifying companies that may have spent excessively.

I. The *Order* is Not Meeting the Commission’s Goals

It is telling that the Commission’s mechanism, while intended to fairly distribute funds within the rate-of-return company recipients of HCLS, has received universal condemnation from those very recipients, particularly from associations with memberships that are predominantly composed of those expected to benefit from the *Order*.⁷ The Commission

⁶ See Rural Associations USF/ICC Transformation NPRM Comments at 9, and para. 215 of the *USF/ICC Transformation Order*.

⁷ See Application for Review and Petition for Stay of National Exchange Carrier Association, Inc., National Telecommunications Cooperative Association, Organization for the Promotion and Advancement of Small Telecommunications Companies, and Western Telecommunications Alliance (*AFR of Rate-of-Return Company Associations*).

adopted a benchmarking rule intended to moderate the expenses of those rate-of-return carriers with very high costs compared to their similarly situated peers, while further encouraging other rate-of-return carriers to advance broadband deployment. The *Order* meets neither goal.

First, the capital and operating expenditures of the companies immediately impacted have already been incurred, as will be true of the expenditures of carriers impacted next year, since there is a two-year lag in cost-recovery. A well-functioning QRA could impact prospective investment decisions, but expenditures already incurred cannot be undone.

However, if the goal of the Commission is to fairly distribute HCLS funding beginning July 1, 2012, and take into account the two-year lag, it must be especially careful to ensure the fairness and accuracy of the QRA, since it is effectively being applied retroactively. Because companies had no notice of the rules prior to making expenditures during the two-year lag period, they could not therefore alter their decision-making based on any known regulatory parameters. Moreover, when rules are applied prospectively, carriers can adjust to those rules while they are being perfected. But when rules are effectively being applied retroactively, as is the case here, the dynamic nature of the process of ensuring that the rules are well-functioning comes too late for those companies to whom the imperfect rules led to harm, such as significant revenue reductions.

Second, the perception among the rate-of-return carrier community is that the results of the QRA are relatively random, and that future minor actions by companies could result in major impacts on their high-cost loop support (HCLS), a significant revenue source for many small rate-of-return companies. Merely providing a phase-in of reductions and a waiver mechanism, albeit helpful, are inadequate responses to a mechanism about which there are doubts as to accuracy and concerns regarding transparency and predictability. This perception of significant

inaccuracy and unpredictability of the QRA, whether correct or not, is causing widespread fear in the cost-company rate-of-return community which is having a chilling effect on the broadband investment plans of rate-of-return companies, thus contravening the Commission's goal of extending and improving broadband service in the challenging rural service areas of small rate-of-return companies.

II. Postponement of QRA Implementation Would Not Impact the Commission's Budget for High-Cost Funding

The QRA does not impact the size of the HCLS fund and is almost purely distributional within the rate-of-return company community.⁸ Postponing implementation of the QRA would thus not impact the Commission's high-cost funding budget. USTelecom shares the Commission's goal of ensuring efficient use of scarce high-cost funding dollars. The *USF/ICC Transformation Order* created a high-cost funding budget as one way to meet that goal.⁹ USTelecom endorsed a budget target in the Consensus Framework¹⁰ submitted by the ABC Coalition and various telecom associations prior to adoption of the *USF/ICC Transformation Order*. Taking the time to ensure an accurate, transparent and predictable QRA mechanism would not interfere with the goal of constraining high-cost funding within a budget nor with any of the mechanisms, such as the budget targets, adopted by the Commission to meet that goal.

⁸ See para. 5 of the *Order* "When fully implemented, we estimate that the roughly 100 study areas that are capped would see approximately \$65 million in support reductions, while the roughly 500 study areas that are not capped would receive approximately \$55 million in additional support for broadband investment."

⁹ See para. 11 of the *USF/ICC Transformation Order*.

¹⁰ See *ex parte* letter, page 2 of 4, of Walter B. McCormick (USTelecom), Robert W. Quinn, Jr. (AT&T), Melissa Newman (CenturyLink), Michael T. Skrivan (FairPoint Communications), Kathleen Q. Abernathy (Frontier), Kathleen Grillo (Verizon), Michael D. Rhoda (Windstream), Shirley Bloomfield (National Telecommunications Cooperative Association), John Rose (OPASTCO) and Kelly Worthington (Western Telecommunications Alliance), filed July 29, 2011.

III. The QRA is Not Sufficiently Transparent

For the QRA to meet the Commission's goals, it must be understandable and subject to review and verification when applied to small rate-of-return companies by those companies and their consultants. Most, if not all, small companies do not have resources in house to perform the sophisticated analysis required here. Small companies use consultants who are involved in preparation of cost studies and who provide advice and make recommendations on investment decisions based on their best understanding of the rules. Whether those parties agree with the policy reasons behind adoption of the QRA, or even agree with particular characteristics of the mechanism, is irrelevant as long as the QRA is understandable and can be run under various scenarios by small companies. If companies cannot understand the operation of the QRA, it will not be effective in providing incentives for prudent investment.

At present, the QRA is viewed as a "black box" into which values are entered and results are produced, but how precisely those results are arrived at is a mystery. The software which runs the QRA model is expensive and complex, particularly given the resources to which small companies have access. The software costs upwards of \$20,000 and comes with a manual of several hundred pages. Carriers do not have the resources to run the software on their own, so they must rely on consultants to do so. Consultants provide valuable services to small companies, but such services are not without costs, and in this instance, many companies have to spend well in excess of \$100,000 for analysis of their QRA impact. As noted in several of the applications for review of the *Order* filed by individual operating companies,¹¹ small companies are struggling to understand how the model generates the results for each particular company.

This lack of transparency impacts not only companies with USF reductions this year due to

¹¹ See Applications for Review of the *Order* filed May 25, 2012, by EATEL, the Blooston Rural Broadband Carriers, and Silver Star Telephone Company, Inc.

QRA, but also companies attempting to determine HCLS revenue next year and in the out years. The Commission should make available all formulae and data necessary for companies to run the model and provide opportunities for companies to develop a thorough understanding of the analysis broadly across the affected community.

IV. The Serious Questions About Accuracy of the QRA Should be Addressed Prior to Implementation

Various parties have expressed serious concerns about the accuracy of the QRA. In order for the mechanism to have its intended effect, companies should be confident that the model is reasonably accurate. There are several issues which would benefit from further examination prior to implementation. Those include:

- Inaccuracies in the model, such as the study area contours, not only impact the companies with inaccurate data, but also include an apparent sensitivity of other companies' support level to changes in the data.¹²
- The robustness of the model. Model results for all observations are affected, sometimes significantly, by correcting a single, previously inaccurate observation. Moreover, corrections to selected inaccurate independent variables for a single study area appear to have a significant effect on coefficients for independent variables that were not corrected.¹³
- Some of the coefficients appear to have the wrong signs, such as those for bedrock, the percentage of study area urbanized in the capex and opex regressions, road miles in the capex regression, and the percentage of plant undepreciated in the opex regression.

¹² See AFR of Rate-of-Return Company Associations at pp. 6-8 and Exhibit 2.

¹³ See *Id.* at pp. 8-9.

Having particular variables yield results which appear to be counter-intuitive diminishes confidence in the entire model.¹⁴

- The models, particularly the capex model, include a number of statistically non-significant independent variables. Inclusion of insignificant variables may impair the “predictive accuracy” of the models.¹⁵

V. The Perceived Lack of Predictability of the Model Discourages Needed Investment in Broadband Facilities

There is a widespread perception among the rate-of-return carrier community that the results of the QRA are random, and that future minor actions by companies could result in major impacts on their high-cost loop support (HCLS), a significant revenue source for many small rate-of-return companies. The Rate-of-Return Associations claim this unpredictability is inherent in the model.¹⁶ The updates beginning in 2014 are subject to volatility, even if the data improve and the model does not change.¹⁷ Future application of the QRA to Interstate Common Line Support (ICLS) will only magnify the impact and exacerbate the concern in the small company community about making investments that could impact their QRA results.¹⁸

¹⁴ See AFR of Rate-of-Return Company Associations at *Id.* at pp. 11-12 and fn. 37.

¹⁵ See *Id.* at pp. 12-13.

¹⁶ See *Id.* at pp. 16 – 17 (“[T]he caps will change each year due to factors beyond any individual carrier’s control...Because the caps are revised each year, that carrier could find itself on the wrong side of the operating expense cap again because of actions (or inactions) on the part of other companies during the relevant time period...”), p. 17 (describing the caps as “a constantly moving target”), pp. 17-18 (“the caps are far more likely to foster paralysis as carriers reduce operations and delay or forego network investments in a guessing game as to what the caps might look like several years in the future”), and Exhibit 8.

¹⁷ See *Order* at para. 5

¹⁸ See para. 225 of the *USF/ICC Transformation Order*, which states that “we note that while the methodology in Appendix H [Modeling Limits on Reimbursable Operating and Capital Costs] is specifically designed to modify the formula for determining HCLS, we conclude that we should also develop similar benchmarks for determining ICLS.”

This perception of significant inaccuracy of the QRA, whether correct or not, is causing widespread fear in the cost-company rate-of-return community which is having a chilling effect on the investment plans of rate-of-return companies, thus contravening the Commission's goal of extending and improving broadband service in the challenging rural service areas of small rate-of-return companies. Further, given this potential for a significant downturn in rate-of-return company investment, annual recalculation of the caps creates risks that today's reasonable investment will be considered excessive in the future, solely because other carriers change their spending behavior. This downward spiral exacerbates the concerns about predictability.

The Commission should closely examine the predictability of the model, and make model runs with various assumptions to determine whether the model is stable or not. Commenters have asserted that unpredictability is inherent in the model. Merely maintaining the current inputs for an extra year does not ensure robustness of the model if the variables create inherent instability. But changing those inputs after two years definitely creates additional unpredictability, particularly when the Commission is asking carriers to submit five year plans.

The fact that the previous method of calculating HCLS using the national average cost per loop (NACPL) was not completely consistent year over year is not a sufficient justification for adopting a model with a potentially much greater degree of unpredictability.¹⁹ Carriers coped well with the annual changes to the NACPL, but are having a much different reaction to the QRA.

VI. Companies are Unfairly and Excessively Burdened by the Costs of Running the Model and Submitting Waiver Requests if Necessary

As noted above, obtaining the software and the requisite expertise to run the model are very expensive undertakings. These costs are being imposed on all rate-of-return companies

¹⁹ See AFR of Rate-of-Return Company Associations at pp. 18-19 and Exhibit 8.

settling on a cost basis, whether or not they are suffering immediate reductions from the constraints the QRA puts on their HCLS revenue. Companies must submit a five-year broadband build-out plan to the Commission,²⁰ and in order to do so, they must determine their available capital, including revenue from universal service funding. The Commission is currently applying QRA to limit HCLS, but is considering using the analysis to limit ICLS as well.²¹ Companies must be able to test various investment scenarios under the QRA in order to make investment decisions which would be reported in the five year plan. The lack of transparency, expense and complexity of the model is a major obstacle to enabling companies to make such investments decisions and comply with their reporting obligations to the Commission. The Commission should explore all steps to make the model transparent, simple and inexpensive (or free) to use.

While the Bureau did provide an expedited procedure and waive the fee for companies needing to address the mapping input, it did not provide any expedited procedures or fee waivers for companies seeking to correct other factual inputs or providing information on their unique situations that are contrary to the assumptions made by the variables.²² The Bureau

²⁰ See para. 587 of the *USF/ICC Transformation Order* requiring the filing of 5-year build-out plans in a manner consistent with 54.202(a)(1)(ii) by April 1, 2013.

²¹ See para. 225 of the *USF/ICC Transformation Order*, which states that “we note that while the methodology in Appendix H [Modeling Limits on Reimbursable Operating and Capital Costs] is specifically designed to modify the formula for determining HCLS, we conclude that we should also develop similar benchmarks for determining ICLS.”

²² See page 7 of the Application for Review of the *Order* by Silver Star Telephone Company, Inc., filed April 24, 2012, which explains that the assumption that an efficient carrier would use aerial plant in areas with bedrock, but that Silver Star is precluded from doing so because of federal government regulations that prohibit Silver Star from placing aerial plant in areas along federally designated scenic byways. Also see page 7 of the Application for Review of the *Order* filed April 24, 2012, by EATEL which explains their use of buried plant in an area with bedrock due to the potential for destruction of such aerial plant by hurricanes.

acknowledges that some of the data sources do not provide optimal information,²³ so instead of penalizing companies by charging them for filing corrected data or making the Commission aware of anomalous situations, the Commission should adopt policies to encourage such filings. Such policies would not only help the individual filers, they would strengthen the data sets underlying the QRA.

VII. Conclusion

USTelecom respectfully requests the Commission to grant this Application for Review and briefly postpone implementation of the *Order* until the issues raised by USTelecom's Application for Review have been suitably resolved. Uncertainty and lack of clarity around present and future effects of the Quantile Regression Analysis (QRA) adopted by the Wireline Competition Bureau's Order threaten to undermine the delivery and expansion of rural broadband availability. Taking the time to resolve questions and concerns relating to the accuracy, transparency and predictability of the QRA would be time well spent by the Commission. It would best serve the goals of the *USF/ICC Transformation Order* to encourage the efficient expansion and improvement of broadband service to consumers in rural areas served by rate-of-return ILECs. A stable and predictable QRA would provide a better environment for investment and accelerate the transition from circuit-switched to IP networks. It would be more fiscally responsible, as it would accurately target those spending excessively; it would make all

²³ See para. 27 of the *Order*.

rate-of-return companies more accountable for their USF-supported investments and it would provide incentives to maximize the value of scarce program resources. Moreover, it would not interfere with the Commission's goal of ensuring that high-cost universal service funding is spent efficiently and constrained within a budget.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION



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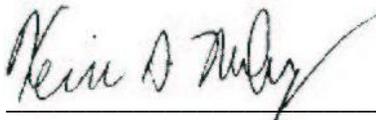
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