

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554  
RE: WC Docket No. 06-122  
GN Docket No. 09-51

Dear Secretary Dortch:

I continue to oppose the proposed substitutes for the revenues-based mechanism " basing assessments on telephone numbers or on network "connections." The use of a revenues-based method continues to be the fairest, most equitable approach for assessing contributions. We concur with other advocates,<sup>4</sup> who have stated that using a connections-based or numbers-based approach would be unreasonable and would unfairly increase the contribution and ultimately the costs of telecommunications for millions of consumers, especially low-volume consumers and low-income consumers.

As an advocate for low-income Americans, we also believe the Commission should not impose USF contribution obligations on consumers receiving Lifeline-supported service. Further, providers of non-billed services such as prepaid wireless services should not be required to contribute to the USF on revenues derived from those services unless the Commission is able to establish a collection mechanism which does not require that such providers fund their USF contributions from their own resources without being able to recover any portion of their contributions from consumers of their services. It seems unfair to place providers of such service who are unable to recover their USF contributions from consumers in the position of having to compete with those that have the ability through their billing mechanisms to recover their USF contributions from consumers. We fear that such an inequitable contribution methodology would unnecessarily increase those providers'™ costs of providing prepaid services, place them at a

significant competitive disadvantage, and perhaps ultimately drive those providers out of the market. The unavailability of such prepaid services would create economic hardship for many low-income, low-volume consumers who rely on such services for affordable telecommunications. We are aware that some states successfully collect 911 and other state or local fees on prepaid services at the point of retail sale.

We also believe that it is appropriate to continue to require a separate line-item on consumer bills with the USF contribution. Consumers should know what they are paying for and be able to see the pass through fees charged, along with other state or local taxes.

Consumers who pay monthly bills as well as those who pay-as-they-go for prepaid services purchased at retail vendor locations deserve to know and understand what they are paying for and why. We think the FCC must ensure truth in billing and truth in purchasing, and support a line-item approach " on a bill or on a receipt at the time of a prepaid purchase.

Submitted respectfully,  
Richard Banzet