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September 24, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

**Re: In the Matter of: Nomination for Universal Service Administrative
Company Board of Directors, CC Docket Nos. 96-45 and 97-21**

Dear Ms. Dortch,

In accordance with the Public Notice of September 13, 2012 (DA 12-1469), COMPTTEL hereby nominates Joseph Gillan to fill the position on the Board of Directors for the Universal Service Administrative Company as the representative from the competitive local exchange carrier industry. Mr. Gillan has worked with and represented competitive carriers for over twenty years and is a respected consultant to this industry segment. (a copy of Mr. Gillan's curriculum vitae is attached).

Mr. Gillan has served on the USAC Board since late 2008 and is currently the Vice Chairman of the High Cost and Low Income Committee and Vice Chair of the USAC Audit Committee. Mr. Gillan possesses substantial experience and knowledge of the telecommunications industry, and is a recognized expert in this area. As such, COMPTTEL respectfully requests that Mr. Gillan be re-nominated to the USAC Board and hold the seat designated for a representative of the competitive local exchange carrier industry.

Sincerely,

A handwritten signature in black ink that reads "Jerry James". The signature is written in a cursive, flowing style.

Jerry James
CEO, COMPTTEL

CC: Erica W. Myers, Telecommunications Access Policy Division, Erica.Myers@fcc.gov
Charles Tyler, Telecommunications Access Policy Division, Charles.Tyler@fcc.gov.

Joseph Gillan
Gillan Associates
joegillan@earthlink.net

Education

B.A. Economics, University of Wyoming, 1978.
M.A. Economics, University of Wyoming, 1979.

Professional History

Gillan Associates, Economic Consulting (1987-Present)

Mr. Gillan manages a private consulting practice specializing in the economic evaluation of regulatory policies and business opportunities in the telecommunications industry. Since forming his consulting practice in 1987, Mr. Gillan has advised business clients as diverse as AT&T and TDS Telecom (a small entrant seeking the authority to compete in a rural area). Mr. Gillan has also acted as the principal economic consultant to the Competitive Telecommunications Association (COMPTEL) as well as CompSouth.

Vice President, US Switch, Inc. (1985-1987)

Responsible for crafting the US Switch business plan to gain political acceptance and government approval. US Switch pioneered the concept of "centralized equal access," which positioned independent local telephone companies for a competitive long distance market. While with US Switch, Mr. Gillan was responsible for contract negotiation/marketing with independent telephone companies and project management for the company's pilot project in Indiana.

Policy Director/Market Structure - Illinois Commerce Commission (1980-1985)

Primary staff responsibility for the policy analysis of issues created by the emergence of competition in regulated markets, in particular the telecommunications industry. Mr. Gillan served on the staff subcommittee for the NARUC Communications Committee and was appointed to the Research Advisory Council overseeing NARUC's research arm, the National Regulatory Research Institute.

Mountain States Telephone Company - Demand Analyst (1979)

Responsible for conducting statistical analysis of the demand for access by residential subscribers.

Professional Appointments

Board of Directors	Universal Service Administrative Company 2008-Present
Guest Lecturer	Northwestern University Law School 2007
Guest Lecturer	School of Laws, University of London, 2002, 2008
Instructor	Michigan State University, Regulatory Instructional Program, 2005-Present

Professional Appointments (cont)

Instructor	Principles of Regulation, New Mexico State University Center for Regulation
Advisory Council	New Mexico State University, Center for Regulation, 1985 – Present
Faculty	Summer Program, Public Utility Research and Training Institute, University of Wyoming, 1989-1992
Contributing Editor	<u>Telematics: The National Journal of Communications Business and Regulation</u> , 1985 - 1989
Chairman	Policy Subcommittee, NARUC Staff Subcommittee on Communications, 1984-1985
Advisory Committee	National Regulatory Research Institute, 1985
Distinguished Alumni	University of Wyoming, 1984

Selected Publications

"The Transition to an All-IP Network: A Primer on the Architectural Components of IP Interconnection," with David Malfara, National Regulatory Research Institute, NRRI 12-05, May 2012.

The Next Step for Next Generation Technology: Interconnecting Managed Packet Networks to Preserve Voice Service Quality and Competition." 2008, http://www.freetocompete.com/files/gillan_nextstep-nextgen_2008.pdf

"The Local Exchange: Regulatory Responses to Advance Diversity", with Peter Rohrbach, Public Utilities Fortnightly, July 15, 1994.

"Reconcentration: A Consequence of Local Exchange Competition?", with Peter Rohrbach, Public Utilities Fortnightly, July 1, 1994.

"Diversity or Reconcentration?: Competition's Latent Effect", with Peter Rohrbach, Public Utilities Fortnightly, June 15, 1994.

"Consumer Sovereignty: An Proposed Approach to IntraLATA Competition", Public Utilities Fortnightly, August 16, 1990.

"Reforming State Regulation of Exchange Carriers: An Economic Framework", Third Place, University of Georgia Annual Awards Competition, 1988, Telematics: The National Journal of Communications, Business and Regulation, May, 1989.

"Regulating the Small Telephone Business: Lessons from a Paradox", Telematics: The National Journal of Communications, Business and Regulation, October, 1987.

"Market Structure Consequences of IntraLATA Compensation Plans", Telematics: The National Journal of Communications, Business and Regulation, June, 1986.

Selected Publications (continued)

"Universal Telephone Service and Competition on the Rural Scene", Public Utilities Fortnightly, May 15, 1986.

"Strategies for Deregulation: Federal and State Policies", with Sanford Levin, Proceedings, Rutgers University Advanced Workshop in Public Utility Economics, May 1985.

"Charting the Course to Competition: A Blueprint for State Telecommunications Policy", Telematics: The National Journal of Communications Business, and Regulation, with David Rudd, March, 1985.

"Detariffing and Competition: Options for State Commissions", Proceedings of the Sixteenth Annual Conference of Institute of Public Utilities, Michigan State University, December 1984.

International Assignments

The Federal Universal Service System in the United States: A History of Spiraling Contribution, Report submitted to the Canadian Radio-television and Telecommunications Commission on behalf of Bell Canada.

The Appropriate Pricing Standard for Wholesale Loops, with George Hariton, Telecommunications Issues and Analysis, Report submitted to the Canadian Radio-television and Telecommunications Commission on behalf of Bell Canada.

Forcing a Square Peg into a Round Hole: Applying the Universal Service Cost Model in the Cayman Islands, Analysis Presented to the Government of the Cayman Islands on behalf of Cable and Wireless.

Recovering Contribution: Lessons from the United States' Experience, Report submitted to the Canadian Radio-television and Telecommunications Commission on behalf of CallNet.

Listing of Expert Testimony – Court Proceedings

Dina Hataishi, individually and as class representative vs. First American Home Buyers Protection Corporation and The First American Corporation (Case No. BC420436, Superior Court of The State of California For the County Of Los Angeles)(Geographic precision of telephone numbers).

The Metropolitan Gov't of Nashville and Davidson County, Tenn. v. XO Tennessee, Inc., et al., (Docket Nos. 02-679-IV & 02-749-IV, Chancery Ct. for Davidson City, Tenn.)(Proper payment for the use of Public Rights of Way).

Global Crossing Telecommunications, Inc. v. NTELOS Telephone, Inc., (Civil Action No. 7:11-CV-005030-SGW United States District Court, Western District of Virginia, Roanoke Division)(Access Tariff Interpretation/Meet Point Billing of Transport).

Listing of Expert Testimony – Court Proceedings (continued)

Trinsic, Inc. et al., v. Thermo Credit, LLC, (Bankruptcy Case No. 07-10324-MAM-7 United States Bankruptcy Court, Southern District of Alabama, Southern Division)(Industry Structure/Federal Policy/Local Entry Strategies)

ACD Telecom, Inc., v. Michigan Bell Telephone Company, d/b/a SBC Michigan, (Civil Action No. 04-689-CK Circuit Court for the County of Ingham Michigan) (Breach of Contract/Industry Terminology)

MCI, L.L.C. dba Verizon Business vs. Vorst Paving, Inc., (Civil Action NO. CV: 106-064 District Court for the Southern District Of Georgia) (Damages Claim)

United States of America v. SBC Communications Inc. and AT&T Corp. (Civil Action No. 1:05CV02102 District Court for the District of Columbia) (Inadequacy of Proposed Final Judgment Settling SBC Merger with AT&T)

United States of America v. Verizon Communications Inc. and MCI Inc. (Civil Action No. 1:05CV02103 District Court for the District of Columbia) (Inadequacy of Proposed Final Judgment Settling Verizon Merger with MCI)

T & S Distributors, LLC, ACD Telecom, Inc, Telnet Worldwide, Inc et al. v. Michigan Bell Telephone Company (Civil Action No. 04-689-CK Ingham Circuit Court, State of Michigan) (Enforcement of contract; Industry definitions of local exchange service and end user)

Dwayne P. Smith, Trustee v. Lucent Technologies (Civil Action No. 02-0481 Eastern District of Louisiana)(Entry and CLEC Performance)

BellSouth Intellectual Property v. eXpeTel Communications (Civil Action No. 3:02CV134WS Southern District of Miss.)(Service definition, industry structure and Telecom Act of 1996)

CSX Transportation Inc. v. Qwest International, Inc. (Case No. 99-412-Civ-J-21C Middle District of Florida) (industry structure and wholesale contract arrangements).

Winn v. Simon (No. 95-18101 Hennepin Cty. Dist. Ct.)(risk factors affecting small long distance companies)

American Sharecom, Inc. v. LDB Int'l Corp. (No. 92-17922, Hennepin County District Court) (risk factors affecting small long distance companies)

World Com, Inc. et al. v. Automated Communications, Inc. et al. (No. 3:93-CV-463WS, S.D. Miss.) (damages)

Summary of Expert Testimony and Affidavits – US Regulatory Proceedings

Mr. Gillan has testified over 300 times before more than 40 state commissions. A detailed listing of his testimony is available upon request.