

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

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link-Up)	WC Docket No. 03-109
)	
Universal Service Fund Reform Mobility Fund)	WT Docket No. 10-208
)	

COMMENTS OF TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.

INTRODUCTION

Texas Statewide Telephone Cooperative, Inc. (TSTCI) is an organization representing 35 small, rural incumbent local exchange companies (ILECs) and cooperatives in Texas, all operating under rate-of-return regulation. (See Attachment 1.) TSTCI provides these comments in response to the Commission’s Public Notice¹ on the proposed intercarrier compensation (ICC) Reform Compliance and Monitoring Form.

As stated in the Public Notice, the USF/ICC Transformation Order requires ILECs “that participate in the ICC recovery mechanism to file, on an annual basis, data regarding their ‘ICC rates, revenues, expenses, and demand’” and the Wireline Competition Bureau has the authority

¹ Public Notice, DA 13-11, Released January 4, 2013

to adopt a template to be used for submitting the data. The proposed template is a very complex Excel spreadsheet seeking to obtain information for not only the new Recovery Mechanism process, but also to gather data for the open issue in the Further Notice of Proposed Rulemaking portion of the Order regarding originating access and transport. TSTCI is concerned that the complexity of the data being requested will be overly burdensome in terms of the time and resources needed by small companies to provide the required data. Due to the additional time and manpower needed to provide this data, in many cases companies will have to employ consultants to gather the information in the proposed format. Additional administrative and or/programming expenses due to new reporting obligations are particularly concerning to small companies at a time when their revenue base is declining due to the decrease in intercarrier compensation and universal service support.

DIFFERENCES IN RATE ELEMENT TERMINOLOGY MAY CAUSE CONFUSION REGARDING DATA TO BE PROVIDED

The proposed template is extremely detailed with multiple tabs, each tab specifying a switched access or reciprocal compensation rate element or group of rate elements contained in Part 51 or Part 69 of the FCC rules. Each tab contains the same 29 columns (A through AC), even if the column is not applicable to the category of data being requested for a tab. The assumption is that this column uniformity will facilitate the uploading of the reported data into a database. Within each tab are multiple rows of interstate rate elements, as needed, but only a single row for all rate elements for intrastate data for each of the 50 states, the District of Columbia, Guam, Puerto Rico, and American Samoa. The last row is a total row for all interstate and intrastate data.

Since the tabs represent end user and switched access billing elements directly from Part 51 and Part 69 of the FCC rules, TSTCI does not dispute the need for data under these tabs.

However, TSTCI wants to point out that there will likely be much confusion for the NECA tariff companies since the Part 69 rate element description does not match the rate element name in the NECA tariff. For example, the “TandemInfo” tab is requesting data for the Tandem-Switched Transport and Tandem Rate Elements. Row 3 is requesting data for “Tandem-Switched Transport – Common” between the end office and the tandem. Row 5 is requesting data for “Tandem-Switched Transport – Dedicated” between the serving wire center and the tandem. The NECA tariff rate elements for “Tandem-Switched Transport – Dedicated” are actually called Direct-Trunked Transport rate elements. The NECA tariff does not refer to “Tandem-Switched Transport – Dedicated” rate elements. Adding to the confusion is the fact that there is a separate “DrctTrnkTrans” tab that is requesting data for “Direct-Trunked Transport” rate elements. It must be assumed that this data would be for Direct End Office Trunking only, and does not include the NECA Direct-Trunked Transport data for the dedicated trunks between the serving wire center and the tandem.

Additionally, the “SignalTandem” tab is requesting data for the Signaling for Tandem Switching Rate Elements. This rate element is applicable to Tier 1 (non-NECA companies), so NECA members will not have any information to report for this tab.

TSTCI believes that the labeling of some columns will add to the confusion for NECA tariff members. Column F is labeled Total Originating Units for Usage-Based Elements. Column G is labeled Total Terminating Units for Usage-Based Elements. On the “TandemInfo” tab, there are separate rows for Interstate Tandem Switching and Interstate Tandem-Switched Transport rate elements. These two rate elements typically have very different demand units. The two rows will allow for the reporting of separate interstate demand units for these two items. However, for Intrastate data, there is only one single row, per state, for all Tandem-Switched Transport rate elements, including Tandem Switching and Tandem-Switched Transport. Since

the demand units for Tandem Switching are consistently greater than the demand units for Tandem-Switched Transport, it is not clear as to which of these demand units should be reported in Columns F and G for the applicable single intrastate row.

DETERMINING 8YY ORIGINATING REVENUE MAY REQUIRE COSTLY PROGRAMMING CHANGES

Column L is labeled 8YY Originating Units for Usage-Based Elements and Column W is labeled 8YY Originating Revenue from Usage-Based Rates. The total interstate and intrastate 8YY Originating Units (i.e., MOUs) should be available within existing CABS billing systems from the Access Minutes of Usage summary reports. However, the interstate and intrastate revenue specifically associated with the 8YY Originating MOUs may not be readily available from most of the existing CABS billing systems and may require significant programming changes in order to obtain this revenue number. This will significantly add to the costs of producing data needed only for this Commission report.

CONCLUSION

TSTCI understands the need for the Commission to monitor the impact of its USF and ICC reform measures but urges the Commission to consider the impact on small companies of increasing regulatory report burdens at a time when the revenue base of many small companies is negatively impacted by decreasing ICC and USF support revenues.

Respectfully submitted,

Texas Statewide Telephone Cooperative, Inc.



By: Cammie Hughes
Authorized Representative

February 4, 2013

TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.

Alenco Communications, Inc.
Brazoria Telephone Company
Brazos Telecommunications, Inc.
Brazos Telephone Cooperative, Inc.
Cameron Telephone Company
Cap Rock Telephone Cooperative, Inc.
Central Texas Telephone Cooperative, Inc.
Coleman County Telephone Cooperative, Inc.
Colorado Valley Telephone Cooperative, Inc.
Community Telephone Company, Inc.
Cumby Telephone Cooperative, Inc.
E.N.M.R. Telephone Cooperative, Inc.
Electra Telephone Company
Etex Telephone Cooperative, Inc.
Five Area Telephone Cooperative, Inc.
Ganado Telephone Company, Inc.
Hill Country Telephone Cooperative, Inc.
Industry Telephone Company, Inc.
La Ward Telephone Exchange, Inc.
Lake Livingston Telephone Company
Lipan Telephone Company, Inc.
Livingston Telephone Company
Mid-Plains Rural Telephone Cooperative, Inc.
Nortex Communications, Inc.
Panhandle Telephone Cooperative, Inc.
Peoples Telephone Cooperative, Inc.
Poka Lambro Telephone Cooperative, Inc.
Riviera Telephone Company, Inc.
South Plains Telephone Cooperative, Inc.
Tatum Telephone Company
Taylor Telephone Cooperative, Inc.
Wes-Tex Telephone Cooperative, Inc.
West Plains Telecommunications, Inc.
West Texas Rural Telephone Cooperative, Inc.
XIT Rural Telephone Cooperative, Inc.