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March 1, 2013

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

*Re: 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; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208*

Dear Ms. Dortch:

In the above-referenced proceeding, the Commission sought comment on the proposed Intercarrier Compensation Reform Compliance and Monitoring Form.<sup>1</sup> AT&T agrees with the concerns voiced by commenters about the proposed data collection. AT&T, however, also views narrowly tailored and minimally burdensome reporting requirements as critical to ensuring full compliance with the *USF/ICC Transformation Order*.<sup>2</sup> Thus, AT&T offers the attached suggested reporting requirements to supplement the record of this proceeding.

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<sup>1</sup> See *Comment Sought on Intercarrier Compensation Reform Compliance and Monitoring Form*, CC Docket Nos. 01-92, 96-45; GN Docket No. 09-51; WC Docket Nos. 03-109, 05-337, 07-135, 10-90; WT Docket No. 10-208, Public Notice, DA 13-11 (rel. Jan. 4, 3013).

<sup>2</sup> *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; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) (*USF/ICC Transformation Order*), appeal pending (subsequent history omitted).

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

A handwritten signature in black ink, appearing to read "Christi Shewman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Christi Shewman

Attachment

cc: Victoria Goldberg  
Randy Clarke  
Lynne Engledow

AT&T recommends that the FCC target the following data that AT&T would be able to produce on an ongoing basis to comply with the Monitoring and Compliance Requirements of the *USF/ICC Transformation Order*:

- Fiscal Year 2012 (October 2011 through September 2012) Billed Demand Quantities, Rates, and Revenues (Rates times Demand) by Study Area by Jurisdiction (Inter- and Intrastate)
  - Terminating Minutes of Use for All Per-Minute rate elements that were subject to transition per rules adopted in the *USF/ICC Transformation Order*.
  - Quantities of All Flat-rated End Office and Tandem (*e.g.*, ports) rate elements. These quantities will be prorated to represent terminating only.
  - Quantities of All Flat-rated Switched Dedicated Transport rate elements used to transport two-way traffic – Originating and Terminating.
  - Revenues (Rates times Demand) associated with both per-minute and flat-rated elements.
- Fiscal Year 2012 Billed Quantities and Rates for ARC and SLC  
(Note: There will be only 3 months of ARC data in this FY)
  - ARC Rates, Applicable Lines, and Revenues (Lines time Rates) by type of lines by Study Area if they vary by Study Area (*i.e.*, Residential/Single-Line Business)
  - ARC Rates, Applicable Lines, and Revenues (Lines times Rates) by Type of lines at the Holding Company Level if those rates do not vary by Study Area (*i.e.*, Multi-Line Business for AT&T)
- LEC-CMRS Reciprocal Compensation Revenues and Expense data from the annual filing

LEC-LEC Net Reciprocal Compensation Revenue and Expense data for FY2012 should not be required from those carriers, such as AT&T, that have opted not to include them in their eligible recovery calculations. Requiring these carriers to provide these data would be unreasonably burdensome and this information is not needed to ensure compliance.

AT&T maintains only billed data (rather than collected) at the individual access element level.

In order to produce the additional data needed “to resolve the issues teed up in the FNPRM,” one-time special studies would need to be conducted.<sup>1</sup> AT&T believes those data requirements and timelines should be kept distinct and separate from the annual monitoring filings so they do not unnecessarily complicate the filing process or impact the ongoing implementation efforts underway.

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<sup>1</sup> *USF/ICC Transformation Order*, 26 FCC Rcd 17663, para. 922.