

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 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 a 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 Reform -- Mobility Fund)	WT Docket No. 10-208
To: The Commission)	

REPLY OF VERIZON AND VERIZON WIRELESS¹

Verizon and Verizon Wireless (“Verizon”) agree with the United States Telecom Association (“USTelecom”) that the Commission should clarify the remaining issues regarding eligible telecommunications carriers’ (ETCs) reporting obligations under section 54.313 of the Commission’s rules.² In particular, Verizon urges the Commission to limit voice and broadband

¹ In addition to Verizon Wireless, the Verizon companies participating in this filing are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

² See United States Telecom Association, Petition for Reconsideration and Clarification and Comments in Response to Paperwork Reduction Act, *Connect America Fund, et al.*, WC Docket Nos. 10-90, *et al.* (filed April 4, 2013) (“USTelecom Petition”). See also Petition for Reconsideration of Action in Rulemaking Proceedings, *Connect America Fund, et al.*, Public Notice, Report No. 2975 (May 1, 2013); 78 FR 29097 (May 17, 2013).

reporting requirements to offerings that are relevant to the Connect America Fund (CAF) and clarify that broadband reporting is not required for ETCs whose support is being phased out.

Voice and Broadband Reporting. As USTelecom observes, the first draft of FCC Form 481 proposes to require carriers to report on their voice offerings in a way that is considerably more extensive and burdensome than necessary to fulfill the requirements in the *USF/ICC Transformation Order*³ and the rules.⁴ The second draft of FCC Form 481 does not materially change this requirement.⁵ The draft form’s proposal to require ETCs to report on “*each* broadband speed service offering that meets or exceeds the high cost speeds”⁶ is clearly beyond the scope of the requirement that carriers report on broadband offerings that cover their compliance with broadband service requirements in the rules.

Broadband Reporting for Carriers Whose Support Is Being Phased Out. Verizon agrees with USTelecom and AT&T that no purpose is served by requiring broadband reporting by carriers who are receiving only legacy support that is being phased out.⁷ Such support was not intended to support broadband, and carriers should not have to account for new ways of spending

³ *Connect America Fund, et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2013) (“*USF/ICC Transformation Order*”).

⁴ See USTelecom Petition at 20-26. See also *Draft Pending OMB Approval FCC Form 481*, at 6 (2013), http://www.usac.org/_res/documents/hc/pdf/fcc/DRAFT-FCC-Form-481.pdf (“first draft FCC Form 481”).

⁵ See *FCC Form 481 Annual Carrier Reporting Data Collection Form*, at tab (0700) VoicePricing, (May 22, 2013) http://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=201302-3060-001&icID=31529 (select “Instrument File: 0986_FCCForm481_ExcelSpreadsheet_052213_final.xlsx”) (“second draft FCC Form 481”).

⁶ *Instructions for Completing FCC Form 481*, at 21 (May 22, 2013) (emphasis added), http://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=201302-3060-001&icID=31529 (select “Instrument File: 0986_FCCForm481Instructions_052313_final.doc”).

⁷ See USTelecom Petition at 7-11; AT&T Comments at 5-9 (June 3, 2013).

support that is being eliminated. This is particularly true for legacy support that is intended to reduce interstate switched access charges.⁸

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Verizon urges the Commission to clarify ETCs' reporting obligations under section 54.313 as quickly as possible.

Respectfully submitted,

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June 11, 2013

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⁸ See, e.g., AT&T Comments at 6.