

information collection is sizeable as the Commission is seeking information on 500 urban Census tracts and there are separate samples for fixed voice and fixed broadband services. Several providers have received surveys for multiple Census tracts. The fixed voice service request is also new and significantly more complex than previous surveys. Moreover, the survey was distributed on December 16th, at the beginning of a period in which many of the subject matter experts required to accurately complete the survey were not at work because of holidays and school vacations, leaving providers just two weeks from the beginning of the new year to complete the survey.

I. The Fixed Voice Service Information Request is New and Complex

The Fixed Voice Service information request has become more complex over time. One hundred and seventeen data points must be completed if the local exchange carrier (LEC) offers all voice services. Also, the largest wireline incumbent LECs have many census tracts for which the burden of data collection is multiplied for several reasons. They may have multiple rate centers or rate groups within one census tract. In each of those rate centers or rate groups, they may have multiple fixed voice services offerings, including flat rate service, measured service and unlimited service. Rate centers or rate groups may also feature offerings of both circuit-switched and voice services. Multiple taxes and/or surcharges may exist within the same rate center or rate group. These issues necessitate the development of rate arrays to properly reflect minimum and maximum rates. Finally, carriers needed to have a common understanding of the input needed among reporting carriers (e.g.; tariff data or billing data) in order to have a meaningful end product that is comparable across jurisdictions.

II. A Uniform Approach Must be Adopted for Non-Recurring Service Installation Charges

The information requested for non-recurring Service Installation Charges is somewhat unclear, so respondents need time to develop a uniform approach to gathering the data so as to enhance its accuracy and usefulness to the Commission. Guidance from the Bureau would be helpful in expediting this process. The first outstanding issue is whether to include “minimum additional charge if drop line and terminal block are needed to connect service” within “total connection charge for residential service if no premises visit [is] required.” Second, should all “state, county and local taxes and surcharges on connection” be included in “Mandatory surcharge on connection accounted as company revenue?” Third, should Gross Receipts Taxes and any other unique taxes be included? Finally, should any relevant service installation charges be included even if some of them are waived for promotional purposes?

III. The Broadband Pricing Data Also Has Significant Complexity

The requirement to track broadband pricing data for each upload and download speed combination, including the non-recurring component, requires 18 data points for each combination. This is complex and time-consuming.

IV. The Submission Requires Individual Data Entry

Because each actual data entry must be made individually, the process of making such entries is exceedingly time consuming and requires substantial review in order to ensure accuracy. This aspect alone of the data collection justifies a two-week extension of the date for submission.

V. Conclusion

It is in the best interests of the Commission and the public for the data collected through the urban rate survey to be accurate. This can be accomplished by grant of a brief, two-week extension of the date for submission of the data.

Respectfully submitted,

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