

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
Universal Service Reform – Mobility Fund	)	WT Docket No. 10-208
	)	
ETC Annual Reports and Certifications	)	WC Docket No. 14-58
	)	
Establishing Just and Reasonable Rates for Local Exchange Carriers	)	WC Docket No. 07-135
	)	
Developing an Unified Intercarrier Compensation Regime	)	CC Docket No. 01-92
	)	
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**Comments of GVNW Consulting, Inc.**

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## **EXECUTIVE SUMMARY**

Over at least the past five years, some key facts have been ignored based in large part on the National Broadband Plan and the resultant Transformation Reform Order (TRO) over-reliance on wireless technology to meet rural service metrics. These facts are that there are significant differences between wireline and wireless platforms, as evidenced by the filings that **wireless carriers themselves** have placed in the record indicating that a single strand of fiber can carry 1,000 times more bits per second as compared to an enormous 10 GHz wide radio channel. Simply stated, we respectfully submit that the broadband future for our country must sustain both wireless mobility AND a strong foundation of a fiber backbone network.

We believe that both federal and state regulators should establish at least a baseline set of service performance metrics in order to gauge provider performance regarding the performance of universal service obligations. To do otherwise would be a tacit admission that the starting gun for the “race to the bottom” has been fired.

Accountability also includes the FCC completing its analysis of the 100% competitive overlap rule that has yet to be implemented over the last three years in a reasoned and thoughtful manner. It is taking time because it is difficult and boundary disputes are taking more time to resolve than originally anticipated. We recommend that the burden should be on the asserting competitor as opposed to placing the burden on the incumbent to refute the assertions and allegations of the unproven potential competitor.

If the Commission truly intends to not revisit the \$2 Billion artificial annual budget cap until 2017, then in the interim rural carriers impacted by middle mile capacity constraints should not be unfairly penalized for providing service in a location that is vital

to the provision of the agricultural and natural resource inputs that help feed the nation and fuel our cars and warm our homes. While attacking the problem in \$10,000,000 increments may prove to be a Sisyphean effort when one studies the magnitude of the problem, we support for 2014-2015 the Commission's decision to focus initially on supporting middle mile improvements for Alaska and tribal areas.

The Commission attempts to finesse its \$2 Billion annual USF budget dilemma at paragraph 144 by defining a reasonable request as “cost-effectively extend a voice and broadband-capable network” based on the level of expected end-user revenues from the voice and retail broadband Internet access services that will be offered plus anticipated universal service support. We believe that any definition of reasonable request will only work if there are truly clear guidelines governing reasonable requests and if it is coupled with the **availability of predictable and sufficient funding**.

At some point in time, and it is likely in the not too distant future, increased speeds will not be achieved with clever definitions, nor excluding this category or that category. It will require a larger investment in the infrastructure in rural America if the Commission desires to meet the requirements of the current federal law.

The Commission notes at paragraph 278 that the “*ITTA has proposed the most comprehensive plan in the record for such a transition (ITTA Plan)*.” It does not appear that the \$2 Billion annual budget cap is fully accounted for in the current version of the ITTA Plan with respect to industry equity. In this regard, we share a threshold question: “Is the ITTA proposal “budget cap equitable” for the carriers that serve above average cost territory that do not now or might not ever fit into a model paradigm?”

We propose that participating carriers be required to make a state-level election to receive model-based support, comparable to what is required of price cap carriers. Such an approach would prevent rate-of-return carriers from cherry picking the most attractive areas in their study areas, potentially those areas where model-support is greater than legacy support, leaving the least desirable areas for a competitive process.

Carriers refraining from choosing this optional approach should not be negatively impacted by budget parameters that occur when other companies choose the optional model plan.

We support the Commission's proposed changes to the level of support reductions that result from failure to file certain mandated forms at a date certain as a step in the right direction. Under current sections 54.313(j) and 54.314(d), the penalties do not differ whether the filing is a day late or a month late. While we do not wish to understate the importance of carriers meeting their filing deadlines, this seems rather inequitable. It is curious that the FCC rules already in place found in section 1.80(b)(8) for failure to file required forms or information have not been used in this regard. Even if those rules were modified to increase the \$3,000 fine to \$5,000 or \$10,000, it would seem to be a more administratively efficient way to handle late filers and allow more Wireline Competition Bureau staff expertise to focus on the remaining tasks of implementing the TRO.

## **Introduction and Background**

GVNW Consulting, Inc. (GVNW) submits comments filed pursuant to the Commission's *Further Notice of Proposed Rulemaking*<sup>1</sup> (FNPRM) (FCC 14-54), released on June 10, 2014. In the *FNPRM*, the Commission seeks comment on a variety of issues, including issues emanating from the Seventh Order on Reconsideration. As the Commission stated at paragraph 10, it proposes a series of “*measures to update and further implement the framework adopted by the Commission in 2011.*”

GVNW is a management consulting firm that provides a wide variety of consulting services, including regulatory and advocacy support on issues such as universal service, intercarrier compensation reform, and strategic planning for communications carriers in rural America. We are pleased to have the opportunity to offer comments addressing the issues the Commission has raised in the *Omnibus Order* and posed in the *FNPRM*. We have crafted our comments in this filing to support the definition in the current law (254(c)(1)) of universal service as an evolving level of telecommunications services that the Commission shall establish periodically under this section, taking into account advances in telecommunications and information technologies and services.

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<sup>1</sup> *Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration and a Further Notice of Proposed Rulemaking (Omnibus Order)*, WC Docket Nos. 10-90, 14-58, 07-135; WT Docket No. 10-208; CC Docket No. 01-92, FCC 14-54 (rel. June 20, 2014) (*FNPRM*).

## **AN EVOLVING NATIONAL BROADBAND ACTION PLAN REQUIRES A CAREFUL UNDERSTANDING OF THE DIFFERENCES BETWEEN COMPLEMENTARY VERSUS SUBSTITUTABLE PLATFORMS**

Over at least the past five years, some key facts have been ignored based in large part on the National Broadband Plan and the resultant Transformation Reform Order (TRO) over-reliance on wireless technology to meet rural service metrics. These facts are that there are significant differences between wireline and wireless platforms, as evidenced by the filings that **wireless carriers themselves** have placed in the record.

Even the operators within the wireless sector recognize the limitations of the laws of physics. In comments in the FCC's Open Internet docket (GN Docket No. 14-28) filed July 15, 2014, Mobile Future states in part: *"Mobile broadband providers continue to face spectrum limitations – in terms of availability and capacity. A single strand of fiber can carry 1,000 times more bits per second as compared to an enormous 10 GHz wide radio channel . . . spectrum remains a finite resource. The measures taken now to address spectrum limitations will not be sufficient to meet exploding demand caused by more data-intensive applications."* (Mobile Future cited as the basis for the 1,000 times more capacity statistic in footnote 36 of their July, 2014 filing an article from the May 27, 2014 issue of Fierce Wireless by Peter Rysavy entitled: *How will 5G compare to fiber, cable, or DSL?*)

Simply stated, we respectfully submit that the broadband future for our country must sustain both wireless mobility AND a strong foundation of a fiber backbone network.

This recent Mobile Future excerpt reinforces several prior filings that are in the Commission's record in related dockets. In 2010, wireless carriers asserted<sup>2</sup> that their platforms technical limitations (e.g., shared cell site facilities and spectrum limitations) should justify exempting mobile services from open internet rules. In the same time frame, a 2010 report<sup>3</sup> by the Association of Communications Engineers (ACE Report) documented important issues affecting wireless broadband systems for rural areas. Limitations noted included signal strength limitations, terrain problems, and interference issues. While some of these issues have been mitigated in part, the geography and topography for rural America remains as it was in 2010 and these inherent limitations continue in 2014 and will for the foreseeable future.

While the current Commission will be faced with applying, or not applying open internet rules now to all platforms, the logical extension of such arguments is that such services should be viewed as **complementary for purposes of broadband universal service funding**.

To meet the standard of achieving a data-driven process, we agree with prior positions of NTCA, et al that assert there *"is no basis for affording such a presumption to any would-be competitor. Indeed, the Bureau has cited no evidence whatsoever for affording such a presumption, and it would be the antithesis of 'data-driven' decision-making to give any one sector . . . such a 'free pass.' . . . As a statutory principle, 'reasonable comparability' should not be contingent upon guesswork, conjecture, 'check-*

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<sup>2</sup> See letter from Christopher Guttman-McCabe, CTIA, to Marlene H. Dortch, FCC, GN Docket No. 09-191 (Sept. 21, 2010). See also comments in GN Docket No. 09-91 filed January 14, 2010 (CTIA at 39; Verizon and Verizon Wireless at 5; T-Mobile at 15-16).

<sup>3</sup> *Good Engineering Practices Relative to Broadband Deployment in Rural Areas*, The Association of Communications Engineers (ACE) (2010 ACE Report).

*the-box’ use of incomplete and at least partially inaccurate databases, and/or limited access to certain service characteristics that any given sector of the industry almost certainly holds proprietary. . . Instead, the Commission should require all providers – whether fixed wireline or fixed wireless – to make the same meaningful affirmative evidentiary showing that they meet the necessary speed, latency, capacity and price criteria.”*

### **THE BURDEN OF PROOF IS MISPLACED ON COMPETITIVE ENTRY PROPOSALS**

Since the Commission led by former Chairman Reed Hundt, there has been a tendency to “bet on the come” with regard to competitive entry. A notable experiment that failed to achieve the desired policy outcome is the Commission’s identical support experiment. In lieu of requiring even basic<sup>4</sup> cost information of competitors, the Commission’s decision to use only incumbent’s cost factors (identical support path) ended poorly as even the FCC has acknowledged that the identical support rule has produced adverse and unanticipated consequences.

Apparently not learning from this prior identical support failure, the Commission is now proposing that competitors can just show up and with generalized assertions become a qualified competitor. Before it proceeds with the track of pursuing a “qualified competitor” designation, the Commission must address substantial public interest questions regarding performance, public safety and accountability.

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<sup>4</sup> Several tools were placed on the record that could have assisted the Commission in this regard. See, for example, ex parte letter filed on May 30, 2008, by Jeffrey H. Smith, GVNW Consulting in WC Docket No. 05-337 and CC Docket No. 96-45, presenting the WiCAC II proposal, a refinement to the July, 2007 WiCAC algorithm that offered a replacement for the identical support rule. The WiCAC methodology is based on Wireless Carrier Actual Cost (WiCAC), and was proposed to provide an auditable and administratively workable solution to identical support, while also recognizing the problems facing the smaller rural wireless providers. It used very basic accounting data, not complex studies.

## Performance

Support recipients must meet standards for universal service on a sustainable basis. To this end, we believe that both federal and state regulators should establish at least a baseline set of service performance metrics in order to gauge provider performance regarding the performance of universal service obligations. To do otherwise would be a tacit admission that the starting gun for the “race to the bottom” has been fired. Put simply, the FCC should focus on where competitors are actually meeting performance and pricing standards to enable provision with support. It is a reasonable expectation that a potential competitor should be required to provide information specific to its service locations and not just a blanket assertion that it “covers the area in question.” The standards that will ultimately be applied to rural rate-of-return territory should be at least as robust as the criteria in place for the price cap CAF Phase II program.

## Public Safety

In the important realm of public safety oversight, regulators need to ask the question as to whether the provider is able to sustain performance metrics<sup>5</sup> especially with respect to public safety. The recent well-publicized problems that Verizon had with their Fire Island location raise questions with respect to mobile services reliability in this regard. Shifting to a different platform, will satellite-based services meet public safety

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<sup>5</sup> At a minimum, compliance should be achieved for access to 911 or enhanced 911 network requirements; call completion requirements (as rural customers not being able to receive calls will in some cases be a safety issue); Communications Assistance for Law Enforcement Act (CALEA) responsiveness; and Customer Proprietary Network Information (CPNI) requirements.

metrics for 911 emergency response in the face of weather related challenges given the fact that satellite service does not function reliably during bad weather?

### Accountability

It is not logical or equitable to demand less of would-be competitors than what is required of USF/CAF recipients with respect to accountability. The Commission itself outlined one potential pitfall<sup>6</sup> in its price cap process in 2013. While policing that sort of activity<sup>7</sup> is difficult, the Commission can pledge to see to it that competitors are incented to comply in full with all necessary oversight requirements.

Accountability also includes the FCC completing its analysis of the 100% competitive overlap rule that has yet to be implemented over the last three years in a reasoned and thoughtful manner. It is taking time because it is difficult and boundary disputes are taking more time to resolve than originally anticipated. We recommend that the burden should be on the asserting competitor as opposed to placing the burden on the incumbent to refute the assertions and allegations of the unproven potential competitor.

The policy argument is different for a carrier that serves an entire market without support than an assertion that mere presence or hypothetical presence or promise of offerings invalidates the need for a carrier of last resort. While the staff of the

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<sup>6</sup> The Commission recognized that one strategy for a competitor to employ would be to advertise a temporary package or even a hypothetical service package with the sole intent being to preclude the receipt of Phase II funding for a price cap carrier. See for example *Connect America Fund*, WC Docket No. 10-90, *Report and Order*, DA 13-1113 (rel. May 16, 2013) (*CAF Phase II Challenge Process Order*), at paragraph 16.

<sup>7</sup> Some form of quarterly or interval reporting should be considered in this regard, as well as a required notification timeframe before service may be “terminated.”

Commission has certainly been fully engaged<sup>8</sup> in implementing the Transformation Order, much work<sup>9</sup> remains to be done and it must be done with an abundance of caution.

### **MIDDLE MILE ENHANCEMENT IN SOME AREAS REQUIRES IMMEDIATE ATTENTION NOW**

At paragraph 3, the Commission states that “*Meeting the infrastructure challenge of the 21<sup>st</sup> century will be a multi-year journey. . . Achieving universal access to broadband will not occur overnight.*” We expect that part of this reference was to areas of the country that are handicapped by a lack of middle mile infrastructure. The cost, or in some cases, lack of access to middle mile backhaul is a vital component of a rate-of-return carrier’s ability to provision a broadband platform to its customers at rates and speed levels that are reasonable comparable to urban<sup>10</sup> service packages.

Middle mile issues for rate-of-return carriers are a topic that highlight the pressure on the FCC-imposed \$2 Billion annual budget cap. While research is not yet complete, we anticipate that a good number of rural carriers may ultimately require some level of support to address above-average middle mile costs if the national telecommunications

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<sup>8</sup> We note that with the “non-numbered” orders that addressed important items of explanation or clarification on various aspects of the *Transformation Order*, the count is actually approaching two dozen documents issued subsequent to November 18, 2011. This equates to a document roughly every 41 days, nearly a monthly occurrence.

<sup>9</sup> We note with irony that the Commission, in 2012 and on its own motion, removed the disaggregation rules that could have been used to assist with some of its current proposals. This move was prompted by the Commission’s decision to eliminate its ill-fated identical support paradigm. The section 214(e) (5) requirement to involve a Joint Board means that a process to reinstitute those types of rules will undoubtedly take some time.

<sup>10</sup> The cost of transport is even becoming an issue for large carriers with much greater scope and scale. In a very recent AT&T July 15, 2014 presentation entitled “The Internet Interconnection Ecosystem”, the carrier asserts at slides 15-18 that the carriage of traffic is not without cost and that there are cost implications of carrying additional traffic. While sorely tempted to observe that our colleagues at AT&T were in essence refuting bill and keep approaches, we will simply acknowledge for the purposes of this filing that the problem is even more acute for rural carriers, especially those in Alaska.

public policy is calibrated to include a true national focus instead of a myopic metropolitan bias. Many rural carriers are located a great distance from peering points, and thus dependent on pricing and terms from what in essence is a monopoly third party provider, or in some cases have no access available. If the Commission truly intends to not revisit the \$2 Billion artificial budget cap until 2017, then in the interim rural carriers impacted by middle mile capacity constraints should not be unfairly penalized for providing service in a location that is vital to the provision of the agricultural and natural resource inputs that help feed the nation and fuel our cars and warm our homes.

While attacking the problem in \$10,000,000 increments may prove to be a Sisyphean effort when one studies the magnitude of the problem, we support for 2014-2015 the Commission's decision to focus initially on supporting middle mile improvements for Alaska and tribal areas, then focus on other rural and remote areas.

### **FASTER SPEEDS REQUIRE BUDGET ADJUSTMENTS**

The Commission's inclination to increase the minimum speeds is in part a recognition of the legal obligation it faces from Section 254(b)(3) that requires reasonable comparability between urban and rural customers with respect to service quality and price. And the Commission reinforces its self-imposed budget parameters at footnote 321, by seeking doing more with less in the following: *Given the likelihood that required broadband speeds will continue to increase over time, we expect recipients of funding to deploy technologies capable of delivering faster speeds (and higher capacities) over time with limited additional investment.*

To lessen the expected impact on its self-imposed budget target that currently sits at \$2.0 Billion<sup>11</sup> per year, footnote 324 indicates that the FCC intends that: *“This proposed higher speed benchmark would only apply prospectively, not to existing obligations.”* Footnote 314 also offers that: *“These changes to the obligations would also not apply to previously-made deployment commitments, such as commitments in connection with Connect America Phase I and Mobility Fund Phase I, which provided one-time, rather than recurring, support.”* But, the march to higher broadband speeds has indeed commenced, as noted at footnote 318: *“This evolving baseline reflects a growing need for increased bandwidth as more Americans use the Internet for work and to build career skills.”*

The Commission attempts to finesse its \$2 Billion annual USF budget dilemma at paragraph 144 by defining a reasonable request as “cost-effectively extend a voice and broadband-capable network” based on the level of expected end-user revenues from the voice and retail broadband Internet access services that will be offered plus anticipated universal service support. We believe that any definition of reasonable request will only work if there are truly clear guidelines governing reasonable requests and if it is coupled with the **availability of predictable and sufficient funding**.

At some point in time, and it is likely in the not too distant future, increased speeds will not be achieved with clever definitions, nor excluding this category or that category. It will require a larger investment in the infrastructure in rural America if the Commission desires to meet the requirements of the current federal law.

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<sup>11</sup> We are optimistic that the Commission will revisit this issue in 2017.

**THE OPTIONAL MODEL ADOPTION IS CORRECTLY SET FOR A STATEWIDE ELECTION IN ORDER TO NOT SQUEEZE THE OTHER SMALL RURAL CARRIERS**

At paragraph 276, the Commission initiates the debate as to whether and how to allow rate of return carriers an optional path to adopt some form of incentive regulation. The Commission notes at paragraph 278 that the *“ITTA has proposed the most comprehensive plan in the record for such a transition (ITTA Plan).”* It does not appear that the \$2 Billion annual budget cap is fully accounted for in the current version of the ITTA Plan with respect to industry equity. In this regard, we share a threshold question: **“Is the ITTA proposal “budget cap equitable” for the carriers that serve above average cost territory that do not now or might not ever fit<sup>12</sup> into a model paradigm?”**

To ameliorate those concerns, we offer several recommendations with respect to the current ITTA Plan (2/27/14) that would level the playing field. First, in the section II. a. Phase 1, i. Universal Service Fund Support, there does not appear to have been consideration as to *what should occur if the “freeze” lasts longer than one year.* If “Model-Based Support” is not implemented as of the start of a given calendar year after such election, it would seem equitable for budget cap equity that the electing carriers frozen ICLS and HCLS amounts should transition downward at 10% per year, but not going below 50% after year 5 in the case of such delay.

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<sup>12</sup> We noted with great interest the comments in the March 5, 2014 letter to Chairman Wheeler from the 35 rural oriented associations in the first paragraph on page 2: *“Given that the FCC’s work on developing a model that applies to the operations of only 13 larger carriers has yet to be completed after almost four years of review. . .”*

*What should be the disposition of any and all USF support that could be considered to be “freed up” as a result of the transition suggested above? A budget cap equitable proposal would be to have 50% of such support flow back to and be considered part of any ROR “budget” (including CAF ICC) and the other 50% shall become part of any Model-Based Support available pursuant to those carriers receiving support at that time under the model.*

Second, in the section II. a. Phase 1, ii. Intercarrier Compensation, there does not appear to have been consideration as to *what should occur if the “freeze” lasts longer than anticipated.* If “Model-Based Support” is not implemented as of the start of the third calendar year after such election, it would seem equitable for budget cap equity that the electing carriers’ scheduled ICC Eligible Recovery reduction shall increase to 10% per year. *What should be the disposition of any and all CAF ICC amounts that could be considered to be “freed up” as a result of the transition suggested above? A budget cap equitable proposal would be to have such support flow back to and be considered part of any ROR “budget” for USF (including CAF ICC) purposes.*

Third, in II. b. Phase II. i. Universal Service Fund Support, we recommend a different timing and disposition of freed up savings. At i. 3., (To the extent that Phase II funding for a study area is lower than frozen support), we believe a more budget cap equitable approach is to shorten the transition period to three years, and to have such support flow back to and be considered part of any ROR “budget” for USF (including CAF ICC) purposes.

At paragraph 287, the Commission proposal states: *“The ITTA Plan proposes to allow participating rate-of-return carriers to make an election on a study area-by-study*

*area basis. We propose instead that participating carriers be required to make a state-level election to receive model-based support, comparable to what is required of price cap carriers. Such an approach would prevent rate-of-return carriers from cherry picking the most attractive areas in their study areas, potentially those areas where model-support is greater than legacy support, leaving the least desirable areas for a competitive process.”*

These issues of study area versus statewide selection are neither new nor novel, as an analogous discussion occurred over a dozen years ago. From their February 14, 2002 MAG comments, AT&T stated in part beginning at page 15:

**B. The Commission Should Retain – And Enforce – The “All or Nothing” Rule.**

The Commission should also reject MAG’s proposal to eliminate the all-or-nothing rule. *See Notice paragraph 263.* In 1993, the D. C. Circuit explained that “it seems quite obvious that dual regulation . . . has a key feature in common with regulated-unregulated dual status: a firm can escape the burden of costs incurred in its unregulated *or* price cap business by shifting them to the rate-of-return affiliate, which can pass them on to ratepayers.” *See NRTA*, 988 F. 2d at 179-180. The Court went on to affirm the Commission’s “all-or-nothing” rule, which was designed to guard against such anticompetitive behavior by prohibiting LECs from owning facilities that are not subject to the same type of rate regulation. *See id.* at 181. Those rules are at least as essential today for protecting the public interest as they were when first adopted in 1990. *See LEC Price Cap Order*, paragraphs 271-278.

LECs continue to have substantial incentives to engage in price-inflating cost-shifting between incentive regulation affiliates and rate-of-return affiliates. By shifting

costs from price cap affiliates to rate-of-return affiliates, LECs can – as they could when the Commission first adopted its all-or-nothing rule – increase profit margins for incentive regulation affiliates, while continuing to receive the same return for rate-of-return affiliates. In addition, LECs would have incentives to “game” the system through sequential mergers and acquisitions. (End of citation)

In summary, carriers refraining from choosing this optional approach should not be negatively impacted<sup>13</sup> by budget parameters that occur when other companies choose the optional model plan.

### **POOLING ISSUES REQUIRE REVIEW AND MODIFICATION**

If the Commission moves forward with an optional path for rate-of-return carriers to adopt incentive regulation, it may be necessary for the National Exchange Carrier Association to make certain adjustments to its pooling procedures.

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<sup>13</sup> What safeguards does the Commission contemplate to preclude a company with a 100+ study areas from moving corporate overhead and other expenses around after such selections are made?

## **THE PROPOSED NON-COMPLIANCE OPTIONS ARE A MORE APPROPRIATE LEVEL OF PENALTY**

We support the Commission's proposed changes to the level of support reductions that result from failure to file certain mandated forms<sup>14</sup> at a date certain as a step<sup>15</sup> in the right direction. Under current sections 54.313(j) and 54.314(d), the penalties do not differ whether the filing is a day late or a month late. While we do not wish to understate the importance of carriers meeting their filing deadlines, this seems rather inequitable.

The current set of rules imposes the draconian penalty of missing an entire quarter of federal universal service support if the filing is one minute late. While in the majority of occurrences that we reviewed we see the penalties have been waived when good cause was shown, the current rules also have resulted in a lot of Commission staff time being used to deal with the waivers.

We also support the Commission proposal with respect to grace periods.

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<sup>14</sup> The annual section 54.313 reporting made via Form 481 is due on July 1 and the annual section 54.314 certification for use of support is due each October 1.

<sup>15</sup> It is curious that the FCC rules already in place found in section 1.80(b)(8) for failure to file required forms or information have not been used in this regard. Even if those rules were modified to increase the \$3,000 fine to \$5,000 or \$10,000, it would seem to be a more administratively efficient way to handle late filers and allow more Wireline Competition Bureau staff expertise to focus on the remaining tasks of implementing the TRO.

GVNW Consulting, Inc.

Comments in WC Docket Nos. 10-90, 14-58, 07-135; WT Docket No. 10-208; CC Docket No. 01-92

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Respectfully submitted,

*s/ Jeffrey H. Smith*

*Via ECFS at 8/08/14*

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