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

**CC Docket No. 80-286**

In the Matter of

Amendment of Part 36 of The Commission's Rules And Establishment of a Joint Board

## RECOMMENDED DECISION

**Adopted: December 7, 1995; Released: December 8, 1995**

By the Federal-State Joint Board:

## I. INTRODUCTION AND SUMMARY

1. The Federal-State Joint Board recommends that the Commission extend for six months the duration of the two-year indexed cap ("interim cap") on the total level of the Universal Service Fund ("USF").[1] Our recommendations are restricted to issues relating to extension of the interim cap. We specifically offer no recommended decisions regarding permanent resolution of any issue raised or discussed below.

2. We believe that the interim cap should be extended for the purpose of continuing to moderate the growth of the USF during the pendency of the Commission's rulemaking revising the Part 36 jurisdictional separations rules governing the USF. In view of our concurrence with the Commission's belief that an additional six months should be sufficient to complete that rulemaking,[2] we recommend the extension of the interim cap for an additional six months.

## II. BACKGROUND

### A. Creation and Prior Modification of the Universal Service Fund

3. The USF rules were adopted in 1984 to promote universally available telephone services at reasonable rates.[3] The rules provide interstate assistance to high-cost local exchange carriers ("LECs") by allowing those LECs with loop costs[4] above a specified assistance threshold to allocate a percentage of those loop costs to the interstate jurisdiction.[5]

4. In 1993, the Commission stated its intention to review the USF high-cost assistance mechanisms, in order to determine whether changes were needed to better serve its public policy goals.[6] Intending to address possible changes in the Part 36 USF rules through a Notice of Proposed Rulemaking, the Commission adopted interim rules imposing an indexed cap on the total USF to moderate growth in the USF for the duration of the USF rulemaking.[7] The rules imposing that cap are now scheduled to expire on January 1, 1996.[8]

5. In 1994, the Commission issued a Notice of Inquiry in order to focus the issues in advance of the proposed rulemaking.[9] On July 13, 1995, the Commission issued a Notice of Proposed Rulemaking and Notice of Inquiry ("Notice") inviting comment on three proposals for revising the Commission's USF rules.[10] The Notice also solicited comment on the use of high cost credits through which a customer could direct USF assistance to the LEC selected by that customer.[11] The Notice invited comment on the abolition, revision, or combination with USF assistance of

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[1] 47 C.F.R. § 36.601(c). Under the interim cap, growth in the total level of the USF is indexed to growth in the total number of working loops. *Id.; see also* Amendment of Part 36 of the Commission's Rules and Establishment of a Joint Board, *Report and Order*, 9 FCC Rcd 303, para. 20 (1993) (*Interim Order*). A working loop is "[a] revenue producing pair of wires, or its equivalent, between a customer's station and the central office from which the station is served." 47 C.F.R. Part 36, Appendix-Glossary.

[2] Amendment of Part 36 of the Commission's Rules and Establishment of a Joint Board, *Notice of Proposed Rulemaking*, 60 Fed. Reg. 52,359, para. 11 (1995) (*Extension Notice*).

[3] Amendment of Part 67 of the Commission's Rules and Establishment of a Joint Board, *Decision and Order*, 96 FCC 2d 781, para. 29 (1984).

[4] The costs included in the unseparated loop costs are enumerated in 47 C.F.R. § 36.621(a). The number of working loops within a LEC study area is defined in 47 C.F.R. § 36.611(a)(8). The average unseparated loop cost per working loop and national average unseparated loop cost per working loop are defined in 47 C.F.R. § 36.622.

[5] LECs with average cost per loop above 115 percent of the national average cost per loop can allocate a specified percentage of these costs to the interstate jurisdiction. 47 C.F.R. § 36.631(c), (d). This allocation is in addition to the interstate allocation allowed under the Commission's general jurisdictional separations rules. *See* 47 C.F.R. § 36.154(c).

[6] Amendment of Part 36 of The Commission's Rules And Establishment of a Joint Board, *Notice of Proposed Rulemaking*, 8 FCC Rcd 7114, paras. 2, 11-15 (1993) (*Interim Notice*).

[7] *Interim Order, supra* note 1, paras. 1-2.

[8] 47 C.F.R. § 36.601(c).

[9] Amendment of Part 36 of The Commission's Rules And Establishment of a Joint Board, *Notice of Inquiry*, 9 FCC Rcd 7404, 7406 n.5 (1994).

[10] *Amendment of Part 36 of The Commission's Rules And Establishment of a Joint Board, Notice of Proposed Rulemaking and Notice of Inquiry*, CC Dkt No. 80-286, FCC 95-282, para. 17 (rel. July 13, 1995) (summarized in 60 Fed. Reg. 46,803 (1995)). The first proposal presented three specific alternative modifications to the existing rules that would continue to base high-cost assistance on actual costs reported by LECs.*Id.*, paras. 37-38, 47, 51. Under the second proposal, assistance would be distributed on the basis of factors related to the cost of providing service rather than on the basis of actual reported costs. *Id.*, paras. 56-75. The third proposal suggested the distribution of assistance among the States, with State utility commissions deciding the allocation of assistance among the carriers serving the State under distribution plans developed in accordance with Commission guidelines and reviewed by the Commission. *Id.*, paras. 76-77.

[11] *Id.*, para. 17.

dial equipment minute ("DEM") weighting.[12] The Notice requested comments by September 12, 1995 and reply comments by October 12, 1995.[13]

6. On August 31, 1995, the Commission granted requests from interested parties, including the Alaska Public Utilities Commission, for an extension of time for the filing of comments and reply comments, because the Commission was persuaded that an extension would encourage more detailed analysis by interested parties of the complex issues presented in the Notice.[14] Comments and reply comments were filed on October 10 and November 9, 1995, respectively.[15]

**B. The Commission's Proposed Extension of the Interim Cap**

7. On October 3, 1995, the Commission issued a Notice of Proposed Rulemaking, proposing the extension of the interim cap for an additional six months.[16] The rationale underlying this proposal was to continue to moderate growth in the USF during the pendency of the USF rulemaking. The Commission noted that the interim cap was scheduled to remain in place for two years because the Commission initially believed that two years would be sufficient to complete the USF rulemaking, but that it had become clear that additional time will be required.[17]

8. The Commission projected that an additional six months would be sufficient to complete the USF rulemaking in view of the progress made to date. The Commission referred the issues raised in its *Extension Notice* to the Federal-State Joint Board for a Recommended Decision, and invited interested parties to propose extensions of longer or shorter periods of time.[18]

## III. DISCUSSION

9. *Comments.* As a preliminary matter, we note that some parties' comments reiterate their opposition to the current interim cap.[19] Several parties opposing the proposed extension of the interim cap contend that limitations on the USF are incompatible with the goal of universal service.[20] OPASTCO argues that such limitations discourage investments in infrastructure and may harm the level of service provided to customers of smaller, rural local exchange carriers.[21] Similarly, FW&A contends that USF recipients should not be penalized by extension of the interim cap owing to the failure of the Joint Board and the Commission to complete the USF rulemaking within the period of time originally planned.[22] PTI, which opposed the interim cap, also contends that the interim cap conflicts with universal service goals, but supports an extension until changes to USF rules are finalized in order to avoid uncertainty.[23]

10. Other parties suggest that the small burden the USF imposes on interexchange customers is outweighed by the benefit of upgrades to local networks made possible through the USF.[24] They contend that the burden on the interexchange market from the USF is too small to require a cap on the fund,[25] arguing that on a per minute of use basis, the USF burden on interexchange carriers has not increased over time.[26] In response to these arguments, AT&T asserts that the need for the interim cap has been decided and this issue should not be reopened.[27]

11. *Discussion.* We reject the contention of the parties that the interim rules' limitations on the total level of the USF are incompatible with the goal of universal service. In adopting the current interim cap, the Commission explained that its decision to proceed with the USF rulemaking was driven by its continued support for universal service goals.[28] The interim cap wasdesigned to moderate the growth in the USF during the pendency of the rulemaking "while continuing to ensure the availability of basic local telephone service at reasonable rates."[29] Moreover, the interim cap cannot be regarded as a penalty to USF recipients, because it would not reduce the USF. As we and the Commission explained earlier in this proceeding, the interim cap would allow the USF to grow, but would merely limit the rate of such growth.[30]

12. We also agree with AT&T that the concerns described in the foregoing paragraphs are beyond the limited scope of the *Extension Notice*. The need for the current interim cap, settled prior to its adoption, is not at issue here. The *Extension Notice* did not invite evaluation of the benefits of the USF to recipients and its costs to interexchange carriers or customers. We do not therefore, address those arguments in this Recommended Decision, although we discuss the related issue of the potential benefits and harm from extending the interim cap.[31]

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12 *Id.*, paras. 9-12. DEM weighting allows LEC study areas with fewer than 50,000 loops to allocate an additional portion of their local switching costs to the interstate jurisdiction.

13 *Id.*, para. 91.

14 Amendment of Part 36 of the Commission's Rules and Establishment of a Joint Board, *Order*, CC Docket No. 80-286, DA 95-1876, para. 4 (rel. Sept. 1, 1995).

15 The Appendix to this Recommended Decision lists the parties filing comments and replies as well as the shortened names that we have used to refer to those parties.

16 *Extension Notice, supra* note 2.

17 *Id.*, para. 11.

18 *Id.*, para. 11.

19 *E.g.*, Century Comments at 2; Vitelco Comments at 1-2.

20 Century Comments at 2; OPASTCO Comments at 2; *cf.* NTCA Comments at 3; NTCA Reply at 1.

21 OPASTCO Comments at 2. *See also* PTI Comments at 2; NTCA Comments at 2-3.

22 FW&A Comments at 2.

23 PTI Comments at 1-3.

24 *See, e.g.*, NTCA Reply at 1.

25 PTI Comments at 2; NTCA Comments at 2-3.

26 Vitelco Comments at 2; NTCA Comments at 3 n.7.

27 AT&T Reply at 4.

28 *See Interim Order, supra* note 1, paras. 14-16. In supporting the Commission's announced intention to initiate the USF rulemaking, we explained that the rulemaking was compelled by changes in the industry and that "[t]he challenge for the Commission and for the Joint Board is to ensure that the USF high cost support mechanisms promote the accessibility and affordability of essential telecommunications services without creating or perpetuating economic inefficiencies or competitive inequities." Amendment of Part 36 of the Commission's Rules and Establishment of a Joint Board, *Recommended Decision*, 9 FCC Rcd 334, para. 11 (1993) (*Interim Recommendation*).

29 *Interim Order, supra* note 1, para. 20.

30 *Interim Recommendation, supra* note 28, para. 12; *Interim Order, supra* note 1, paras. 19-20.

31 *See, e.g., infra* para. 15.

13. Part A of this section discusses the issue of whether the interim cap should be extended. Part B discusses what the duration of that extension should be. In Part C, we discuss other issues raised by interested parties in their comments and reply comments.

**A. Extension of the Interim Cap**

14. *Comments*. Numerous parties opposing extension of the interim cap argue that, because the total level of the USF is not growing, the extension is unnecessary.[32] As evidence, some parties refer to NECA's recent annual USF data submission; the loop cost data reported by NECA indicates that the total USF support payments in 1996 ($735 million) will be 1.6 percent below the 1995 total ($746 million).[33] Other parties contend that the NECA submission shows that an extension of the cap is unnecessary because the total USF support payments in 1996 will be at least $40 million below the maximum that an extended interim cap ($777.1 million) would permit.[34] Finally, some parties argue "that an extension of the interim cap is unnecessary because the historical growth in the USF has been reasonable.[35]

15. Parties supporting the extension maintain that the rationale for imposing the cap, to moderate growth in the USF during the proceeding to revise the USF rules, remains valid justification for maintaining the interim cap for the six additional months it may take to complete the rulemaking.[36] Those parties also explain that continuing the current interim cap should not significantly harm USF recipients. NYNEX and GTE reason that an extension of the interim cap would have little effect on recipients of USF assistance in 1996 because NECA's calculation of the total USF support payments in 1996 are below the limit that the interim cap would impose.[37] Similarly, AT&T points out that the fact that NECA's 1996 projections are below the level of an extended interim cap does not mean that an extension should not occur; if NECA's projections are correct, AT&T explains, continuing the interim cap would be at worst superfluous.[38] AT&T further argues that, if NECA's calculations are incorrect, then "there is the potential for serious harm to contributors to the fund" should the fund grow beyond the capped amount.[39] STV also supports extension of the interim cap, noting that NECA's data show that the interim cap was successful in limiting growth in the fund.[40]

16. *Discussion*. We recommend extension of the interim rules that cap the USF. As we and the Commission concluded during our earlier deliberations in this proceeding, an indexed cap will minimize dislocation if the Commission revises the current USF rules.[41] We believe that it would be unwise to enable the USF to grow significantly prior to conclusion of the ongoing USF rulemaking, particularly with the prospect of revised USF rules soon after expiration of the current interim cap. Parties' citations to NECA's current calculations of a 1996 USF that is below the level of the USF determined under the current interim rules do not change that belief. In fact, if the current NECA calculations for the 1996 USF are accurate, it is unclear why commenters citing them object to the interim cap's extension. As other parties have explained, assuming that NECA's current 1996 USF figures are correct, no one is harmed if the actual claims for USF assistance fall below the interim cap.[42] On the other hand, significant dislocation could result if the actual 1996 USF is substantially greater than NECA's current calculations.

17. In prior years, adjustments to the underlying data have frequently caused the actual USF for a given year to vary significantly from NECA's prior calculations.[43] Because there is no way to know, at this time, whether the adjusted 1996 USF will exceed the amount calculated under the interim cap, we believe it prudent to continue the interim cap. If the 1996 adjusted USF does not exceed the interim cap, there will be no effect for USF recipients. On the other hand, if the 1996 adjusted USF figures substantially exceed NECA's current calculations, the interim cap will protect against unanticipated and unwanted growth in the fund during the pendency of the USF rulemaking.

18. Finally, we reject arguments that because growth in the USF has been reasonable, an extension of the interim cap is unwarranted. In recommending the adoption of the interim cap, we concluded that concern regarding the overall rate of increase in the USF was "well-founded" and that the pattern of fund growth had been erratic.[44] The USF decrease projected in NECA's recent submissions is consistent with our observations that the USF levels have tended to vary widely from year to year. Moreover, we explained in our *Interim Recommendation* that "a definitive conclusion regarding the reasonableness of past USF growth" was not a necessary predicate to our decision to recommend an interim cap, rather "[t]he dispositive issue is whether it is

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[32] *E.g.*, Century Comments at 2; NRTA Comments at 1-2.
[33] *E.g.*, Century Comments at 2; OPASTCO Comments at 3.
[34] NECA Comments at 3; NRTA Comments at 2.
[35] *E.g.*, OPASTCO Comments at 2-3; NECA Comments at 2; NRTA Comments at 1-2.
[36] Ameritech Reply at 3; MCI Comments at 2; AT&T Comments at 2; Sprint Comments at 1-2.
[37] *E.g.*, NYNEX Comments at 2-3; GTE Comments at 6 n.12.
[38] AT&T Reply at 4-5; *see also* Vitelco Comments at 2; USTA Comments at 3.
[39] AT&T Reply at 5.
[40] STV Comments at 1-2.
[41] *Interim Recommendation, supra* note 28, paras. 26-28; *Interim Order, supra* note 1, paras. 17-20.
[42] The interim rules provide that assistance shall be distributed under either those rules or the permanent USF rules, whichever method results in the lower total USF.
[43] NECA's USF and tariff calculations, filed with the Commission for the upcoming year, frequently have varied significantly from the actual, adjusted USF total for the year in question: For example: The September 1990 NECA filing indicated total 1991 USF payments of $629.2 million; the actual adjusted 1991 USF payment total was $644.9, an increase of $15.7 million. NECA Universal Service Fund (USF) 1990 Submission of 1989 Study Results (filed Sept. 4, 1990); NECA Universal Service Fund (USF) 1994 Submission of 1993 Study Results (filed Sept. 30, 1994). The September 1991 NECA filing calculated total 1992 USF payments of $671.9; the actual adjusted 1992 USF payment total was $692.9, an increase of $21.0 million. NECA Universal Service Fund (USF) 1991 Submission of 1990 Study Results (filed Sept. 3, 1991); NECA Universal Service Fund (USF) 1995 Submission of 1994 Study Results (Sept. 29, 1995). The December 1993 NECA tariff filing indicated that, without the interim cap, the USF payments in calendar year 1994 would total $744.0 million; by May 1995, that figure had been adjusted to $761.3 million, an increase of $17.3 million. NECA Application No. 166 (filed Dec. 28, 1993); NECA Transmittal No. 670 (May 17, 1995).
[44] *Interim Recommendation, supra* note 28, paras. 17, 24. The Commission agreed. *Interim Order, supra* note 1, para. 18.

advisable to adopt measures to deter large USF increases during the interim period."[45] We remain convinced, for the reasons set forth here and in our *Interim Recommendation*, that moderation of the level of the USF during the pendency of the USF rulemaking will serve the public interest.

19. For the reasons discussed in the foregoing paragraphs, we recommend that the Commission extend the current interim USF rules. We turn next to consideration of the appropriate duration of such an extension.

**B. Duration of the Interim Cap Extension**

20. In its *Extension Notice*, the Commission proposed extending the interim cap for six more months, until July 1, 1996, while we work with the Commission to complete the USF rulemaking.[46] The Commission requested comment on its proposed six-month extension of the interim cap and invited comment on whether that extension should be longer or shorter.[47]

21. *Comments*. Several commenters support the proposed six-month extension to complete the USF rulemaking[48] others, however, challenge the ability of the Joint Board and the Commission to complete this proceeding within six months.[49] Some commenters supporting an extension of the interim cap urge that any extension be minimal, expressing concern that permanent USF rule revisions not be delayed.[50] AT&T contends that six months should be sufficient time to complete the USF rulemaking.[51] NTCA argues that the Commission should divide the USF rulemaking into two phases, with the issues of high-cost credits and proxy factors reserved for the second phase, and should extend the interim cap only through the end of the first phase.[52]

22. Other commenters suggest extending the interim cap for more than the six months the Commission proposed.[53] Alternatives to the six-month extension proposed in the *Extension Notice* include proposals for an extension of one year[54] and extensions for an indefinite period.[55] Some parties argue that to perform the factual analysis and resolve the policy issues raised in the USF proceeding requires a one-year extension.[56] Others propose expansion of the USF rulemaking, and suggest that broadening the scope of that proceeding will require a one-year extension.[57] Some interested parties contend that companies affected by rule changes could implement modifications at the beginning of the calendar year more easily than at mid-year.[58]

23. Several commenters support an extension of the interim cap for an indefinite period, until such time as the USF rulemaking is completed.[59] MCI maintains that this approach would avoid multiple extensions.[60] Other commenters suggest modifications to the scope or structure of the USF proceeding.[61] For example, several parties suggest that the interim cap be extended indefinitely while the Commission undertakes a comprehensive review of issues relating to universal service.[62] Other commenters suggest that the interim cap be extended through the duration of other proceedings.[63] Many of the parties supporting a one-year extension or an extension of indefinite duration maintain that such measures are necessary in order to ensure that new USF rules are consistent with anticipated federal telecommunications legislation.[64]

24. *Discussion*. After carefully considering the arguments made in support of longer extensions, we conclude that the Commission should extend the interim cap for six months, which should be sufficient to complete the USF rulemaking. Proposals for longer or indefinite extensions of time in order to broaden the issues presented in the USF rulemaking clearly exceed the scope of the *Extension Notice*, as does NTCA's proposal for bifurcating the USF proceeding. The same is true of proposals premised on the expectation of federal telecommunications legislation, which, in addition, involve circumstances beyond the control of the Commission or this Joint Board.

25. Although some parties have challenged the ability of the Joint Board and the Commission to complete the USF rulemaking within six months, we believe that it is important to conclude this proceeding expeditiously. Given the tasks before this Joint Board and the Commission, we believe that the USF rulemaking can be completed by July 1, 1996. A more generous extension of time, or one of no fixed duration, would thus be inconsistent with our assessment of the time still needed to resolve these admittedly complex issues. In addition, we believe that the duration of an extension of the interim cap should be as short as possible, in order to emphasize the commitment, of this Joint Board and the Commission, to prompt resolution of the issues before us in the USF rulemaking.

26. For the reasons discussed above, we do not, at this time, support an extension longer than six months, nor do we support an extension with no specified termination date. We recommend that the Commission extend the in-

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45 *Interim Recommendation, supra* note 28, para. 22.

46 *Extension Notice, supra* note 2, para. 11.

47 *Id.*

48 U S WEST Comments; Sprint Comments at 2-3; NYNEX Comments at 2.

49 BellSouth Comments at 1-2 (citing numerous unresolved issues in the underlying USF rulemaking); BellSouth Reply at 1-2; PTI Comments at 3; STV Comments at 2; MCI Comments at 2 (citing many proceedings before the Commission and pending legislation on telecommunications legislation).

50 Ameritech Reply at 2-3; AT&T Comments at 3.

51 AT&T Reply at 2-3.

52 NTCA Comments at 3-5.

53 *E.g.*, Sprint Comments at 2; U S WEST Comments; BellSouth Reply at 2.

54 *E.g.*, Vitelco Comments at 2; PTI Comments at 3-4.

55 *E.g.*, BellSouth Reply at 2; MCI Comments at 1-3.

56 *E.g.*, USTA Comments at 2 (maintaining that a one-year extension is necessary to analyze the data collected in the USF proceeding); PTI Comments at 3.

57 *E.g.*, Sprint Comments at 2; USTA Comments at 2-3; USTA Reply at 1-2.

58 *E.g.*, Southwestern Comments at 2-3; Vitelco Comments at 2. *See also* FW&A Comments at 2; OPASTCO Comments at 2. *But cf.* AT&T Reply at 3 n.6.

59 Pacific Bell Comments at 1; MCI Comments at 1-3; GTE Comments at 6-7. *See also* STV Comments at 2-3 (suggesting extension until six months after the pending USF rulemaking is completed).

60 MCI Comments at 1-3.

61 BellSouth Comments at 2; Southwestern Comments at 2; GTE Comments at 5.

62 *E.g.*, BellSouth Comments at 2; GTE Comments at 2-3, 5-7.

63 *E.g.*, Pacific Bell Comments at 1-2 (suggesting extension pending completion of "Price Cap review, Access Reform and the full scope of the subsidy mechanisms").

64 Southwestern Comments at 2; USTA Comments at 2; PTI Comments at 2-3.

terim USF rules for a period of six months, as proposed in the *Extension Notice,* and further recommend that prompt completion of this USF rulemaking receive high priority. We recommend that the Commission consider a longer extension only if, contrary to our goals and expectations, it becomes clear that the USF rulemaking will not be completed by July 1, 1996. We believe that the issue of companies' abilities to accommodate mid-year modifications should be deferred until the Joint Board and the Commission address implementation of any permanent revisions to the USF rules that may be adopted in this rulemaking.

### C. Other Issue

27. Southwestern suggests that if the amount of the USF or recipients of the fund are significantly changed, a transition period will be necessary because companies losing funds require planning time to ensure that universal service is not affected.[65] As with the issue of mid-year modifications, we believe that Southwestern's suggestion should be considered in conjunction with implementation of any decisions reached in the completed USF rulemaking.

## IV. RECOMMENDATION CLAUSE

28. For all of the reasons discussed in this Recommended Decision, this Federal-State Joint Board recommends, pursuant to Section 410(c) of the Communications Act of 1934, as amended, 47 U.S.C. § 410(c), that the Federal Communications Commission extend, until July 1, 1996, the current interim rules prescribing an indexed cap on the total level of the Universal Service Fund, 47 C.F.R. §§ 36.601, 36.622.

FEDERAL COMMUNICATIONS COMMISSION

William F. Caton
Acting Secretary

## APPENDIX - LIST OF COMMENTS AND REPLY COMMENTS

### COMMENTS

AT&T Corp. ("AT&T")
BellSouth Telecommunications, Inc. ("BellSouth")
Century Telephone Enterprises, Inc. ("Century") Fred Williamson & Associates, Inc. ("FW&A")
GTE Service Corporation and its affiliated domestic operating companies ("GTE")
MCI Telecommunications Corporation ("MCI")
National Exchange Carrier Association, Inc. ("NECA")
National Rural Telecom Association ("NRTA")
National Telephone Cooperative Association ("NTCA")
The NYNEX Telephone Companies ("NYNEX")
The Organization for the Protection and Advancement of Small Telephone Companies ("OPASTCO")
Pacific Bell ("Pacific Bell")
Pacific Telecom, Inc. ("PTI")
Southwestern Bell Telephone Company ("Southwestern")
Sprint Corporation ("Sprint")
Sprint Telecommunications Venture ("STV")
U S WEST, Inc. ("U S WEST")
United States Telephone Association ("USTA")
Virgin Islands Telephone Corporation ("Vitelco")

### REPLY COMMENTS

The Ameritech Operating Companies ("Ameritech")
AT&T
BellSouth
NTCA
OPASTCO
Sprint
USTA

### FEDERAL-STATE JOINT BOARD SERVICE LIST

The Honorable Sharon L. Nelson, Chairman
Washington Utilities and Transportation Commission
Chandler Plaza Building
1300 South Evergreen Park Drive, S.W.
Olympia, Washington 98504-7250

The Honorable Cheryl L. Parrino, Chair
Wisconsin Public Service Commission
Post Office Box 7854
Madison, Wisconsin 53707-7854

The Honorable Stephen O. Hewlett, Commissioner
Tennessee Public Service Commission
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

The Honorable Laska Schoenfelder, Chairman
South Dakota Public Utilities Commission
State Capitol Building
Pierre, South Dakota 57501-5070

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W. - Room 814
Washington, D.C. 20554

The Honorable Andrew C. Barrett, Commissioner
Federal Communications Commission
1919 M Street, N.W. - Room 826, Stop 0105
Washington, D.C. 20554

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[65] Southwestern Comments at 3.

The Honorable Susan Ness, Commissioner
Federal Communications Commission
1919 M Street, N.W. - Room 832
Washington, D.C. 20554 .

Deborah A. Dupont,
FCC Joint Board Staff Chair
Federal Communications Commission
Common Carrier Bureau - Accounting & Audits Div.
2000 L Street, N.W. - Room 257
Washington, D.C. 20036

Teresa Pitts,
State Joint Board Staff Chair
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive, S.W.
Olympia, Washington 98504-7250

Charles Bolles
South Dakota Public Utilities Commission
State Capitol Building
Pierre, South Dakota 57501-5070

Elton Calder
Georgia Public Service Commission
162 State Office Building
244 Washington Street, S.W. Atlanta, Georgia 30334

Ronald Choura
Michigan Public Service Commission
6545 Mercantile Way
Lansing, Michigan 48910

Rowland Curry
Texas Public Utility Commission
7800 Shoal Creek Blvd. - Suite 400N
Austin, Texas 78757

Ann Dean
Maryland Public Service Commission
6 St. Paul Centre
Baltimore, Maryland 21202

Dean Evans
California Public Utilities Commission
505 Van Ness Avenue - Room 4004
San Francisco, California 94102

William Howden
Federal Communications Commission
Common Carrier Bureau - Accounting & Audits Div.
2000 L Street, N.W. - Room 812
Washington, D.C. 20036

Chris Klein
Tennessee Public Service Commission
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Robert Loube
Public Service Commission of District of Columbia
450 Fifth Street, N.W.
Washington, D.C. 20001

Sam Loudenslager
Arkansas Public Service Commission
1000 Center Street
Post Office Box C-400
Little Rock, Arkansas 72203

Rafi Mohammed
Federal Communications Commission
Common Carrier Bureau - Accounting and Audits Div.
2000 L Street - Room 812
Washington, D.C. 20036

Paul Pederson
Missouri Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65102
James Bradford Ramsay
National Association of Regulatory Utility Commissioners
1102 ICC Building
Constitution Avenue & 12th Street, N.W.
Post Office Box 684
Washington, D.C. 20044

Jonathan Reel
Federal Communications Commission
Common Carrier Bureau - Accounting and Audits Div.
2000 L Street, N.W. - Room 257
Washington, D.C. 20036

Jeff Richter
Wisconsin Public Service Commission
Post Office Box 7854
Madison, Wisconsin 53707-7854

Gary Seigel
Federal Communications Commission
Common Carrier Bureau - Accounting & Audits Div.
2000 L Street, N.W. - Room 812
Washington, D.C. 20036

Joel B. Shifman
Maine Public Utilities Commission
State House Station # 18
Augusta, Maine 04333

Fred Sistarenik
New York Public Service Commission
3 Empire State Plaza
Albany, New York 12223

Mary Steele
North Carolina Utilities Commission
Box 29510
Raleigh, North Carolina 27626-0510