

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
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JULY 3, 2001)
2000 Annual Access Tariff Filings)
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**Reply of
Iowa Telecommunications Services, Inc.**

Iowa Telecommunication Services, Inc. (“Iowa Telecom”) , by its attorney and pursuant to Section 1.773(b) of the Commission’s rules, 47 C.F.R. § 1.773(b), and the Commission’s Order in July 3, 2001 Annual Access Charge Tariff Filings, CCB/CPD 01-08, DA 01-838 (released April 6, 2001), hereby submits its Reply to the Petition of AT&T Corp. filed in the above-captioned proceeding requesting, inter alia, that the Commission suspend and investigate Iowa Telecom’s annual interstate access tariff filing issued on June 18, 2001.

I. Iowa Telecom’s Annual Access Tariff Filing Should Not Be Suspended Because AT&T Has Repeated The Same Frivolous Argument Regarding Meet Point Billing That It Alleged Last Year.

AT&T claims that all local exchange carriers (“LECs”) subject to price cap regulation have improperly treated each minute of use of their transport facilities that are meet point billed as a full minute.¹ This is the same frivolous claim that AT&T alleged

¹ AT&T Petition at 22.

last year with respect to the year 2000 annual access tariff filings.² Last year, Iowa Telecom filed a reply to these AT&T allegations, which is attached hereto as Exhibit A. In its reply, Iowa Telecom demonstrated that adjusting the denominator in the transport component of the Average Traffic Sensitive (“ATS”) charge calculation, as AT&T wants, without adjusting the transport revenue based on full minutes of use in the numerator would violate Section 61.3(e) of the Commission’s rules.³ Iowa Telecom’s reply showed that AT&T’s claim ignores the fundamental nature of circuit-switched transport, as a LEC’s transport facilities are used for the entire duration of a call regardless of whether there is a meet point billing arrangement.⁴ Rather than repeat last year’s reply, Iowa Telecom hereby incorporates by reference its reply filed last year and attached as Exhibit A.

The petition that AT&T has filed this year makes no attempt to respond to any of the points made in last year’s reply filed by Iowa Telecom. Instead, AT&T baldly asserts the same claims about meet point billing that are economically and logically flawed. The AT&T Petition is clearly devoid of any merit and should be promptly denied.

According to Section 1.773(a)(1) (iv) of the Commission’ rules,⁵ a tariff filing by a price cap LEC is prima facie lawful, and will not be suspended by the Commission

² Like last year’s petition, the petition that AT&T has filed this year does not specifically mention Iowa Telecom’s tariff filing in the body of the petition. Iowa Telecom has again prepared a reply to AT&T’s allegations regarding meet point billing because it appears that AT&T intends for its allegations to apply to all price cap LECs.

³ 47 C.F.R. § 61.3(e).

⁴ AT&T provides no explanation why the meet point billed transport facilities of a LEC subject to rate of return regulation are used for a full minute while the transport facilities of a price cap LEC are used for less than a full minute.

⁵ 47 C.F.R. § 1.773(a)(1)(iv).

unless: (1) a price cap LEC has not provided supporting data or (2) there is a “high probability” that the tariff filing is unlawful and will cause “irreparable injury” if not suspended. With its 2001 annual tariff filing, Iowa Telecom filed the supporting data required by the Commission’s rules. AT&T has not shown, nor even alleged, otherwise. AT&T’s Petition certainly has not satisfied the heavy burden of proof of “high probability” and “irreparable injury” required for a suspension. To the contrary, AT&T’s allegations about meet point billing are groundless on their face and have no prospect of succeeding. Even if AT&T’s meet point billing claim had any merit, which it does not, irreparable injury would not occur if Iowa Telecom’s tariff filing was not suspended because AT&T can seek damages for any violations of the Commission’s rules by filing a formal complaint.

Iowa Telecom’s 2001 annual tariff filing was filed in full compliance with the Commission’s rules and the CALLS Order.⁶ The reasons given by the Commission for suspending Iowa Telecom’s tariff filing last year are not applicable to this year’s filing. The Commission suspended all of the LECs’ 2000 annual access tariff filings because price cap LECs were required to make a collective \$2.1 billion reduction in switched access usage charges last year. The Commission was therefore concerned that any adjustment to the tariff rates filed last year by one price cap LEC would require rate adjustments by all price cap LECs.⁷ This year, each price cap LEC independently calculated its rates, and there was no collective rate reduction. Therefore, a suspension of

⁶ Federal-State Joint Board On Universal Service, Eleventh Report and Order, 15 FCC Rcd 12962 (2000) (“CALLS Order”).

⁷ 2000 Annual Access Tariff Filings, Memorandum Opinion and Order, 15 FCC Rcd 11741, 11742 (2000).

another price cap LEC's 2001 annual access tariff filing does not warrant a suspension of Iowa Telecom's tariff filing.

II. The Sole Impact of the CALLS Order Will Be Higher Consumer Rates and the Enrichment of AT&T Unless AT&T Lowers Consumer Rates to Reflect Reductions in Switched Access Rates.

Incredibly, AT&T claims it wants a suspension and investigation of the annual access tariff filings "so that consumers receive the full benefits of the CALLS plan."⁸ However, the only way for consumers to benefit from the CALLS Order is for AT&T to reduce consumer rates to reflect the enormous reductions in switched access charges that have occurred since its implementation. While Iowa Telecom was not a party to the CALLS agreement, Iowa Telecom has drastically reduced its switched access rates as mandated by the CALLS Order. Those access charge reductions resulted in AT&T paying less to Iowa Telecom, but did not result in consumers paying less to AT&T. So far, the CALLS Order has adversely impacted AT&T consumers because AT&T has increased its long distance rates rather than reduce them. In fact, AT&T has announced an 11% increase in its basic rates for 28 million consumers that will take effect on July 1, 2001.⁹

III. Conclusion.

Iowa Telecom's 2001 annual access tariff filing fully complies with the Commission's rules and the CALLS Order. Iowa Telecom has done its part; it has drastically reduced its switched access charges since the issuance of the CALLS Order. However, Iowa Telecom has no means of extending the benefits of those rate reductions

⁸ AT&T Petition at 21.

⁹ Long -Distance Provider To Increase Standard Rates, Wall St. J., June 4, 2001, at B8.

beyond AT&T, to consumers. Only AT&T can reduce the rates charged to consumers to reflect the enormous reduction in switched access charges mandated by the CALLS Order.

AT&T's Petition repeats the same frivolous claim that it made last year regarding a meet point billing adjustment to the ATS charge calculation. It has not met the heavy burden of proof required for a suspension and certainly has not demonstrated that Iowa Telecom's tariff filing raises any substantial issue of lawfulness. Accordingly, Iowa Telecom respectfully requests that AT&T's Petition be denied.

Respectfully submitted,

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June 29, 2001

EXHIBIT A

**Before the
FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)
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2000 Annual Access Tariff Filings)
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**Reply of
Iowa Telecommunications Services, Inc.**

Iowa Telecommunications Services, Inc. (Iowa Telecom), by its attorneys, submits its Reply to the Petition of AT&T Corp. filed in the referenced proceeding requesting, *inter alia*, that the Commission suspend and investigate Iowa Telecom’s interstate access tariff, filed June 16, 2000. AT&T has failed to demonstrate that Iowa Telecom’s tariff filing raises substantial issues of lawfulness justifying a suspension.¹ As discussed below, Iowa Telecom prepared its initial tariff in compliance with the FCC’s Rules and the recently adopted *CALLS Order*.² Accordingly, AT&T’s Petition must be denied.

I. AT&T’s Proposed Meet Point Billing Adjustment Is Not Warranted

AT&T argues generally that, “LECs should be required to apply a meet-point percentage to their meet-point and other jointly-provided traffic and to provide a complete explanation for their transport volumes.”³ AT&T claims that all price cap

¹ See e.g., *Long-Term Telephone Number Portability Tariff Filings of U S WEST Communications, Inc.*, 14 FCC Rcd 4383 (March 25, 1999) (The Commission may suspend a tariff only if petitioner raises “substantial issues of lawfulness that warrant an investigation”).

² *Access Charge Reform*, Sixth Report and Order in CC Docket Nos. 96-262 and 94-1, Report and Order in CC Docket No. 96-45, FCC 00-193, released May 31, 2000 (“*CALLS Order*”).

³ AT&T Petition at 10 *et. seq.* Iowa Telecom is referenced a single time in Appendix A to AT&T’s Petition which simply lists all the carriers subject to AT&T’s Petition without providing any description or allegations concerning the carriers’ tariffs. Unlike most of the price cap carriers named in Appendix A, Iowa Telecom is not specifically named in any portion of AT&T’s

LECs (with the exception of BellSouth) have improperly counted each minute of meet-point traffic as a full transport minute. AT&T further argues that this practice results in the understatement of transport costs “actually incurred by IXCs.” As its proffered remedy, AT&T proposes that the price cap LECs “be required to multiply each meet-point minute by a fraction that represents the portion of these transport links that is provided by the individual LEC.”

AT&T’s reasoning is economically and logically flawed and contrary to the FCC’s rules. Accordingly, it should be promptly rejected.

As an initial matter, it should be noted that BellSouth’s workpaper calculations are immaterial to Iowa Telecom’s rates. Iowa Telecom is not privy to the development of BellSouth’s 2000 annual access charge tariff filing. The calculations made therein and the labels used by BellSouth to display its calculations are relevant only to its tariff filing and cannot be fairly used by the Commission to draw any conclusions about Iowa Telecom’s proposed access charge rates.

A. Section 61.3(e) Requires Price Cap LECs to Include Meet-Point Billed MOUs for the Base Period

Section 61.3(e) of the FCC’s rules defines how price cap LECs are required to calculate the Average Traffic Sensitive (“ATS”) charge. As part of that calculation, price cap LECs must divide their proposed Transport revenues by “incumbent LEC only base period MOUs (including meet-point billing arrangements for jointly-provided interstate

Petition where it alleges issues concerning the lawfulness of tariffs. Iowa Telecom has prepared the instant reply to AT&T’s allegations concerning the meet point billing adjustment because it appears that AT&T intended its allegations to apply to all price cap LECs. However, without making a specific allegation concerning Iowa Telecom’s tariff, AT&T has failed to follow the requirements of Section 1.773 to provide any “specific reasons” why Iowa Telecom’s tariff filing warrants suspension. 47 C.F.R. §1.773.

access by an incumbent LEC and any other LEC).”⁴ This rule does not require or even permit an incumbent LEC to make any adjustments to its MOUs or even its meet-point billed MOUs. Indeed, the CALLS access charge reform plan that was placed on public notice for comments did not even contain any proposal for adjustments to meet-point MOUs. Rather, the CALLS plan proposed and the FCC mandated that price cap LECs include all MOUs from jointly provided traffic in the divisor for calculating their ATS charge factors.

In essence, AT&T claims that there is a defect in using MOUs as the proper measure of transport usage when transport involves a meet point billing arrangement. Even if AT&T were correct, and it is not, AT&T’s logic would require making the same adjustment to the numerator of the transport component of the ATS charge because full MOUs are present there. Transport revenues, the numerator in the transport component of the ATS calculation, is based on actual revenues derived from full minutes of use and actual distance for all transport provided. If minutes of use in the denominator of the transport component of the ATS calculation were adjusted as AT&T suggests, logic requires that the numerator also be adjusted by the same factor to reduce LEC revenues associated with meet point billed transport. Of course the *CALLS Order* provides for neither of these adjustments.

The Commission’s rules often require regulated companies to make specified adjustments of one form or another. For example, Section 76.922(d)(3)(ii) of the Commission’s rules provides that a cable television system “must adjust its rates in the next calendar year quarter for any decrease in programming costs that results from the

⁴ 47 C.F.R. §61.3(e).

deletion of a channel or channels from a regulated tier.”⁵ If the FCC had intended price cap LECs to make adjustments to their meet-point MOUs, it would have provided detailed specifications for how such adjustments were to be made. Further, the CALLS order would have discussed the rationale for the FCC’s adoption of such a requirement. None of these events occurred; therefore, under both the Communications Act of 1934, as amended (“Act”)⁶ and the Administrative Procedures Act (“APA”),⁷ price cap LECs are not required to make AT&T’s fanciful and self-serving adjustment.

B. AT&T’s Comparison of It’s Expenses to the Access Service Prices of Only Some LECs is Misleading

AT&T has confused its expenses for access services with the rates charged by only some of the LECs on a meet-point billed route. AT&T states on page 10 of its Petition that “the average per minute transport rates calculated by the LECs understate the average transport costs actually incurred by IXCs.” Iowa Telecom submits that, as a fundamental principle of economics, the rates charged by some individual LECs for meet-point traffic and the average costs incurred by an IXC for such traffic cannot be the same—except as a matter of accident.⁸

Generally, originating meet-point traffic is transported by a smaller LEC with relatively high costs and, axiomatically, higher prices for access service (“LEC-A”) and a larger LEC with relatively lower costs and prices for access service (“LEC-B”).⁹ The

⁵ 47 C.F.R. §76.922(d)(3)(ii).

⁶ 47 U.S.C. §§151 *et seq.*

⁷ 5 U.S.C. §§ 551 *et seq.*

⁸ The only time when the composite of the two LECs’ transport prices (after adjustment for mileage factors) would equal the IXC’s costs for transport would be when both LECs charged the identical price for transport.

⁹ The opposite switching and transport pattern takes place with terminating access service traffic.

prices charged by the two LECs for transport to the IXC, when combined, will result in the affected IXC having a transport cost for traffic on the meet-point route that is greater than the price charged by LEC-B, but lower than the price charged by LEC-A.

The concept can be understood with a simple example. Assume that LEC-A's per-minute transport rate is \$0.01 for a ten-mile call, and that LEC-B's per-minute transport rate is \$0.005 for a ten-mile call. Further assume that the billing percentages for the two LECs are 45% and 55% respectively, and that the rating distance for transporting an access charge call between the two LECs is ten miles. Using these figures one can readily calculate the transport charges applicable to calls of varying lengths in time, as shown in the following table:

Table 1

Call Duration in Minutes	Transport Charges Billed by LEC-A	Transport Charges Billed by LEC-B	Transport Charges Paid by IXC
1	\$0.0045	\$0.00275	\$0.00725
2	\$0.0090	\$0.00550	\$0.01450
5	\$0.0225	\$0.01375	\$0.03625
10	\$0.0450	\$0.02750	\$0.07250
25	\$0.1125	\$0.02750	\$0.18125
100	\$0.4500	\$0.27500	\$0.72500

Iowa Telecom submits that Table 1 demonstrates that, for meet-point billed traffic, the transport price charged by an individual LEC simply could not equal the transport costs incurred by an IXC. Further there is no logical or economic reason that LEC-B's (the presumed price cap LEC in this example) meet-point billing MOUs should be adjusted to force an artificial matching of just LEC-B's transport rate with the IXC's costs for transport.

C. Both LECs Incur a Full Minute's Transport Costs for Each Minute of Meet-Point Billed Traffic

AT&T's self-serving argument also ignores the fundamental nature of circuit-switched transport.¹⁰ When an access service call is transported by LEC-A to LEC-B for delivery to an IXC, both LECs devote one entire voice path in their jointly provided inter-office trunk to the call. This circuit is working and, therefore, generating costs for both LECs during the entire duration of the call. Since the IXC in question uses the local networks of both LECs during the entire call, it only stands to reason that both LECs should charge the IXC their individual transport rates for the entire length of the access service call.

It is easy to see that AT&T is attempting to confound the concepts of time and distance. Assume that a ten-minute transport call is made from LEC-A's exchange through LEC-B's exchange for delivery to an IXC's switch. Using the assumptions underlying Table 1's examples, LEC-A transports this particular call 4.5 miles and LEC-B transports it 5.5 miles. Under AT&T's proposed formula, LEC-A's reportable transport minutes would be only 4.5, because it carried the call only 45% of the total ten-mile distance. At the same time, LEC-B's reportable transport minutes would be only 5.5, because it carried the call only 55% of the total ten-mile distance. Time and distance are not interchangeable. A ten-minute call lasts ten-minutes whether it is transported fifty feet or 2000 miles. A LEC incurs ten minutes of transport costs for a ten-minute call whether it carries that call one percent or 100 percent of the total transport distance. AT&T's argument is fatally flawed and must be rejected.

¹⁰ What AT&T does not inform the Commission is the financial windfall that AT&T is seeking through its specious reasoning. AT&T is simply trying to twist the FCC's formula for calculating all price cap LECs' ATS charges by reducing the number of MOUs in the formula's denominator. This distortion, if permitted by the Commission, would have the result of overstating each price cap LEC's ATS charge. By creating ATS charges that are incorrectly high, AT&T hopes to achieve access charge rate reductions that are greater than those contemplated by the CALLS access charge reform plan.

II. AT&T's Increase in its Basic Interstate Long Distance Prices Following FCC Approval of the CALLS Access Charge Reform Order Has Undermined All "Customer Benefits" of the CALLS Plan

AT&T obscures, with the cloak of "consumer benefit," its self-serving plan to obtain a financial windfall through its distortion of the plain meaning of Section 61.3(e) of the FCC's rules. According to AT&T,¹¹ if the FCC fails to rewrite its formula for calculating each price cap LEC's ATS charge for meet-point billed traffic, "customers will not receive the full amount of benefits intended by the CALLS plan."

Recent developments demonstrate that AT&T's level of concern for typical residential and small business end user customers is low and, further calls into question whether the CALLS plan is a positive development for the nation's consumers. As the FCC is well aware, AT&T's initial response to the unprecedented access charge rate reductions required by the FCC's decision to make the CALLS access charge reform plan mandatory was to increase AT&T's basic rate for interstate long distance service from 26¢ per minute (daytime) to 29¢ per minute—an increase of more than 11.5%. *See* Transmittal No. 11632, AT&T Tariff Nos. 13 and 27, filed June 23, 2000. AT&T's reaction to drastically reduced access charge expenses was to boost rates for the lowest-volume end user customers. Accordingly, it is quite likely that AT&T is simply looking to distort Part 61 of the FCC's rules to obtain even more cost savings that benefit its shareholders, rather than to reduce its long distance prices for those ordinary consumers least able to afford basic long distance telephone service. It is not proper or lawful for AT&T to attempt to distort the FCC's price cap rules to wring unfair and unwarranted access charge rate reductions just to bolster AT&T's financial performance. That simply is not the purpose of either the Act or the CALLS access charge reform plan.

¹¹ AT&T Petition at 12.

AT&T's recent tariff filing provides ample evidence that the Commission should take a step back and rethink what it has wrought with the *CALLS Order*. Clearly, AT&T and the Commission are of two distinct mindsets. AT&T is simply using the tariff review process to lower its access service costs with no intent to pass any savings on to its customers. End user savings was the major benefit of the CALLS plan. Yet, AT&T continues to ignore its part of the CALLS bargain. Consequently, Iowa Telecom herein submits that serious consideration should be given to the call by Commissioner Tristani to put the CALLS plan on "hold"¹² until and unless the FCC can rein in the rogue members of the CALLS coalition.

III. Conclusion

At the outset, AT&T argues generally that all price cap local exchange carriers have taken actions "that violate the spirit of the CALLS agreement."¹³ As demonstrated herein, Iowa Telecom, while not a party to the CALLS agreement, has prepared and made its tariff filing in full compliance with the FCC's Rules and the *CALLS Order*, including the calculation of its target ATS charge. Iowa Telecom has done its part, it has filed its tariff using rates in full compliance with the CALLS Order. It is now incumbent upon AT&T, a member of the CALLS coalition, to reduce its rates so that consumers will see a reduction in their basic long distance rates. It remains to be seen if AT&T will uphold its end of the CALLS "deal."¹⁴

¹² *Statement of FCC Commissioner Gloria Tristani*, News Release, released June 23, 2000 (*Tristani Statement*).

¹³ AT&T Petition at 2.

¹⁴ *See, Tristani Statement; see also Statement of FCC Chairman William E. Kennard Regarding AT&T Tariff Filing*, News Release, released June 23, 2000.

In summary, Iowa Telecom's initial tariff filing is in full compliance with the FCC's Rules and *CALLS Order*. AT&T has failed to demonstrate that Iowa Telecom's tariff presents substantial issues of lawfulness. Accordingly, Iowa Telecom respectfully requests that AT&T's Petition be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, *James U. Troup*, hereby certify that a copy of the foregoing *Reply of Iowa Telecommunications Services, Inc.* has been sent via first-class mail, postage pre-paid this 29th day of June, 2001, to the following:

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