

ORIGINAL



BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

JEFF HATCH-MILLER

Chairman

WILLIAM A. MUNDELL

Commissioner

MARC SPITZER

Commissioner

MIKE GLEASON

Commissioner

KRISTIN K. MAYES

Commissioner

2005 JUL - 11 P 3: 13

AZ CORP COMMISSION
DOCUMENT CONTROL

Arizona Corporation Commission
DOCKETED

JUL - 1 2005

DOCKETED BY

IN THE MATTER OF REVIEW AND)	DOCKET NO. RT-00000H-97-0137
POSSIBLE REVISION OF THE)	
ARIZONA UNIVERSAL SERVICE)	COMMENTS OF MCI
RULES.)	

The regulated subsidiaries of MCI, Inc., ("MCI") submit these comments. MCI opposes the proposal stated by ALECA to make it easier for small and medium-sized local exchange carriers ("LECs") to draw from the Arizona state universal service fund ("USF") and recommends the Commission refrain from making any changes to its current USF rules as proposed by ALECA. MCI also opposes the elimination of the classification of a medium-sized LEC as proposed by ALECA. ALECA's proposal is merely a device to increase its members' revenues without having to make any showing of need. However, the Commission may wish to take this opportunity to examine the broader questions, as outlined below, regarding universal service in light of the dramatic changes in the telecommunications industry.

First and foremost, the specific request in the ALECA petition should be denied. In support of its proposed amendments, ALECA states its "belie[f] that this utilization rate [of the AUSF] is artificially low as a result of the hurdles inherent in the current

application of the AUSF Rules.”¹ What is conspicuously missing from ALECA’s pleading is any claim that the current application of those rules is in any way causing Arizona customers to do without basic telephone service. Rather, ALECA candidly states that the objective is to enable “more practicable access to the AUSF for carriers,”² which is to say that the Commission should change the rules to make it easier for carriers to draw from the fund. Nowhere is there mention that, by easing access to the AUSF, carriers would thereby have “support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended” as Congress required.

The ALECA analogy to the federal USF (“FUSF”) is telling in this regard. At page 3 of its initial pleading, ALECA reveals the following result from its proposed revisions:

- ILEC qualifies for AUSF the same as with FUSF, i.e., if its working loop cost exceeds 115% of the national benchmark loop cost
- In such instances, ILEC combined support from AUSF and FUSF = 100%
- Thus, the ILEC loop cost support provided by its own customers = 0%

From MCI’s perspective, the appropriate question before the Commission is whether the AUSF is meeting its goals of providing universal service to Arizona consumers. Merely making it easier for companies to get money from the AUSF is not an appropriate goal. Money paid into the AUSF comes from ratepayers, and before more of it goes out to companies, the Commission should require companies to demonstrate a need for additional funding. At this time, there is no evidence whatsoever that those universal service goals are not being met. Thus, it is certainly premature to discuss changes to the AUSF rules impacting the ILECs’ receipt of AUSF monies.

¹ ALECA pleading at 2.

² Id.

It may, however, be appropriate to begin a re-examination of universal service issues in Arizona. Historically, universal service has been funded through a hodge-podge of cross-subsidy mechanisms, including “explicitly and implicitly subsidizing and pricing basic telephone service.”³ Whether implicit or explicit, the core of universal service was a system in which one set of ratepayers paid higher prices (or surcharges) to provide lower cost service to other ratepayers. In a monopoly, rate of return environment, such systems are sustainable and controllable via traditional regulatory processes.

With the break up of ATT in 1984 and with passage of the 1996 Federal Telecommunications Act, things began to change. In the 1996 Act, Congress directed that support for universal service “should be explicit” and that “[a] carrier that receives such support shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”⁴ Congress further directed that support for universal service must be provided “on an equitable and nondiscriminatory basis.”⁵ The advent of new, non-traditional providers of communications services, such as wireless, cable companies, VoIP providers, and peer-to-peer providers, creates additional pressures on traditional universal service programs.

To the extent the Commission wishes to address USF, there are several larger questions the Commission can examine:

- 1) What service should be supported?
- 2) To what degree should any particular service be supported, and how do issues of affordability come into play?

³ *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order in CC Docket No. 96-45 released May 8, 1997 (FCC 97-157), ¶ 7.

⁴ 47 U.S.C. § 254(e).

⁵ *Id.*, § 254(d).

3) How can distribution methods be made competitively neutral? Should any subsidies flow directly to consumers, as opposed to the current system of channeling subsidies through carriers?

4) How do we make funding of any subsidy competitively neutral and sustainable?

Although MCI believes that all these issues are critical and require careful investigation,⁶ MCI limits its remaining discussion to a brief presentation of views on the last issue.

The current AUSF is supported as set forth in AAC R14-2-1204 (*i.e.*, by toll and local customers of telecommunications providers). The changes that are racking the industry indicate that such a funding mechanism is neither competitively neutral nor sustainable. In that regard, this Commission is well aware of the forces that are impacting telecommunications markets. For example, consumers increasingly use their cellular phones to place long distance and local calls, instead of wireline phones. *InternetWeek.com* reports, in an article dated November 10, 2004, entitled “Wireless Gaining at the Expense of Wire-Line Service,” that 60 percent of cellular phone users in U.S. households are making their long distance calls on their wireless handsets. The article includes a quote from Yankee Group analyst, Kate Griffin, stating that “We’re seeing long distance as a standalone industry disappearing.”⁷ The impact of this replacement on the revenues of traditional Interexchange Carriers (“IXCs”) such as MCI is huge. The most recent evidence in this regard is contained in the FCC’s report on “Statistics of Communications Common Carriers,” released October 12, 2004. Table

⁶ As discussed above, ALECA has not made the requisite showing that changes are needed as to how funds are disbursed by the AUSF.

⁷ <http://www.internetweek.com/story/showArticle.jhtml?articleID=52600678>

5.13 of that report has been reproduced below. As can be seen by even a cursory examination of the data, IXCs' switched access minutes have been in a steep decline over the past four years.

Statistics of Communications Common Carriers
Table 5.13 -- Interstate Switched Access Minutes
(In Billions)

Year	Period	Access Minutes	Year	Period	Access Minutes	Year	Period	Access Minutes
1984	Third Quarter	37.5	1991	First Quarter	79.2	1998	First Quarter	124.0
	Fourth Quarter	39.6		Second Quarter	81.9		Second Quarter	131.3
				Third Quarter	82.6		Third Quarter	130.7
				Fourth Quarter	84.4		Fourth Quarter	132.8
			Total 1991	328.0		Total 1998	518.8	
1985	First Quarter	39.6	1992	First Quarter	85.6	1999	First Quarter	135.6
	Second Quarter	41.5		Second Quarter	86.5		Second Quarter	138.1
	Third Quarter	42.8		Third Quarter	87.9		Third Quarter	138.3
	Fourth Quarter	43.3		Fourth Quarter	89.8		Fourth Quarter	140.3
	Total 1985	167.1		Total 1992	349.7		Total 1999	552.3
1986	First Quarter	43.0	1993	First Quarter	90.6	2000	First Quarter	142.6
	Second Quarter	44.8		Second Quarter	91.2		Second Quarter	142.6
	Third Quarter	46.7		Third Quarter	93.6		Third Quarter	141.5
	Fourth Quarter	48.5		Fourth Quarter	95.9		Fourth Quarter	140.2
	Total 1986	183.1		Total 1993	371.2		Total 2000	566.9
1987	First Quarter	51.2	1994	First Quarter	98.7	2001	First Quarter	137.4
	Second Quarter	52.5		Second Quarter	97.9		Second Quarter	136.3
	Third Quarter	55.0		Third Quarter	101.9		Third Quarter	133.1
	Fourth Quarter	57.0		Fourth Quarter	102.9		Fourth Quarter	131.4
	Total 1987	215.7		Total 1994	401.4		Total 2001	538.3
1988	First Quarter	59.0	1995	First Quarter	105.6	2002	First Quarter	124.7
	Second Quarter	59.6		Second Quarter	106.8		Second Quarter	123.9
	Third Quarter	62.1		Third Quarter	109.0		Third Quarter	119.5
	Fourth Quarter	64.0		Fourth Quarter	110.6		Fourth Quarter	118.1
	Total 1988	244.6		Total 1995	431.9		Total 2002	486.1
1989	First Quarter	66.2	1996	First Quarter	115.7	2003	First Quarter	114.2
	Second Quarter	68.5		Second Quarter	114.7		Second Quarter	112.1
	Third Quarter	69.7		Third Quarter	117.5		Third Quarter	110.0
	Fourth Quarter	72.6		Fourth Quarter	120.2		Fourth Quarter	107.8
	Total 1989	277.1		Total 1996	468.1		Total 2003	444.1
1990	First Quarter	74.7	1997	First Quarter	122.1	2004	First Quarter	109.3
	Second Quarter	75.8		Second Quarter	124.4		Second Quarter	106.1
	Third Quarter	77.9		Third Quarter	124.9			
	Fourth Quarter	79.1		Fourth Quarter	125.8			
	Total 1990	307.4		Total 1997	497.3			

Source: National Exchange Carrier Association (NECA), MOU/Data/Summary of NECA Total Pool Results, September 15, 2004.

In the first two quarters of 2004, the volume of switched access minutes had dropped to levels not seen since 1995. When calculated as the change from the peak in

2000, the first two quarters of 2004 were down by roughly 25% from same periods only 4 years earlier. Among the reasons for this decline is the growing tendency of users to substitute wireless calling for traditional wireline long distance calls, as well as the ILECs' market successes in retail Long Distance upon obtaining relief under Section 271 of the federal Telecommunications Act. Regardless, a loss in annual interstate switched access minutes in the range of *130 billion minutes* since 2000 is testament to the market convulsions impacting both the traditional IXCs' revenues and the federal or state universal service programs that are funded via a percentage of those revenues. According to the latest data released by the FCC, the number of wireless subscribers nationwide now totals more than 167 million.⁸

Sustainable funding for universal service cannot be achieved by tweaking the existing mechanism. Rather, the problem of sustainability must be addressed both in terms of 1) the entities that would be assessed, and 2) the manner of the assessment.

At the Federal level, as part of a broad coalition of industry players, MCI supports the Intercarrier Compensation Forum ("ICF") proposal that has been filed with the FCC.⁹ The ICF proposal for funding of USF is based on the following principles:¹⁰

- The contribution methodology should not give one vendor of a service a competitive advantage over another vendor of an equivalent service. All similar platforms should be treated in an equitable and nondiscriminatory fashion.

⁸ See, "Federal Communications Commission Releases Data on Local Telephone Competition," press release dated December 22, 2004, p. 1.

⁹ See, *ex parte* dated October 5, 2004 by the ICF, *Re: Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-992*. The members of the ICF include AT&T Corp., Global Crossing North America Inc., General Communications, Inc., Iowa Telecom, Level 3 Communications, LLC, MCI, Inc., SBC Communications Inc, Sprint Corporation, and Valor Telecommunications.

¹⁰ Appendix A to the October 5, 2004 *ex parte* contains the Intercarrier Compensation and Universal Service Reform Plan in its entirety. The principles are at p. 75 of the Plan.

- The mechanism should create the maximum amount of stability in the amount of the fee carriers impose on customers to collect USF contributions (*i.e.*, should not rise over time).
- Carriers should be permitted to pass any such assessment through, dollar-for-dollar, to the customer that caused the carrier to incur the contribution obligation.

In keeping with these principles, the ICF proposes a funding methodology that is “based on the number of Unique Working Telephone Numbers [as defined] a service provider uses for retail services, as well as certain network access connections [also specified within the plan].” Each Unique Working Telephone Number would represent one “unit” under the ICF proposal, as would each DSL or cable modem broadband connection.¹¹ Thus, any end user customer with a telephone number assignment would represent one “unit” whether that number is assigned by a traditional wireline telephone company, a CLEC providing circuit-switched service, a cellular wireless provider, or an entity providing a VoIP capability to the end user.

Although the ICF proposal before the FCC is just that – a proposal – the approach has backing across a wide spectrum of industry participants including both large and small ILECs, interexchange carriers, cellular interests, and CLECs. In addition, the NARUC Task Force on Intercarrier Compensation recently circulated a “Straw Man Proposal” endorsing the concepts underlying the ICF’s proposed universal service funding methodology. The “Straw Man” stated that the ICF proposal represents “the best approach proposed to date.” The approach thus merits serious consideration as the Commission grapples with how to respond to the dramatic changes impacting the industry.

¹¹ The ICF Plan would also capture Wi-Fi “Hot Spots” via the underlying network connection to that “Hot Spot” rather than via the end users who utilize that wireless connection. (*Id.*, at 78.)

As stated in MCI's comments filed at the FCC in the intercarrier compensation docket, a goal for reform must be to preserve and enhance universal service without distorting the marketplace while ensuring a long-term, stable funding source. Such reform must eliminate current regulatory distinctions that discriminate illogically among service providers and artificially limit the pool of contributors to universal service. For example: (1) while DSL providers are now required to contribute to universal service, providers of comparable cable modem services are exempt; and (2) while providers of interstate circuit-switched telephony are now required to contribute to universal service, VOIP providers today largely are not required to make direct contributions. Universal service funding should not depend on arbitrary classifications that unfairly burden certain carriers and provide others an unwarranted economic advantage in the marketplace.

Reform is also needed to address the erosion of implicit support in the current system. In the Telecommunications Act of 1996 ("1996 Act"), Congress mandated that universal service support "should be explicit,"¹² recognizing that implicit support is not sustainable in today's competitive marketplace. Nevertheless, this Commission continues to rely heavily on implicit support to fund universal service and keep basic local rates low, most notably through excessive intrastate switched access rates charged to interexchange carriers ("IXCs"). Arizona LECs still recover a substantial portion of their network costs through per-minute charges to other carriers. As the high-volume and business customers that pay implicit support migrate to services and technologies that do not pay such charges, rates for the remaining customers rise, and carriers have fewer resources to invest in the network.

¹² 47 U.S.C. § 254(e).

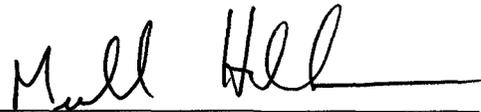
Simply eliminating implicit support and arbitrary contribution classifications, however, is not enough. A true commitment to universal service requires securing a long-term, stable funding source. A plan should create an explicit funding mechanism that will ensure reasonable end-user rates for all users. Effective reform will protect all Americans' access to affordable telecommunications and information services.

Accordingly and in conclusion, MCI urges the Commission to reject ALECA's proposal. Rather, the Commission should consider beginning a broader examination of universal service issues in our changing industry. As discussed previously, this examination includes issues on both the funding and the distribution of universal service subsidies (including a re-examination of what universal service means in the environment.) At the very least, as it examines the larger issues, the Commission should consider adopting a funding methodology that is sustainable, technologically and competitively neutral in application, and is otherwise consistent with the above-referenced principles, to the extent permitted under current Arizona law.

RESPECTFULLY SUBMITTED this 1st day of July, 2005.

LEWIS AND ROCA, LLP

By

A handwritten signature in black ink, appearing to read "Michael T. Hallam", written over a horizontal line.

Thomas Campbell
Michael T. Hallam
40 North Central Avenue
Phoenix, Arizona 85004-4429
Attorneys for MCI, Inc.

ORIGINAL and thirteen (13)
copies of the foregoing filed
this 1st day of July, 2005, with:

The Arizona Corporation Commission
Utilities Division – Docket Control
1200 W. Washington Street
Phoenix, Arizona 85007

COPY of the foregoing hand-delivered
this 1st day of July, 2005, to:

Maureen Scott
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Ernest Johnson, Director
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Lyn Farmer, Chief Administrative Law Judge
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Christopher Kempley
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

COPY of the foregoing mailed this
1st day of July, 2005, to:

TIMOTHY BERG
FENNEMORE CRAIG, P.C.
3002 N. CENTRAL AVENUE, STE. 2600
PHOENIX, ARIZONA 85012-2913

JOAN S. BURKE
OSBORN MALEDON, P.A.
2929 N. CENTRAL AVENUE, STE. 2100
PHOENIX, ARIZONA 85012-2794

MICHAEL W. PATTEN
ROSHKA HEYMAN & DEWULF, PLC
ONE ARIZONA CENTER
400 E. VAN BUREN STREET, STE. 800
PHOENIX, ARIZONA 85004

STEVE DUFFY
ISACSON & DUFFY, P.C.
3101 N. CENTRAL, STE. 740
PHOENIX, AZ 85012

MITCHELL F. BRECHER
800 CONNECTICUT AVENUE, NW, STE. 500
WASHINGTON, DC 20006

ROBERT RICHARDS
ACCIPITER COMMUNICATIONS, INC.
2238 W. LONE CACTUS DRIVE, STE. 100
PHOENIX, AZ 85027

WILLIAM BRAUN
1-800-RECONEX, INC.
2500 INDUSTRIAL AVENUE
HUBBARD, OR 97032

MICHAEL A. CONWAY
ACCXX COMMUNICATIONS, LLC
4035 TAMPA ROAD, STE. 6000
OLDSMAR, FL 34677

LIN GENTEMANN
360NETWORKS (USA) INC.
867 COAL CREEK CIRCLE, STE. 160
LOUISVILLE, CO 80027-4670

LISA LEZOTTE
ACN COMMUNICATIONS SERVICES, INC.
32991 HAMILTON COURT
FARMINGTON HILLS, MI 48334

HERVE R. ANDRIEU
3U TELECOM, INC.
1802 N. CARSON STREET, STE. 212-2683
CARSON CITY, NV 89701

CHERYL BEICHNER
ADELPHIA TELECOMMUNICATIONS, INC.
1 NORTH MAIN
COUDERSPORT, PA 16915

ROBERT SOKOTA
ABOVENET COMMUNICATIONS, INC. dba
METROMEDIA FIBER NETWORK SERVICES,
INC.
360 HAMILTON AVENUE
WHITE PLAINS, NY 10601

ROBERT D. MAGUIRE
ADVANCED TELEMAGEMENT GROUP,
INC.
8912 E. PINNACLE PEAK ROAD, STE. 423
SCOTTSDALE, AZ 85255

PATRICK CLISHAM
ACC NATIONAL LONG DISTANCE CORP.
320 EAST BROADMOOR COURT
PHOENIX, AZ 85022

SONYA BLY
ADVANTAGE TELECOMMUNICATIONS
CORP.
3001 ALONA AVENUE, STE. 304
WINTER PARK, FL 32792

MARK JOZWIAH
ACCESS ONE, INC.
820 W. JACKSON BLVD., 6TH FLOOR
CHICAGO, IL 60607

ROWENA VALLE
AFFINITY NETWORK INCORPORATED dba
QUANTUMLINK COMMUNICATIONS
3660 WILSHIRE BLVD.
LOS ANGELES, CA 90010

KAYE DAVIS
ACCESS POINT, INC.
16 HYLAND ROAD, STE. D
GREENVILLE, NC 29615

CHARLES R. COMB
AFFORDABLE VOICE COMMUNICATIONS,
INC.
1000 NORTH MAIN STREET
LAS CRUCES, NM 88001-1126

BILL STATHAKAROS
AMERICAN TELECOMMUNICATIONS
SYSTEMS, INC
4450 BELDEN VILLAGE STREET, NW, STE.
602
CANTON, OH 44718

AVI LONSTEIN
AIRESRING, INC.
6060 SEPULVEDA BLVD., STE. 220
VAN NUYS, CA 91411-2512

WILLIAM CORRELL III
AMERICAS.COM, INC.
63 SOUTH HARRISON STREET, STE. B
DENVER, CO 80209-3181

BETTY NAY
AIRNEX COMMUNICATIONS, INC.
3000 EXECUTIVE PARKWAY, STE. 230
SAN RAMON, CA 94583

JUAN GUILLERMO DUCAUD
AMERICATEL CORPORATION
4045 NW 97TH AVENUE
MIAMI, FL 33178

DAVID STARR
ALLEGIANCE TELECOM OF ARIZONA, INC.
9201 N. CENTRAL EXPRESSWAY, 6B
DALLAS, TX 75231

MICHELLE POST
AMERICOM TECHNOLOGIES, INC. dba
NETWORK UTILIZATION SERVICES
PO BOX 990-165
BOSTON, MA 02199

MICHAEL MALLON
ALLIANCE GROUP SERVICES, INC.
1221 POST ROAD EAST
WESTPORT, CT 06880

THOMAS BADE
ARIZONA DIALTONE, INC. dba TOUCH
COMMUNICATIONS
7170 OAKLAND STREET
CHANDLER, AZ 85226

JAMES MORGAN
ALL-STAR ACQUISITION CORPORATION
STARTEC GLOBAL LICENSING COMPANY
1151 SEVEN LOCKS ROAD
POTOMAC, MD 20854

KENNETH SHARP
ASC TELECOM, INC. dba ALTERNATEL
6391 SPRINT PARKWAY
OVERLAND PARK, KS 66251-6100

PAM FULLER
ALLTEL COMMUNICATIONS, INC.
ONE ALLIED DRIVE
MS 1269-B4F04-ND
LITTLE ROCK, AR 72202

KEVIN KLEPPER
ASSOCIATION ADMINISTRATORS, INC.
180 E. MAIN STREET
SMITHTOWN, NY 11787

FRANK SANDERS
AMERICA NET, LLC
3435 WILSHIRE BLVD., STE. 1090
LOS ANGELES, CA 90001

LETTY FRIESEN
AT&T
919 CONGRESS AVENUE, STE. 900
AUSTIN, TX 78701-2444

DANIEL COLEMAN
AMERICAN CYBER CORPORATION dba
DISCOUNT PLUS
6053 HUDSON, STE. 110
WOODBURY, MN 55125

BETH KEIKO FUJIMOTO, REGULATORY
COUNSEL
AT&T WIRELESS SERVICES, INC.
16331 NE 72ND WAY, BLDG. I
REDMOND, WA 98052

BRUCE FRANKIEWICH
AMERICAN FIBER SYSTEMS, INC.
100 MERIDIAN CENTER, STE. 250
ROCHESTER, NY 14618

CINDY MANHEIM, REGULATORY COUNSEL
AT&T WIRELESS SERVICES, INC.
7277 164TH AVENUE NE
REDMOND, WA 98052

DENNIS CONNOR
AMERICAN LONG LINES, INC.
700 ENTERPRISE ROAD, 2ND FLOOR
HORSHAM, PA 19044-0449

FRANK SCARDINO
ATLAS COMMUNICATIONS, LTD. dba
ATCOM, LTD.
P.O. BOX 607
CONSHOHOCKEN, PA 19428-0607

RICCARDO FERRANTI
AMERICAN PHONE SERVICES, CORP.
308 MAXWELL ROAD, STE. 100
ALPHARETTA, GA 30004
DAVID C. KIDD
BCE NEXXIA CORPORATION
1000 DE LA GAUCHETIERE OUESTE, FLOOR
41
MONTREAL, QB H3B 58H

RICHARD BOUDRIA
BCN TELECOM, INC. dba NUI TELECOM, INN.
550 ROUTE 202/206, 2ND FLOOR
BEDMINSTER, NJ 07921

KIMM PARTRIDGE
BUYERS UNITED INTERNATIONAL, INC.
14870 SOUTH PONY EXPRESS DRIVE
BLUFFDALE, UT 84065

TOD BYBEE
BEE LINE LONG DISTANCE, LLC
255 SOUTH OREM BLVD.
OREM, UT 84058

CLYDE AUSTIN
BUY-TEL COMMUNICATIONS, INC.
6409 COLLEYVILLE BLVD
PO BOX 1170
COLLEYVILLE, TX 76304

ROBIN TAYLOR
BELLSOUTH LONG DISTANCE, INC.
400 PERIMETER CENTER TERRACE, STE. 400
ATLANTA, GA 30346

ROBERT E. STUP, JR.
C III COMMUNICATIONS OPERATIONS, LLC
701 PENNSYLVANIA AVENUE NW, STE. 900
WASHINGTON, DC 20004-2608

JAMES KENEFICK
BETTER WORKS TELECOM, INC.
11921 FREEDOM DRIVE, STE. 550
RESTON, VA 20190

BEVERLY JACKSON
C12
200 GALLERIA PARKWAY, STE. 1550
ATLANTA, GA 30339

LUIS ARIAS
BLACKSTONE COMMUNICATIONS
COMPANY
11600 NW 34TH STREET
MIAMI, FL 33178

JEFFREY ELKINS
CALTECH INTERNATIONAL TELECOM
CORP.
PO BOX 837
SAN RAMON, CA 94583

ROB HEATH
BOB INNES
AMERICAN FIBER NETWORK
9401 INDIAN CREEK PARKWAY, STE. 140
OVERLAND PARK, KS 66210

DIANE S. REYNOLDS
CASCADE ACCESS, LLC
PO BOX 1285
ESTACADA, OR 97023

KAREN HANSON
BROADWING TELECOMMUNICATIONS, INC.
1122 CAPITAL OF TEXAS HIGHWAY SOUTH
AUSTIN, TX 78746-6426

RON JOHNSON TED M. HANKINS LORI
AUSTIN
CENTURYTEL
100 CENTURYTEL DRIVE
PO BOX 4065
MONROE, LA 71203

R. DANIEL HYDE, JR.
BUDGET PHONE, INC.
PO BOX 19360
SHREVEPORT, LA 71149

MAGGIE JESSUP
CHRISTIAN MEDIA TECHNOLOGIES, INC.
8000 NE PARKWAY DRIVE, STE. 110
VANCOUVER, WA 98662

CRAIG SPIEGELBERG
BUEHNER-FRY, INC. dba DIRECDIAL USA &
RESORT
OPERATOR SERVICES
62975 BOYD ACRES ROAD, STE. 2
BEND, OR 97701-8237

BILL DVORAK
CIMCO COMMUNICATIONS, INC.
1901 SOUTH MEYERS ROAD, STE. 700
OAKBROOK TERRACE, IL 60181

CURT HUTTSELL
CITIZENS, ELECTRIC LIGHTWAVE, NAVAJO
AND FRONTIER
4 TRIAD CENTER, STE. 200
SALT LAKE CITY, UT 84180

ALLISON BLOOM
BUSINESS DISCOUNT PLAN, INC.
ONE WORLD TRADE CENTER, STE. 800
LONG BEACH, CA 90831

DIRECTOR OF REGULATORY AFFAIRS
BUSINESS NETWORK LONG DISTANCE, INC.
1400 SIXTEENTH STREET, STE. 400
DENVER, CO 80202

DUANE BENNETT
CITYNET ARIZONA, LLC
343 N. FRONT STREET, STE. 400
COLUMBUS, OH 43215

MICHAEL O'BRIEN
BUSINESS TELECOM, INC. dba BTI
TELECOMMUNICATIONS SERVICES
4300 SIX FORKS ROAD
RALEIGH, NC 27609-5781

JAMES MANCUSO
CLEAR WORLD COMMUNICATIONS
CORPORATION
2601 SOUTH HARBOR BLVD.
SANTA ANA, CA 92704

SEAN LUO
CM TEL(USA), LLC
700 WISHIRE BLVD., 7TH FLOOR
LOS ANGELES, CA 90017

FRANK PAZERA
COVISTA, INC.
721 BROAD STREET, STE. 200
CHATTANOOGA, TN 37402

CHARLIE BRENNEMAN
COAST INTERNATIONAL, INC.
14303 W. 95TH STREET
LENEXA, KS 66215

MARK DINUNZIO
COX ARIZONA TELECOM, LLC
1550 W. DEER VALLEY ROAD
MS:DV3-16, BLDG. C
PHOENIX, AZ 85027

REID R. ZULAGER
COGENT COMMUNICATIONS OF ARIZONA,
INC.
1015 31ST STREET N W
WASHINGTON, DC 20007

LAURIE ITKIN, DIRECTOR OF GOVERNMENT
AFFAIRS
CRICKET COMMUNICATIONS, INC.
10307 PACIFIC CENTER COURT
SAN DIEGO, CA 92121

MICHAEL NELSON
COMCAST BUSINESS COMMUNICATIONS,
INC. dba
COMCAST LONG DISTANCE SERVICE
183 INVERNESS DRIVE WEST
ENGLEWOOD, CO 80112

DOUGLAS VAN WINKLE
CTC COMMUNICATIONS CORP
115 SECOND AVENUE
WALTHAM, MA 02451

W. DON WILLIAMS
COMDATA TELECOMMUNICATIONS
SERVICES, INC.
5301 MARYLAND WAY
BRENTWOOD, TN 37027

MICHAEL PAYNE
CTI LONG DISTANCE, INC.
PO BOX 80070
PORTLAND, OR 97280

SHERI PRINGLE
COMM SOUTH COMPANIES, INC.
2909 NORTH BUCKNEW BLVD., STE. 800
DALLAS, TX 75228-4861

MARC ROZAR
CUSTOM NETWORK SOLUTIONS, INC.
210 ROUTE 4 EAST, STE. 102
PARAMUS, NJ 07652

KEVIN M. O'HARE
COMMONWEALTH LONG DISTANCE
COMPANY
105 CARNEGIE CENTER
PRINCETON, NJ 08540

VICKI CROWDER
CUSTOM TELECONNECT, INC.
3111 S. VALLEY VIEW, STE. E-120
LAS VEGAS, NV 89102

PHILIP BETHUNE
COMMUNICATIONS BILLING, INC.
20033 DETROIT ROAD, STE. 202
ROCKY RIVER, OH 44116

GREGORY McGRAW
CYPRESS COMMUNICATION OPERATING
COMPANY, INC.
15 PIEDMONT CENTER, STE. 100
ATLANTA, GA 30305

GREGORY BARNUM
COMPUTER NETWORK TECHNOLOGY
CORPORATION
6000 NATHAN LANE
MINNEAPOLIS, MN 55442

MICKEY RAO
DANCRIS TELECOM, LLC
6900 EAST CAMELBACK ROAD, STE. 1003
SCOTTSDALE, AZ 82251

GLORIA EPPS
COMTECH21, LLC
ONE BARNES PARK SOUTH
WALLINGFORD, CT 06492

TINA TECCE
DC COMMUNICATIONS
270 SOUTH MAIN STREET
FLEMINGTON, NJ 08822

ED PENCE
CONSOLIDATED COMMUNICATIONS
NETWORK
SERVICES, INC.
121 S. 17TH STREET
MATTOON, IL 61938

SMITH BAGLEY, INC. dba CELLULARONE OF
NE ARIZONA
DEPARTMENT OF REGULATORY AFFAIRS
1500 S. WHITE MOUNTAIN ROAD, STE. 103
SHOW LOW, AZ 85901

TROY JUDD JUDY BRUNS
COPPER VALLEY TELEPHONE, INC.,
VALLEY
CONNECTIONS, LLC, VALLEY TELEPHONE
COOPERATIVE, INC.
752 E. MALEY
WILLCOX, AZ 85643-0970

DOBSON CELLULAR SYSTEMS, INC.
DEPARTMENT OF REGULATORY AFFAIRS
14201 WIRELESS WAY
OKLAHOMA CITY, OK 73134

VALLEY TELECOMMUNICATIONS CO., INC.
DEPARTMENT OF REGULATORY AFFAIRS
752 E. MALEY STREET
PO BOX 970
WILLCOX, AZ 85644-0970

EARTHLINK, INC.
LEGAL DEPARTMENT
1375 PEACHTREE STREET, LEVEL A
ATLANTA, GA 30309

DOUGLAS BARLEY
DIALAROUND ENTERPRISES, INC
30-50 WHITESTONE EXPRESSWAY, STE. 101
FLUSHING, NY 11354

ROBERT MOCAS
EASTON TELECOM SERVICES, LLC
3046 BRECKSVILLE ROAD
RICHFIELD, OH 44286

ALLEN SCIARILLO
DIAL-THRU, INC.
17383 SUNSET BLVD., STE. 350
PACIFIC PALISADES, CA 90272

EDWARD JACOBS
ECI COMMUNICATIONS, INC. dba ITS
NETWORK SERVICES
575 EAST LOCUST AVENUE, STE. 201
FRESNO, CA 93720

KAREN S. FRAME
DIECA COMMUNICATIONS, INC. dba COVAD
7901 LOWRY BLVD
DENVER, CO 80230

DAVID BINIACHVILI
ECONODIAL, LLC
3611 FOURTEENTH AVENUE
BROOKLYN, NY 11218

MICHAEL BAGLEY
DIRECTOR OF PUBLIC POLICY
VERIZON WIRELESS
15506 SAND CANYON AVENUE
IRVINE, CA 92618

WAYNE GANDY
ENCOMPASS COMMUNICATIONS, LLC
119 W. TYLER, STE. 260
LONGVIEW, TX 75601

THOMAS CORRIGAN
DISCOUNT NETWORK SERVICES, INC.
23750 ELMIRA, STE. 202
REDFORD, MI 48239

RAYMOND CHAN
ENHANCED COMMUNICATION NETWORK,
INC. dba
ASIAN AMERICAN ASSOCIATION
1031 S. GLENDORA AVENUE
WEST COVINA, CA 91790

ROBERT BONNELL
DISCOUNT UTILITIES, LLC
P.O. BOX 839
MONTICELLO, IN 47960

EARL ROBINSON
ENHANCED COMMUNICATIONS GROUP,
LLC
312 SE DELAWARE AVENUE
BARTLESVILLE, OK 74003-3630

DANIEL HOLLOWAY
DNR ENTERPRISES, LLC
3404 WEST CHERYL DRIVE, STE. A175
PHOENIX, AZ 85051

NAYLE SHAFEI
ENKIDO, INC.
401 HACKENSACK AVENUE, 5TH FLOOR
HACKENSACK, NJ 07601

DAVID DORWART
dPi-TELECONNECT, INC.
2997 LBJ FREEWAY, STE. 225
DALLAS, TX 75234

SCOTT D. VAN DERHEI
EN-TOUCH SYSTEMS, INC.
13105 NORTHWEST FREEWAY, STE. 1020
HOUSTON, TX 77040

WENDY BLUEMLING
DSLNET COMMUNICATIONS, LLC
545 LONG WHARF DRIVE, FLOOR 5
NEW HAVEN, CT 06511

CARL BILLEK
ENTRIX TELECOM, INC.
520 BROAD STREET
NEWARK, NJ 07102-3111
JAMES FALVEY
E.SPIRE, XSPEDIUS
7125 COLUMBIA GATEWAY DRIVE, STE. 200
COLUMBIA, MD 21046

CATHERINE A. MURRAY
ESCHELON TELECOM OF ARIZONA, INC.
730 SECOND AVENUE SOUTH, STE. 1200
MINNEAPOLIS, MN 55402

PATRICK CROCKER
EARLY LENNON CROCKER &
BARTOSIEWICZ
900 COMERICA BLDG.
KALAMAZOO, MI 49007

DONALD HERBERT
ESSENTIAL.COM, INC.
C/O UNITED SYSTEMS ACCESS TELECOM
5 BRAGDON LANE
KENNEBUNK, ME 04043

KEVIN ALLEN
EXCEL TELECOMMUNICATIONS, INC
2440 MARSH LANE
CARROLLTON, TX 75006

TERESA REFF
GLOBAL CROSSING
1080 PITTSFORD VICTOR ROAD
PITTSFORD, NY 14534

CHADY ADOU
EXERGY GROUP, LLC
1550 WEST 84TH STREET, STE. 50
HIALEAH, FL 33014

MICHAEL AVIS
GLOBAL INTERNETWORKING, INC.
8605 WESTWOOD CENTER DRIVE, STE. 300
VIENNA, VA 22182

STEVE GUIDI
EXTELCOM, INC. dba EXPRESS TEL
324 SOUTH STATE, STE. 308
SALT LAKE CITY, UT 84111

GAVIN MCCARTY
GLOBALCOM, INC.
333 WEST WACKER DRIVE, 15th FLOOR
CHICAGO, IL 60606

DANIEL J. COULTER
EZ PHONE, INC. dba HOME PHONE, INC
1095 HOME AVENUE
AKRON, OH 44310

JOE VITALE
GLOBCOM, INC.
2100 SANDERS ROAD, STE. 150
NORTHBROOK, IL 60062

PATRICK BOGGS
EZTEL NETWORK SERVICES, LLC
P.O. BOX 1006
INDIANOLA, MS 38751-1006

MAZ GOODARZI
GLYPHICS COMMUNICATIONS, INC.
775 W. 1200 N., STE. 200
SPRINGVILLE, UT 84663-3065

MICHAEL FARMER
FIRSTMILE SERVICES, LLC
750 LIBERTY DRIVE
WESTFIELD, IN 46074

BENJAMIN A. STOLZ
GO SOLO TECHNOLOGIES, INC.
5053 OCEAN BLVD., STE. 54
SARASOTA, FL 34242

ROBERT BENSON
FOX COMMUNICATIONS CORPORATION
5210 CARILLON POINT
KIRKLAND, WA 98033

CARMINE TUCCI
GOLD LINE TELEMANAGEMENT, INC.
180 WEST BEAVER CREEK ROAD
RICHMOND HILL
ONTARIO, BRITISH COLUMBIA L4B 1B4

JEAN-SEBASTIEN FALISSE
FRANCE TELECOM CORPORATE
SOLUTIONS, LLC
2300 CORPORATE PARK DRIVE, MS SP0606
HERNDON, VA 20171

GEOFF COOKMAN
GRANITE TELECOMMUNICATIONS, LLC
234 COPELAND STREET
QUINCY, MA 02169

GARY HICKOX
FREEDOMSTARR COMMUNICATIONS, INC.
8730 SUNSET BLVD., STE. 700
WEST HOLLYWOOD, CA 90069

KRISTINE A. KUNKEL
GREENBERG TRAUIG LLP
2375 E. CAMELBACK ROAD, STE. 704
PHOENIX, AZ 85016

MIREL JAKOVLJEVIC
GATES COMMUNICATIONS, INC.
1100 OLIVE WAY, STE. 951
SEATTLE, WA 98101

JERRY DECICCIO
GTC TELECOM
3151 AIRWAY AVENUE, STE. P-3
COSTA MESA, CA 92626

MEREDITH H. GIFFORD
GE BUSINESS PRODUCTIVITY SOLUTIONS,
INC.
3225 CUMBERLAND BLVD., STE. 470
ATLANTA, GA 30339

MITCH OLSON
HARBOR COMMUNICATIONS
3211 SW SCHOLLS FERRY CT.
PORTLAND, OR 97221

DIRECTOR OF REGULATORY AFFAIRS
GILA RIVER CELLULAR GENERAL
PARTNERSHIP
7065 W. ALLISON ROAD
BOX 5015

LISA ROGERS
HJN TELECOM, INC.
801 INTERNATIONAL PARKWAY, 5TH
FLOOR
LAKE MARY, FL 32746

SCOTT BEER
ICG TELECOM GROUP - AZ
161 INVERNESS DRIVE WEST, STE. 100
ENGLEWOOD, CO 80112

NAOKI KINOTO
KDDI AMERICA, INC.
375 PARK AVENUE, 7TH FLOOR
NEW YORK, NY 10152

CARL BILLEK
IDT AMERICA CORPORATION
520 BROAD STREET
17TH FLOOR LEGAL DEPARTMENT
NEWARK, NJ 07102-3111

ROBERT S. KIGER
KIGER TELEPHONE & TELEPHONY, LLC
999 18TH STREET, STE. 1825
DENVER, CO 80202

TONY OXBORROW
I-LINK COMMUNICATIONS, INC.
9775 BUSINESS PARK AVENUE
SAN DIEGO, CA 92131-1642

MIKE DUKE
KMC
1755 N. BROWN ROAD
LAWRENCEVILLE, GA 30043

RED LARSON
INDEPENDENT NETWORK SERVICES CORP.
2600 N. CENTRAL AVENUE, STE. 1750
PHOENIX, AZ 85004

MARTIN J. TIBBITTS
LCR TELECOMMUNICATIONS, LLC
100 W. BIG BEAVER ROAD, STE. 200
TROY, MI 48084

LAURIE WILLMAN
INFONE, LLC dba SOUTHEASTCOM LLC
11200 MURRAY SCROLLS PLACE
BEAVERTON, OR 97007

SEAN CONNORS
LDC TELECOMMUNICATIONS, INC.
C/O INTERCONTROLLERS
3350 BUSCHWOOD PARK DRIVE
TAMPA, FL 33618

PAUL GALLEBERG
INFONET TELECOMMUNICATIONS
CORPORATION
2160 EAST GRAND AVENUE
EL SEGUNDO, CA 90245

JERRY FINFROCK
LDMI TELECOMMUNICATIONS, INC.
27777 FRANKLIN ROAD, STE. 500
SOUTHFIELD, MI 48034

WILLIE GRAY
INMARK, INC. dba PREFERRED BILLING
7300 HUDSON BLVD. N, #265
ST. PAUL, MN 55128-7143

RYAN CUMMINGS
LEAST COST ROUTING, INC. dba LONG
DISTANCE CHARGES
2 VIA RAVENNA COURT
HENDERSON, NV 89011

MIKE COMPTON
INTELLICAL OPERATOR SERVICES, INC. dba
ILD
5000 SAWGRASS VILLAGE CIRCLE, STE. 30
PONTE VEDRA BEACH, FL 32082

DENNIS SMITH
INTERNATIONAL EXCHANGE
COMMUNICATIONS, INC.
dba IE COM, CLARICOM NETWORKS, INC.
MATRIX TELECOM, INC.
2912 LAKESIDE DRIVE
OKLAHOMA CITY, OK 73120

CURTIS BROWN
LEGACY LONG DISTANCE INTERNATIONAL,
10833 VALLEY VIEW STREET, #150
CYPRESS, CA 90630-5040

KURT KNEIP
INTER-TEL NETSOLUTIONS, INC.
1615 SOUTH 52ND STREET
TEMPE, AZ 85281

PATRICK SULLIVAN
LEGACY TELECOMMUNICATIONS
CORPORATION
4706 SHAVANO OAK, STE. 101
SAN ANTONIO, TX 78249

ALLTEL COMMUNICATIONS OF THE
SOUTHWEST, LP
LEGAL DEPARTMENT
11025 ANDERSON DRIVE
LITTLE ROCK, AR 72202

JASON REINHARDT
ITC^DELTACOM COMMUNICATIONS, INC.
4092 SOUTH MEMORIAL PARKWAY
HUNTSVILLE, AL 35802

WILLIAM HUNT III
LEVEL 3 COMMUNICATIONS, LLC
1025 ELDORADO BLVD.
BROOMFIELD, CO 80021

JOE SAMPLEY
JLS MARKETING
2024 N. 125TH AVENUE
AVONDALE, AZ 85323

THERESA HERRING
LIGHTYEAR COMMUNICATIONS, INC.
1901 EASTPOINT PARKWAY
LOUISVILLE, KY 40223

JAN LOWE
LONG DISTANCE CONSOLIDATED BILLING
CO.
145 S. LIVERNOIS, STE. 199
ROCHESTER, MI 48307

RON HUSNEY
MOTION TELECOM, INC.
7101 S. FULTON STREET, STE. 200
ENGLEWOOD, CO 80112

JODI J. CARO
LOOKING GLASS NETWORKS, INC.
1111 WEST 22ND STREET, STE. 600
OAK BROOK, IL 60523-1940

JACQUELINE MANOGIAN
MOUNTAIN TELECOMMUNICATIONS, INC.
1430 BROADWAY ROAD, STE. A200
TEMPE, AZ 85282

SARAH OISTAD
LOTEL dba COORDINATED BILLING
SERVICES
4646 DEVONSHIRE CIRCLE
SHOREWOOD, MN 55331

LYNN ABRAHAM
MPOWER COMMUNICATIONS CORP.
175 SULLY'S TRAIL, STE. 300
PITTSFORD, NY 14534

FRANCIS X. AHEARN
McGRAW COMMUNICATONS, INC.
228 EAST 45TH STREET, 12TH FLOOR
NEW YORK, NY 10017

CHAD DOBBINS
NATEL, LLC
1720 WINDWARD CONCOURSE, STE. 250
ALPHARETTA, GA 30005

THOMAS DIXON
MCI WORLDCOM COMMUNICATIONS, INC.
707 17TH STREET #4200
DENVER, CO 80202

THOMAS SPEED, JR.
NATIONAL DIRECTORY ASSISTANCE, LLC
12700 SHELBYVILLE ROAD
LOUISVILLE, KY 40243-1536

JOSEPH DUNBAR
MCI, INTERMEDIA, TELECONNECT, TDI
201 SPEAR STREET, 9TH FLOOR
SAN FRANCISCO, CA 94105

JANET MEDEIROS-SILVEIA
NETLOJIX TELECOM, INC.
501 BATH STREET
SANTA BARBARA, CA 93101

DAVID R. CONN
McLEODUSA TELECOMMUNICATIONS
SERVICES, INC.
6400 C. STREET SW
P.O. BOX 3177
CEDAR RAPIDS, IA 52406-3177

STEPHANIE JACKSON
NETWORK COMMUNICATIONS
INTERNATIONAL CORP.
1809 JUDSON ROAD
LONGVIEW, TX 75605-4710

JACK QUINN
155 WILLOWBROOK BLVD.
WAYNE, NJ 07470

TARA HAYES
MERCURY LONG DISTANCE, INC.
2288 GUNBARREL ROAD, STE. 11-269
CHATTANOOGA, TN 37421

KEVIN ESTES
METRACOM CORPORATION
1901 EASTPOINT PARKWAY
LOUISVILLE, KY 40223

M. H. KAMRAVA
NETWORK ENHANCED TECHNOLOGIES,
INC.
700 SOUTH FLOWER STREET, STE. 420
LOS ANGELES, CA 90017

IRINA AVAGYAN
METROPOLITAN TELECOMMUNICATIONS
OF ARIZONA, INC.
44 WALL STREET, 14TH FLOOR
NEW YORK, NY 10005

SUSAN FREEMAN
NETWORK OPERATOR SERVICES, INC.
PO BOX 3429
LONGVIEW, TX 75606

D. CHRISTENSEN
MGEN SERVICES CORP
2510 REDHILL AVENUE
SANTA ANA, CA 92705

TONI VAN BURKLEO
NETWORKIP, LLC
119 WEST TYLER STREET, STE. 168
LONGVIEW, TX 75601

LANE R. WILLIAMS
MIDVALE TELEPHONE EXCHANGE, INC.
2205 KEITHLY CREEK ROAD
PO BOX 7
MIDVALE, ID 83645

KATHELEEN HELEIN
NEW CENTURY TELECOM, INC.
8180 GREENSBORO DRIVE, SE. 700
McLEAN, VA 22102

PENNY BEWICK
NEW EDGE NETWORK, INC.
3000 COLUMBIA HOUSE BLVD., STE. 106
VANCOUVER, WA 98661

GERI EUBANKS
OLS, INC.
217 ROSWELL STREET, STE. 100
ALPHARETTA, GA 30004

GARNET GOINS
NEXTEL COMMUNICATIONS, INC
2001 EDMUND HALLEY DRIVE.
RESTON, VA 20191

ANNE C. BERNARD LAURA CLORE
ONE CALL COMMUNICATIONS, INC. DBA
OPTICOM
801 CONGRESSIONAL BLVD
CARMEL, IN 46302

RICHARD L. MAHFOUZ
NOBELTEL, LLC
5759 FLEET STREET
CARLSBAD, CA 92008

ENRIQUE MARTINEZ
ONELINK COMMUNICATIONS, INC.
8400 N. UNIVERSITY DRIVE
TAMARAC, FL 33321

PATRICK J. QUINN
NORMAN CURTRIGHT
QWEST CORPORATION
4041 NORTH CENTRAL AVENUE, 11TH
FLOOR
PHOENIX, AZ 85012

DICK KOLB
ONEPOINT COMMUNICATIONS COLORADO,
LLC
2 CONWAY PARK
150 FIELD DRIVE, STE. 300
LAKE FOREST, IL 60045

SCOTT FOOTE
NORSTAN NETWORK SERVICES, INC.
5101 SHADY OAK ROAD
MINNETONKA, MN 55343

JAMES SILVA
ONEPOINT SERVICES, LLC
TWO CONWAY PARK
150 FIELD DRIVE, STE. 300
LAKE FOREST, IL 60045

CHERYL JUNG
NORSTRAN NETWORK SERVICES, INC.
5105 SHADY OAK ROAD
MINNETONKA, MN 55343

JULIE BUSE
ONESTAR LONG DISTANCE, INC.
7100 EAGLE CREST BLVD
EVANSVILLE, IN 47715

TODD LESSER
NORTH COUNTY COMMUNICATIONS
CORPORATION
3802 ROSENCRANS, STE. 485
SAN DIEGO, CA 92110

JAMES F. BOOTH
ONFIBER CARRIER SERVICES, INC.
7887 E. BELLEVIEW AVENUE, STE. 820
ENGLEWOOD, CO 80111

ROWENA VALLE
NOS COMMUNICATIONS, INC. dba
INTERNATIONAL
PLUS NOSVA LTD. PARTNERSHIP
4380 BOULDER HIGHWAY
LAS VEGAS, NV 89121-3002

ED HERBERT
OPEX COMMUNICATIONS, INC.
500 EAST HIGGINS ROAD, STE. 200
ELK GROVE VILLAGE, IL 60007

ERIC BENDER
NTC NETWORK, LLC
633 WEST 5TH STREET, 5TH FLOOR
LOS ANGELES, CA 90071

ROBERT YOUNG
OPTICOM
801 CONGRESSIONAL BLVD.
CARMEL, IN 46032

ENGIN YESIL
NTERA, INC.
1020 NW 163RD DRIVE
MIAMI, FL 33169

M. DEVIN SEMLER
PACIFIC CENTREX SERVICES, INC.
6855 TUJUNGA AVENUE
NORTH HOLLYWOOD, CA 91605

JERRY HOOVER
NTS COMMUNICATIONS, INC..
5307 W. LOOP 289
LUBBOCK, TX 79414-1610

LYNNE MARTINEZ
PAC-WEST TELECOMM, INC
1776 W. MARCH LANE, STE. 250
STOCKTON, CA 95207

JOHN BROTEN
NYNEX LONG DISTANCE COMPANY dba
VERIZON
ENTERPRISE SOLUTIONS & VERIZON LONG
DISTANCE
1320 NORTH COURT HOUSE ROAD, 9TH
FLOOR
ARLINGTON, VA 22201

J.T. AMBROSI
PAETEC COMMUNICATIONS, INC.
ONE PAETEC PLAZA
600 WILLOWBROOK
FAIRPORT, NY 14450

DON BECKWITH
PAYROLL ADVANCE, INC. dba THE PHONE
CONNECTION
808 S. BAKER STREET
MT. HOME, AR 72654

PAT HOWARD
QUANTUMSHIFT COMMUNICATIONS
88 ROWLAND WAY, STE. 145
NOVATO, CA 94945

ART GRAT
PHASE 2 TELESYSTEMS, INC.
8901 E. RAINTREE
SCOTTSDALE, AZ 85260

ANDREW STOLLMAN
QUINTEL ENTERTAINMENT, INC.
1 BLUE HILL PLAZA
PEARL RIVER, NY 10965

STACY A. LEWIS
PNG TELECOMMUNICATIONS, INC.
PO BOX 1848
WEST CHESTER, OH 45071-1848

MARK SIMMONDS
QWEST COMMUNICATIONS CORPORATION
1801 CALIFORNIA STREET
DENVER, CO 80202

REED PETERSON
QWEST CORP.
3033 N. 3RD STREET, ROOM 1010
PHOENIX, AZ 85012

WILLIAM J. POPP
POPP TELECOM INCORPORATED
620 MENDELSSOHN AVENUE N
GOLDEN VALLEY, MN 55427-0067

ALEX VALENCIA
PREFERRED CARRIER SERVICES, INC. dba
PHONES FOR ALL/TELEFONOS PARA TODOS
14681 MIDWAY ROAD, STE. 105
ADDISON, TX 75001-3147

QWEST WIRELESS, LLC
QWEST LEGAL DEPARTMENT
1801 CALIFORNIA STREET, 10TH FLOOR
DENVER, CO 80202

DENNIS E. BAY
R2C COMMUNICATIONS, INC.
9532 MISSION ROAD, STE. 25
OVERLAND, KS 66206

LORINDA C. BUCCHIERI
PRE-PAID PHONES, LTD.
1605 GOLDEN OAK DRIVE
LAS VEGAS, NV 89117

BENJAMIN ARDELEAN
PRIMO COMMUNICATIONS, INC.
617 BIRCHTREE COURT
ROCHESTER HILLS, MI 48306

KORHAN AYDIN
RADIANT TELECOM, INC.
1020 NW 163 DRIVE
MIAMI, FL 33169

K. PAUL SINGH
PRIMUS TELECOMMUNICATIONS, INC
1700 OLD MEADOW DRIVE, 3RD FLOOR
McLEAN, VA 22102

KENNETH W. BROWN
REGAL DIVERSIFIED, INC. dba REGAL
TELEPHONE COMPANY
PO BOX 1240
MISSOULA, MT 59806-1240

TOM ANDERSON
PROMISE VISION TECHNOLOGY, INC
1050 E. END STREET, #212
EDMOND, OK 73034-5313

BRENDA CROSBY
RIO VIRGIN TELEPHONE COMPANY
PO BOX 189
ESTACADA, OR 97023

CORAL JOHNSTON
PRONET COMMUNICATIONS, INC.
3290 BLAZER PARKWAY, STE. 201
LEXINGTON, KY 40509

MICHAEL W. PATTEN
ROSHKA HEYMAN & DeWULF
ONE ARIZONA CENTER
400 EAST VAN BUREN
PHOENIX, AZ 85004

ROSALIND GAFFNEY
PT- 1 LONG DISTANCE
3050 WHITESTONE EXPRESSWAY
FLUSHING, NY 11354

NINA BURSLEM
RRV ENTERPRISES, INC. dba CONSUMER
ACCESS
D.D.D. CALLING, INC.
6300 RICHMOND AVENUE, STE. 303
HOUSTON, TX 77057-5927

MARIA WIEGAND
QAI, INC. dba LONG DISTANCE BILLING
PO BOX 898
TUSTIN, CA 92781-9998

KAREN ELLIS
RURAL NETWORK SERVICES, INC.
PO BOX 217
MIDVALE, ID 83645-0217

ABDULLA SANDERS
SANTRAC TECHNOLOGIES, INC.
PO BOX 535
GLENDALE, AZ 85311

WILLIAM HAYES
TABLE TOP TELEPHONE COMPANY, INC.
600 N. SECOND AVENUE
AJO, AZ 85321

FRED GOODWIN
SBC TELECOM, INC.
1010 N. ST. MARY'S, ROOM 13K
SAN ANTONIO, TX 78125-2109

SHARON THOMAS, DIRECTOR OF
REGULATORY
AFFAIRS
TALK AMERICA, INC.
6805 ROUTE 202
NEW HOPE, PA 18938

LON E. BLAKE
SHARED COMMUNICATIONS SERVICES, INC.
SCS OF ARIZONA, INC.
3723 FAIRVIEW INDUSTRIAL DRIVE SE
SALEM, OR 97302

TIMOTHY SLEDZ
TARA RODRIGUEZ
CONNECTAMERICA, INC. dba CONNECT US
OF DELAWARE
1842 CENTRE POINT DRIVE, STE. 128
NAPERVILLE, IL 60563

HATTIE G. RUDD-MCGREGOR
SNET AMERICA, INC.
310 ORANGE STREET, 3RD FLOOR
NEW HAVEN, CT 06510

NIKAYLA NAIL
TCAST COMMUNICATIONS, INC.
24300 TOWN CENTER, STE. 320
VALENCIA, CA 91355

ANTHONY ABATE
SNIP LINK, LLC
100-A TWINBRIDGE DRIVE
PENNSAUKEN, NJ 08110

JOHN ZELLER
TDS LONG DISTANCE CORPORATION
2495 NORTH MAIN STREET
CHOCTAW, OK 73020-0220

MARK McLEMORE
SOUTH CENTRAL UTAH TELEPHONE
ASSOCIATION,
INC., SOUTH CENTRAL COMMUNICATIONS
PO BOX 555
45 NORTH 100 WEST
ESCALANTE, UT 84726

RONNIE BROOKOVER
TDS TELECOM
150 W. SUNSET STREET
PO BOX 4810
QUARTZSITE, AZ 85359

NORMAN W. DESCOTEAUX
SOUTHWESTERN BELL COMMUNICATIONS
SERVICES, INC.
5850 W. LAS POSITAS BLVD.
PLEASANTON, CA 94588

MANAGER OF REGULATORY AFFAIRS
TDS TELECOM
525 JUNCTION ROAD
MADISON, WI 53717-2152

RONNIE BROOKOVER
SOUTHWESTERN TELEPHONE COMPANY,
INC.
PO BOX 5158
MADISON, WI 53705-0158

JEFF SWICKARD
TEL WEST COMMUNICATIONS, LLC
PO BOX 94447
SEATTLE, WA 98124

ERIC HEATH
SPRINT
100 SPEAR STREET, STE. 930
SAN FRANCISCO, CA 94105

ASHER SYED
TELE CIRCUIT NETWORK CORP.
620 CROSSBRIDGE ALLEY
ALPHARETTA, GA 30022

WILLIAM B. WILHELM
SWIDLER BERLIN SHEREFF FRIEDMAN, LLP
3000 K STREET NW, STE. 300
WASHINGTON, DC 20007-5116

PAMELA MOCK
TELECARE, INC.
444 LAFAYETTE ROAD
NOBLESVILLE, IN 46060

DAVID J. ROBINSON
SYNIVERSE NETWORKS, INC.
ONE TAMPA CENTER, STE. 700
TAMPA, FL 33602

GREGORY LAWHON
TELECOM RESOURCES, INC.
2020 BALTIMORE
KANSAS CITY, MO 64108

CHRISTOPHER CANFIELD
T.N.C., INC.
7310 WOOLWORTH AVENUE
OMAHA, NE 68124

JANET TRIPI
TELEDIAS COMMUNICATIONS, INC.
5605 RIGGINS COURT, STE. 265
RENO, NV 89502

KELLIE S. WEBB
TELEGENIUS, INC.
2901 RIDGELAKE DRIVE, STE. 212
METAIRIE, LA 70002

TERI Y. OHTA
T-MOBILE USA, INC.
12920 SE 38TH STREET
BELLEVUE, WA 98006

MICHAEL C. WU
TELEGLOBE AMERICA, INC.
ONE DISCOVERY SQUARE
12010 SUNSET HILLS ROAD
RESTON, VA 20190

NEIL VOX
TON SERVICES, INC.
4185 HARRISON BLVD., STE. 301
ODGEN, UT 84403
LILIAN CHRISTINE OPDAM

TELEGLOBE USA, INC.
11495 COMMERCE PARK DRIVE
RESTON, VA 20191

MIKE SLAUSON
TOUCH 1 COMMUNICATIONS, INC.
PO DRAWER 10751
ATMORE, AL 36504-5757

BOB MARRO
TELEMANAGEMENT SYSTEMS, INC.
12150 EAST BRIARWOOD AVENUE, STE. 146
CENTENNIAL, CO 80112

MICHAEL MELDAHL
TOUCH AMERICA SOURCES
130 N. MAIN STREET
BUTTE, MT 59701

MARK RICHARDS
TELEPHONE COMPANY OF CENTRAL
FLORIDA, INC.
1025 GREEN WOOD BLVD., STE. 470
LAKE MARY, FL 32746

TRACFONE WIRELESS, INC.
8390 NW 25TH STREET
MIAMI, FL 33122

PATRICK WILL
TRANSAMERICAN TELEPHONE, INC.
209 EAST UNIVERSITY
DENTON, TX 76201

AVELINO IGLESIA
TELEUNO, INC.
2754 N. ATLANTIC BLVD., STE. 8
POMPANO BEACH, FL 33069

JEFF BECKER
TRANSCOM COMMUNICATIONS, INC.
1925 W. JOHN CARPENTER FREEWAY, STE.
500
IRVING, TX 75063

JENNIFER MARTIN
TELIGENT SERVICES, INC.
460 HERNDON PARKWAY, STE. 100
HERNDON, VA 20170

JAMES HOLSTINE, JR.
TRANSCOMMUNICATIONS, INC.
6125 PRESERVATION DRIVE
CHATTANOOGA, TN 37416

TERRI LIGHT
TELLISS, LLC
10142 BROOKS SCHOOL ROAD, STE. 198
FISHER, IN 46038

BRIAN TWOMEY
TRANS-NATIONAL COMMUNICATIONS
INTERNATIONAL, INC.
2 CHARLES GATE WEST
BOSTON, MA 02215

JIM HOUGHTALIN
TELOGIC, INC.
PO BOX 14-1048
DALLAS, TX 75214

COLIN WOOD
TRANSWORLD NETWORK CORP.
7702 WOODLAND CENTER BLVD., STE. 50
TAMPA, FL 33614-2411

JEFF COMPTON
TELSCAPE COMMUNICATIONS, INC.
606 E. HUNTINGTON DRIVE
MONROVIA, CA 91016

RON IRELAND
TRI-M COMMUNICATIONS, INC. dba TMC
COMMUNICATIONS
125 E. DE LA GUERRA, STE. 201
SANTA BARBARA, CA 93101

ELLEN VIBACH
THE FREE NETWORK, LLC
1607 E. BIG BEAVER ROAD, STE. 201
TROY, MI 48083

TUCSON CELLULAR TELEPHONE COMPANY
180 WASHINGTON VALLEY ROAD
BEDMINSTER, NJ 07921

BRIAN THOMAS
TIME WARNER TELECOM OF ARIZONA LLC
10475 PARK MEADOWS DRIVE, STE. 400
LITTLETON, CO 80123

LORENE KOEN
UNITED COMMUNICATIONS HUB, INC.
10390 COMMERCE CENTER DRIVE, STE. 250
RANCHO CUCAMONGA, CA 91730

MICHELLE SHAW
UNITED STATES ADVANCED NETWORKS,
INC.
3080 NORTHWOOD CIRCLE
NORCROSS, GA 30071

DEPARTMENT OF REGULATORY AFFAIRS
VIRGIN MOBILE USA, LLC
10 INDEPENDENCE BLVD.
WARREN, NJ 07059

JOHN W. GUSTAITIS
UNI-TEL COMMUNICATIONS GROUP, INC.
47 EAST CHICAGO AVENUE
NAPERVILLE, IL 60540

SHAWN M. LEWIS
VOLO COMMUNICATIONS OF ARIZONA,
INC.
151 SOUTH WYMORE ROAD, STE. 3000
ALTAMONTE SPRINGS, FL 32714-4254

MILES HERITAGE
UNIVANCE TELECOMMUNICATIONS, INC.
7010 S. FULTON STREET, STE. 200
ENGLEWOOD, CO 80112

LINDA ROBERTS
VYCERA COMMUNICATIONS, INC.
12750 HIGH BLUFF DRIVE, STE. 200
SAN DIEGO, CA 92130-2083

WANDA MONTANO
US LEC COMMUNICATIONS, INC.
6801 MORRISON BLVD.
CHARLOTTE, NC 28211

PHILLIPE SZWARC
W2COM INTERNATIONAL, LLC
3500 PARK CENTER DRIVE
DAYTON, OH 45414

NORMAN CONWAY
US SOUTH COMMUNICATIONS, INC. dba
INCOMM
250 WILLIAMS STREET, STE. 2360
ATLANTA, GA 30303

CINGULAR WIRELESS
WEST REGION CORRESPONDENCE
PO BOX 755
ATWATER, CA 95301

ROBERT YOUNG
US TELECOM LONG DISTANCE, INC.
3960 HOWARD HUGHES PARKWAY, # 5001F
LAS VEGAS, NV 89109

KATHY LeBRUN
WESTEL, INC.
1122 COLORADO STREET, STE. 107
AUSTIN, TX 78701

A. JOHN LEACH
US WATS, INC.
2 GREENWOOD SQUARE
3331 STREET ROAD, STE. 275
BENSALEM, PA 19020

AMANDA NIX
WESTERN WIRELESS
CUSTOMER RELATIONS DEPARTMENT
2001 NW SAMMAMISH ROAD
ISSAQUAH, WA 98027

DAVID D. WILLIAMSSON
USA DIGITAL COMMUNICATIONS, INC.
1603 SE 19TH STREET, STE. 120
EDMOND, OK 73013-6621

WESTERN WIRELESS CORPORATION, LEGAL
DEPARTMENT
3650 131ST AVENUE SE, STE. 600
BELEVUE, WA 98006

CAROL EVEN
VARTEC LONG DISTANCE WHOLESALE
CLUB.
1600 VICEROY DRIVE
DALLAS, TX 75235

CHRIS S. BARTON
WHOLESALE CARRIER SERVICES, INC
7200 W. CAMINO REAL, STE. 303
BOCA RATON, FL 33433

JESSE (JAY) B. TRESLER
VERIZON CALIFORNIA
112 S. LAKEVIEW CANYON ROAD - CA501GC
THOUSAND OAKS, CA 91362-3811

KATHY HOUGH
WILLIAMS LOCAL NETWORK, LLC,
WILLIAMS
COMMUNICATIONS, LLC, dba WILTEL
COMMUNICATIONS, LLC
ONE TECHNOLOGY CENTER, MD TC7B
TULSA, OK 74103

ANTHONY GILLMAN
VERIZON SELECT SERVICES, INC.
6665 N. MacARTHUR BLVD., HQK02D84
IRVING, TX 75039

ERIC BENDER
WILSHIRE CONNECTION, LLC
633 W. STREET, 56TH FLOOR
LOS ANGELES, CA 90071

TIMOTHY SEAT
Z-TEL COMMUNICATIONS, INC.
601 S. HARBOUR ISLAND BLVD., STE. 220
TAMPA, FL 33602

NANCY L. DAVIS, GENERAL COUNSEL,
WESTERN AREA
VERIZON WIRELESS
15505 SAND CANYON AVENUE
IRVINE, CA 92618

JOSEPH M. SANHRI, JR.
WINSTAR COMMUNICATIONS OF ARIZONA,
LLC
1850 M STREET NW, STE. 300
WASHINGTON, DC 20036

WALTER McGEE
WORKING ASSETS FUNDING SERVICE, INC.
101 MARKET STREET
SAN FRANCISCO, CA 94105

GARY WASSERSON
WORLDXCHANGE CORP.
9775 BUSINESS PARK AVENUE
SAN DIEGO, CA 92131

MARK PAVOL
X2COMM, INC.
270 SOUTH MAIN STREET
FLEMINGTON, NJ 08822

REX KNOWLES
XO ARIZONA, INC.
1111 SUNSET HILLS ROAD
RESTON, VA 20190

ROBIN CLARKE
YAK COMMUNICATIONS (AMERICA) INC.
55 TOWN CENTRE COURT, STE. 610
SCARBOROUGH, ONTARIO MIP 4X4

JILL PAPHENHAUSER
ZONE TELECOM, INC.
200 LAKE DRIVE EAST, STE. 200
CHERRY HILL, NJ 08002

