

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

Before Commissioners: Brian Moline, Chair
Robert E. Krehbiel, Commissioner
Michael C. Moffet, Commissioner

DEC 29 2006

 Docket
Room

In the Matter of a General Investigation into)
The Commission's Telephone Billing) Docket No. 06-GIMT-187-GIT
Practices Standards)

BRIEF OF THE CITIZENS' UTILITY RATEPAYER BOARD

COMES NOW the Citizens' Utility Ratepayer Board (CURB) and files its Brief on the Commission's authority to impose billing standards on wireless eligible telecommunications carriers (ETCs). In support of the Commission's authority to impose billing standards on wireless ETCs, CURB states as follows:

I. INTRODUCTION

1. The Commission's December 14, 2006, Order Adopting Procedural Schedule directs parties in this docket to file briefs addressing the following issues:

A. Does the Commission have the authority to impose the billing standards on wireless ETCs?

1. Kansas statutory authority regulatory exemption for wireless carriers.

2. Federal preemption of state regulation of wireless carriers.

B. If the answer to A is 'yes,' is it appropriate for the Commission to exercise its authority?¹

2. The Commission also directed the parties to address in a separate section of their briefs how their answers to the above questions comport with the Commission's reasoning

¹ Order Adopting Procedural Schedule, ¶ 3.

regarding jurisdiction over wireless ETCs in orders issued in Docket Nos. 06-GIMT-446-GIT, 00-GIMT-584-GIT, and 05-GIMT-187-GIT.²

3. CURB will demonstrate below that the Commission not only has the authority to impose billing standards on wireless ETCs under state and federal law, but that the Commission should exercise that authority.

II. THE COMMISSION HAS THE AUTHORITY TO IMPOSE BILLING STANDARDS ON WIRELESS ETCs.

4. The Commission has authority under both Kansas and federal law to impose billing standards on wireless ETCs.

A. Kansas Statutes Do Not Effect The Commission's Authority To Impose Billing Standards On Wireless ETCs.

5. The Commission does not have jurisdiction to regulate wireless carriers generally. K.S.A. 66-104a(c) and 66-1,143(b). However, as noted by the Commission in Docket No. 00-GIMT-584-GIT, the radio common carrier statutes were enacted in 1969 and last amended in 1988, long before the enactment of the federal and Kansas telecommunications acts and the concept of ETC designations and universal service support.³

6. The Commission is authorized to establish eligibility criteria for wireless ETCs under K.S.A. 66-2008(b), which provides:

Pursuant to the federal act, distributions from the KUSF shall be made in a competitively neutral manner to qualified telecommunications public utilities, telecommunications carriers and wireless telecommunications providers, that are deemed eligible both under subsection (e)(1) of section 214 of the federal act and by the commission. (emphasis added)

7. This statute authorizes the Commission to make distributions from the KUSF to “qualified” wireless telecommunications providers who are “deemed” eligible *both* under the

² *Id.* at ¶ 4.

³ Order 3: Addressing Jurisdiction, Docket No. 00-GIMT-584-GIT, ¶ 23.

federal act *and* “by the commission.” The language enacted by the legislature in K.S.A. 66-2008(b) allows additional eligibility criteria for ETCs to be required, not just pursuant to section 214(e)(1) of the federal act, but also as determined “by the commission.” The Commission therefore has authority to impose requirements on wireless ETCs under the provisions of K.S.A. 66-2008(b).

8. The Commission has consistently recognized this authority in prior dockets:

Conditioning receipt of state universal service support on non-discriminatory requirements on all ETCs related to the provision of universal service would not be an unlawful exercise of jurisdiction over radio common carriers.⁴

The Commission has in prior dockets addressed the question of whether the Commission has authority to impose requirements on ETCs that are wireless carriers and has consistently concluded that it does.⁵

While these earlier dockets were focused on quality of service, the rationale is the same. The Commission has consistently held that it has jurisdiction over wireless ETCs in their capacity as an ETC. Neither Sprint nor Alltel has pointed to any “clear and controlling authority” that justifies a departure from this Commission’s prior holdings on the issue. A wireless carrier that submits to the jurisdiction of this Commission for the purpose of ETC designation is subject to the conditions imposed by the Commission in order to be designated as an ETC.⁶

The Commission again reaffirms that it is consistently holding to that legal determination and, until it is presented with clear and controlling authority to the contrary – something Sprint has failed to produce in this docket – the Commission determines that it has the jurisdiction to impose quality of service standards on wireless ETC carriers as a condition to distributions of KUSF funds in addition to the ETC designation. If a wireless carrier makes the decision to avail itself of the benefit of universal service funds, that carrier also subjects itself to Commission jurisdiction which is based on the Commission’s duty to effectively and reasonably carry out its duties under federal and state statutory provisions.⁷

⁴ *Id.* at ¶ 24.

⁵ Order Addressing Petitions For Reconsideration, Docket No. 06-GIMT-466-GIT, ¶ 11.

⁶ *Id.* at ¶ 12.

⁷ Order on Motions of Sprint, SWBT, and Cox, 05-GIMT-187-GIT, ¶ 13.

9. It is important to note that ETC designation is optional for competitive carriers, including wireless carriers. As noted by the Commission previously, “Radio common carriers would obviously be free to decide whether they are prepared to comply with any such conditions or to abstain from receiving support.”⁸ Staff has also previously noted that, “Carriers that find the otherwise reasonable designation criteria to be onerous do not have to seek designation or may forfeit their designation.”⁹

B. Federal Law Does Not Preempt The Commission’s Authority To Impose Billing Standards On Wireless ETCs.

10. The provisions of the federal act also provide authority for the Commission to impose billing standards on wireless ETCs. State Commissions are authorized under 47 U.S.C. § 253(b)(1) to impose,

on a competitively neutral basis and consistent with section 254, requirements necessary to preserve and advance universal service, protect the public safety and welfare, ensure the continued quality of telecommunications services and safeguard the rights of consumers.

11. While 47 U.S.C. § 332(c)(3)(A) prohibits states from regulating the “entry of or the rates charged by” wireless carriers, it expressly provides that states are not prohibited from “regulating the other terms and conditions” of wireless carriers. On July 31, 2006, the Eleventh Circuit Court of Appeals issued a decision regarding billing standards and the authority of states to require or prohibit the use of line items.¹⁰ The Eleventh Circuit decision states in part:

On the key issue, we grant the petitions for review because we conclude that the Commission exceeded its authority when it preempted the states from requiring or prohibiting the use of line items. The scope of federal authority to regulate "rates" or "entry" does not include the presentation of line items on cellular wireless bills.

⁸ Order 3: Addressing Jurisdiction, Docket No. 00-GIMT-584-GIT, ¶ 24.

⁹ Reply Comments of Commission Staff, Docket No. 06-GIMT-446-GIT, ¶ 3.

¹⁰ *National Association of State Utility Consumer Advocates v. F.C.C.*, 457 F.3d 1238 (11th Cir. 2006).

47 U.S.C. § 332(c)(3)(A). This *billing practice* is a matter of "other terms and conditions" that Congress intended to be regulable by the states. *Id.*¹¹

12. The Eleventh Circuit has therefore determined the states have the authority to impose billing standards on wireless carriers, including the ability to require or prohibit the use of line items on bills, as a matter of "other items and conditions" that Congress intended to be "regulable" by the states. As a result, this Commission is not preempted from imposing billing standards on wireless ETCs under federal law.

III. IT IS APPROPRIATE FOR THE COMMISSION TO EXERCISE ITS AUTHORITY TO IMPOSE BILLING STANDARDS ON WIRELESS ETCs.

13. It is appropriate for the Commission to exercise its authority to impose billing standards on wireless ETCs in Kansas. Billing standards applicable to both wireline and wireless carriers include, among other things:

- Billing frequency
- Billing periods, mailing dates and due dates
- Clear, itemized service charges
- Taxes and fees
- Notice of late payment charges
- Non-deniable charges
- Alternative billing formats
- Refunds for interruptions
- Notifications of service changes
- Subscriber rate information
- Subscriber notices
- Due dates/Delinquency dates
- Late payment charges
- Billing during suspension of service
- Delayed billing
- Payment of deposits in installments
- Suspension in special circumstances
- Information included in suspension/disconnection notices

¹¹ *Id.*, at 1242 (emphasis added).

14. Consistency in the application of each of these items is required for consumers to make informed choices among all competitive providers. Unequal application of these items between wireless ETCs and other ETCs creates an uneven playing field and fails to adequately ensure competitive neutrality, as required by K.S.A. 66-2008(b). This also violates the KCC's obligations under K.S.A. 66-2001 to "ensure that consumers throughout the state realize the benefits of competition," "promote consumer access to a full range of telecommunications services," and "protect consumers of telecommunications services from fraudulent business practices."

15. Vague, misleading, and/or deceptive billing practices, whether committed by wireline or wireless carriers, prevent ratepayers from accurately assessing: (1) what they are being billed for; (2) whether the amounts charged conform to the price charged for the service; (3) when and why their service may be suspended or disconnected; (4) when and how late-payment penalties may be assessed; (5) when their payments are due or delinquent; and (6) when service or rates will be changed. These are vital consumer protections for Kansas ratepayers who are paying for universal service provided by ETC carriers receiving federal and state universal service support.

16. Clearly the FCC has determined a need exists to regulate billing for wireless carriers. The FCC has disagreed with the argument that competition alone is enough to forestall the need for billing standards:

We disagree with those commenters that argue that CMRS providers should be exempted from this requirement because they operate in a competitive marketplace. The Commission specifically rejected this argument in the *Truth-in-Billing Order* noting that, as competition evolves, the provision of clear and truthful bills is paramount to efficient operation of the marketplace. Although we agree that a robustly competitive marketplace provides the best incentive for carriers to meet the needs of their customers and affords dissatisfied customers with an opportunity to change carriers, we also recognize that some providers in a

competitive market may engage in misconduct in ways that are not easily rectified through voluntary actions by the industry. As the Commission emphasized in the *Truth-in-Billing Order*, one of the fundamental goals of the truth in billing principles is to provide consumers with clear, well-organized, and non-misleading information so that they will be able to reap the advantages of competitive markets.¹²

17. In fact, the FCC rescinded earlier exemptions for CMRS providers stating, “we conclude the CMRS carriers should no longer be exempt from 47 C.F.R. § 64.2401(b)’s requirement that billing descriptions be brief, clear, non-misleading and in plain language.”¹³

18. It is in the public interest to impose Kansas billing standards on wireless ETCs, who are receiving FUSF and/or KUSF support to provide universal service. Without the protection of these billing standards, Kansas ratepayers subscribing to universal service from wireless ETCs will not be afforded the same necessary consumer protections the Commission requires of other ETCs, and the Commission will have failed to ensure competitive neutrality.

19. Kansas and federal law do not prevent the Commission from exercising its authority to ensure that FUSF and KUSF distributions are competitively neutral, i.e., imposing the same billing standards on wireless ETCs that are applicable to all ETCs. Wireless carriers are free by law to serve Kansans without compliance with Kansas billing standards. However, when wireless carriers seek ETC certification to receive FUSF and/or KUSF support, they should be required to comply with the billing standards applicable to other ETCs in order to ensure competitive neutrality.

¹² Second Report and Order, Declaratory Ruling, and Second Further Notice of Proposed Rulemaking (Truth-In-Billing Order), *In the Matter of Truth-In-Billing and Billing Format*, 20 F.C.C.R. 6448, 6456-57, 20 FCC Red. 6448, 35 Communications Reg. (P&F) 1008 (March 18, 2005).

¹³ *Id.*, 20 F.C.C.R. at 6456.

IV. HOW DOES CURB'S POSITION ON THE ABOVE ISSUES COMPORT WITH THE COMMISSION'S REASONING REGARDING JURISDICTION OVER WIRELESS ETC'S IN PRIOR ORDERS?

A. The Commission Has Consistently Acknowledged Its Jurisdiction Over Wireless ETCs.

20. As discussed in detail in paragraph 8 above, the Commission has consistently recognized its authority over wireless ETCs in prior orders issued in Docket Nos. 00-GIMT-584-GIT, 05-GIMT-187-GIT, and 06-GIMT-466-GIT.¹⁴

21. CURB's position on the issues posed by the Commission is therefore entirely consistent with the Commission's prior determinations that it had jurisdiction over wireless ETCs.

B. The Commission Has Recently Exercised Its Jurisdiction Over Wireless ETCs.

22. In Docket No. 06-GIMT-446-GIT, the Commission exercised its jurisdiction over wireless ETCs by imposing specific requirements on wireless ETCs, including requiring certain advertising requirements, allowing Lifeline customers to select their plan of choice, and requiring two-year quality improvement plans.¹⁵ "The Commission has consistently held that it has jurisdiction over wireless ETCs in their capacity as an ETC... A wireless carrier that submits to the jurisdiction of this Commission for the purpose of ETC designation is subject to the conditions imposed by the Commission in order to be designated as an ETC."¹⁶

¹⁴ See, Order 3: Addressing Jurisdiction, Docket No. 00-GIMT-584-GIT, ¶ 24; Order on Motions of Sprint, SWBT, and Cox, 05-GIMT-187-GIT, ¶ 13; and Order Addressing Petitions For Reconsideration, Docket No. 06-GIMT-466-GIT, ¶¶ 11-12.

¹⁵ Order Addressing Petitions For Reconsideration, Docket No. 06-GIMT-466-GIT, ¶¶ 25, 47, 50, 55, 58.

¹⁶ *Id.* at ¶ 12.

23. These requirements imposed on wireless ETCs by the Commission decision in the 446 Docket are consistent with CURB's position that the Commission should exercise its authority to impose billing standards on wireless ETCs in this docket.

C. The Commission's Prior Decisions Not To Exercise Its Jurisdiction Over Wireless ETCs.

24. In Docket Nos. 00-GIMT-584-GIT and 05-GIMT-187-GIT, the Commission decided not to exercise its jurisdiction to impose quality of service standards on wireless ETCs.¹⁷ However, CURB believes the Commission's decisions not to impose quality of service standards on wireless ETCs are distinguishable from whether it should impose billing standards on wireless ETCs.

25. While the Commission did not impose quality of service requirements on wireless ETCs in the 05-GIMT-187-GIT Docket, it expressly stated that it did not intend to limit its jurisdiction to evaluate wireless carriers service quality offerings in the context of their requests for ETC status.¹⁸

26. Further, in deciding not to impose quality of service standards on wireless carriers, the Commission specifically noted the following arguments raised by wireless carriers in support of its decision:¹⁹

- Competitive choice provides sufficient consumer protections for purpose of quality of service.
- 97% of the US population lives in a county served by at least three wireless providers.
- The cost of heightened regulation.

¹⁷ CURB's discussion distinguishing the Commission's decision not to impose quality of service standards on wireless ETCs in Docket Nos. 00-GIMT-584-GIT and 05-GIMT-187-GIT Docket should not be construed as agreement with those decisions.

¹⁸ Order on Motions of Sprint, SWBT, and Cox, Docket No. 05-GIMT-187-GIT, ¶ 20.

¹⁹ *Id.* at ¶¶ 15-16, 20. CURB does not agree with the arguments raised by wireless carriers that the Commission cited in support of its decision not to impose quality of service standards on wireless ETCs in the 05-GIMT-187-GIT Docket.

- With regard to quality of service reporting information, there are sources of consumer information such as Consumer Reports, which rate wireless carriers.
- Different service issues applicable to wireless carriers than wireline carriers, such as compensation for the telephone equipment provided to wireless customers and quality issues related to coverage rather than other quality issues.

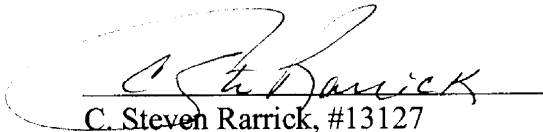
27. The arguments made by wireless ETCs and cited by the Commission in support of its decision not to impose quality of service standards on wireless ETCs do not support a decision not to impose billing standards on wireless ETCs in this docket. Billing standards applicable to both wireline and wireless carriers include: billing frequency; billing periods; mailing dates and due dates; clear, itemized service charges; taxes and fees; notice of late payment charges; non-deniable charges; alternative billing formats; refunds for interruptions; notifications of service changes; subscriber rate information; subscriber notices; due dates/delinquency dates; late payment charges; billing during suspension of service; delayed billing; payment of deposits in installments; suspension in special circumstances; and information included in suspension/disconnection notices.

28. Consistency in the application of each of these items is required for consumers to make informed choices among all competitive providers. Unequal application of these items between wireless ETCs and other ETCs creates an uneven playing field and fails to adequately ensure competitive neutrality, as required by K.S.A. 66-2008(b). This also violates the KCC's obligations in K.S.A. 66-2001 to "ensure that consumers throughout the state realize the benefits of competition," "promote consumer access to a full range of telecommunications services," and "protect consumers of telecommunications services from fraudulent business practices."

V. CONCLUSION

29. On behalf of Kansas small business and residential ratepayers, CURB urges the Commission to exercise its authority and impose billing standards on wireless ETCs in Kansas.

Respectfully submitted,



C. Steven Rarrick, #13127

Citizens' Utility Ratepayer Board
1500 SW Arrowhead Road
Topeka, KS 66604
Tel: (785) 271-3200
Fax: (785) 271-3116

CERTIFICATE OF SERVICE

06-GIMT-187-GIT

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was placed in the United States mail, postage prepaid, or hand-delivered this 29th day of December, 2006, to the following:

BILL ASHBURN, VP-EXTERNAL AFFAIRS, STATE
GOVERNMENT AFFAIRS
ALLTEL KANSAS LIMITED PARTNERSHIP
1620 M STREET
LINCOLN, NE 68501
Fax: 402-472-9636
bill.ashburn@alltel.com

LINDA LANGSTON, REGULATORY AFFAIRS MANAGER,
KS, MO, AR
COX KANSAS TELCOM, L.L.C.
D/B/A COX COMMUNICATIONS, INC
701 EAST DOUGLAS
WICHITA, KS 67202
Fax: 316-260-6051
linda.langston@cox.com

LINDA GARDNER, ATTORNEY, KSOPKJ0401
EMBARQ COMMUNICATIONS, INC.
5454 W 110TH STREET
OVERLAND PARK, KS 66211-1204
Fax: 913-397-3598
linda.gardner@embarq.com

RACHEL LIPMAN REIBER, ATTORNEY
EVEREST MIDWEST LICENSEE LLC
D/B/A EVEREST CONNECTIONS
9647 LACKMAN ROAD
LENEXA, KS 66219-1205
Fax: 913-322-9729
rachel.reiber@everestgt.com

ROBERT A. FOX, ATTORNEY
FOULSTON & SIEFKIN LLP
ONE AMVESTORS PLACE
555 S KANSAS AVENUE
SUITE 101
TOPEKA, KS 66603-3423
Fax: 233-1610
bfox@foulston.com

THOMAS E. GLEASON, ATTORNEY
GLEASON & DOTY, CHARTERED
P.O. BOX 6
LAWRENCE, KS 66044-0006
Fax: 785-856-6800
gleason@sunflower.com

JAMES M. CAPLINGER, ATTORNEY
JAMES M. CAPLINGER, CHARTERED
823 W 10TH STREET
TOPEKA, KS 66612
Fax: 232-0724
jim@caplinger.net

MARK E. CAPLINGER, ATTORNEY
JAMES M. CAPLINGER, CHARTERED
823 W 10TH STREET
TOPEKA, KS 66612
Fax: 232-0724
mark@caplinger.net

JAMES M. CAPLINGER, JR., ATTORNEY
JAMES M. CAPLINGER, CHARTERED
823 W 10TH STREET
TOPEKA, KS 66612
Fax: 785-232-0724
jrcaplinger@caplinger.net

COLLEEN HARRELL, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD ROAD
TOPEKA, KS 66604-4027
Fax: 785-271-3354
c.harrell@kcc.state.ks.us
**** Hand Deliver ****

STEVEN M. CHERNOFF, ATTORNEY
LUKAS NACE GUTIERREZ & SACHS, CHTD
1650 TYSONS BOULEVARD
SUITE 1500
MCLEAN, VA 22102
Fax: 202-828-8403
schernoff@fcclaw.com

DAVID A. LAFURIA, ATTORNEY
LUKAS NACE GUTIERREZ & SACHS, CHTD
1650 TYSONS BOULEVARD
SUITE 1500
MCLEAN, VA 22102
Fax: 703-584-8694
dlafuria@fcclaw.com

CERTIFICATE OF SERVICE

06-GIMT-187-GIT

BRUCE D. COHEN, ASSOCIATE GENERAL COUNSEL
MCIMETRO ACCESS TRANSMISSION SERVICES LLC
PO BOX 152092
IRVING, TX 75015-2092
Fax: 877-450-4658

GREGG DIAMOND, REGULATORY POLICY & PLANNING
MCIMETRO ACCESS TRANSMISSION SERVICES LLC
PO BOX 152092
IRVING, TX 75015-2092
Fax: 877-450-4658

MICHAEL LENNEN, ATTORNEY
MORRIS, LAING, EVANS, BROCK & KENNEDY,
CHARTERED
OLD TOWN SQUARE
300 N MEAD STREET
SUITE 200
WICHITA, KS 67202-2722
Fax: 316-262-5991
mlennen@morrislaing.com

STEPHANIE CASSIOPPI
OHIO RSA #1 LIMITED PARTNERSHIP
D/B/A KANSAS RSA #15 / US CELLULAR
8410 BRYN MAWR
CHICAGO, IL 60631
Fax: 773-864-3133
stephanie.cassioppi@uscellular.com

ELIZABETH KOHLER, VICE PRESIDENT, LEGAL
SERVICES
RURAL CELLULAR CORPORATION
D/B/A CELLULAR ONE
WATER TOWER HILL
302 MOUNTAIN VIEW DRIVE, SUITE 200
COLCHESTER, VT 05446
Fax: 802-654-5050
bethlk@rccw.com

CHRIS KING, REGULATORY ANALYST
SAGE TELECOM, INC.
805 CENTRAL EXPRESSWAY SOUTH
SUITE 100
ALLEN, TX 75013-2789
Fax: 214-495-4790
cking@sagetelecom.net

ROBERT W MCCAUSLAND, VICE PRESIDENT
REGULATORY AFFAIRS
SAGE TELECOM, INC.
805 CENTRAL EXPRESSWAY SOUTH
SUITE 100
ALLEN, TX 75013-2789
Fax: 214-495-4790
rmccausland@sagetelecom.net

JOHN DI BENE, VICE PRESIDENT, GENERAL COUNSEL
& SECRETARY
SBC LONG DISTANCE, LLC
5850 W LAS POSITAS BLVD.
PLEASANTON, CA 94588
jd3235@sbc.com

MARK P. JOHNSON, ATTORNEY
SONNENSCHN NATH & ROSENTHAL LLP
4520 MAIN STREET
SUITE 1100
KANSAS CITY, MO 64111
Fax: 816-531-7545
mjohnson@sonnenschein.com

JAMES KIRKLAND, ATTORNEY
SONNENSCHN NATH & ROSENTHAL LLP
4520 MAIN STREET
SUITE 1100
KANSAS CITY, MO 64111
Fax: 816-531-7545
jkirkland@sonnenschein.com

TRINA R. LERICHE, ATTORNEY
SONNENSCHN NATH & ROSENTHAL LLP
4520 MAIN STREET
SUITE 1100
KANSAS CITY, MO 64111
Fax: 816-531-7545
tleriche@sonnenschein.com

ROGER STEINER, ATTORNEY
SONNENSCHN NATH & ROSENTHAL LLP
4520 MAIN STREET
SUITE 1100
KANSAS CITY, MO 64111
Fax: 816-531-7545
rsteiner@sonnenschein.com

CERTIFICATE OF SERVICE

06-GIMT-187-GIT

MELANIE N. MCINTYRE, ATTORNEY
SOUTHWESTERN BELL TELEPHONE CO.
D/B/A SBC
220 EAST SIXTH STREET, RM. 500
TOPEKA, KS 66603
Fax: 785-276-1948
ms3765@att.com

BRUCE A. NEY, ATTORNEY
SOUTHWESTERN BELL TELEPHONE CO.
D/B/A SBC
220 EAST SIXTH STREET, RM. 500
TOPEKA, KS 66603
Fax: 785-276-1948
bruce.ney@att.com

TIMOTHY S. PICKERING, GENERAL COUNSEL
SOUTHWESTERN BELL TELEPHONE CO.
D/B/A SBC
220 EAST SIXTH STREET, RM. 500
TOPEKA, KS 66603
Fax: 785-276-1948
tp1481@att.com

DIANE C. BROWNING, ATTORNEY/KSOPHN0212-2A411
SPRINT COMMUNICATIONS COMPANY L.P.
6450 SPRINT PKWY
OVERLAND PARK, KS 66251
Fax: 913-523-0571
diane.c.browning@sprint.com


KENNETH A. SCHIFMAN, ATTORNEY/MS: KSOPHN0212-
2A303
SPRINT COMMUNICATIONS COMPANY L.P.
6450 SPRINT PKWY
OVERLAND PARK, KS 66251
Fax: 913-523-9827
kennth.schifman@mail.sprint.com

KEVIN K. ZARLING, SR. COUNSEL/MX TXAUST1401-
1414
UNITED TELEPHONE CO. OF KANSAS
D/B/A EMBARQ
400 W 15TH STREET
SUITE 1400
AUSTIN, TX 78701
Fax: 512-472-8362
kevin.k.zrling@sprint.com

BRUCE D. COHEN, ASSOCIATE GENERAL
COUNSEL/HQE03J27
VERIZON
P O BOX 152092
IRVING, TX 75015-2092
Fax: 877-450-4658

GREGG DIAMOND, REGULATORY POLICY &
PLANNING/HQE02E84
VERIZON
P O BOX 152092
IRVING, TX 75015-2092
Fax: 877-450-4658

DEBRA R. SCHMIDT, PROVISIONING MANAGER
WORLDNET L.L.C.
1 RIVERFRONT PLAZA
SUITE 301
LAWRENCE, KS 66044
Fax: 785-312-6997
dschmidt@sunflowerbroadband.com


C. Steven Rarrick