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OMB Control No. 3060-0986
Competitive Carrier Line Count Report
WC Docket No. 05-337
CC Docket No. 96-45
FCC Form 525

Worldcall Interconnect, Inc. Comments

The FCC recently capped total annual competitive eligible telecommunications carrier (ETC) universal service high-cost support for each state at the level of support that competitive ETCs in that state were eligible to receive during March 2008 on an annualized basis. Order, *In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service*, 23 FCC Rcd. 8834 (2008) (“*CETC Cap Order*”). The Commission instituted two exceptions from the cap, one of which is the subject of these comments. Specifically, a competitive ETC will not be subject to the interim cap to the extent it files cost data demonstrating that its costs meet the support threshold in the same manner as the incumbent local exchange carrier. *Id.* at 8848-8849. The Commission has solicited Paperwork Reduction Act (“PRA”) comments on its tentative decision to “not amend FCC Form 525 in order to incorporate the information requests related to the two limited exceptions to the interim cap on high-cost support.” See, 74 FR 3035 (January 16, 2009).

Worldcall Interconnect, Inc. (“WCX”) is a CMRS carrier that was given ETC designation by the Texas Public Utility Commission on January 9, 2009. WCX also has a pending request before the Commission for ETC designation in Warren and Washington counties in upstate New York. WCX has decided to submit its own costs and thereby operate “exempt from the cap.” To do this, WCX has filed and will continue to “file cost data demonstrating that its costs meet the support threshold in the same manner as the incumbent local exchange carrier.” This information was submitted to USAC on March 9, 2009. WCX did not use form 525; instead, WCX used the same information sources and reporting formats that the incumbent local exchange carriers use, so that it could demonstrate that “its costs meet the support threshold *in the same manner as the incumbent local exchange carrier.*”

While form 525 is suitable for those CETCs that continue to use the “identical support rule” and operate under the interim cap, it cannot be used as the reporting vehicle for those CETCs that choose to submit their own costs. Form 525 does not contemplate or allow the CETC to report its own cost data; it entirely assumes and is

completely built around implementation and use of the identical support rule. There is no location on the form for the CETC to present its own cost data.

The Commission's tentative decision to not amend form 525 is reasonable, but only if that decision does not mean that CETCs choosing to seek support based on their own costs must somehow make the required cost demonstration using that form. CETCs that choose to operate exempt from the CETC cap should instead demonstrate that their costs meet the support threshold "in the same manner as the incumbent local exchange carrier" by supplying the same kind of information and using the same reporting formats that the incumbent local exchange carriers use.

WCX respectfully requests that the Commission confirm that CETCs who choose to make their own cost determination should not use form 525, but should instead proceed in the same manner as incumbent local exchange carriers.

Respectfully Submitted,

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