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VIA EMAIL AND FEDERAL EXPRESS

June 1, 2012

Public Utilities Commission of Oregon
Attention: Filing Center
550 Capitol Street NE, Ste 215
Salem, OR 97301-2551

RE: UM-1017 – Verizon's Comments on Joint Motion to Approve and Accept Memorandum of Understanding

Dear Filing Center:

Enclosed for filing in the above-referenced matter are the original and five (5) copies of Verizon's Comments on Joint Motion to Approve and Accept Memorandum of Understanding and the certificate of service with service list.

If you have any questions, please contact me at 805-499-6179 or email jacque.lopez@verizon.com .

Sincerely,

Jacque Lopez

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Assistant to
Richard B. Severy and
Rudy Reyes

Enclosures
cc: See Service List – UM-1017

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1017

In the Matter of the Investigation into Expansion of the Oregon Universal Service Fund to Include the Service Areas of Rural Telecommunications Carriers	VERIZON'S COMMENTS ON JOINT MOTION TO APPROVE AND ACCEPT MEMORANDUM OF UNDERSTANDING

VERIZON'S COMMENTS ON JOINT MOTION TO APPROVE AND ACCEPT MEMORANDUM OF UNDERSTANDING

MCI Communications Services, Inc. d/b/a Verizon Business Services and MCImetro Access Transmission Services LLC d/b/a Verizon Access (together, "Verizon") submit these comments on the Joint Motion ("Motion") to approve and accept the Memorandum of Understanding ("MOU") of the Oregon Exchange Carrier Association ("OECA"), Oregon Telecommunications Association ("OTA"), and Commission Staff (collectively, "Proponents").

As explained below, Verizon opposes the MOU and urges the Commission not to approve it, and instead to initiate a comprehensive investigation to reform the Oregon Universal Service Fund ("OUSF"). If, however, the Commission is inclined to approve some version of the MOU on a temporary basis, then, at a minimum, the Commission should change the renewal process proposed in Section D of the MOU.

I. Procedural Background

Because of the truncated and rushed manner in which this matter has been presented to interested parties and the Commission for consideration and decision, a brief review of the procedural history is warranted. The Proponents initially submitted their Motion for approval of the MOU on May 22, 2012. Verizon and other interested parties reasonably understood that,

under the Commission's normal procedures, they would have 15 days (until June 6) to review the terms of the proposal; seek clarification, discuss and obtain further information from the Proponents; and then provide the Commission with comments based on their evaluation. Providing a fair amount of time for undertaking such a review was reasonable and understandable, particularly in light of the Proponents' representations that they had spent many months engaged in "a series of discussions," conducting "extensive analysis," and crafting the specific proposals set forth in the MOU. *See* MOU at 2.[1] Verizon was not invited to participate in those discussions, and so its views were neither sought nor incorporated in the MOU.

Two days later, however, the Proponents filed a "Request for Expedited Treatment" ("Request"), asking for the first time that the deadline for submitting responses to their Motion be shortened and that interested parties be required to file their comments no later than June 1, 2012, only five business days after they filed their Request — a truncated period that included a holiday weekend. In making their Request, the Proponents did not comply with the procedural requirements for requesting expedited consideration. In particular, OAR 860-001-0420(7) imposes a requirement that the moving party "must … certify that [it] has attempted to contact the other parties to the proceedings to discuss the motion and state whether the parties support the motion." At most, OECA and OTA stated that they had discussed their Request with Staff, but there was no representation that OECA or OTA contacted other parties.

In addition, OECA and OTA did not provide any reasonable explanation for their delay in bringing these issues to other parties and the Commission on a timely basis, and for then trying to force other parties to review and address the Motion and the terms of the MOU in a hurried fashion. Proponents have had many months to develop their proposal and present it to the Commission and other stakeholders for consideration. Their proposal was ostensibly based

[1] Citations herein to the MOU are to the "replacement" MOU that the Proponents filed on May 30, 2012.

on *2010* financial data that was filed in the fall of last year, and developed through a "workshop" and "several meetings" among the Proponents themselves — but not other interested parties — and an interactive process with Staff, apparently over a period of time that spanned several months. *See* MOU at 2. Because the timing of the submission of the MOU was entirely within their control, it was unreasonable for Proponents to subsequently seek to shorten the time for other parties to respond, and to foreclose other interested parties from having a full opportunity to evaluate, consider and comment on the substance of their ambitious, unprecedented — and now changing — proposal.

On May 30, only two days before the early filing deadline the Proponents had urged the Commission to set, the Proponents filed a *revised* MOU to incorporate certain changes to their original proposal.[2] While the new version represents a modest improvement over the original MOU, Proponents still have not suggested that interested parties should be afforded additional time to review and comment on their new proposals; rather, their position appears to be that parties should be required to file comments on the amended MOU only two days after it was filed — which is far less than time than the Commission's procedural rules ordinarily provide.

On its face, the unreasonable, unnecessary and hurried procedural approach pushed by the Proponents is unfair to other parties, including other carriers and the consumers in Oregon that would bear the brunt of any expansion of the OUSF and the higher surcharge imposed on customers of all other carriers if the MOU were to be approved. The abbreviated process advocated by Proponents is thus inconsistent with basic principles of due process and reasoned and informed decision making. The Commission must understand that the deficiencies of the truncated process urged by the Proponents have prevented the development of a comprehensive

[2] Adding to the confusion, the revised (or "replacement") MOU bears a date of May 22, 2012.

and informed record on which it could thoroughly evaluate and carefully consider the merits — and disadvantages and downsides — of the MOU.

II. The MOU, as Amended, Is Not in the Public Interest and Should Not be Approved

The MOU proposes to more than *double* the amount that rural incumbent local exchange carriers ("RLECs") could receive from the OUSF, by expanding the size of the rural fund from $6.8 million to more than $15,650,000. MOU at 2-3. This, in turn, would cause the tax imposed on the customers of other service providers in Oregon to increase substantially, to 8.5% (*id.)*, which would be one of the highest such end user surcharges in the United States.

The Proponents suggest that the amounts of the proposed fund and increased surcharge are driven by a "formula" adopted by the Commission about a decade ago (and then voluntarily adjusted downward) (MOU at 2), but they do not provide any information to substantiate this claim. Moreover, interested parties have not had an opportunity to obtain and review any of the data which purportedly provides the basis for the Proponents' claimed amounts. Accordingly, the Commission should not accept the Proponents' assertions solely on face value.

Moreover, the Commission should be hesitant to rely on a formula that was developed in an earlier era when market conditions were vastly different to calculate the amount of money that may be needed to support "basic universal service" in 2012 and beyond. Reasoned decision making requires the Commission to perform a contemporary assessment of the reasonable bases for determining whether, and how much, funding continues to be needed, if at all, to support the availability of basic universal service in particular service areas in Oregon. The MOU provides no basis for concluding that the decade-old "formula" is a valid, reliable basis for making those determinations in today's markedly changed environment.

Reforming the OUSF and related intercarrier compensation programs should be undertaken deliberately with input from all stakeholders — not simply by accepting a MOU authored by the potential recipients of the additional funding. Before rushing to expand the OUSF, the Commission should first determine whether there is a need for continued — let alone substantial — additional support. However, neither the Motion nor the MOU provide the type of information, let alone sufficient data, that would permit such a reasoned, fact-based analysis.

Before increasing the tax on customers of other telecommunications service providers to an extraordinary level, the Commission should also afford consumers and their representatives an opportunity to consider and weigh in on the proposal. Based on information and belief, Verizon understands that an 8.5% fee would constitute one of the highest state end user surcharges in the country. Such an increase runs counter to the direction of other states and the Federal Communications Commission ("FCC") to stabilize and, if possible, *decrease* universal service funds. The Commission should consider the impact that this substantial tax hike would have on consumers and business customers throughout Oregon before approving an increase of this magnitude.

Before imposing additional burdens on other service providers and their customers to continue subsidizing the operations of RLECs, the Commission should also consider whether it would be reasonable instead to allow modest increases to retail rates, which have been kept artificially below market levels by the very system of subsidies that proponents seek to expand here. Indeed, when it recently reformed the nation's universal service and intercarrier compensation systems, the FCC explained that it "is inappropriate" to provide support through universal service funding mechanisms to subsidize local rates beyond what is necessary. "Doing

so," the FCC stated, "places an undue burden on the Fund and consumers that pay into it."[3] The FCC took notice of the fact that a number of local exchange companies, including those in Oregon and Washington, currently charge basic local exchange rates that are "significantly lower" than the national average.[4]

The MOU is fundamentally inconsistent with this aspect of the FCC's reform policies. In particular, the MOU provides that an RLEC could "apply [new] OUSF distributions for the purpose of keeping local service rates *lower than they might otherwise be required to be*." MOU at 4 (emphasis added). There is no rational basis for increasing the tax imposed on the customers of all other carriers in Oregon in order to subsidize artificially suppressed local exchange rates. Before expanding the OUSF and increasing distributions to rural carriers, the Commission should examine the local exchange rates those companies charge, and require those LECs with artificially suppressed rates to increase them to a more reasonable and sustainable level. In fact, when the FCC adopted universal service and intercarrier compensation reforms at the national level, it suggested that RLECs take advantage of the opportunity to seek additional revenues from their end user customers for regulated and unregulated services.[5] Additionally, as part of its reform efforts, the FCC concluded that a "Residential Rate Ceiling" of $30 per month "will help ensure that consumer rates remain affordable and set at reasonable levels."[6] Clearly, no

[3] *Connect America Fund*, WC Docket No. 10-90, *et al*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd 17633 (2011) at ¶237.

[4] *Id.* at ¶236 and fn. 381.

[5] *Id.* at ¶291.

[6] *Id.* at ¶¶913-916. The rates that comprise the "residential rate ceiling" include the flat rate for residential local service, mandatory extended area service charges, federal and state subscriber line charges, the federal access recovery charge, per-line state high cost contributions, state E911 charges, and state TRS charges. *Id.* at ¶914.

RLEC should be entitled to receive funds from the OUSF unless it can show that it complies with this element of the FCC's decision.

Reform of the OUSF should be consistent with related, ongoing FCC reforms. The MOU, however, would negate some of the benefits of the FCC's policy goals. The MOU would expressly permit RLECs to recover "amounts lost under the FCC's intercarrier compensation reform rules that are not replaced with federal support under the FCC's rules adopted in [the *Connect America Fund* order]." MOU at 4. The FCC made clear, however, that its "package of universal service reforms is targeted at eliminating inefficiencies and closing gaps in our system," "ensuring significant overall cost savings and improving incentives for rational investment and operation by rate-of-return carriers."[7] In addition, the FCC expressed its "belie[f] that the overall regulatory and revenue predictability and certainty for rate-of-return carriers under today's reforms will help facilitate access to capital and efficient network investment."[8] Moreover, the MOU's attempt to "compensate" RLECs for revenues lost as a result of FCC reforms is especially baffling because the FCC expressly provided for a complete revenue recovery solution – for both lost interstate *and intrastate* revenues – through the new federal end-user Access Recovery Charge and the spill-over universal service Access Recovery Mechanism. On this point, the FCC could not have been more clear that state action is not required and an additional state funding would simply be a windfall:

> In addition, as noted above, adopting a uniform federal transition and recovery mechanism will free states from potentially significant financial burdens. Our recovery mechanism will provide carriers with recovery for reductions to eligible interstate *and* intrastate revenue. As a result, states will not be required to bear the burden of establishing and funding state recovery mechanisms for intrastate access reductions, while states will continue to play a role in implementation.[9]

[7] *See, e.g., id.* at ¶¶ 287, 299.

[8] *Id.* at ¶291.

[9] *Id.* at ¶795 (emphasis in original).

The suggestion in the MOU that the OUSF may be used to provide "complementary" support to that available under new federal programs is also not a function of the "formula" the Commission established many years ago, or of the Commission's own universal service policies. The Commission should not authorize payments from the OUSF for a purpose that has not been previously authorized, and without a clear, fact-based evaluation that the use of such funds for that purpose is appropriate, consistent with the goals of the state's universal service program, a reasonable use of taxpayer funds, and otherwise in the public interest.

III. Concerns with the Amended MOU

Perhaps in acknowledgment of the problems identified above, the amended MOU makes three basic revisions to the original proposal. First, the Proponents assert that they will recommend to the Commission that it "open as soon as possible a generic docket to investigate reform of the Oregon Universal Service Fund." MOU at 5. Verizon supports this request because that type of investigation is appropriate and long over-due. The review must evaluate the issues described above, including the continued necessity and size of the fund. For example, the Commission must examine whether there remains a need to provide financial support to incumbent local exchange carriers, both RLECs and larger carriers, in order to subsidize "basic universal service." The industry has changed dramatically since the Commission last examined these questions, technology and the competitive landscape have been fundamentally altered, and the FCC has undertaken a fundamental re-examination of USF policies on a national scale. These developments compel a review of the policies underlying the OUSF and the programs that have been put in place. Accordingly, the Commission should adopt this suggestion and begin a thorough investigation and reform effort.

Second, Proponents now request that the MOU be in effect for up to one year, rather than three years, as initially proposed. MOU at 4-5. This would limit, to some extent, the negative impact of the substantial tax increase that the MOU would impose on Oregon consumers and other carriers. While Verizon has serious concerns with many provisions of the MOU, a one-year expansion of the OUSF is not as egregious and harmful as the original three-year expansion plan and tax increase. Moreover, the proposal for a one-year approval is tied to the first revision discussed above, because the revised MOU provides that it would terminate or expire once the Commission issues an order revising the OUSF. MOU at 4.

However, the Proponents also provide that the revised MOU "shall renew" for up to two additional one-year periods. MOU at 5. Presumably, although this is not stated explicitly, the renewal would occur only if the Commission does not complete its review of OUSF reforms within a year. Under the MOU, each one-year renewal would occur automatically without the Proponents taking any action. The MOU would place the burden on parties that object to the renewal to file an objection with the Commission to prevent the renewal from taking effect.

Verizon opposes the proposed renewal process. As stated above, the MOU is fraught with problems and will impose substantial costs on carriers and customers in Oregon. Limiting the harmful impacts to one-year is one thing, but it would be unreasonable to automatically prolong the harms and unreasonable policies inherent in the MOU for up to two additional years. The burden should not be placed on opponents to "stop the train." Rather, if the Proponents want to renew their plan, *they* should bear both the responsibility of timely requesting an extension *and* the burden of demonstrating good cause for doing so. If renewals are automatic, and higher surcharges and disbursements are guaranteed, the recipients of those funds will have less incentive to cooperate with the Commission's reform efforts, and help ensure that the

investigation is concluded in a reasonable time frame. Moreover, given the procedural shortcomings in this proceeding described above, Proponents bear some responsibility for demonstrating to the Commission that the plan they advocate is reasonable and in the public interest and should be continued until the Commission completes its consideration of needed OUSF reforms.

Accordingly, if the Commission is inclined to approve the MOU, Verizon recommends that the Commission adopt the following procedure, instead of the one set forth in Section D of the MOU:

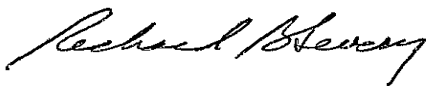
> The provisions in Section A of the Memorandum of Understanding ("MOU") will be in effect for one year, but may be terminated earlier upon the Commission's issuance of an order revising the Oregon Universal Service Fund; provided that the MOU may be renewed by the Commission, upon good cause shown, for no more than two successive one-year periods, at the request of the parties to the MOU. If the parties seek to extend the MOU beyond the initial one-year period, they must file a petition by March 1, 2013, or no later than March 1, 2014, for a second one-year renewal. The filing deadline is intended to afford all interested parties ample opportunity to review the request and to provide the Commission with their comments on the proposed renewal, and for the Commission to review any issues raised in advance of the June 30 expiration date of the MOU. Any renewal authorized by the Commission shall be subject to early termination upon the Commission issuing an order revising the Oregon Universal Service Fund.

IV. **Conclusion**

For the foregoing reasons, Verizon recommends that the Commission reject the MOU, and that it instead initiate a comprehensive investigation of the Oregon Universal Service Fund and implement needed reforms based on that review. If, however, the Commission is inclined to

approve some version of the MOU, then, at a minimum the Commission should adopt a different renewal process, as proposed above.

Respectfully submitted,



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June 1, 2012

Attorneys for Verizon

CERTIFICATE OF SERVICE
UM 1017

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 2535 W. Hillcrest Drive, Newbury Park, CA 91320; I have this day served a copy of the foregoing, **VERIZON'S COMMENTS ON JOINT MOTION TO APPROVE AND ACCEPT MEMORANDUM OF UNDERSTANDING** by electronic mail to those who have provided an e-mail address and by U.S. Mail to those who have not, on the service list.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of June, 2012 at Newbury Park, California.

JACQUE LOPEZ

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UM 1017

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