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DATED: 06/04/10

**AMENDED**

**URGENT NECA BROADBAND DATA REQUEST**

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Recently the FCC issued a Notice of Proposed Rulemaking (NPRM) and Notice of Inquiry (NOI) regarding proposed changes to the federal USF mechanisms that will be far reaching and impact each rural ILEC. On numerous occasions, FCC officials have made it clear that they are data oriented and want to see specific data to back up statements made in comments regarding their proposals. NECA, NTCA, OPASTCO and WTA have agreed to file joint comments in this proceeding and NECA has been asked to gather data to support these comments. NECA has been working with a group of key consultants to gather the data necessary for the joint comments and for comments by others in the proceeding so that companies will not be faced with multiple data requests. NECA is requesting data from all ILECs to determine the impact of modifying and limiting current USF mechanisms to shift support to broadband services and to quantify middle mile and second mile access and broadband. NECA is conducting a study to provide data for the joint comments responding to the FCC's NPRM and NOI and is seeking data from rural ILECs by June 18, 2010. Your data is vitally important as it will be used by NECA to advocate policy regarding the FCC's National Broadband Plan (NBP). The FCC is emphatic that it wants to see actual ILEC data rather than rhetoric; thus, your data is critical to prove to the FCC that rural ILECs continue to face high costs to serve rural America and need support to be continued at current levels.

All of the submitted data will be treated as confidential and only aggregated data will be included in comments to the FCC. NECA must compile the data and incorporate it into comments that are due on July 11<sup>th</sup>; hence, NECA needs the ILEC data by June 18<sup>th</sup>. The NECA data request is detailed and will provide crucial information to the FCC regarding the cost of running your local voice and broadband networks and the revenues you rely on to support those networks. NECA is seeking 10 year forecasts of all expenses and revenues associated with providing local voice and broadband services. NECA will use those forecasts to estimate the impact of the FCC's NPB. A second part of the data request looks at last mile broadband capabilities and services offered and the cost of providing middle mile elements of that service.

While the joint association comments will provide industry impacts, GVNW is also aware of the FCC's interest in seeing data from individual companies. Thus, GVNW will encourage individual ILECs to submit data and comments with the FCC. The deadline for filing data and comments as an individual ILEC filing with the FCC is **July 12<sup>th</sup>** with reply comments due on **August 11<sup>th</sup>**.



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ILECs can submit the completed spreadsheets to [mnovy@neca.org](mailto:mnovy@neca.org). The middle-mile data request can alternatively be submitted using the online NECA data collections website at [www.neca.org](http://www.neca.org), going to the NECA Data collections. GVNW's cost consultants are ready to assist with preparing and submitting data to NECA's data request and will be contacting you to see if you would like assistance in this important effort. For assistance in responding to the data request, please contact your GVNW consultant.