S T A T E   O F   M I C H I G A N

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission's own motion, to solicit public comments regarding the Commission's administration of the Federal Communications Commission's order on comprehensive Universal Service Fund and Intercarrier Compensation reform.	Case No. U-16943

At the April 17, 2012 meeting of the Michigan Public Service Commission in Lansing, Michigan.

PRESENT: Hon. John D. Quackenbush, Chairman
Hon. Orjiakor N. Isiogu, Commissioner
Hon. Greg R. White, Commissioner

ORDER

On January 12, 2012, the Commission issued an order commencing this proceeding pursuant to the Michigan Telecommunications Act, MCL 484.2101 *et seq.,* (MTA), seeking comments on Federal Communications Commission (FCC) order FCC 11-161, WC Docket No. 10-90 *et al*, *Report and Order and Further Notice of Proposed Rulemaking,* issued on November 18, 2011, (FCC order). The FCC order was intended to modernize systems related to universal service and intercarrier compensation arrangements. As noted in the January 12, 2012 order, the FCC order requires bill-and-keep as the end-state, default method for all intercarrier compensation traffic, including intrastate switched toll access traffic, and provides a path for certain types of traffic to transition from current rates to bill-and-keep rates. To that end, the FCC order requires all providers to transition to terminating intrastate switched access rates at levels no higher than corresponding interstate rates by July 1, 2013. Specifically, the Commission's January 12, 2012 order sought comment on: (1) the effect the FCC order will have on the access restructuring mechanism (ARM) adopted in Case No. U-16183; (2) intrastate switched toll access tariff rates and filings, and (3) other issues relevant to the Commission's administration of the MTA.

By February 13, 2012, the Commission had received comments from the Telecommunications Association of Michigan (TAM), ACD Telecom, Clear Rate Communications, TCS Telecom, and TelNet Worldwide, (collectively, the CLECs), the Michigan Cable Telecommunications Association (MCTA), Michigan Bell Telephone Company, d/b/a AT&T Michigan (AT&T Michigan), Frontier North Inc., Frontier Midstates Inc., Frontier Communications of Michigan, Frontier Communications of America, and Frontier Online and Long Distance Company (collectively, Frontier), and CenturyLink. By March 13, 2012, the Commission received reply comments from the Commission Staff (Staff), MCTA, AT&T Michigan, TAM, Frontier, and the CLECs.

The comments filed by AT&T Michigan, TAM, Frontier, CenturyLink, and the Staff reflect a general understanding that the provisions of the FCC's order and MCL 484.2310 (Section 310) requirements are complementary and can work together with limited modifications. CenturyLink affirmatively states that there is nothing the Commission must do at this time because the two forms of access reform are compatible. However, the CLECs take the position that the FCC order preempts the MTA. MCTA's comments focus mainly on procedural issues in this case, with responses to other parties in its reply comments. The Staff's reply comments summarize the positions of the commenters and make recommendations for the issues raised.

Discussion

Preemption and Access Rate Reductions

The FCC order provides that terminating intrastate access rates should be at parity with interstate access rates for the same service. For those carriers that currently charge more for intrastate access than for interstate access, the order prescribes a reduction path to bring the respective rates to parity by July 1, 2013. The order provides for a two-step reduction. By July 1, 2012, carriers should reduce the difference by 50% and be at parity by July 1, 2013. The FCC order provides for the eventual requirement that intercarrier compensation be a bill-and-keep system. The latest date for compliance with that requirement is July 1, 2020.

The MTA, on the other hand, provides for up to a five-year transition with annual reductions of at least 20% of the differential between intrastate and interstate access rates (terminating and originating). In the state statutory scheme, parity between intrastate and interstate access rates would be achieved no later than January 1, 2015. MCL 484.2310(2).

The CLECs argue that the FCC order preempts the MTA and any Commission orders with respect to all intrastate access reform. They insist that the FCC's scheme of two reductions (50% each) of the difference between intrastate and interstate access rates should prevail and that, therefore, the state statutory schedule of 20% per year over a period of five years should be disregarded as of the effective date of the FCC order. They argue that because the FCC order became effective on December 29, 2011, the default transition plan described in the FCC order, which provides for the first reduction on July 1, 2012, supersedes the access rate reduction required by the MTA, which would require a 20% reduction as of January 1, 2012. Thus, they argue, there was no need to reduce intrastate access rates on January 1, 2012 as otherwise required by Section 310(2). Although the CLECs acknowledge that the FCC order permits states to reduce the differential between current intrastate and interstate access rates more quickly than the FCC requires, they argue that requiring the January state reduction would actually delay the implementation of the plan put in place in the FCC order.

Moreover, the CLECs argue, the FCC order indicates that there should be no changes in originating access rates at this time. Thus, they argue no reduction in those rates should occur either.

The Staff and AT&T Michigan respond that the CLECs propose an incorrect interpretation of the legal effect of the FCC order. The Staff points out that with respect to originating access, there is no conflict between the FCC order and the MTA, because the former deals solely with terminating access rate reform. TAM notes that the FCC left unchanged "other intrastate access rates, including originating switched access, common transport, and dedicated transport service rates." TAM comments, p. 3. Although the FCC order imposed a cap on originating intrastate access rates, it did not require a reduction, nor map a different path for reducing those rates. Therefore, TAM argues there is no conflict with the FCC order in relation to originating intrastate access rates.

AT&T Michigan argues that there can be no preemption with regard to state access reform because: (1) the reductions required under Michigan statute are completely consistent with the reductions required by the FCC order; (2) the CLECs are no worse off under the combined effect of the state and federal plans than they would be under either set of reductions, standing alone; and (3) the FCC order does not address the reductions in intrastate originating switched access required by Section 310. AT&T Michigan points out however, that after the January 1, 2012 reduction, the FCC order's plan would control, as its reductions to parity are quicker than those required by the Michigan statute.

AT&T Michigan further argues that the CLECs' position concerning originating access is also without merit. It points out that the CLECs' citations to paragraphs in the FCC order actually impose a rate cap on originating intrastate access, not a rate freeze. Thus, there is no inconsistency with continuing on the path reducing these rates under the MTA. AT&T Michigan points to the following language:

> To the extent that states have established rate reduction transitions for rate elements not reduced in this Order, nothing in the Order impacts such transitions. . . . Nor does this Order prevent states from reducing rates on a faster transition provided that states provide any additional recovery support that may be needed as a result of a faster transition.

FCC Order 11-161, fn 1542.

The Commission finds that for originating intrastate access rates, there is no preemption, because the FCC order explicitly leaves originating access alone, but does not preclude state reductions, as long as the state provides whatever cost recovery is deemed necessary. This, the MTA provides. Therefore, the scheduled reduction in any disparity between a carrier's originating intrastate and interstate access rates should remain in place, and the January 1, 2012 reductions were required to be made. Further, the Commission retains authority to administer that transition to parity between inter- and intrastate originating access rates. *See*, FCC order, paragraph 816, fn 1542. The only requirement is that any cost recovery permitted for those adjustments required by the state also come from the state.

As to terminating access rates, the Commission is persuaded that the reductions required by the MTA for January 1, 2012 are not preempted by the FCC order and should have been put in place by all affected carriers. The FCC order explicitly states that it does not preempt state programs that bring the intrastate and interstate access rates to parity more quickly than the FCC scheme. The Commission rejects the CLECs' argument that making the January 1, 2012 reduction would actually delay access reform as contemplated in the FCC order. The January reduction moves intrastate terminating access rates closer to parity with their interstate counterparts more quickly than the scheme in the FCC order. Thus, the January 1, 2012 reduction is not inconsistent with the FCC order and must be made. By July 1, 2012, the CLECs must also reduce the disparity that existed on December 29, 2011 by 50%. *See*, 47 CFR 51.911(b). There is no conflict in these two reductions, and thus, no preemption argument can prevail.

The Commission directs that any provider that has not filed revised tariffs for the January 1, 2012 required reduction in intrastate access rates shall do so no later than 15 days from the date of this order.

<u>Compliance</u>

AT&T Michigan suggests in its comments and reply comments that the Commission require providers to demonstrate that they are making the correct access charge reductions by filing a copy of the affected tariff pages in this proceeding. In that manner, AT&T Michigan suggests that other carriers can assist the Commission to monitor compliance with the rate reduction requirements of the MTA and the FCC order. It notes that such a filing requirement would have assisted the industry to confirm that the state required reductions in intrastate access charges were completed on January 1, 2012.

Moreover, AT&T Michigan suggests that the Commission require this information on an ongoing basis. It argues that CLECs that are not mirroring federal interstate access rates should be required to provide data that supports their proposed rate reductions by July 1, 2012. It insists that there will be a deluge of information for the Staff to review in a timely manner. It suggests that the public filings should be required by May 1, 2012.

AT&T Michigan asserts that to the extent that the information required by these filings is considered confidential, it can be filed pursuant to protective order, and as proposed in a form attached to its reply comments.

Frontier reply comments agree with AT&T Michigan with respect to directing providers to file documentation in this docket to demonstrate compliance with the mandates of the MTA.

The Commission is not persuaded that expanding this docket with the tariffs and documentation suggested by AT&T Michigan is necessary for enforcing the requirements of the MTA or the FCC order. Such a direction would likely yield more confusion than value. The Staff has historically received tariff filings and reviewed documentation related to these issues without the aid of industry members, and the Commission remains comfortable that the Staff is capable of continuing its regulatory role.

Operation of the ARM

The CLECs argue that the ARM has been preempted by the FCC order, which they argue has put in place a comprehensive scheme for replacing lost revenue associated with intrastate access revenues. They argue that the ability of incumbent local exchange carriers (ILECs) to obtain recovery of these revenues under the Michigan statute is thus preempted. Therefore, they insist, the ARM should be discontinued.

TAM argues that the CLECs are incorrect that the ARM is preempted and is no longer necessary. It states that the FCC concluded that a state recovery mechanism was a necessary condition for any state program that reduced certain access rates on a faster timetable than required by the FCC. TAM argues that there is no legal or policy basis for discontinuing or reducing the ARM. TAM agrees with AT&T Michigan and adds that the FCC expressly permitted state access reform mechanism to continue as long as they are not inconsistent with the specific requirements or restrictions in the FCC order.

The Staff and AT&T Michigan agree that the ARM is not preempted by the FCC order. The Staff argues that the FCC order outlines a recovery mechanism for changes in rates specific to the FCC's default transition path, which became effective December 29, 2011. On the other hand the Staff states, the Michigan statute provided the ARM to address the rate transition that lowered the state's rural local incumbent exchange carriers (rural ILECs) intrastate access rates to interstate levels, and that the ARM is for recovering lost revenues pursuant to the reductions required under the Michigan statute. The Staff argues that if the ARM is eliminated, the rural ILECs will suffer unduly, and a key component of Michigan's access reform legislation would be nullified. It points out that the FCC order permits state recovery mechanisms. The Staff notes that Michigan intra-state reform for rural ILECs was completed September 13, 2010, much faster than the FCC order's default path. Thus, the ARM continues without preemption to provide recovery for those reforms. The Staff suggests that the Commission direct any providers that are delinquent in their payments to the ARM become current immediately.

The Commission agrees with TAM, AT&T Michigan, and the Staff on this issue. There is no preemption because the provisions for recovery can work in tandem and complement one another. The federal recovery mechanism from the FCC order is intended to replace lost revenues associated with the reductions required by that order. Despite the differences in calculation and eligibility between the two, the Commission finds that the Michigan ARM is not inconsistent with the FCC order. It is thus expressly permitted and not preempted.

Adjustments to the ARM

In its comments, AT&T Michigan suggested that the Commission should take the opportunity to make changes in the manner that the ARM operates in order to avoid an anomaly that will occur in the recalculations provided for in Section 310(16). AT&T Michigan recommends that the Commission resize the terminating switched access component of the ARM to prevent double recovery after the first recalculations mandated for September 2014. It argues that Section 310(18) provides the Commission full authority to modify the size, operation, or composition of the restructuring mechanism should it determine that it is warranted. It further recommends that the Commission indicate that this is a contested case to prevent later arguments that it followed an improper procedure.

In its reply comments, AT&T Michigan requests that if the Commission views the statute as not providing it with authority to alter the ARM, it should say so in this order so that the industry has an opportunity to obtain relief.

In its reply comments, TAM disagrees with AT&T Michigan's assertion that the ARM, as recalculated in September 2014, will produce an improper increase in the ARM size, or be in anyway inconsistent with the MTA. TAM acknowledges that reductions in the rates for certain terminating switched access rate elements that the FCC order requires by July 1, 2014 will most likely result in a bigger rate differential between intrastate and interstate switched access rates than the differential that existed in 2010, which the Commission used to determine the initial size of the ARM. However, TAM disagrees that this differential will produce an improper increase in the size of the ARM or is somehow inconsistent with the MTA. Moreover, it argues, it is premature to take any steps to modify the recalculation procedure now -- more than two years before the first recalculation.

TAM argues that it is mere speculation to conclude that the September 2014 recalculation will increase any ARM amount for any eligible provider. It points out that determining the differential is only the first step of the recalculation. The result will be reduced by the percentage decrease in access lines in service for each eligible provider between December 31, 2008 and December 31, 2012. TAM states that there has been a 23.2% decrease in access lines in service for all eligible providers from December 2008 through December 2010. Assuming that trend continues, TAM argues, the reduction in service lines is likely to be around 40%, which would result in a net decrease in the ARM distribution to eligible providers, even with the larger expected differential in access rates.

Further, TAM argues, the reduction of switched access rates to levels below parity are only for terminating access rates. It states that the ARM distributions based on the reductions in originating switched and tandem switched transport access revenues are not affected by the FCC order.

The Staff acknowledges that there may be merit to AT&T Michigan's claims given the timing of reductions under the FCC order and the recalculation required under Section 310(16). Pursuant to the FCC order, by September 2014, the time that the first recalculation will occur for the ARM, terminating intrastate access rates will be below the interstate rates in effect today. It further states that by September 2018, the date for the second recalculation, terminating switched end office intrastate access rates will be reduced even further. According to the formula in the MTA, the recalculation will likely increase the size of the ARM, thereby increasing the contribution percentage for providers. Also, the Staff notes that the FCC order provides a recovery method for the further transition toward bill-and-keep. Thus, it states, it is possible that without modification of the ARM's calculation method, the rural ILECs might recover revenues from both sources, thus creating a double recovery.

The Staff further notes that the FCC has issued subsequent clarification and reconsideration orders regarding the order at issue here, and may issue further orders. Also, the Staff notes that the FCC order is currently on appeal, and in a Further Notice of Proposed Rulemaking, the FCC stated that it would be considering changes to the originating side of access charges. In light of the uncertainties created by these facts, the Staff recommends that the Commission not take any immediate action on this issue. Rather, the Staff recommends that the Commission consider the issues raised here when making a determination on the issue sometime in the future.

The Commission finds that there is no current basis on which to alter the size, operation, or composition of the ARM. The FCC order does not alter the reductions that the state statute has required, and thus, the amounts that need to be recovered. The noted potential problem is not projected to exist until 2014 at the time of recalculating the ARM. That recalculation is statutorily prescribed in detail, with no indication that the Commission may alter it in any way absent a federal action after which there is a contested case proceeding commenced within 60 days.

In the next Section, the Commission addresses the suggestion that this matter be considered a contested case under the Michigan Administrative Procedures Act (MAPA), MCL 24.201 *et seq.* However, in a related argument, AT&T Michigan suggests that if the Commission declines to rule now on the 2014 recalculation, it should at least hold this case open until it becomes clear whether there is a need for resizing. Even if this proceeding were to be considered a contested case, the suggestion to merely leave it open would not be lawful. MCL 484.2203 requires that the Commission observe certain deadlines for resolving cases that contemplates efficient processing, and does not permit the open-ended docket that AT&T Michigan appears to propose.

Contested Case

In its comments, MCTA argues that the MTA requires that this proceeding be conducted as a contested case. It notes that Section 310(18) provides that should federal intercarrier compensation reform occur, the Commission or an interested party may file an application within 60 days of the federal action to determine whether any modifications to the size, operation, or composition of the restructuring mechanism are warranted. MCTA argues that the FCC order is exactly the type of action the legislature had in mind that would trigger the option of Section 310(18). MCTA notes that the Commission began the present case within the required 60 days of the FCC order, but MCTA is concerned that the statute requires an application be filed under MCL 484.2203, which, it argues, provides for proceedings to be conducted under the contested case provisions of the Michigan Administrative Procedures Act, MCL 24.201 *et seq*.

AT&T Michigan agrees that if the Commission fixes "the anomaly" discussed in the previous section, it should conduct this proceeding as a contested case. However, AT&T Michigan states that a contested case is not required for addressing tariff filings.

In its reply comments, Frontier agrees with MCTA that a contested case is needed for this proceeding in order to avoid a later challenge of a procedural defect. In its view, conducting a contested case proceeding would afford the proper framework to examine the impact of the FCC order.

TAM responds that MCTA's argument that any proceeding commenced by the Commission pursuant to Section 310(18) must be a contested case is not correct. It argues that Section 203(1) contains the permissive "may" in reference to use of contested case proceedings. It notes that there have been numerous Commission proceedings conducted as a form of legislative-like inquiry in which the record created consisted of comments submitted by the parties. TAM argues that use of comment proceedings in cases in which individual rights are not adjudicated has withstood legal challenges.

The Commission acknowledges that the statute permits it to commence a contested case proceeding to determine whether any modification to the size, operation, or composition of the restructuring mechanism is warranted. MCL 24.203(3) defines a contested case as "a proceeding, including rate-making, price-fixing, and licensing, in which a determination of the legal rights, duties, or privileges of a named party is required by law to be made by an agency after an opportunity for an evidentiary hearing." In the Commission's view, the issues decided today are legal issues, not conducive to, nor requiring the holding of an evidentiary hearing. At this juncture, the Commission is not persuaded that it need go further in its examination of the FCC order than the two legal issues resolved in this order. Specifically, the Commission recognizes that the FCC order does not preempt the operation of the ARM as it is now established, and finds that the FCC order did not preempt the required January 1, 2012 reduction in intrastate access rates of affected providers. Neither of these issues requires an evidentiary record to reach a lawful conclusion.

Proceeding Concerning Voice Over Internet Protocol (VoIP)

In its comments, AT&T recommends that the Commission initiate a new proceeding under Section 310(13) to examine whether VoIP providers should contribute to the ARM. It points to Section 310(12), which specifically exempts VoIP providers from any obligation to contribute to the ARM and then to Section 310(13), which states:

> Notwithstanding anything in subsection (12), if the federal communications commission determines that internet protocol services may be subject to state regulation for universal service purposes, the commission may open a proceeding to determine who is required to participate in a universal service fund.

AT&T Michigan argues that the FCC has ruled state universal service fund contribution rules for interconnected VoIP providers are not preempted if they are consistent with the FCC's contribution rules for interconnected VoIP providers and if the state commission does not enforce intrastate universal service assessments with respect to revenues associated with interconnected VoIP services provided in another state.

In reply, MCTA argues that AT&T Michigan's request is outside the scope of this proceeding and ignores that Section 310(12) excludes interconnected VoIP providers from contributing to the ARM. MCTA argues that the Commission took the position in a proceeding before the FCC that the ARM is not a universal service fund.

The Commission declines to address this issue in this proceeding as it is outside the scope of the order commencing this case. Further, the FCC finding relied upon by AT&T Michigan's argument is a separate order from the one with which the Commission is concerned in this proceeding. Moreover, the Commission finds nothing in AT&T Michigan's argument that would lead to the conclusion that VoIP providers could be required to contribute to the ARM in light of the specific statutory preclusion of such an imposition.

Allegations of Overrecovery by Certain Providers

In its comments, Frontier argues that there are 28 providers that have actually increased their access rates, yet are receiving ARM disbursements. It alleges that these 28 eligible carriers receive approximately 37% of the total ARM disbursements. It requests that the Commission reduce the annual disbursement for these providers and reduce the percentage required of contributing carriers.

TAM responds that all 28 carriers with which Frontier takes issue in this argument are TAM members and members of the National Exchange Carrier Association (NECA), which establishes interstate access rates for its hundreds of pool member local exchange carriers based on financial data including revenues, costs, and demand quantities reported annually to the NECA. It points to the discussion on the development of interstate switched access rates in an attachment to its replies and argues that there is no opportunity for these 28 members to manipulate or game the processes used by NECA to set interstate access rates for its members.

Further TAM argues, these providers filed state tariff revisions for intrastate switched access rates effective September 13, 2010 to mirror the interstate switched access rates filed by NECA with the FCC as of July 1, 2010. Some rate elements increased, some decreased from the previous filing. However, TAM asserts, the eligible carriers were merely doing what was required of them by the MTA and the Commission's orders in Case No. U-16183. It argues that Frontier's request to reduce the disbursement for the 28 TAM members and reallocate that amount to CenturyTel has no basis in statute or policy and should be rejected.

The Commission is not persuaded that any action need be taken with respect to this issue at this time. Although Frontier appears to believe that these 28 providers acted in a way that violates some policy or principle, there is no allegation or evidence that the TAM members have violated any statute or rule concerning their reporting or their receipt of disbursements from the ARM. If Frontier believes there has been a violation, it may make a request for redress in an appropriately filed proceeding.

THEREFORE, IT IS ORDERED that:

A. FCC Order 11-161 did not preempt the reduction in access charges required under the Michigan Telecommunications Act, or the access restructuring mechanism provisions of that act. Any provider that has failed to comply with these requirements shall rectify that situation within 15 days of this order.

B. No further Commission action is required at this time, and this case is closed.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so by the filing of a claim of appeal in the Michigan Court of Appeals within 30 days of the issuance of this order, under MCL 484.2203(12).

MICHIGAN PUBLIC SERVICE COMMISSION

John D. Quackenbush

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John D. Quackenbush, Chairman

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Orjiakor N. Isiogu, Commissioner

Greg R. White

____
Greg R. White, Commissioner

By its action of April 17, 2012.

Mary Jo Kunkle

____
Mary Jo Kunkle, Executive Secretary

PROOF OF SERVICE

STATE OF MICHIGAN)

Case No. U-16943

County of Ingham)

Mignon Middlebrook being duly sworn, deposes and says that on April 17, 2012 A.D. she served a copy of the attached Commission Order by first class mail, postage prepaid, or by inter-departmental mail, to the persons as shown on the attached service list.

Mignon Middlebrook

Digitally signed by Mignon Middlebrook
DN: cn=Mignon Middlebrook, c=US, email=middlebrookm@michigan.gov
Date: 2012.04.17 16:07:01 -04'00'

Mignon Middlebrook

Subscribed and sworn to before me
This 17th day of April 2012

Gloria Pearl Jones
Notary Public, Ingham County, MI
My commission expires June 5, 2016
Acting in Eaton County

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P R O O F   O F   S E R V I C E

STATE OF MICHIGAN)

Case No. U-16943

County of Ingham)

Lisa Felice being duly sworn, deposes and says that on April 17, 2012 A.D. she served a copy of the attached **Commission Order (Commission's Own Motion) via e-mail transmission**, to the persons as shown on the attached service list (Listserv Distribution List).

Lisa Felice

Lisa Felice

Subscribed and sworn to before me
this 17th day of April 2012

Gloria Pearl Jones

Gloria Pearl Jones
Notary Public, Ingham County, MI
As acting in Eaton County
My Commission Expires June 5, 2016

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