

and ETCs are subject to the federal definition of supported services, what hardship is imposed by having the IUSF reflect current standards for supported networks?

- A-1. The IBTA does not believe there would be any hardship, per se, imposed by having the IUSF reflect current standards for supported networks. The IBTA's testimony acknowledges that all of the IBTA's members that are receiving IUSF disbursements are ETCs and therefore providing the supported services as currently defined in 47 CFR 54.101. However, the Settling Parties³ to the Joint Settlement Agreement (the "Settlement Agreement") that was filed on May 24, 2018 in the above-captioned Cause recommended the Commission maintain the status quo for the IUSF and therefore the Settling Parties did not want any changes made to the IUSF.**

The IBTA recommends all IUSF provisions remain intact, consistent with the Settlement Agreement, with no changes to the IUSF supported services definition, but suggested that if the Commission wanted to consider a definition of supported services for IUSF recipients that is different from the existing IUSF definition, it would not be through this triennial review, but a future proceeding. For example, a request by an eligible IUSF recipient to relinquish its ETC designation may be the appropriate context. The IUSF settlement agreement approved by the Commission in its March 17, 2004 Order in Cause No. 42144 in Section 20 allows a Rural Local Exchange Carrier ("RLEC") to petition the Commission for consideration of an IUSF variance.

- Q-3. Mr. Matsumoto states in his testimony on page 7 that "the creation of the broadband grant program and the Commission's report on IUSF and broadband deployment could have major implications on the IUSF and a comprehensive study of these topics necessitates a wide-ranging investigation beyond the scope of the IUSF triennial review proceeding". Please provide further details, including what should be studied.**

- A-3. The Commission approved IUSF settlement agreement in Cause No. 42144 provided the purpose and scope of the IUSF triennial review:**

The primary purpose and scope of the reviews shall be (1) to ensure that the operations of the IUSF are meeting the Commission's objectives of preserving and advancing universal service within the state of Indiana, (2) to ensure that universal service is continuing to be made available at rates reasonably comparable to rates for basic residential and single-line business local exchange service in urban areas, and that are just, reasonable and affordable, (3) to ensure that the processes, funding levels, size, and the operation and administration of the IUSF remain adequate and sufficient, and (4) to review the operation of the IUSF relative to the federal IUSF as may be appropriate.⁴

³ The Indiana Exchange Carrier Association, Inc. ("INECA"), the Indiana Broadband and Technology Association, Inc., the Century Link entities, and the Frontier entities.

⁴ Order in IURC Cause No. 42144, dated March 17, 2004, at pp. 11-12.

The IBTA testimony provided support that the IUSF is currently accomplishing the Commission’s objectives of preserving and advancing universal service within the State of Indiana, that universal service is continuing to be made available at just, reasonable and affordable rates that are reasonably comparable to local exchange service rates in urban areas, and to ensure that the processes, funding levels, size, and the operation and administration of the IUSF remain adequate and sufficient. I know from firsthand experience as a member of the IUSF Oversight Committee, that the processes, funding levels, size, and the operation and administration of the IUSF remain adequate and sufficient for contributing and recipient carriers. Given the indeterminate full impact of the FCC’s Universal Service Fund and Intercarrier Compensation reform, the IBTA believes maintaining the status quo with respect to the IUSF is appropriate at this time for the reasons stated in its testimony. The IBTA believes Commission approval of the Settlement Agreement would satisfy the Commission’s identified purpose and scope of the triennial review and such approval would serve the public interest to conclude the IUSF triennial review.

The IBTA believes that through the Settlement Agreement the purpose and scope of the IUSF triennial review have been met. Any potential Commission consideration of a broadband grant program and the Commission’s IUSF-Broadband Study are clearly beyond the scope of the IUSF triennial review proceeding. In fact, the Commission issued General Administrative Order (“GAO”) 2018-03 - IUSF-Broadband Study to comprehensively study these topics. The IBTA and the other Settling Parties recommend maintaining the status quo for the IUSF. The IUSF was never designed to support broadband, so consideration of a broadband grant program that could potentially be funded through the IUSF would fundamentally alter the purpose, scope, and intended use of the IUSF and would necessitate a wide-ranging investigation of the IUSF. For example, subjects to be studied include the determination of how and where broadband support should be made available and which entities would be eligible to receive support, the funding mechanism for broadband support and how contributions are to be recovered, and even administration of the IUSF would need to be examined since the contract with Solix, Inc. (“Solix”), the Independent Third-Party Administrator of the IUSF reflects the operations and administration of the IUSF as it exists today.

- Q-4. Mr. Matsumoto states in his testimony on page 18, lines 13-16, seems to indicate that supported services in 47 CFR 54.101 could be reviewed at such a time an RLEC relinquishes its ETC designation and a new ETC seeks IUSF. Please explain further.**
- A-4. Please see response A-1., above. The IBTA recommends no changes to the IUSF supported services, in accordance with the Settlement Agreement. However, the IBTA testimony indicated that if the Commission wanted to review the definition of supported services for IUSF recipients that is different from the existing IUSF definition, a future proceeding, such as a request by an eligible IUSF recipient to relinquish its ETC designation, may be appropriate. The testimony on page 18, lines 13-16, does not address “a new ETC seeks IUSF,” but the IBTA maintains such a hypothetical situation would not be addressed in this triennial review.**

Responsible witness: Alan I. Matsumoto
CenturyLink State Regulatory and Legislative Affairs

Respectfully submitted,

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VERIFIED STATEMENT OF ALAN I. MATSUMOTO

Alan I. Matsumoto, upon oath, deposes and states:

I am employed by CenturyLink as State Regulatory and Legislative Affairs Manager. CenturyLink is a member of the IBTA. I chair the IBTA's Regulatory Committee and am authorized to file responses to the Commission's Docket Entry on its behalf. In that capacity, I have personal knowledge of the foregoing Responses to the Commission's June 28, 2018 Docket Entry and am familiar with the facts stated therein.

The statements in the Responses to the Commission's June 28, 2018 Docket Entry are true to the best of my information, knowledge, and belief.

I affirm, under the penalties for perjury, that the foregoing representations are true to the best of my knowledge, information, and belief.

Dated: June 28, 2018

A handwritten signature in black ink, appearing to read "Alan I. Matsumoto", written over a horizontal line.

Alan I. Matsumoto

CERTIFICATE OF SERVICE
IURC CAUSE NO. 45064

The undersigned counsel hereby certifies that on the 28th day of June 2018, the foregoing “The Indiana Broadband and Technology Association’s Responses to the Commission’s June 25, 2018 Docket Entry” was filed through the Commission’s Electronic Filing System (“EFS”) and a copy was served upon the following counsel by placing a copy in U.S. first class mail prepaid, by hand delivery, by facsimile, and/or electronic transmission, addressed to:

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