

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE STATE RURAL)
UNIVERSAL SERVICE FUND 2018)
SURCHARGE CALCULATION, OR IN THE) Case No. 17-00202-UT
ALTERNATIVE, FOR CONNECTION FIXED)
CHARGE CALCULATION AND FUND SIZE)**

FINAL ORDER ADOPTING RECOMMENDED DECISION

THIS MATTER comes before the New Mexico Public Regulation Commission (“Commission”) upon the recommended decision described below.

Whereupon, being duly informed,

THE COMMISSION FINDS AND CONCLUDES AS FOLLOWS:

1. Presiding Officer and Commissioner Patrick H. Lyons issued his Recommended Decision in this case on August 16, 2018 (the “RD”).

2. Pursuant to the Order Setting Shortened Time Period for Exceptions to Recommended Decision; Setting Page Limit for Exceptions; and Eliminating Responses to Exceptions, issued by Commissioner Lyons on August 16, 2018, exceptions were filed on August 20, 2018, by Comcast Phone of New Mexico, LLC (“Comcast”), and CTIA – The Wireless Association (“CTIA”).

3. The Commission has jurisdiction over the parties and the subject matter of this case.

4. The Commission addresses the exceptions of Comcast and CTIA as follows:

Exception 1 – The Use of New Mexico E-911 Counts as a Proxy Should Be Mandatory

5. Comcast argues that the RD’s allowance for a carrier’s New Mexico E-911 connection counts to be used as a proxy for its “communications connections” during the

transition period should be mandatory, not permissive. Comcast contends that providing a voluntary option creates a risk that all providers will not count their connections in the same way, resulting in a per-connection charge that is not “competitively neutral and auditable.” Comcast asserts that this problem will be “particularly acute regarding VoIP over-the-top providers and providers who have business customers with multiple lines.”

6. The Commission rejects this exception. It is not clear, and it does not appear that Comcast is arguing, that E-911 connection counts will be identical to “communication connection” counts under the Rural Telecommunications Act of New Mexico (the “RTA”), NMSA 1978, Section 63-9H-6. Therefore, the use of E-911 counts as a proxy for communication connection counts should only be a temporary expedient during the transitional period. Moreover, this temporary expedient should only be available as a backup provision for those carriers that are unable to implement in a timely manner the RTA’s definition of “communication connection.”

Exception 2 – The Per-Connection Charge May Burden Interstate Revenue, and Thus, Violate Federal Law

7. As it did in its comments in this matter, CTIA argues in its exceptions that the per-connection charge is inconsistent with the FCC’s universal service rules and that the per-connection charge may burden the mechanism for funding the federal universal service fund by taxing interstate revenue. CTIA further notes that the Commission has not undertaken any examination of rate plans in the market to determine whether a per-connection charge would collect more than 100% of intrastate revenue.

8. The Commission rejects this exception. The Commission adopts and incorporates herein by reference the arguments referenced in the RD with regard to CTIA’s objections on

these same grounds. Moreover, with regard to CTIA's contention that the per-connection charge might collect more than 100% of intrastate revenue, the Commission rejects this contention. The amount to be collected is determined by the needs of the State Rural Universal Service Fund (the "SRUSF"), not by the method of collection. This amount is far less than 100% of intrastate revenue as is demonstrated by the fact that the percentage-of-intrastate-revenue surcharge currently in place is 6.06%. Though that surcharge would have needed to be increased, as projected by the Fund Administrator, that surcharge would have remained far below 100%. Thus, the per-connection charge, collecting the same amount, will collect far less than 100% of intrastate revenue.

Exception 3 – The Per-Connection Charge Is Regressive and Will Shift the Funding Burden to Those Less Able to Afford It

9. As it did in its comments in this matter, CTIA argues in its exceptions that the per-connection charge is regressive and that it will shift the SRUSF burden from those that are more able to afford it to those that are less able.

10. The Commission rejects this exception. The Commission adopts and incorporates herein by reference the arguments referenced in the RD with regard to CTIA's objections on these same grounds.

Exception 4 – The Commission's Rule Requires That Carriers Recover the Amount of Contributions from Their Customers, and There Will Not Be Time for All Carriers to Implement the Change in Billing On or Before October 1, 2018 (and Related Exceptions Regarding Timing)

11. CTIA argues that, with regard to the issue of implementation of the per-connection charge, the RD relies upon CenturyLink's contention that "the obligation to pay the

surcharge is on the provider, not the consumer.” CTIA further argues that this contention is contrary to the Commission’s SRUSF rule, which provides that “[a] contributing company shall recover the amount of its contributions to the fund from its end-user customers . . .” 17.11.10.21 NMAC. CTIA contends that the Commission cannot, without violating its own rules, adopt a surcharge methodology unless it allows carriers adequate time to “operationalize such methodology . . .”

12. The Commission rejects this exception. The RD provides for a transition period stretching from the issuance of this order through the end of 2018. Based upon the record of this proceeding, this should provide more than sufficient time for all carriers to transition their systems. During the transition period, the Commission is allowing carriers to use a system that they should already have in place, the E-911 system, as a proxy should any carriers find themselves unable to transition fully as of October 1, 2018

13. The Commission also rejects CTIA’s exception with regard to the use of E-911 as a proxy. CTIA argues that there are “significant differences” between the E-911 communication counts and those provided under the RTA and that the calculation of the E-911 connections relies on data from another governmental entity not under the jurisdiction of the Commission. CTIA’s exception ignores that the use of E-911 counts would be only a temporary expedient during the transitional period for those carriers that find that that are unable to transition as of October 1, 2018. The Commission further notes CTIA’s own comments at the hearing that some, if not all, of the wireless carriers would be able to make the transition on or before October 1, 2018.

14. The Commission also rejects CTIA’s arguments concerning the timing of this proceeding and the implementation of the per-connection charge. The Commission notes that it began seeking information from carriers concerning their communication connections on August

30, 2017. It is disingenuous, to say the least, for carriers to behave as if the Commission's decision to make the transition to a per-connection charge regime has come as a surprise. The record in this matter indicates that there has been a lack of cooperation and a tendency to delay by some carriers. The Commission will not reward such obstinacy by indulging requests for further delay.

Exception 5 – Certain Segments of the Industry, Such as Intrastate Toll, that Currently Contribute to the SRUSF, Would Not Contribute Under a Per-Connection Charge Regime

15. CTIA argues that “[c]ertain segments of the industry, such as intrastate toll, that currently contribute to the SRUSF based on their revenues would be absolved of their obligation to contribute to the SRUSF” CTIA states that this is “poor policy and would create competitive imbalance in the telecommunications marketplace.”

16. The Commission rejects this exception. The Commission first notes that this exception by CTIA is unclear, particularly with regard to what other “segments of the industry” CTIA is referencing. Also, CTIA does not bother to explain how it is that intrastate toll is included within a percentage-of-intrastate revenue surcharge regime but is excluded from a per-connection charge regime.

17. CTIA's exception also fails to recognize that there are advantages and disadvantages involved in both regimes, and that significant disadvantages of the percentage-of-intrastate revenue regime can be avoided by the shift to a per-connection charge regime. For example, the record in this matter indicates that the Commission has been repeatedly compelled to raise the percentage-of-intrastate revenue surcharge due to the continual decrease in the intrastate revenue base to which the surcharge has been applied. As noted in the record, among

the reasons for this continual decrease have been changes in accounting by wireless companies, resulting in decreasing intrastate voice service revenue and increasing data revenue, the latter of which is not subject to the surcharge.

18. All findings of fact and conclusions of law contained within the RD, whether or not separately stated, numbered or designated as findings of fact and conclusions of law, are incorporated herein by reference as if fully set forth in this Order, and are ADOPTED, APPROVED, and ACCEPTED as Findings and Conclusions of the Commission.

19. The RD is well taken and should be adopted, accepted, and approved by the Commission.

IT IS THEREFORE ORDERED:

A. The Decretal Paragraphs contained in the RD are incorporated by reference as if fully set forth herein and are ADOPTED, APPROVED, and ACCEPTED as Orders of the Commission.

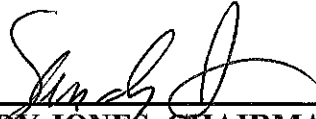
B. The RD is ADOPTED, APPROVED and ACCEPTED in its entirety.

C. This Order is effective immediately.

D. A copy of this Order shall be served upon all parties listed on the attached certificate of service via email, if the email addresses are known, and if not known, by regular mail.

ISSUED under the Seal of the Commission at Santa Fe, New Mexico, this 22nd day
of August 2018.

NEW MEXICO PUBLIC REGULATION COMMISSION



SANDY JONES, CHAIRMAN

VOTED YES

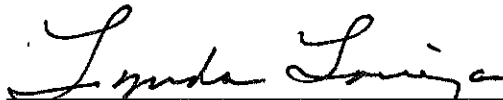
CYNTHIA B. HALL, VICE CHAIR



PATRICK H. LYONS, COMMISSIONER

EXCUSED

VALERIE ESPINOZA, COMMISSIONER



LYNDA LOVEJOY, COMMISSIONER



BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE STATE)
RURAL UNIVERSAL SERVICE FUND)
2018 SURCHARGE CALCULATION) Case No. 17-00202-UT
AND FUND SIZE)**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing **Final Order Adopting Recommended Decision** issued by the New Mexico Public Regulation Commission on August 22, 2018, was sent via email on August 22, 2018, to the parties indicated below:

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Plateau Telecom., RSA 4	alanh@plateautel.com;	CTC Communications Corp	Becky.West@windstream.com;
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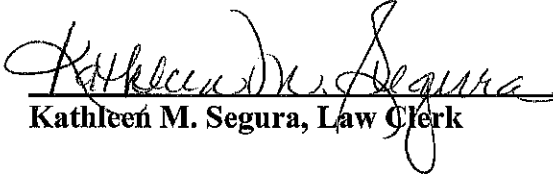
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DATED this 22nd day of August 2018.

NEW MEXICO PUBLIC REGULATION COMMISSION



Kathleen M. Segura, Law Clerk