

April 9, 2008



Via U.S. Mail

Marlene H. Dortch
Office of Secretary
Federal Communications Commission
445 - 12th Street, SW
Washington, DC 20554

Re: Comments on *Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-4 (rel. Jan. 29, 2008) (*Identical Support Rule NPRM*); *Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-5 (rel. Jan. 29, 2008) (*Reverse Auctions NPRM*); *Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, Notice of Proposed Rulemaking, FCC 08-22 (rel. Jan. 29, 2008) (*Joint Board Comprehensive Reform NPRM*)

Dear Ms. Dortch:

Based upon my observations over the past few years, we submit these comments about the receipt of universal service support by Alltel Corporation, a competitive carrier receiving more than \$300M per year in universal service support:

1. Is Alltel making an incremental investment of \$300M per year in capital expenditures and operating expenses beyond the amount that it would spend as part of its normal (non-universal service) build-out – we do not think so?
2. Is Alltel using universal service support received for lines served in rural telephone company areas in rural telephone company areas – based upon service, or lack thereof, in the rural areas of the Rosebud reservation, we do not think so?
3. Does Alltel actually need universal service support, based upon its revenue and costs, to serve consumers in its designated service areas – based upon its profits, we do not think so?

4. Is Alltel offering its unlimited usage universal service offering throughout its designated service area – based upon experience on my reservation, we do not think so?
5. Is Alltel offering Lifeline service in a manner designed to increase wireless service for low-income subscribers – based upon outreach efforts on my reservation, we do not think so?
6. Is Alltel offering its unlimited local usage \$1.00 Lifeline offering on all reservations within its designated service area – based upon experience on my reservation, we do not think so?

Should the FCC send a loud and clear message to all universal service recipients by not disbursing any further universal service funds to Alltel until it demonstrates compliance with the applicable rules, accountability for all universal service funds received, and responds to issues 1-6 above – we think so? And should state commissions not certify Alltel for receipt of any further universal service funds in 2009 until it demonstrates compliance with the applicable rules, accountability for all universal service funds received, and responds to issues 1-6 above – we think so?

Overall, while we believe that the competitive universal service system implemented by Congress, the FCC and the states has significantly benefited rural consumers, there needs to be greater accountability by universal service recipients to preserve universal service for years to come and advance universal service to meet evolving needs. The issues raised herein should be addressed by all ETCs – incumbent LECs and competitive carriers – prior to receiving further universal service support payments; however, the starting point should be the largest universal service fund recipients, like Alltel, who should set the standard for accountability, not just the standard for profiting from a private equity deal. It should also be noted that Alltel has demonstrated a complete disregard for Indian country by its lack of capital investment and not continuing its support for tribal affairs in its federal advocacy, unlike its predecessor, Western Wireless.

Respectfully submitted,

Rosebud Sioux Tribe
South Dakota

cc: State Commissions