

October 3, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: **In the Matter of: Nomination for the Universal Service Administrative Company
Board of Directors, CC Docket Nos. 96-45 and 97-21**

Dear Ms. Dortch:

In accordance with the Public Notice of September 13, 2012, (DA 12-1469), the undersigned organizations, which together represent the vast majority of rate-of-return- regulated incumbent local exchange carriers (“ILECs”), respectfully submit this formal nomination of Mr. Geoffrey A. Feiss, General Manager of the Montana Telecommunications Association, to serve an additional term as a Representative for ILECs (other than Bell Operating Companies) with annual reporting revenues of \$40 million or less, on the Board of Directors of the Universal Service Administrative Company.

There is no question regarding the ongoing critical importance of our nation’s federal universal service policy and the related Universal Service Fund (USF) which USAC and its board of directors are responsible for administering. Our national universal service policy aims to ensure that evolving advanced communications services will become and remain available and affordable for all Americans. The USF mechanisms overseen by USAC are essential to the fulfillment of this policy, and thus it is critical that persons of sound character, keen intellect, and dedication to the underlying principles and ideals of this universal service policy be nominated and confirmed to this crucial post.

The individuals who are appointed to serve as USAC directors will be responsible for ensuring the resources made available in furtherance of this policy are appropriately administered to achieve our national universal service objectives. Mr. Feiss has demonstrated throughout his career, including his prior service on the USAC Board, that he is fully committed to and capable of fulfilling these responsibilities. Indeed, Mr. Feiss has long been a model of thoughtful collaboration in his prior service on the USAC Board, looking to bring together different stakeholders in a manner that seeks to promote the integrity and fiscal responsibility of the USF and with an abiding focus on the fundamental objectives of universal service.

Considering the challenges on the horizon and the debates that are already underway, it is imperative that the USAC Board be comprised of directors that are willing to jump into the discussions right away and help lead the debates. We must place our confidence in individuals that have the deep experience and broad background that will ensure the successful administration of this essential resource in a manner that is fully consistent with the public

interest. We have every confidence that Mr. Feiss is such a person and we unequivocally advocate his speedy reappointment for another term on the USAC board.

Thank you for your consideration of the credentials and qualifications of Mr. Feiss. To assist you in this endeavor, as required by the public notice identified above, attached is Mr. Feiss' detailed curriculum vitae.

Sincerely,

**NATIONAL TELECOMMUNICATIONS
COOPERATIVE ASSOCIATION**

By: /s/ Michael Romano

Michael Romano
Senior Vice President- Policy
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Arlington, VA 22203
(703) 351-2000

**THE ORGANIZATION FOR THE
PROMOTION AND ADVANCEMENT OF
SMALL TELECOMMUNICATIONS COMPANIES**

By: /s/ Stuart Polikoff

Stuart Polikoff
Vice President- Regulatory Policy and
Business Development
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Washington, DC 20006
(202) 659-5990

WESTERN TELECOMMUNICATIONS ALLIANCE

By: /s/ Derrick Owens

Derrick Owens
Director of Government Affairs
317 Massachusetts Avenue N.E.,
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Washington, DC 20002
(202) 548-0202

Attachment

cc: Erica W. Myers
Charles Tyler

Curriculum Vitae

Over 25 years of experience in the telecommunications industry, with 14 years as General Manager (CEO) of the Montana Telecommunications Association, which represents commercial and cooperative telecommunications providers offering advanced communications services throughout Montana.

Experience

1998 – Present. General Manager. Montana Telecommunications Association.
Responsible for managing all facets of a full-service telecommunications industry association, including strategic leadership, public policy advocacy, communications & PR, financial administration, marketing programs, human resources, consulting, customer service, education programs, event planning and innovative member services.

1994 – 1998. Director, Congressional Relations. USTelecom.
Directed national legislative advocacy initiatives and grassroots operations.

1988 – 1993. Director, External Affairs. Michigan Bell Telephone Company.
Counseled senior management team on federal policy strategies. Devised and executed corporate advocacy efforts.

1987 – 1988. Director, Community Development. Michigan Bell.
Operated statewide media relations, community and economic development program.

1984 – 1987. Manager, Legislative Affairs. American Electronics Association.
Managed federal legislative activities, specializing in armed services, small business, taxation and government operations policy.

1979 – 1984. Legislative Assistant. Honorable Bob Davis (R-MI).
Advised Congressman on small business, tax, and government operations issues.

1977 – 1978. Legislative Assistant. Honorable Charles Whalen (R-OH).
Advised Congressman on House Floor activity; managed District communications; analyzed House International Relations Committee proceedings.

1977 Congressional Intern. Honorable Charles Whalen (R-OH).

Boards, Appointments, Committees

- Director, Universal Service Administrative Company (“USAC”). Appointed by FCC Chairman. 2008 – present.
- Chairman, National Council of State Telecommunications Executives. 2010.

- President, The Montana Club. 2010 – present.
- Director/Treasurer, Helena Civic TV/TV Montana. 2006 – present.
- Director, Montana Cooperative Development Center. 2004 – present.
- Director, Montana Society of Association Executives. 2010 – present.
- Radio Commentator. Montana Public Radio. 2004 – present.
- Trustee, Helena School Board. Elected 2000 – 2003.
- NTCA Government Affairs Committee. 2007 – present.
- Legislative/Executive School Funding Task Force. Governor Appt: 2001 – 2002.
- E-911 Executive Council. Governor Appointment: 1998 – 2004.
- Statewide Interoperability Executive Council. Governor Appointment: 1998 – 2004.

Education

- University of Maine. Orono, Maine. International Relations. 1977.
- Certified Association Executive. 2003-2009.
- University of Michigan. Ann Arbor, MI. Executive Finance. 1986.