

**FCC Workshop on Modernizing Universal Service for Broadband  
Omaha, Nebraska (May 18, 2011)  
Panel 1: “The Evolution of the State/Federal Partnership in a Broadband World”  
T-Mobile USA, Inc.**

- State Commissions should continue to have a role in federal universal service.
  - State Commissions bring value because of their closer connection to consumers.
  - There is an ongoing dialog about the best way to incorporate State Commissions’ expertise in today’s communications marketplace.
  - At minimum, State Commissions should provide input on qualifications to participate in the CAF process and play a role in monitoring whether CAF recipients fulfill their obligations.
- Universal service funding recipients should be required to demonstrate their bona fides before receiving support and should remain accountable for using support for its intended purposes.
  - CAF participants should be ETCs or ETC-applicants.
  - CAF recipients should be subject to reasonable public interest obligations.
- T-Mobile supports harmonizing the obligations of federal support recipients through a clear set of federal requirements.
  - Federal standards should clearly articulate the requirements for federal support recipients.
    - Consumers are increasingly mobile and expect to obtain the same service when they move.
    - The FCC is ultimately responsible for ensuring that federal support is used properly.
  - Existing state carrier-of-last-resort (COLR) requirements are not well suited to today’s mobile and broadband world.
    - Most state COLR requirements were developed for monopoly wireline providers. Today’s consumer broadband ecosystem includes a variety of fixed and mobile providers operating in a competitive environment.
    - Existing COLR requirements vary from state to state and may be difficult to ascertain. It is unclear why federal funding recipients should be subject to varying requirements.
    - Existing state COLR requirements may or may not advance federal USF goals and principles. The requirements for federal support recipients should be clear and fit the federal program.
  - State USF funds should only be created after a determination of need, and must be competitively neutral.