

**CONCURRING STATEMENT OF
COMMISSIONER ROBERT M. McDOWELL**

Re: High-Cost Universal Service Support, WC Docket No. 05-337; Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Earlier this year, the Commission committed in this matter to the following schedule: to release a notice of inquiry no later than April 8, 2009, to issue a Further Notice of Proposed Rulemaking (FNPRM) no later than December 15, 2009, and to release a final order no later than April 16, 2010. By meeting the first and now the second deadline, the Commission is keeping up with its procedural commitments in this matter. I am concerned, however, that the substance of this FNPRM does not go far enough to answer some of the court's fundamental questions regarding the non-rural high-cost mechanism.

I recognize that the FNPRM cites the upcoming (and intervening) National Broadband Plan deadline of February 17, 2010, as the reason that the Commission does not use this FNPRM as an opportunity to explore reform options. Nevertheless, I do not think that the Commission's work on the National Broadband Plan should foreclose the Commission from exploring a variety of reform ideas in this matter. In the meantime, I look forward to working with my colleagues, and all stakeholders, in fashioning meaningful and comprehensive Universal Service reform as expeditiously as possible. Thus, I respectfully concur.