

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)	CC Docket 01-92
)	
Federal Communications Commission)	
)	
Missoula Inter-carrier Compensation)	
Reform Plan)	
)	
)	

COMMENTS OF THE IOWA UTILITIES BOARD

On November 8, 2006, the Federal Communications Commission (FCC) released a notice, seeking comment on a proposed interim process for addressing phantom traffic. This process was filed by supporters of the inter-carrier compensation reform plan (the "Missoula Plan") filed July 24, 2006 by the National Association of Regulatory Utility Commissioners' Task Force on Inter-carrier Compensation (NARUC Task force).

The Iowa Utilities Board supports a concept that resolves the problems associated with phantom traffic. It is imperative that an originating carrier responsible for paying inter-carrier compensation, do so in a uniform manner and that enforcement measures, such as FCC assessed forfeitures, FCC awarded damages, and special interconnection obligations for chronic violators, are in place. The Iowa Utilities Board urges the FCC to adopt the interim process proposed.

CONCLUSION

The Iowa Utilities Board respectfully submits these comments for the Federal Communication Commission's consideration regarding its review of the Phantom Traffic Interim Process filed by the supporters of the inter-carrier compensation reform (the Missoula Plan).

Respectfully submitted,

John Ridgway
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December 7, 2006