

**STATEMENT OF
COMMISSIONER MICHAEL J. COPPS,
DISSENTING**

Re: *2000 Biennial Regulatory Review—Requirements Governing the NECA Board of Directors under Section 69.602 of the Commission’s Rules and Requirements for the Computation of Average Schedule Company Payments under Section 69.606 of the Commission’s Rules*

I must respectfully dissent from today’s decision modifying Commission requirements governing elections for the National Exchange Carrier Association board of directors. At a time when corporate governance problems and accounting deprecations dominate so much business news, this Commission has an especially high bar to clear before pulling back from its own requirements. We need to protect against both the possibility and the perception of relaxed vigilance. A deregulatory rush here, with little evidence to support it, goes, I fear, in precisely the wrong direction.

I appreciate that the annual election process imposes administrative burdens on NECA. I also understand that a contested election process imposes costs on NECA and the outside directors who must run substantial campaigns to support their candidacy. It is regrettable that nowhere in this decision can we point to evidence quantifying these costs and administrative burdens. Had the record been more substantial, I perhaps would have been willing to support this item. As it stands, in this decision too little evidence supports too great a reduction in our oversight of the NECA board of directors at a time when it is less than prudent to do so.