

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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Federal Communications Commission  
Office of the Secretary

In the Matter of )  
 )  
Billed Party Preference )  
for 0+ InterLATA Calls )

CC Docket No. 92-77

ORIGINAL  
FILE

AT&T COMMENTS

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## SUMMARY

AT&T's Comments demonstrate, and the Commission's Notice acknowledges, that it is premature to make a decision to require the implementation of the "concept" of billed party preference. Thus, the Commission has sought comments on many important questions and issues which should be resolved before it can make any decision on the merits of this proposal.

AT&T shows in Part I below that billed party preference is not likely to provide a significant incremental benefit over current dialing arrangements. Changes in customers' calling patterns, the impacts of competition and the Commission's regulatory initiatives have already assured that "billed parties" now have greater control over carrier selection than they have ever had before. Such control now extends to almost 90 percent of interLATA operator-handled traffic.

AT&T demonstrates in Part II that the limited benefits of billed party preference should be weighed carefully against the as yet unknown, but potentially significant, costs of implementing this proposal. These costs include not only the direct expense of LEC access charges for providing billed party preference, but also tens of millions of dollars for LEC and IXC development costs and access network rearrangements. Moreover, the

Commission's goal of increasing IXC marketing focus on end users could be undermined by billed party preference, because interposing LEC operator systems between IXCs and their customers on all 0+ traffic could make it more costly and difficult for IXCs to offer innovative and distinctive features that depend on 0+ dialing.

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AT&T COMMENTS

Pursuant to Section 1.415(a) of the Commission's Rules, 47 C.F.R. § 1.415(a), American Telephone and Telegraph Company ("AT&T") submits its comments on the Commission's May 8, 1992 Notice of Proposed Rulemaking on implementation of an automated carrier identification system ("billed party preference") for interLATA calls dialed on a 0+ basis.

BACKGROUND STATEMENT

The billed party preference mechanism described in the Notice (¶¶ 9-12) would fundamentally alter present access and dialing arrangements for interLATA "dial 0" calls.\* Currently, all interLATA calls dialed either on a 1+ or 0+ basis are routed by local exchange carriers

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\* The majority of calls dialed with the "0" prefix invoke an IXC's operator services, which provide "automatic or live assistance to a consumer to arrange for billing or completion, or both, of an interstate telephone call," either on a "sent-paid" basis (e.g., person-to-person or time-and-charge calls) or through an alternate billing method (e.g., calling card, collect, or third-number billed calls). Cf. 47 U.S.C. § 226(a). However, a growing number of other calls dialed with the "0" prefix do not implicate operator services.

("LECs") to the presubscribed interexchange carrier ("IXC") of the originating telephone line. Customers who wish to place a 0+ call with an IXC other than the presubscribed carrier may also do so by dialing an appropriate access code (i.e., on a 10XXX+0, 950 or 1-800 basis). In either event, the dialing protocol selected by the calling party designates the IXC to which the LEC will deliver the traffic for call processing.\*

Under the routing arrangements proposed in the Notice, however, the IXC for interLATA 0+ dialed calls would no longer be automatically selected by the customer placing the call. Instead, the LECs would intercept such calls and, using an interconnected nationwide system of Line Information Data Bases ("LIDBs"), identify the preferred IXC of the party to be billed for the call, and route the call to that carrier. Thus, for example, on a third-number call the LEC operator service switch ("OSS") would obtain information that the caller desired to bill the call to that station, identify the presubscribed carrier for that line, and route the call to that IXC for completion to the called number.

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\* Under the North American dialing plan, calls dialed on a "0-" basis (i.e., 0 without the called number) are routed to the LEC operator system. InterLATA "0-" calls may then be transferred by the LEC to an IXC selected by the caller. A customer may also directly reach the operator system of the presubscribed carrier for the originating telephone line by dialing "00-" where that code has been enabled by the LEC.

The Notice tentatively concludes (¶ 13) that implementation of a nationwide "billed party preference" system for interLATA calls would, in concept, serve the public interest. The Commission indicated that this proposal could possibly simplify calling by minimizing the need for access codes (e.g., 10XXX) on operator-assisted calls, and would also "redirect the competitive efforts" of IXCs by focusing their attention on providing better services and prices for end users. Id., ¶¶ 18-19.

The Notice (¶¶ 18, 41) acknowledges, however, that billed party preference would require substantial changes in both the LECs' and IXCs' networks that could not be implemented at least for several years. Moreover, despite the earlier proceedings on billed party preference in response to the Ameritech and Bell Atlantic Petitions,\*

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\* The Notice is an outgrowth of a petition for rulemaking filed in 1989 by Bell Atlantic, requesting that the Commission mandate these arrangements for 0+ interLATA calls originated from all pay telephones. See Bell Atlantic Telephone Companies Petition for Rulemaking to Establish Uniform Dialing Plan from Pay Telephones, RM-6723, filed April 13, 1989 ("Bell Atlantic Petition"). The Commission solicited comments on that petition in 1989 and a supplemental round of comments in 1991. See Notice, ¶ 9 n.12.

Bell Atlantic's proposal, in turn, mirrors an earlier rulemaking petition filed by Ameritech which would have extended billed party preference to residence and business, as well as public, telephones. See Petition of the Ameritech Companies for Amendment of Part 69 of the Rules to Enable Exchange Access "Dial 0" Services to be Provided by Local Exchange Carriers, RM-6113, filed August 7, 1987 ("Ameritech Petition"). The Commission in 1990 dismissed the Ameritech Petition

(footnote continued on following page)

many critical questions concerning the practical value of this plan remain unresolved.

Accordingly, the Notice (¶¶ 18, 24-35) requests comments on a broad array of issues which must be considered before any final determination can be made on whether the implementation of a billed party preference system should proceed. Thus, the Commission seeks comments as to the potential benefits of billed party preference over current access arrangements for 0+ dialed calls. Further, parties have been requested to comment on the cost, technical and service implications of this new routing arrangement, and on the potential impact of this proposal on competition in the provision of interexchange services. Additionally, the Commission has requested comment on the appropriate scope of billed party preference, i.e., whether it should be mandated for all interLATA 0+ and 0- traffic, or whether it should be limited to a specific segment of 0+ traffic. Notice, ¶¶ 25, 32. AT&T addresses these issues in the Comments below.

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because it recognized that "fundamental changes in the telecommunications industry," most notably the availability of premises owner presubscription for most LEC payphones and the growth of operator service provider ("OSP") competition, had significantly "altered the structure of the payphone and operator services industries . . . ." See FCC 90-5, released January 9, 1990, ¶ 3.

I. THE COMMISSION'S EXISTING POLICIES HAVE ALREADY ACHIEVED MOST OF THE CLAIMED BENEFITS OF BILLED PARTY PREFERENCE.

The Notice correctly recognizes (¶¶ 1, 13, 25) that the Commission must carefully weigh the customer benefits of billed party preference against the cost, service and competitive effects that proposal would create. The principal rationale for billed party preference is that it would enable customers "automatically [to] reach the billed party's carrier" using 0+ dialing. *Id.*, ¶ 18. This rationale, however, should be measured against the fact that current dialing arrangements mandated by the Commission already permit customers readily to access the billed party's preferred IXC for the overwhelming majority of interLATA operator handled calls.

In the Commission's proceeding on the Ameritech Petition almost five years ago, AT&T demonstrated that customer control over carrier selection was already available for more than 80 percent of operator-assisted interLATA calling through then-existing equal access arrangements.\* In the intervening period, changes in the composition of operator services traffic, developments in the intensely competitive calling card marketplace, and regulatory initiatives by the Commission have significantly

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\* See AT&T Comments in RM-6113, filed October 2, 1987 ("AT&T 1987 Comments"), pp. 15-20 and Affidavit of James W. Selzer, ("Selzer Aff.") ¶¶ 14-18.

increased customers' already considerable ability to control the selection of the IXCs that will handle their calls.

The billed party's ability to control the selection of the preferred IXC has always been apparent for calling card calls. The billed party for such calls is either the calling customer himself or a person affiliated with the billed party (e.g., an employee). Calling card customers may readily designate the cardholder's preferred IXC by selecting the appropriate dialing method: that is, by dialing "0+" where the preferred IXC is the presubscribed carrier for the originating telephone, or an access code (10XXX, 950 or 1-800) where it is not. Such calling card traffic accounts for an increasingly large majority of 0+ dialed calls. Calling card traffic represented 50 percent of AT&T's interLATA operator calling in 1986; by 1991, approximately 69 percent of AT&T's interLATA operator services traffic was billed to calling cards.

Calling card customers can also exercise a further measure of control over the IXC that carries their calls simply by using a "proprietary" calling card issued by their preferred carrier. These cards allow IXCs to differentiate themselves from their competitors by offering a variety of features and services to customers. Of particular importance for this rulemaking, however, is the fact that such cards are typically usable for long distance calling only on the network of the issuing IXC.

As AT&T has already demonstrated in the expedited portion of this docket,\* the deployment of proprietary calling cards has increased dramatically in recent years. AT&T has issued tens of millions of proprietary calling cards in response to its customers' demands for a card that protects them from the exorbitant rates of some OSPs to which they were exposed by LEC "joint use" calling cards (as well as by the telephone line number based calling cards previously issued by AT&T). Other competing IXCs have similarly issued millions of proprietary calling cards to their customers; indeed, MCI and Sprint together have issued about 30 percent more such cards than AT&T has.\*\* These competitive initiatives by carriers have further solidified the control calling card customers are able to exercise to assure they reach their preferred IXC.

AT&T demonstrated in the Commission's earlier proceedings that the billed party also has control over the selection of the IXC in a large majority of other types of operator-assisted calls, and that control continues today.\*\*\* Taken together with the changes in

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\* See AT&T Comments, filed June 2, 1992, pp. 4-5; AT&T Reply Comments, filed June 17, 1992, pp. 3-4.

\*\* See AT&T Reply Comments, pp. 12-13.

\*\*\* Approximately 5 percent of AT&T's interLATA 1991 operator services traffic was comprised of calls billed to a third number. Studies performed by AT&T in connection with the Commission's prior proceedings on the Ameritech Petition demonstrated that 95 percent

calling card usage described above, these data demonstrate that the Commission's policies that led to the current access and dialing arrangements already allow the billed party to designate the preferred IXC for almost 90 percent of interLATA operator services calls -- a marked increase over the already high level shown just five years ago.\*

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of such calls are billed to the calling party's home or office. See AT&T 1987 Comments, p. 17, and Selzer Aff., ¶¶ 14-16.

Nor is there any significant need for billed party preference routing for collect calls, which represented about 19 percent of AT&T's 1991 interLATA dial 0 traffic. AT&T's prior studies have shown that in almost half (46 percent) of these calls the called number is the calling party's own residence or business. See AT&T 1987 Comments, p. 17 and Selzer Aff., ¶ 17. For these calls, the calling party and billed party are one and the same, and the customer is able to select the appropriate carrier using either 0+ dialing or an access code, as appropriate. Moreover, AT&T and some other IXCs identify themselves as the carrier when asking the billed party to accept charges on collect and billed calls, permitting the billed party to exercise his carrier choice in this additional manner. If the Commission concludes that this practice would promote billed customers' control over the choice of carrier, it could require all IXCs to adopt that procedure.

Finally, 6.4 percent of AT&T's 1991 interLATA dial 0 traffic consisted of "sent-paid" calling, in which the calling party and billed party are also identical.

\* The computation of this figure is as follows:

Calling Card	100% of 69% of dial "0" interLATA calls	= 69.0%
Sent-paid	100% of 6.4% of dial "0" interLata calls	= 6.4%
Bill to Third		
Number	95% of 5.2% of dial "0" interLATA calls	= 4.9%
Collect	46% of 19.4% of dial "0" interLATA calls	= 8.7%
	Total	89.0%

To the extent that billed parties are unable to select their preferred carrier using these dialing arrangements, that problem is primarily confined to "aggregator" locations (e.g., hotels, motels, hospitals and universities) and private payphones.\* Many of these entities have blocked access code dialing, resulting in the routing of all operator calls originated from their telephones to an OSP from which they receive commissions on that traffic. As the Notice (¶ 6) correctly points out, these practices have led to widespread customer dissatisfaction, as well as to confusion concerning the dialing methods required to reach a customer's preferred IXC from these locations.

However, as the Notice (¶¶ 7-8) also acknowledges, Congress and the Commission have already acted to address these problems by mandating unblocking of access codes at aggregator locations.\*\* Under these provisions, unblocking of 950 and 1-800 access to OSPs is

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\* As the Notice (¶¶ 3-4) points out, equal access dialing has been available since 1989 from Bell Operating Company ("BOC") and GTE Operating Company ("GTOC") public telephones.

\*\* See Telephone Operator Consumer Services Improvement Act of 1990 ("TOCSIA"), codified at 47 U.S.C. § 226; Policies and Rules Concerning Operator Services Providers, CC Docket No. 90-313, Report and Order, 6 FCC Rcd. 2744 (1991); Policies and Rules Concerning Operator Services Access and Pay Telephone Compensation, CC Docket No. 91-35, Report and Order and Further Notice of Proposed Rulemaking, 6 FCC Rcd. 4736 (1991); 47 C.F.R. § 64.704(a), (c)(1)-(5).

already required. Unblocking of 10XXX access at all private payphones should be available in the relatively near future.\* Finally, a schedule has been prescribed for unblocking of 10XXX access from most aggregator locations by 1993 (and all remaining aggregator locations by early 1997). Additionally, the Commission's regulations require that OSPs provide audible "branding" on operator calls, and that aggregators identify their presubscribed OSP through appropriate signage, so that customers can readily determine whether to use an access code to reach their preferred IXC.\*\*

These arrangements, once fully implemented and vigorously enforced, will restore to customers at aggregator locations and private payphones the same ease of control over the selection of their preferred OSP that callers already enjoy from other telephones. Moreover,

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\* On reconsideration of its Report and Order in Docket 91-35, the Commission deferred its original March 1992 deadline for 10XXX unblocking at private payphones (which had been stayed pending action on those petitions) until the LECs deploy blocking and screening services to allow payphone owners to control potentially fraudulent 10XXX calls. See Report No. DC-2144, released June 25, 1992. Even with this modification, however, equal access dialing from most private payphones should be available in the near term.

\*\* See 47 C.F.R. § 64.703(a)-(b). As AT&T has previously shown, incorrect signage currently remains a problem at some aggregator locations. See AT&T Reply Comments filed June 17, 1992, p. 15 n.\*\*\*\*. More effective enforcement of the Commission's regulations in these locations, however, can alleviate this problem long before billed party preference can be implemented, and at substantially less cost.

the schedule for unblocking established in the Commission's rules will bring about this change at or before the time that any billed party preference plan could reasonably be implemented.\* Thus, current access arrangements already provide most of the benefits claimed for billed party preference in providing customer control over the selection of a preferred carrier.

II. BILLED PARTY PREFERENCE WOULD IMPOSE SUBSTANTIAL COSTS ON IXCs AND THEIR CUSTOMERS.

The Notice (¶ 25) correctly acknowledges that a decision about billed party preference must take into account the costs that such a new routing arrangement would entail, both for the LECs and IXCs, and ultimately their customers. The LECs' estimates in the Commission's earlier proceedings on the Ameritech and Bell Atlantic petitions have varied substantially, depending on the carrier and the types of traffic for which billed party preference has been proposed.\*\* As the Commission points

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\* See, e.g., Comments of U S WEST filed June 2, 1992 in CC Docket No. 92-77, p. 5 ("U S WEST believe[s] billed party preference could not be implemented before 1996, at the earliest").

\*\* See Notice, ¶ 25, citing Southwestern Bell Supplemental Comments on Bell Atlantic Petition, p. 4 (\$50 million to implement billed party preference for all 0+ and 0- interLATA traffic for that LEC alone); Bell Atlantic Supplemental Comments, p. 2 (\$150 million for all BOCs and GTOCs for 0+ interLATA traffic from payphones only); PacTel Supplemental Reply Comments, p. 4 (\$200 million to implement for 0+ interLATA payphone traffic solely in its service area).

out, the LECs have not to date supplied many details on the assumptions underlying these cost estimates. Even from the limited LEC data in the public record, however, it is readily apparent that the LEC costs of implementing billed party preference for any segment of operator-assisted calls will be substantial. These costs, in turn, will presumably be passed on by the LECs in the form of higher access charges to IXCs (and, in turn, could lead to higher rates for those carriers' end users).\*

Moreover, this significant increase in LEC access charges for routing interLATA operator traffic is only one part of the "price tag" for billed party preference. Implementation of this new procedure will also require IXCs to make costly changes in their operator systems, and to reconfigure their networks to accommodate this proposal. Specifically, AT&T estimates that it would require at least \$30 million in development costs to modify AT&T's Operator Services Positions System ("OSPS") switching equipment so that it could receive from the LECs' OSS equipment the additional Signaling System 7

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\* For example, in the Commission's proceedings on the Ameritech Petition, AT&T demonstrated that, based on Ameritech's estimates of its likely access charges under billed party preference, AT&T's aggregate access expenses for its then-current volumes of operator traffic would increase by almost \$400 million annually, even if the LECs deploy their Automated Alternate Billing Services ("AABS") to capture information on the call type and billing method and forward those data to AT&T's operator switches. See AT&T 1987 Comments, pp. 20-22, and Selzer Aff. ¶¶ 3-8.

("SS7") protocol information necessary to implement billed party preference.\* Another \$10 million in expenses would be necessary to develop call processing software in the OSPS equipment itself, so that it could operate with the call detail data provided through the SS7 protocol. These development efforts, deployment and installation of the new interfaces and software in AT&T's OSPS equipment, and completion of testing with the LECs' OSS equipment to assure that these systems function properly together could take substantial time to complete.

In addition to the development costs described above, AT&T would incur additional significant costs to change its current network architecture to accommodate billed party preference. In particular, extensive trunk rearrangements would be required to reroute to the LECs' access tandems 0+ traffic that is currently routed directly from LEC end offices to AT&T's network, assuming that the LECs' operator systems which would provide billed party preference signalling are homed on their access tandem switches.\*\* AT&T estimates that its capital costs

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\* AT&T's cost estimates in these Comments are necessarily preliminary because they are dependent upon the future development of industry standards for the SS7 protocol modifications to implement billed party preference.

\*\* To date, the LECs have not specifically described whether this network reconfiguration would result in the "stranding" of a significant amount of LEC plant currently used to provide direct trunking

associated with such a trunking reconfiguration would be approximately \$14 million. The cost of upgrading existing trunks between the LECs' networks and AT&T's operator services POPs to SS7 signalling for billed party preference processing of AT&T's traffic is estimated at a further \$8 million. Additionally, signalling links between AT&T's network and the LECs' Signalling Transfer Points ("STPs"), as well as within AT&T's network, may need to be reengineered to accommodate billed party preference routing of AT&T's 0+ traffic. AT&T estimates the total costs of these signalling link additions at \$6 million.

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from their end offices to AT&T's operator services points of presence ("POPs"). If such stranding occurs, the LECs have not stated how they intend to recover this investment through their billed party preference access rates.

AT&T would itself incur additional stranded investment in equipment currently deployed in its Operator Services Centers ("OSCs") as a result of billed party preference routing, because functions currently performed by its OSCs would now be performed in the LECs' operator systems. The limited data currently available on the LECs' proposal do not permit AT&T to estimate how many of its 124 OSCs that would have to be closed as a result of billed party preference routing; however, the affected investment in each OSC is approximately \$1 million. Moreover, the network rearrangements to implement tandem routing of AT&T's 0+ traffic described above could also result in a substantial increase in AT&T's switched access costs to the extent the revised transport rate structure proposed by the Commission in Docket 91-213 increases common transport rates to reflect their higher underlying costs.

Another cost of billed party preference would be the impact of that proposal upon IXCs' ability to compete effectively for end users' 0+ business. The Commission itself correctly recognizes (§ 19) that IXC competition should be end-user focused, but billed party preference could make it harder, rather than easier, for IXCs to compete for customers' business based upon their ability to develop the most attractive services, features and prices, and upon customers' ability to access their chosen carriers directly.\*

AT&T, for example, has recently invested tens of millions of dollars to develop and implement voice recognition technology in its network in order to increase efficiencies in the processing of collect and billed to third number calls. AT&T's ability to use this new technology could be significantly limited by billed party preference, because the LECs' operator systems would provide "front end" processing on all 0+ interLATA calls and would not pass the caller's voice to AT&T's operator systems. The interpositioning of LEC operator systems

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\* There is also no assurance that billed party preference would avoid the need for duplicative involvement by LEC and IXC operators on all types of calls. The elimination of such duplication is dependent upon the creation of industry standards that have not yet been developed, and upon the uniform implementation of such standards by all LECs and all OSPs.

between IXCs and their customers on such calls would also limit IXCs' ability and incentives to implement other differentiating capabilities on their networks.\*

In addition, billed party preference could affect IXCs' ability to use 0+ dialing to provide other optional features for customers. AT&T makes 0+ sub-account billing options available to customers on sent-paid calls. These options enable customers to use 0+ access and enter a "15XXX" code after the "bong" tone in order to associate calls with various sub-accounts they have established. Customers entering such codes in a billed party preference environment, however, could find that their calls have been rejected or substantially delayed, because the LECs' systems apparently would interpret the "15XXX" codes (which AT&T can recognize in its own network) as invalid calling card numbers and thus reject call attempts made using those codes.

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\* A possible future enhancement of "traditional" 0+ calling that could be impacted by billed party preference is the introduction of voice PINs for calling cards. This enhancement would not only give customers added convenience but would also substantially reduce the opportunity for fraud on the IXC's network. The potential value of this capability could, however, be reduced by the introduction of billed party preference if the LECs' systems could not collect and forward the customer's voice information to the IXC.

Finally, many IXCs today offer customers the ability to bill calls to commercial credit cards.\* Billed party preference, however, would not support the use of such cards.\*\* Thus, callers who wish to use commercial credit cards could not do so on a 0+ basis, even from telephones presubscribed to IXCs that accept such cards. Similarly, some IXCs have made arrangements to accept, on an 0+ basis from presubscribed telephones, calling cards issued by foreign PTTs. Billed party preference would block such use.\*\*\*

#### CONCLUSION

As shown above, the Commission's existing policies have already produced most of the benefits of billed party preference in allowing billed customers to select their preferred IXC. However, billed party preference could substantially increase costs for IXCs

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\* AT&T has announced plans that will make it possible in the future to accept such cards from all telephones.

\*\* See ex parte statement of Ameritech and MCI, RM-6723, dated January 28, 1992 ("Ameritech/MCI ex parte"), p. 9.

\*\*\* Id. There is even an indication (id., pp. 8-10) that calls charged to IXCs' CIID format cards might not work efficiently with billed party preference for as much as two years after its introduction, because the LECs' operator systems would not be able to recognize CIID cards from their first six digits and route validation queries to the appropriate IXC database. AT&T questions this assumption, because this capability is routinely used by the LECs today to validate AT&T's cards when they are offered to charge intraLATA calls.

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(and, hence, for customers), could inhibit customer-focused competition among IXCs, and may deter IXCs' deployment of new technologies and features that will meet the needs of end users. The Commission should carefully weigh these impacts against any incremental benefits billed party preference would produce before determining whether to require that this proposal be implemented.

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CERTIFICATE OF SERVICE

I, Ann Marie Abrahamson, hereby certify that a true copy of the foregoing "AT&T Comments" was served this 7th day of July 1992 by first class mail, postage prepaid, upon the parties on the attached Service List.

  
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