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

AUG 7 1992

In the Matter of)
)
Amendment to Section 1.773 of the)
Commission's Rules Regarding)
Pleading Cycle for Petitions)
Against Tariff Filings Made)
on 14 Days' Notice)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket No. 92-117

REPLY COMMENTS OF BELL ATLANTIC¹

Bell Atlantic opposes the proposal of the Interexchange Resellers Association that carriers be required to notify all "interested parties" by facsimile whenever they file tariffs on fourteen days' notice.² Such a proposal would greatly complicate and increase the cost of filing such tariffs, with no offsetting public interest benefit.

Bell Atlantic has identified nearly 250 customers of its interstate access services. Under IRA's approach, Bell Atlantic would be required to fax to each of them, and an unknown number of other parties, every fourteen day transmittal letter and, on request, the entire tariff.³ IRA's proposal could force

¹ The Bell Atlantic telephone companies ("Bell Atlantic") are The Bell Telephone Company of Pennsylvania, the four Chesapeake and Potomac telephone companies, The Diamond State Telephone Company and New Jersey Bell Telephone Company.

² Comments of the Interexchange Resellers Association ("IRA") at 1-2.

³ Bell Atlantic's transmittal letters average 2 pages in length and the fourteen day tariffs and supporting documentation average over 50 pages.

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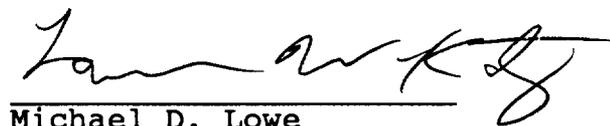
Bell Atlantic to fax many thousands of pages for each fourteen day filing.⁴

Bell Atlantic's fourteen day filings are generally not controversial but are, instead, routine tariff changes that are rarely opposed. There is, therefore, no public interest justification for adopting IRA's burdensome proposal.⁵

Respectfully submitted,

**The Bell Atlantic Telephone
Companies**

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August 7, 1992

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⁴ At one minute a page, 1000 pages would take over 16 hours to transmit, without considering the time to compile the fax list and to dial and (sometimes) repeatedly redial the fax calls. Automated equipment would reduce personnel time but would tie up lines and fax equipment for many hours.

⁵ Bell Atlantic would not object to providing its tariff filings to a third party contractor that would offer interested parties a tariff fax service.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Reply Comments of Bell Atlantic" was served this 7th day of August, 1992, by delivery thereof by first class mail, postage prepaid, to the parties on the attached list.



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