

III. ADDITIONAL MONITORING OF AT&T'S NETWORK RELIABILITY
AND SERVICE QUALITY IS NOT NECESSARY

Issue 4 of the NOI inquired whether the Commission should require additional monitoring of AT&T's network reliability or quality.³⁹ Only the CWA alleges that the Commission should undertake greater monitoring of AT&T's network reliability or quality. The CWA argues that workforce reductions have lowered AT&T's network reliability, claiming specifically that the Thomas Street power outage occurred as result of force reductions.⁴⁰

CWA's concerns are unfounded. The Common Carrier Bureau conducted an exhaustive investigation of the Thomas Street power outage. There was no evidence whatsoever that the outage was attributable to price cap regulation, and the Bureau concluded that any attempt to link the outage to force reductions would be "conjecture."⁴¹

AT&T explained in its comments that its efforts to improve network quality and reliability have increased under price cap regulation. AT&T, p. 55. As MCI recognized in its comments, greater monitoring of AT&T is unnecessary because "the marketplace serves as the impetus for AT&T, as well as other interexchange carriers, to maintain the highest standards of network quality."⁴² In addition, monitoring

³⁹ NOI, ¶ 33, Issue 4.

⁴⁰ CWA, pp. 4, 6.

⁴¹ See Report by the Common Carrier Bureau on the September 17, 1991 AT&T NYC Power Outage Network Disruption (Nov. 8, 1991).

⁴² MCI, p. 9.

- 22 -

mechanisms established in Docket 91-273 complement the existing marketplace incentives. The CWA proposals are thus unnecessary and would result in needless regulatory oversight.

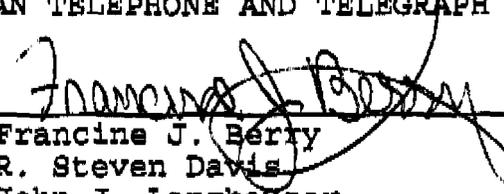
CONCLUSION

For the reasons set forth herein and in AT&T's Comments, the Commission should eliminate AT&T price caps and streamline its regulation of AT&T's remaining interstate services. In the event that price cap regulation is retained for a final transition period, the Commission should eliminate earnings reporting and implement AT&T's other proposed changes to the price cap requirements.

Respectfully submitted,

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I, Helen Dalba, hereby certify that a true copy of the foregoing "AT&T Reply Comments" was served this 5th day of October, 1992 by first-class mail, postage prepaid, upon the parties listed below:

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