

Accordingly, pending full Commission action on the 80-286 Joint Board's recommended decision on separation issues, NARUC respectfully suggests that the LECs should be required to exclude an amount of expense equivalent to the amount of revenues received for interstate collocation arrangements before separations occurs.

**D. ESTABLISHMENT OF A MONITORING PROCEDURE.**

The FCC decided to proceed via this order, without awaiting a Joint Board recommendation, because it believes "...that the Joint Board will be better able to develop appropriate implementing separations changes after we have adopted an expanded interconnection architecture and rate structure."

Thus, it is critical that the FCC immediately establish a monitoring mechanism to collect and report information concerning collocation expenses, revenues, and deployment activity. Even preliminary data will be invaluable to the Joint Board in its deliberations. The data also would likely provide useful insight for use in the FCC's pending NPRM concerning collocation for switched services, as well as a foundation for later examination of the impact of the current proceedings. In addition, it would assist both State and federal regulator's in their oversight functions.

Regardless of the method of service monitoring ultimately implemented, the FCC and the State commissions should work together to develop methods for, and provide complete reciprocal access to information relevant to collocation efforts.

**E. RELATED ISSUES REQUIRING RESOLUTION IN THIS DOCKET.**

NARUC urges the FCC to address the following issues in the current proceedings, either on reconsideration, or additional rulemakings, as may be appropriate:

- The proper designation of property, expenses and revenue used in the development of tariffed rates for central office space;
- The differentiation of jurisdictional costs and revenues in cases where the interconnection/collocation is provided under both federal and state jurisdiction;
- That deaveraging for transport or switched services be implemented only after a comprehensive, thorough review of the economic effects of deaveraging on the public and on the industry, especially those concerns associated with the maintenance of universal service, the participation of rural America in economic growth, and an evaluation of how to reduce costs in high cost areas;
- The establishment of support mechanisms for high cost areas before rates are set at different levels for different market areas;
- The proper assignment of the industry's interoffice official facilities in view of their use in advanced network configurations;

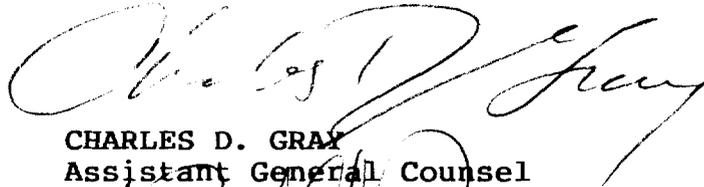
VI. CONCLUSION

NARUC respectfully requests that the FCC grant the relief requested herein.

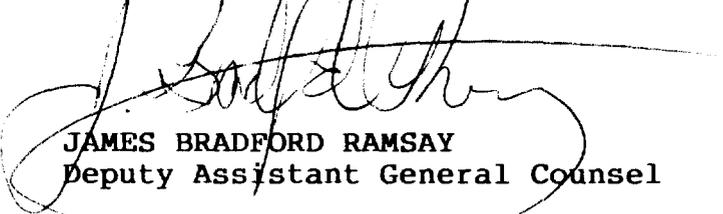
Respectfully submitted,



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December 18, 1992

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of  
Expanded Interconnection with Local Telephone Company Facilities  
CC Docket No. 91-141

APPENDIX A

NARUC'S NOVEMBER, 1992 RESOLUTION

**Resolution Regarding Expanded Interconnection  
(Collocation) (Docket 91-141) and  
Switched Transport Rate Structure (Docket 91-213)**

WHEREAS, On October 19, 1992 the FCC released its Report & Order and Further Notice of Proposed Rulemaking on expanded interconnection with local telephone company facilities; and

WHEREAS, On October 16, 1992 the FCC released its Second Notice of Proposed Rulemaking proposing switched transport and switching/signalling interconnection whereby switched transport collocation would be offered under similar terms and conditions as special access collocation, to be effective in November 1993; and

WHEREAS, On October 16, 1992, the FCC also released its Report & Order regarding switched transport rate restructuring for Tier 1 LECs and its Further Notice of Proposed Rulemaking seeking comment on the long term transport structure which will become effective in November 1995; and

WHEREAS, The Alternative Costing Methods Project has illustrated potentially large differences in prices between rural and urban areas should prices be de-averaged in conjunction with expanded interconnection for switched services; and

WHEREAS, America has benefitted from averaged rates for telecommunication services that have allowed rural communities to more fully participate in the economic growth of their state; and

WHEREAS, The FCC has requested that the Joint Board address the jurisdictional allocation of Special Access interconnection costs and revenues only; and

WHEREAS, Regulatory agencies and industry representatives have participated in the NARUC Access Issues Work Group (AIWG); and

WHEREAS, The FCC has made an implicit finding that both virtual and physical collocation meet its objective by permitting waivers to those States that have adopted virtual collocation for intrastate services; and

WHEREAS, The FCC has preempted States by mandating physical collocation for any state that has not adopted an intrastate collocation policy by February 19, 1993; and

WHEREAS, The FCC has proposed an ambitious comment cycle for CC Docket 91-141 (Comments due December 4, 1992 and Replies due December 21, 1992), CC Docket 91-141 Phases I and II (Comments due December 4, 1992 and Replies due December 21, 1992 [Phase I] and Comments due December 21, 1992 and Replies due January 22, 1993 [Phase II] ) and CC Docket 91-213 (Comments due December 18, 1992 and Replies due January 21, 1993); now, therefore, be it

RESOLVED, That the National Association of Regulatory Utility Commissioners (NARUC), convened at its 104th Annual Convention in Los Angeles, California, recommends that the FCC be urged to extend the timing of the comment cycles until after the Winter NARUC meetings to allow for a more thorough review by the States on the effect of the FCC's proposals regarding access; and be it further

RESOLVED, That NARUC uses its existing Access Issues Work Group to evaluate the effects of the FCC's proposals on the state jurisdictions and report its findings and recommendations to the Communications Committee at the Winter 1993 NARUC meeting; and be it further

RESOLVED, That the NARUC requests that the FCC recognize the direct effects of interstate access restructure and pricing policies on state regulation and rates to consumers in rural and high cost areas, and that the FCC be encouraged to work with and support the interactive regulatory process by assigning these issues to a 410(c) Joint Board; and be it further

RESOLVED, That the NARUC recommends that the LECs be required to exclude an amount of expense equivalent to the amount of revenues received for the physical collocation before separations occurs; and be it further

RESOLVED, That the NARUC urges the FCC to address the following issues in current proceedings, reconsideration, or additional rulemakings, as may be appropriate:

- The proper designation of property, expenses and revenue used in the development of tariffed rates for central office space;
- The differentiation of jurisdictional costs and revenues in cases where the interconnection/collocation is provided under both federal and state jurisdiction;
- That deaveraging for transport or switched services be implemented only after a comprehensive, thorough review of the economic effects of deaveraging on the public and on the industry, especially those concerns associated with the maintenance of universal service, the participation of rural America in economic growth, and an evaluation of how to reduce costs in high cost areas;
- The establishment of support mechanisms for high cost areas before rates are set at different levels for different market areas;
- The proper assignment of the industry's interoffice official facilities in view of their use in advanced network configurations;
- The establishment of costing and pricing policies for switched access service interconnection; and be it further

RESOLVED, That the NARUC urges that further FCC proceedings not delay the implementation of interstate switched interconnection in those States that have approved switched interconnection; and be it further

RESOLVED, That the NARUC urges the FCC to collect and report information periodically in a monitoring mechanism for collocation expenses, revenues, and deployment activity; and be it further

RESOLVED, That the NARUC directs its General Counsel to file a petition for reconsideration expressing the concerns of the States regarding preemption by the FCC on physical versus virtual interconnection arrangements for intrastate services, prior to providing the States a reasonable period within which to consider the issue.

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**Sponsored by the Committee on Communications**  
**Adopted November 18, 1992**

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of  
Expanded Interconnection with Local Telephone Company Facilities  
CC Docket No. 91-141

APPENDIX B

# 1992 State Legislative Sessions

State	Prefile	1992												1993	Convene	Adjn	Carry-Over	Intro Counts
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC					
Alabama	Y														02/04	05/06	No	1850
Alaska	Y														01/13	05/13	91-92	650
Arizona	Y														01/13	04/25	No	900
Arkansas		Does Not Meet In Regular Session in 1992																
California	N														01/06	11/30	91-92	3800
Colorado	Y														01/08	05/11	No	750
Connecticut	N														02/05	05/06	No	1750
Delaware	N														01/14	06/30	91-92	850
Florida	Y														01/14	03/13	No	3200
Georgia	N														01/14	03/06	91-92	1400
Hawaii	Y														01/15	04/30	91-92	3000
Idaho	Y														01/06	03/31	No	850
Illinois	Y														01/14	06/30	91-92	2200
Indiana	Y														01/06	03/13	No	900
Iowa	N														01/13	04/23	91-92	950
Kansas	Y														01/13	04/11	91-92	1000
Kentucky	N														01/14	04/15	No	2300
Louisiana	Y														03/18	06/22	No	3500
Maine	Y														01/08	04/15	91-92	900
Maryland	Y														01/08	04/13	No	3200
Massachusetts	Y														01/01	12/30	No	9000
Michigan	N														01/08	12/28	91-92	2900
Minnesota	N														01/06	04/30	91-92	2300
Mississippi	Y														01/07	05/10	No	3100
Missouri	Y														01/08	05/15	No	1300
Montana		Does Not Meet In Regular Session in 1992																
Nebraska	N														01/08	04/14	91-92	800
Nevada		Does Not Meet In Regular Session in 1992																
New Hampshire	N														01/08	05/05	91-92	800
New Jersey	N														01/14	01/10	92-93	9000
New Mexico	N														01/14	02/13	No	1100
New York	Y														01/08	12/31	91-92	6200
North Carolina	N														05/26	07/25	91-92	800
North Dakota		Does Not Meet In Regular Session in 1992																
Ohio	N														01/03	12/28	91-92	2000
Oklahoma	Y														02/03	05/29	91-92	1150
Oregon		Does Not Meet In Regular Session in 1992																
Pennsylvania	N														01/07	11/27	91-92	250
Rhode Island	Y														01/07	07/03	91-92	3500
South Carolina	Y														01/14	06/04	91-92	1700
South Dakota	N														01/07	03/16	No	900
Tennessee	Y														01/14	04/07	91-92	3400
Texas		Does Not Meet In Regular Session in 1992																
Utah	Y														01/13	02/19	No	800
Vermont	N														01/07	05/13	91-92	550
Virginia	Y														01/08	03/14	92-93	2000
Washington	Y														01/13	03/23	91-92	1700
West Virginia	Y														01/08	03/17	No	2400
Wisconsin	N														01/28	03/17	91-92	900
Wyoming	Y														02/17	03/17	No	300
U.S. Congress	N														01/21	12/01	91-92	4500

■ Heavy introductory activity

■ Committee/floor activity

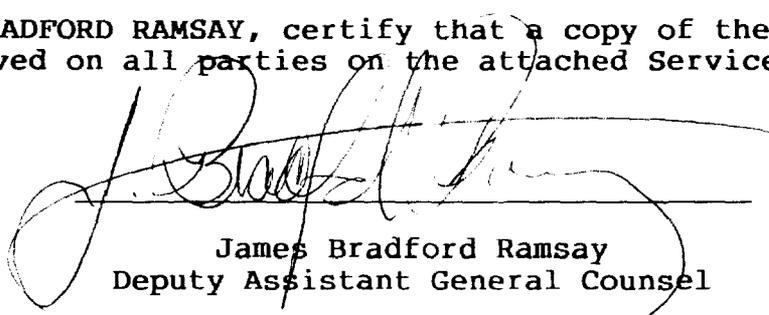
△ Executive action deadline

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of  
  
Expanded Interconnection with Local Telephone Company Facilities  
  
CC Docket No. 91-141

CERTIFICATE OF SERVICE

I, JAMES BRADFORD RAMSAY, certify that a copy of the foregoing was served on all parties on the attached Service List.

A handwritten signature in black ink, appearing to read "J. Bradford Ramsay", is written over a horizontal line. The signature is fluid and cursive.

James Bradford Ramsay  
Deputy Assistant General Counsel

National Association of  
Regulatory Utility Commissioners

December 18, 1992

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