



Larus

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electronics for telecommunications

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February 4, 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

Re: Verilink Petition for Rulemaking No. 8158

Dear Ms Searcy:

This letter is written in support of Verilink's request for rulemaking in regards to amending the Commission's Part 68 Rules to authorize regulated carriers to provide certain line build out functionality as a part of their regulated network equipment located on the customer premises.

Larus Corporation is a manufacturer of network interface devices, T1 transmission equipment, and original equipment manufacturer (OEM) T1 interface modules used by channel service unit (CSU) vendors. As such, we have products before the interface, at the interface, and in the customer equipment.

In allowing the line build out (LBO) function to be provided by the regulated carrier, (1) there will be a savings from the elimination of joint engineering, (2) there will be no practical impact on existing products or services, (3) would allow a uniform interface as described by ANSI T1.403.

Presently, Larus field service spends time on the phone discussing the settings of equipment with both the regulated carrier and the customer. We have found that the present system results in the various parties involved trying all combinations until the circuit works. This, in some cases, causes harm to the network, as higher level signals are inadvertently launched towards the network, which result in interference on another customer's service in the same cable. The proposal would eliminate the setting issue in the customer equipment, and leave Larus with supporting only one uniform set of rules for the regulated carrier. The cost savings to Larus are small, but the cost savings to the carrier and the customer may be great in terms of on time reliable service being provided.

Presently, the LBO is used by the CSU vendors in non-network applications for setting levels so the LBO feature will not be removed from their products. The LBO functionality must be present in the regulated carriers' network interface device (NID) to properly set levels for the looped back condition. Thus the

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rulemaking will not change the cost of either the CSU or NID. All customers will be instructed to set their CSUs to option A (0 dB DS1 DSX reference level), and the engineering will be left to the regulated carrier, who does this in any case already. In cases of older equipment which is relocated, the regulated carrier may choose to install a NID, if not already present, or pad the circuit when the equipment is relocated.

I was part of the standards process which resulted in ANSI T1.403 and contributed to the areas of pulse specification at the interface. As such, I am a technical expert on the subject. After much debate and consideration, the standard was written to allow present equipment to be supported, as well as allow the provision of new services, such as fiber delivered T1, without going back and revising the standard, or the customer equipment. I feel that the present standard accomplished these goals and is being used by regulated carrier, manufacturer, and customer alike to offer, build, and specify present and future services.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Austin Lesea".

Austin Lesea  
Vice President  
Advanced Product Development  
Larus Corporation  
2160 Del Franco Street  
San Jose, CA 95131

AL:be