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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 16, 1993

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, DC 20554

Subject: Tariff Filing Requirements for Nondominant Common
Carriers
CC Docket No. 93-36

Dear Ms. Searcy:

Enclosed please find the original and nine copies of the General Services Administration's Reply Comments for filing in the above-referenced docket. Copies of this filing have been served on all interested parties.

Sincerely,

Michael J. Ettner

Michael J. Ettner
Senior Assistant General Counsel
Personal Property Division

Enclosures

cc: International Transcription Service
Policy and Program Planning Division (2 copies)

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BEFORE THE
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FEDERAL COMMUNICATIONS COMMISSION

SUMMARY

In these Reply Comments, GSA responds to initial comments related to the tariff notice, content and form requirements proposed by the Commission for nondominant carriers. In the absence of legislative amendment of the Communications Act, GSA believes that consumer interests are best served by making the rate schedules of telecommunications services as open to the public as possible.

GSA urges the Commission to adopt rules to protect customers against tariffs that abrogate contracts between carriers and customers. At a minimum, GSA believes the following safeguards should be adopted:

1. In cases where long-term tariffs contain a carrier commitment not to unilaterally alter a service arrangement, the Commission, pursuant to Sections 201(b) and 205, should declare unlawful any new tariff filing that seeks to abrogate that commitment.
2. Carriers intending to file a tariff that is inconsistent with an underlying contract shall notify the customer at least 15 days in advance (to allow parties to the contract to resolve differences).
3. Carriers shall identify or "flag" contract-abrogating tariff filings, and such filings shall be made on 120 days' notice.

GSA also opposes the rate range proposal in the NPRM. GSA recommends that the Commission affirm the criteria established in the Interexchange Competition Order as the necessary components of nondominant carrier tariffs. To the extent applicable, all tariffs should include the following information:

1. the term necessary to qualify for rates listed, including any renewal options,
2. a brief description of each of the services provided,
3. minimum volume commitments for each service,
4. the price for each service element at each volume commitment level available,
5. a general description of any volume discounts built into the rate structure, and
6. a general description of other classifications, practices, and regulations affecting the rate.

GSA supports the direction set by the Commission in seeking to minimize paper tariffs. However, GSA recommends that the tariff form proposal be changed to require the filing of tariffs as ASCII text files on an electronic bulletin board to be established by the Commission. This electronic bulletin board would be open to the public.

REPLY COMMENTS OF THE GENERAL SERVICES ADMINISTRATION

CC DOCKET NO. 93-36

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of
Tariff Filing Requirements for
Nondominant Common Carriers

CC Docket No. 93-36

REPLY COMMENTS OF THE GENERAL SERVICES ADMINISTRATION

The General Services Administration ("GSA"), on behalf of the Federal Executive Agencies, hereby submits its Reply Comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM"), FCC 93-103, released February 19, 1993, in CC Docket No. 93-36. This NPRM solicits comments and replies on the proposed tariff filing requirements for nondominant common carriers.

I. INTRODUCTION

This NPRM was issued in response to a recent court decision finding the Commission's current nondominant carrier tariffing forbearance policy to be in violation of the *Communications Act of 1934*.¹ The NPRM addressed three categories of issues:

1. **Nondominant Carrier Tariff Notice Requirements**

The Commission proposed that nondominant carriers only be required to file tariffs one day in advance of their effective date.

¹ AT&T v. FCC, 978 F.2d 727 (D.C. Cir. 1992).

2. Nondominant Carrier Tariff Content Requirements

The Commission proposed that nondominant carriers be allowed great flexibility in the content of their tariffs with only a maximum or range of rates being filed for public inspection.

3. Nondominant Carrier Tariff Form Requirements

The Commission proposed that nondominant carriers be required to submit tariffs as WordPerfect 5.1 files on Microsoft DOS 5.0 formatted 3 1/2 inch floppy disks.

In response to this NPRM, the following forty-one parties filed comments:

- the United States Telephone Association, the National Cooperative Association and seven Local Exchange Companies ("LECs"),
- the Competitive Telecommunications Association and eleven individual interexchange carriers ("IXCs"),
- the Association for Local Telecommunications Services ("ALTS") and five individual Competitive Access Providers ("CAPs"),
- the Cellular Telecommunications Industry Association and two individual cellular carriers,
- Pac Tel Paging, et al. ("Paging Companies"),
- six users or user groups,
- the American Public Communication Council, Mobile Marine Radio, the Small Business Administration and attorney Kenneth Robinson.

For the most part, the respondents to the NPRM advanced positions that they have advocated in other proceedings. For example, in their comments, the American Telephone and Telegraph Company ("AT&T") and the LECs sought either not to file tariffs or alternatively to cause their nondominant competitors to adhere to every tariff provision applicable to dominant carriers. Sprint Communications Company, L.P. ("Sprint") and MCI Telecommunications Corporation ("MCI") claimed that they have no market power and must be protected from public disclosure of their prices. The smaller nondominant carriers and their associations pointed out the costs of filing tariffs, the possibility of aggressive competition from dominant carriers and the need for clarification of what is expected of them in tariffs. The users commenting in the

proceeding were concerned that their long-term arrangements for service could be superseded by tariffs that could be effective prior to the consumer knowing of their existence.

Interestingly, this contention is over varying interpretations of how to enforce and apply a rather simple provision in a long-established law. The provision, §203(a) of the *Communications Act of 1934*, sets forth the requirements for public notification of rates:

§ 203 Schedules of Charges

(a) Filing; Public Display

Every common carrier, except connecting carriers, shall, within such reasonable time as the Commission shall designate, file with the Commission and print and keep open for public inspection schedules showing all charges for itself and its connecting carriers for interstate and foreign wire or radio communication between the different points on its own system, and between points on its own system and points on the system of its connecting carriers or points on the system of any other carrier subject to this chapter when a through route has been established, whether such charges are joint or separate, and showing the classifications, practices, and regulations affecting such charges. Such schedules shall contain such other information, and be printed in such form, and be posted and kept open for public inspection in such places, as the Commission may by regulation require, and each such schedule shall give notice of its effective date; and such common carrier shall furnish such schedules to each of its connecting carriers, and such connecting carriers shall keep such schedules open for inspection in such public places as the Commission may require. [emphasis added]

GSA believes that this provision should be interpreted simply and precisely to allow the public to inspect “schedules showing all charges,” and “the classifications, practices, and regulations affecting such charges.” At the same time, GSA wishes to nurture the competitive environment that the Commission has been so successful in creating to the betterment of all purchasers of telecommunications services. In these Reply Comments, GSA will demonstrate that the notice and content requirements proposed by the Commission should be more tightly drawn to the benefit of the public. Further, GSA suggests that the form requirements should be framed in a way that increases ease of filing and the consumer’s access to critical information.

II. RULES MUST BE ADOPTED TO PRESERVE THE MUTUAL ENFORCEABILITY OF CARRIER-CUSTOMER CONTRACTS.

As a major purchaser of telecommunications services under negotiated contracts, GSA agrees with the comments of several parties who urge the Commission to resolve consumers' legitimate concerns over the "tariff precedence doctrine" implications of the Commission's proposal.² Although widely recognized as an inequitable rule, the current case law indicates that the prices, terms and conditions in a subsequently-filed tariff take precedence over the prices, terms, and conditions in an underlying contract.³

By law, federal government telecommunications acquisitions are conducted as full and open competitive procurements.⁴ As a result of this process GSA, and other federal agencies acting under delegations of authority from GSA, have awarded contracts to nondominant carriers. Reimposition of tariff filing requirements on the government's telecommunications service providers may expose more contracts to the risk of subsequent action that increases rates or alters material terms and conditions. While a long-range solution to this dilemma may be found in Congressional revision of the Communications Act, some ameliorative action is within the authority of the Commission and should be taken now.

GSA urges the Commission to adopt rules to protect customers against tariffs that abrogate contracts between carriers and customers. In this regard, the parties' initial comments contain several recommendations. At a minimum, GSA believes the following safeguards should be adopted:

² See the Comments of Capital Cities/ABC, Inc. and National Broadcasting Company, Inc.; Telecommunications Association; Aeronautical Radio, Inc.; and the Ad Hoc Telecommunications Users Committee.

³ See, e.g., *American Broadcasting Companies, Inc. v. FCC*, 643 F.2d 818 (D.C. Cir. 1980); see also *RCA American Communications*, 86 FCC 2d 689, 705 (1981); *RCA American Communications, Inc.*, 2 FCC Rcd 2363, 2367-68 (1987), *aff'd*, *Showtime Networks, Inc. v. FCC*, 932 F.2d 1 (D.C. Cir. 1991).

⁴ *Competition in Contracting Act*, 41 U.S.C. 253 *et seq.*

1. In cases where long-term tariffs contain a carrier commitment not to unilaterally alter a service arrangement, the Commission, pursuant to Sections 201(b) and 205, should declare unlawful any new tariff filing that seeks to abrogate that commitment.
2. Carriers intending to file a tariff that is inconsistent with an underlying contract shall notify the customer at least 15 days in advance (to allow parties to the contract to resolve differences).
3. Carriers shall identify or "flag" contract-abrogating tariff filings, and such filings shall be made on 120 days' notice.
4. The Commission shall suspend such filings and require a detailed and compelling demonstration that the changes are just and reasonable.
5. The Commission shall provide that if an inconsistent tariff is allowed to take effect, the customer is granted the right to terminate the service agreement without liability, notwithstanding any tariff or contractual provision to the contrary.

These, and other safeguards recommended by consumers, will improve the benefits of the competitive environment which the Commission has done so much to create.

III. TARIFF NOTICE REQUIREMENTS SHOULD BE BASED ON THE CONTENT OF THE TARIFF BEING FILED.

The Commission proposed that the dominant carriers' 14-day tariff filing requirement should be lessened for nondominant carriers to one day. AT&T supports this proposal as long as it can also have its filing lead time requirement similarly reduced. AT&T states: "Thus, proposals to reduce the notice period and to grant carriers flexibility with regard to the form of their tariffs are well within the Commission's authority. There is no basis, however, to apply the Commission's proposals to AT&T's competitors, but not to AT&T."⁵

Only two of the commenting LECs addressed the issue of notice requirements. Southwestern Bell expressed general approval of streamlined regulation, if it was applied to all carriers, and cited the one-day rule as an example: "If a one day notice

⁵ Comments of American Telephone and Telegraph Company ("AT&T"), p. 15.

period for any particular provider of access services serves the public interest, it serves the public interest to apply that notice period to all such providers."⁶ NYNEX opposed the one-day rule, and argued that it would prevent the review of tariffs prior to their effective date, and that "there is no effective substitute for pre-effective review."⁷

MCI and the majority of smaller nondominant carriers supported a one-day lead time for tariff filings. They generally expressed their justification of the reduction of the requirement as ALTS did:

There can be no doubt that under a 14 day notice period LECs will file 'nuisance' petitions opposing nondominant carrier tariffs. Designed to harass emerging competitors and cast doubt in the marketplace concerning the lawfulness of their tariffs, such petitions are the obvious continuation of the LECs' long-standing efforts to preclude or delay competition in the local services market.⁸

Sprint, on the other hand, maintained that it had voluntarily filed tariffs with a 14-day lead time and did not find the 14-day lead time particularly onerous. Therefore, Sprint argued that the requirement should be kept for nondominant carriers.⁹

Users and user groups were strongly opposed to the one-day rule. In their comments they saw the potential for the rule to upset the current contractual marketplace by allowing providers to alter long-existing contracts through the device of a tariff filing. As Capital Cities/ABC and National Broadcasting Company ("ABC/NBC") stated in their joint comments, "the one day notice proposal ought to be revised in order to give customers a realistic opportunity to challenge any attempts by carriers to abrogate or alter their contractual commitments to customers."¹⁰ ABC/NBC and other users suggest that no tariff that would change long standing agreements should be allowed without at least 14 days notice. Some parties suggested that tariffs which do

⁶ Comments of Southwestern Bell Corporation ("Southwestern Bell"), p. 8.

⁷ Comments of the NYNEX Telephone Companies ("NYNEX"), p.11.

⁸ Comments of ALTS, p. 6

⁹ Comments of Sprint, p. 15.

¹⁰ Comments of ABC/NBC p. 3.

not affect long standing agreements should be allowed a one-day lead time, and that those that do should be kept to the fourteen-day standard.¹¹

GSA believes that varying the lead time of tariff filing requirements for dominant and nondominant carriers is inappropriate, and that, instead, the Commission should base lead times for all carriers on the content of the tariff. Most interested consumers of telecommunications services, including GSA, initially find out about changes in tariffs through the trade press. It is likely that under the one-day requirement the customers of nondominant carriers would only find out about changes in rates after they were in effect. Although the lead time of the filing is clearly the prerogative of the Commission, the one-day requirement seems to be counter to the "open to public inspection" spirit and language of §203(a), especially when changes increase customer rates.

GSA recommends that the Commission not adopt the one-day rule for all tariff filings from nondominant carriers, but instead adopt a content-based approach to notice requirements. Specifically, tariffs that have no effect on contracts or a lowering effect on the rates of both the dominant and nondominant carriers, should be placed under the one-day rule. Tariffs that would alter long standing contracts, or increase rates, should be more open to public inspection through a fourteen-day rule.

IV. TARIFF CONTENT REQUIREMENTS MUST SATISFY SECTION 203(a) OF THE COMMUNICATIONS ACT.

The Commission asked commenters to give their opinions on a proposal that nondominant carriers only file maximum rates or a range of rates. The Commission also asked that commenters respond to the question of the legality of the Commission's proposal under §203(a) of the *Communications Act*. On these questions the commenters fell into two camps: dominant carriers who thought the rate range proposal

¹¹ Comments of the International Communications Association, ("ICA") p. 2; Ad Hoc Telecommunications Users Committee, p. 9. The Comments of Tele-Communications Association ("TCA") maintain that there should be a 15 day period for tariffs that did not affect long standing contracts and 120 days for tariffs that do.

was a poor idea and not responsive to §203(a), and nondominant carriers who thought the rate range proposal was a good idea that would suffice under the law.

AT&T was vehement in its opposition to the rate range proposal, stating "The Notice proposes a new rule that would purportedly allow carriers to file tariffs that contain maximum rates or ranges of rates, but that do not specify the actual charges to the customer or a formula for determining those charges. This rule is contrary to the plain language of Section 203".¹² The LECs, too, were generally against the idea, believing that the Commission's proposal would be found unresponsive to §203. Bell Atlantic wrote that the Commission "cannot make tariffing a *pro forma* requirement that merely pays lip service to the requirements of Section 203."¹³

Pacific Bell and Nevada Bell ("Pacific") drew analogies between the requirements needed for nondominant carrier tariffs and those in the recent Interexchange Competition Order which set rules for AT&T's contract tariffs.¹⁴ Pacific stated that in that proceeding the "Commission took care to observe the requirements of Section 203(a) by requiring AT&T to file tariffs that did not disclose proprietary customer information, but specified the rates and terms of these contracts. The same approach is called for here."¹⁵

Commenters in favor of the rate range proposal gave various reasons for keeping the charges, classifications, practices and regulations affecting telecommunications services secret from the public. A prime reason was fear of competitive activity. Sprint

nondominant carriers would advance the interests of AT&T, who would be able to use the detailed information to discipline the market and limit the growth of competition.”¹⁶

MFS Communications (“MFS”) and others argue that nondominant carriers are more innovative and require greater flexibility to be so, and cannot afford the process of informing the public of their rates.

As previously stated, CAPs are highly innovative service providers and thus require latitude in specifying their services and rates. The NPRM provides this flexibility, and thereby relieves nondominant carriers of the burden of filing constant tariff revisions. Such revisions slow the pace of innovation, as well as impose costs of \$490 per filing. While these filing costs are nothing to the LECs, who are guaranteed to recover such costs through monopoly service rates, such costs can be significant for the CAPs and could further stifle their innovation.¹⁷

The Paging Companies and Telocator requested more specificity from the Commission as to exactly what was being required of them.¹⁸ Telocator writes:

While Telocator endorses the policy underlying this text, to achieve its intended purpose the rule should be clarified. Specifically, Telocator requests that the FCC set out in greater detail the minimum information it believes to be required by Section 203(c). Such an authoritative construction will reduce unnecessary litigation by guiding carriers in complying with the tariff filing requirements and will be entitled to substantial deference on judicial review.¹⁹

GSA does not believe that there should be differentiation in the tariff filing requirements of dominant and nondominant carriers. The maximum rate and rate range proposal is unresponsive to the objective of providing consumers sufficient information to allow those consumers to know what kinds of services are being provided at what cost.

GSA believes that the Commission addressed and appropriately resolved these very same issues in its Interexchange Competition Order:

¹⁶ Comments of Sprint, p. 8.

¹⁷ Comments of MFS, p. 10.

¹⁸ Comments of Paging Companies p. 9; Comments of Telocator, pp. 8-9.

¹⁹ Comments of Telocator p. 9.

"We now alter the filing requirement proposed in the Notice. In particular, we require AT&T to file, fourteen days prior to the effective date of each of its customer contracts, a tariff summarizing that contract and containing the following information:

- 1. the term of the contract including any renewal options,**
- 2. a brief description of each of the services provided under the contract,**
- 3. minimum volume commitments for each service,**
- 4. the contract price for each service or services at the volume levels committed to by the customers,**
- 5. a general description of any volume discounts built into the contract rate structure and**
- 6. a general description of other classifications, practices, and regulations affecting the contract rate.**

As discussed below, the provision of this information will satisfy the requirements of section 203(a) of the Act, while avoiding disclosure of customer proprietary information or information that might increase the risk of tacit collusion in the marketplace."²⁰

In that earlier decision, the Commission gave the public the ability to inspect "schedules showing all charges," and "the classifications, practices, and regulations affecting such charges" by clearly setting forth what was required in AT&T contract tariffs. GSA believes that since this was, indeed, the information necessary to "satisfy the requirements of section 203(a) of the Act, while avoiding disclosure of customer proprietary information or information that might increase the risk of tacit collusion in the marketplace," similar treatment should be accorded here. The information necessary for the contracts of a dominant carrier to comply with §203 nineteen months ago is the same information necessary for the contracts and rate schedules of the nondominant carriers today.

²⁰ Interexchange Competition Order, para. 121.

GSA recommends that the Commission affirm that the six criteria established in the Interexchange Competition Order to respond to §203(a) are the necessary constituents of nondominant carrier tariffs in this docket.

V. TARIFF FORM REQUIREMENTS SHOULD BE ESTABLISHED WHICH FACILITATE PUBLIC INSPECTION.

In this NPRM the Commission has acted creatively to craft a proposal for tariff form requirements that would be at the same time innovative and inexpensive. The existing volumes of tariffs available to those few members of the public able to travel to Washington, D.C. and visit the FCC's Public Tariff Room fail to meet that objective. In a clear effort to fit future tariffs into the Public Tariff Room, the Commission suggests that the nondominant carriers be required to file tariffs on 3 1/2 inch Microsoft DOS formatted floppy disks as WordPerfect wordprocessing program files.

Most commenters did not address this proposal, but the majority of those making comments on it approved of the idea. The general tenor of the approval was well expressed by one commenter as follows:

LinkUSA is well on its way to creating a 'paperless office.' We applaud the Commission's suggestion to file tariffs on diskette. From a cost perspective, LinkUSA believes that the cost of a diskette will be balanced by the eliminated cost of paper and the associated weight-based shipping costs of the tariff.²¹

Two commenters raised important objections, however, as to the specificity of the format proposed by the Commission. Sprint reported that it currently uses a word processing program called DisplayWrite 4 for its tariffs and that it would have to incur significant expense in converting to WordPerfect format. The Telecommunications Resellers Association ("TRA"), commenting on behalf of its 130 members, had a similar problem and suggested a possible solution:

²¹ Comments of LinkUSA, p. 4.

Carriers that utilize Macintosh hardware and compatible software and carriers that utilize word processing other than WordPerfect, for example, could provide the Commission with floppy diskettes in an ASCII format that would be easily decoded by practically any hardware and software configuration.²²

GSA joins in the general approval of the direction and spirit of the Commission's proposal for tariff filing in digital form. GSA and the Federal Executive Agencies also are moving toward paperless offices in order to better serve their customers, the taxpayers. GSA would like to propose two modifications to the Commission's proposal that would maintain its spirit and direction:

1. Require tariff filing in ASCII²³ text format rather than WordPerfect 5.1 format
2. Require carriers to file tariffs on an electronic Bulletin Board Service ("BBS") and allow access to the BBS by the public.

GSA believes that the proposal to file tariffs as WordPerfect 5.1 files is a well-intentioned attempt by the Commission to prescribe a generic microcomputer standard to lessen the problems associated with incompatibility of systems and software. However WordPerfect 5.1 is not a generic standard in the industry. In fact, as of this date, WordPerfect 5.1 has been superseded by WordPerfect 5.2. In coming years, if the Commission accepts this standard it will have to deal with questions of when to go to WordPerfect 6, 7, 9 or, if the WordPerfect Corporation should disappear, as some of the giants of software have done, what new standard to adopt.

There is only one truly generic standard in microcomputers, and that is ASCII text format. All the leading software packages on the market for the last 10 years have had the ability to read and write ASCII text files. These include wordprocessing programs such as WordPerfect, Microsoft Word, WordStar and DisplayWrite and spreadsheet programs such as Quattro Pro, Microsoft Excel and Lotus 123. ASCII text files are easily used in a variety of operating environments, including DOS, Macintosh, UNIX and

²² Comments of TRA, p. 6.

²³ American Standard Code for Information Interchange.

almost all mainframes. ASCII text format is also not likely to disappear, since it is a long-established and widespread protocol.

GSA also believes that the filing of tariffs on floppy disks is a significant advance in the use of technology. However, to prepare for the information age that the Commission has done so much to create, the Commission should go further and require that all tariffs be filed and maintained on a government BBS. A BBS is a computer program that is set up on one computer and is accessed by other, remote, computers. A remote user can access the BBS by using a modem and a common phone line. The user logs into the BBS by means of a conventional telephone call and can then transfer and receive files and messages of interest. Thousands of BBS's are currently used throughout the country by schools, businesses and private groups to share computer files and connect to databases.

There are three fundamental reasons for adopting this proposal:

1. The technology to establish a tariff BBS is freely available in the government and in the Commission.
2. The adoption of a tariff BBS would improve the access and reduce the cost burden to the Commission, the carriers, and the public associated with acquiring, using and maintaining tariffs.
3. The adoption of a tariff BBS will allow the Commission to truly "keep open for public inspection schedules showing all charges" in a fast-changing market.

The use of bulletin boards and large computer networks through such systems as Internet and CompuServe is changing the fabric of how information is obtained and distributed in the 1990s and into the twenty-first century. The Federal government already has a large number of bulletin boards that are used by the public. Thirty of these bulletin boards are listed in Appendix A to these reply comments.

The Commission itself maintains a BBS, named FCC Public Access Link or "PAL." The PAL BBS includes an access equipment authorization database, list of terms and codes used in application records, public notices, bulletins and other public

information. The system is open to the public 24 hours a day, seven days a week, is very easy to use, and could serve as a model for the construction of a tariff BBS.

Having tariffs on a BBS would mean that every staff member of the Commission, carrier of telecommunications services and member of the public with a computer and modem could, for the cost of a call, check the date of the latest change in a tariff. They could also log in and upload (transfer a file on to the system) a tariff or download (transfer a file from the system onto their own microcomputer) a tariff. A carrier or consumer outside the Washington area would not have to wait the 2-3 weeks that most tariff provision services take to update a tariff, or hire an agent in Washington to visit the Public Tariff Room during its limited hours of operation to gain access to information on tariffs. The costs to the Commission, consumer and carriers would be substantially reduced and there would be a significant increase in the availability of information.

The establishment of a tariff BBS would truly "keep open for public inspection schedules showing all charges" as specified in §203(a), but in a way that was unimaginable to the framers of the Communication Act in 1934. The framers recognized that informing the public as a necessary task, however, because an informed public is essential to every aspect of regulating their common good.

VI. CONCLUSION

As the agency vested with the responsibility for acquiring telecommunications services for use of the Federal Executive Agencies, GSA supports the Commission's efforts to fully conform to the requirements of §203 of the Communication Act of 1934. GSA recommends that the Commission adopt rules that will preserve the mutual enforceability of contracts between customers and carriers. GSA recommends that the Commission base the tariff notice requirements of all carriers on the content of the tariff being filed, incorporate the six criteria established in the Interexchange Competition Order into the tariff requirements of nondominant carriers and establish a tariff form requirement of ASCII text files kept on a public electronic bulletin board service.

Respectfully submitted,

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Library Of Congress	Federal Library Committee
National Aeronautics And Space Administration	Information Technology Center National Space Science Data Center Space Physics Analysis Network
National Science Foundation	Science Resources Studies
Securities & Exchange Commission	Information Systems Management

CERTIFICATE OF SERVICE

I, MICHAEL J. ETTNER, do hereby certify that copies of the foregoing "Reply Comments of the General Services Administration" were served this 16th day of April 1993, by postage paid to the following parties:

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