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Federal Communications Commission
Office of the Secretary

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

In the Matter of)
)
Petition of Southwestern Bell Telephone)
Company to Amend Part 68 of the Commission's)
Rules to Include Terminal Equipment Connected)
to Basic Rate Access Services Provided via)
Integrated Services Digital Network)
Access Technology)

RM-7815 /

REPLY COMMENTS OF THE AMERITECH OPERATING COMPANIES

The Ameritech Operating Companies¹ submit these reply comments in support of the petition of Southwestern Bell Telephone Company ("Southwestern Bell") requesting the Commission to amend Part 68 of its Rules to include terminal equipment connected to two-wire Basic Rate Access interface provided by Integrated Services Digital Network ("ISDN") access technology.

The petition has gathered substantial support and virtually no opposition.² Therefore, the Companies will not reiterate their comments

¹ The Ameritech Operating Companies are: Illinois Bell Telephone Company, Indiana Bell Telephone, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

² IDCMA, AT&T, BellSouth, NYNEX, Southern New England Telephone Company, Pacific Bell and Nevada Bell, and Bell Atlantic, in addition to the Ameritech Operating Companies, have all filed in support of the petition. Although US West believes that the rules proposed by Southwestern Bell are unnecessary, it does not force its opposition and, instead, even suggests clarifying changes to the proposed rule sections.

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as to the benefits of granting Southwestern Bell's petition. However, two issues were raised in the comments of other parties which deserve special attention.

First, US West touches briefly on the jack/connector issue mentioned by the Companies in their comments. US West suggests that the Commission adopt an eight-position jack called a SJA-11 in lieu of creating a new registration jack.³ US West's proposal, however, is premature. It is the Companies' understanding that the ECSA T1E1.3 working group, Connectors and Wiring Arrangements, is discussing the issue of appropriate network connectors. At their meeting on the 14th of November, 1991, it was the consensus of the working group that the eight-pin connector might not be appropriate for the network interface. The working group will continue to address the issue. However, a rulemaking proceeding on the registration of ISDN terminal equipment need not await the industry's consensus on connectivity to the network at the physical layer. By the time rule changes on CPE standards are ready to take effect, the industry recommendation for connection devices will be ready for Commission approval.

Second, AT&T requests that the Commission's Part 68 Rules be amended to provide specifications for terminal equipment connected to the four-wire ISDN Primary Rate Access ("PRA") interface as well.⁴ The Ameritech Operating Companies have no objection to the inclusion of the PRA interface along with the BRA interface in a rulemaking proceeding. The Companies, however, have not had sufficient time to analyze the

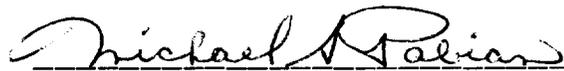
³ US West at 4.

⁴ AT&T at 2-3.

technical merits of AT&T's proposed rule language in that regard and would reserve the right to raise any potential objections to that language in the context of the rulemaking proceeding itself.

Again, the Companies would encourage the Commission to grant Southwestern Bell's petition but to otherwise take no action that would require network connection for ISDN BRA via an eight-position jack.

Respectfully submitted,



Floyd S. Keene
Michael S. Pabian
Attorneys for the Ameritech
Operating Companies
Room 4H76
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025
(708) 248-6044

Dated: November 21, 1991

CERTIFICATE OF SERVICE

I, Jenell Thompson, do hereby certify that a copy of the Reply Comments of the Ameritech Operating Companies has been mailed this 21st day of November 1991, by first-class mail, postage prepaid, to the attached service list.

By: Jenell Thompson
Jenell Thompson

Francine J. Berry
Michael J. Holliday
Lowel B. Miller
American Telephone and Telephone Company
295 North Maple Avenue
Basking Ridge, New Jersey 07920

James P. Tuthill
Jeffrey B. Thomas
Pacific Bell
Nevada Bell
Room 1530-A
140 New Montgomery St.
San Francisco, CA 94105

Michael D. Lowe
Lawrence W. Katz
Bell Atlantic Telephone Companies
1710 H Street, N. W.
Washington, D.C. 20006

Stanley J. Moore
Pacific Bell
Nevada Bell
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

William B. Barfield
Kirven Gilbert III
BellSouth Corporation
Suite 1800
1155 Peachtree Street, N.E.
Atlanta, Georgia 30367

E. William Kobernusz
Vice President - Regulatory
The Southern New England
Telephone Company
227 Church Street
New Haven, CT 06506-1806

Herbert E. Marks
James L. Casserly
Loren H. Kravetz
Counsel for Independent Data
Communications Manufacturers
Association, Inc.
Squire, Sanders & Dempsey
1201 Pennsylvania Ave., N.W.
P.O. Box 407
Washington, D.C. 20044

Durward D. Dupre
Richard C. Hartgrove
Michael J. Zpevak
Thomas A. Pajda
Bruce E. Beard
Southwestern Bell Telephone Company
1010 Pine Street, Room 2114
St. Louis, MO 63101

Mary McDermott
Shelley E. Harms
New York Telephone Company and
New England Telephone and Telegraph Co.
120 Bloomingdale Road
White Plains, NY 10605

Lawrence E. Sarjeant
U S West Communications, Inc.
Suite 700
1020 19th Street, N.W.
Washington, D.C. 20036