

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

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Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Petition to Amend Part 68 of the)
Commission's Rules to Include Terminal) RM 7815
Equipment Connected to Basic Rate)
Access Services Provided via)
Integrated Services Digital Network)
Access Technology)

SOUTHWESTERN BELL TELEPHONE COMPANY'S
REPLY TO COMMENTS REGARDING
PETITION FOR PROPOSED RULEMAKING

Southwestern Bell Telephone Company (SWBT), by its attorneys, respectfully submits this response to comments filed in regards to SWBT's Petition for Rulemaking. The Petition for Rulemaking requested the Commission to amend Part 68 of its Rules to include terminal equipment connected to two wire Basic Rate Access interface provided by the Integrated Services Digital Network (ISDN) access technology.

SWBT's Petition for Rulemaking is based on the American National Standards Institute's (ANSI) standard for BRA ISDN.¹ All parties filing comments generally support SWBT's Petition for Rulemaking. The Ameritech Operating Companies (Ameritech) note that while the ANSI standard specifies an 8 position non-keyed jack, Ameritech currently offers ISDN BRA via standard RJ-11 jack. Ameritech requests the Commission to do nothing to preclude local

¹ ANSI T1.601, 1988, Integrated Services Digital Network Basic Access Interface for use on Metallic Loops for Application on the Network Side of NT-Layer 1 Specification.

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exchange carriers from offering connection to ISDN BRA through any other appropriate registered/tariffed jack.²

The ANSI T1E1 standards committee has reached an agreement to address the concerns regarding the use of alternate jacks. Resolution of the issue is anticipated at the February, 1992 standards meeting. The Committees recommendation will be forwarded to the Commission upon resolution of the issue.

CONCLUSION

For the reasons stated in SWBT's Petition for Rulemaking and the comments filed in support thereof, SWBT's Petition should be granted.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By



Durward D. Dupre
Richard C. Hartgrove
Michael J. Zpevak
Bruce E. Beard

Attorneys for
Southwestern Bell Telephone Company

1010 Pine Street, Room 2114
St. Louis, Missouri 63101
(314) 235-2507

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² SWBT supports the use of the tariff alternative specified in Section 68.104(C). SWBT Petition for Rulemaking, p. 7, fn. 12.

CERTIFICATE OF SERVICE

I, Lisa Jundt, hereby certify that the foregoing
"Southwestern Bell Telephone Company's Reply to Comments
Regarding Petition for Proposed Rulemaking" in Docket # RM-7815
has been served this 21st day of November to the Parties of
Record.


Lisa Jundt

November 21, 1991

Downtown Copy Center
1114 21st Street, N.W.
Washington, D.C. 20036

Francine J. Berry
Michael J. Holliday
Lowell B. Miller
American Telephone and
Telegraph Company
295 North Maple Avenue
Basking Ridge, NJ 07920

Floyd S. Keene
Michael S. Pabian
Ameritech Operating Companies
Room 4H76
2000 W. Ameritech Center Drive
Hoffman Estates, IL 60195-1026

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

William B. Barfield
A. Kirven Gilbert III
Southern Bell Telephone and
Telegraph Company, and
South Central Bell Telephone
Company
1155 Peachtree Street, N.E.
Suite 1800
Atlanta, Georgia 30367

Herbert E. Marks
James L. Casserly
Lauren H. Kravetz
Independent Data Communications
Manufacturers Association, Inc.
1201 Pennsylvania Ave., N.W.
P.O. Box 407
Washington, D.C. 20044

James P. Tuthill
Jeffrey B. Thomas
Pacific Bell
Nevada Bell
140 New Montgomery St.
Rm. 1522-A
San Francisco, CA 94105

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

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

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

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