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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

NOV - 6 1991

Federal Communications Commission  
Office of the Secretary

In the Matter of )  
 )  
Petition 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

93-268

BELL ATLANTIC'S<sup>1</sup> COMMENTS IN SUPPORT OF PETITION FOR RULEMAKING

The Commission should grant Southwestern Bell Telephone Company's petition<sup>2</sup> to incorporate interface standards for Integrated Services Digital Network ("ISDN") basic rate access into Part 68 of the Rules.<sup>3</sup> By doing so, the Commission will signal equipment manufacturers that it supports wide-scale deployment of ISDN and will encourage them to offer needed customer premises equipment ("CPE").

ISDN is rapidly evolving from an "island" technology to a widely deployed architecture. Bell Atlantic intends to file ISDN tariffs this year and next in all of its intrastate jurisdictions. Within two years, most Bell Atlantic wire centers

<sup>1</sup> The Bell Atlantic telephone companies ("Bell Atlantic") are The Bell Telephone Company of Pennsylvania, the four Chesapeake and Potomac telephone companies, The Diamond State Telephone Company and New Jersey Bell Telephone Company.

<sup>2</sup> Petition for Rulemaking (filed August 23, 1991).

<sup>3</sup> 47 C.F.R. Part 68.

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will be ISDN-equipped. The range of compatible CPE, however, remains limited.

A significant reason so little CPE has been available is that uniform interface standards had not been published. Now, however, the American National Standards Institute has adopted such a standard for ISDN basic rate access.<sup>4</sup> By including in Part 68 specifications based on this standard, the Commission will avoid the need for individual telephone companies to include necessary ISDN interconnection specifications in their own tariffs, which could vary by company. The resulting uniformity will encourage manufacturers to offer ISDN CPE to meet the growing demand.

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<sup>4</sup> ANSI T1.601, Integrated Services Digital Network - Basic Access Interface for Use on Metallic Loops for Application on the Network Side of NT - Layer 1 Specification.

Accordingly, the Commission should grant the petition and promptly institute a rulemaking to amend Part 68 to include basic rate access ISDN interconnection specifications.

Respectfully submitted,

**The Bell Atlantic Telephone  
Companies**

By Their Attorneys

  
\_\_\_\_\_  
Michael D. Lowe  
Lawrence W. Katz

Mark J. Mathis  
James R. Young  
Of Counsel

1710 H Street, N.W.  
Washington, D.C. 20006  
(202) 392-6580

November 6, 1991

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Bell Atlantic's Comments in Support of Petition for Rulemaking" was served this 6th day of November 1991, by delivery thereof by first class mail, postage prepaid, to the parties on the attached list.

*Ruth F. Durbin*

Ruth F. Durbin

Durward Dupre  
Richard Hartgrove  
Southwestern Bell Telephone  
Company  
1010 Pine Street, Room 2114  
St. Louis, MO 63101

Downtown Copy Center  
1919 M Street, NW, Room 246  
Washington, DC 20554

Gerald Vaughan  
Federal Communications Commission  
1919 M Street, NW  
Room 500  
Washington, DC 20554

Carl Lawson  
Federal Communications Commission  
919 M Street  
Room 500  
Washington, DC 20554

Kenneth Moran  
Federal Communications Commission  
2000 L Street, NW  
Room 812  
Washington, DC 20554