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PACIFIC TELESIS
Group Washington

December 6, 1993

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William Caton
Acting Secretary
Federal Communications Commission
Mail Stop Code 1170
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Dear Mr. Caton:

Re: CC Docket No. 92-296

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "Petition for Reconsideration or Clarification" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. You may contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Enclosures

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

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In the Matter of	)	
	)	
Simplification of the Depreciation Prescription Process	)	CC Docket 92-296
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PETITION FOR RECONSIDERATION OR CLARIFICATION BY PACIFIC BELL AND NEVADA BELL

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SUMMARY

Pacific Bell and Nevada Bell respectfully request reconsideration of the Order adopting the basic factor range option as a means to simplify the depreciation represcription process. The Commission should select instead the price cap carrier option which would provide the greatest simplification gain and is in the public interest. The basic factor range provides only a modicum of efficiency gain but is not sufficient to permit carriers to respond to the momentous events occurring in the telecommunications industry today.

In rejecting the price cap carrier option, the Order does not provide sufficient facts, evidence, or analysis to support the concern that the price cap carrier option presents an opportunity to manipulate sharing. The collection of safeguards offered by the carriers can successfully deter behavior that would be of concern to the Commission.

The Order also cites insufficient competition to warrant the flexibility provided by the price cap carriers option. But, the Order does not permit carriers to understand how much competition there must be to warrant the adoption of the price cap carrier option. We maintain that there is significant competition for access services in our territory. Moreover, safeguards proposed by the LECs can be used as a means to regulate until market forces can do so.

If, on reconsideration, the Commission affirms the adoption of the basic factor range option, Pacific Bell and

Nevada Bell request reconsideration of certain aspects of the rules in order to increase the extent of simplification under the basic factor range option. First, carriers should be able to move within an approved range at any time and without having to provide additional studies. Second, ranges should be set on the basis of forward-looking data and wider than one standard deviation. Third, new data on curve shape should only be required for major changes in curve shape or account structure. Fourth, carriers should be able to use the prescribed range for those accounts which have been divided into categories for depreciation study purposes as long as the composites of the study categories are within the range.

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PETITION FOR RECONSIDERATION OR CLARIFICATION BY PACIFIC BELL AND NEVADA BELL

Pacific Bell and Nevada Bell respectfully submit this Petition for Reconsideration of the Report and Order, released October 20, 1993 ("Order") in the above captioned proceeding. The Order adopts a modified form of the proposed basic factor range option for local exchange carriers ("LECs") regulated under price cap regulation.[1] Pacific Bell and Nevada Bell seek reconsideration of the decision to adopt the basic factor range option and urge the Commission to instead adopt the price cap carrier option.

Pacific Bell and Nevada Bell have participated in the development of the Petition for Reconsideration by the United States Telephone Association ("USTA") filed in this proceeding and support USTA's positions and comments therein.[2] In

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[1] Order, paras. 1, 57-78.

[2] Petition for Reconsideration of the United States Telephone Association, dated December 3, 1993.

addition, Pacific Bell and Nevada Bell submit this Petition for Reconsideration or for clarification if the Commission affirms the adoption of the basic factor range option.

I. Introduction

The Commission's intent in establishing this proceeding is to simplify the depreciation prescription process, to capture administrative savings and flexibility for carriers while continuing to ensure just and reasonable tariffed rates to consumers.[3] Pacific Bell and Nevada Bell and the other LECs endorse the price cap carrier option. Pacific Bell and Nevada Bell continue to affirm that the price cap carrier option provides the greatest flexibility and administrative savings while continuing to safeguard against unreasonable rates.

II. The Basic Factor Range Option Is Not A Meaningful Response To The Dynamically Changing Marketplace.

The Commission concludes that the basic factor range option is the most reasonable option for the LECs in that it provides simplification, savings and flexibility. Pacific Bell and Nevada Bell believe that the extent of simplification, savings and flexibility fit the category of "too little-too late". The Order recognizes that in the past depreciation practices and rates may have lagged behind changes in the

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[3] Order, para. 3.

telecommunications market.[4] The micro-step toward simplification represented by the basic factor range option does not begin to respond to the dynamic changes occurring in the telecommunications industry. As the Order recognizes, changes today are occurring at dizzying speed with spectacular impact on the industry.[5] For example, in September of this year, US West announced that it would write down $5.2 billion (before taxes) in fixed assets for financial reporting purposes. A month later, in October, Bell Atlantic announced its merger with Tele-Communications, Inc., the world's largest cable television company -- a merger potentially worth more than $20 billion. On November 11, 1993, Pacific Bell announced its plans to spend $16 billion over the next 7 years to provide an advanced integrated network, an information superhighway, for California residents. By the end of 1996 more than 1.5 million of Pacific Bell's customers will be served by facilities capable of providing consumers with advanced telephony, data and video services. These current events leapfrog by five or more years the minimal regulatory reform the Commission makes by this decision. There is increasing recognition that the marketplace is moving faster than regulators can react.[6] The adoption of

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[4] Order, para. 51.

[5] Id., para. 55.

[6] Andrew C. Barrett, Remarks to the Florida Economic Club, (August 27, 1992), Beyond Price Caps: Escaping the Traditional Regulatory Framework ("Commissioner Barrett"), p. 3; Bell Atlantic/TCI Looks at Long-Term Prospects, TE&M, November 15, 1993, p. 18.

the basic factor range option is an example of how the Commission's intent, admirable in concept, fails for lack of meaningful implementation. In order to effectively serve the nation and its economic imperatives, the evolution in regulation must quickly synchronize with the massive infrastructure investments undertaken by the LECs and with their entry into competitive arenas such as video and wireless services. The Commission has long endorsed marketplace regulation in lieu of government regulation. But given the opportunity provided by this proceeding, the Commission rejects the option that best reflects marketplace regulation and instead retreats to a "measured step"[7] of governmental regulation.

III. The Price Cap Carrier Option Continues To Offer The Greatest Public Interest Benefit.

The Commission agrees that the price cap carrier option is simpler and provides greater flexibility than any of the other proposed options. However, the Commission also concludes that the price cap carrier option provides a significant opportunity and incentive for LECs to undermine the sharing component of the price cap plan; that the degree of flexibility is not warranted by the extent of competition facing the LECs today; and that the extent of administrative savings is not likely because of the opposition of state commissions to the price cap carrier

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[7] Order, para. 4.

option.[8] For these reasons, the Commission does not adopt the price cap carrier option.

The Order does not provide objective facts, empirical evidence or analysis to support the Commission's conclusions. The Commission's concerns about a LEC's ability to use depreciation expense as a means to manipulate sharing is entirely speculative and unsupported. The Order does not provide sufficient analysis for carriers to understand why the Commission bases its decision on the likelihood of manipulation. Moreover, realizing that opponents would focus on the effect of depreciation expense on rates, the LECs proposed a significant number of safeguards that would be effective in assuring that manipulation would be easily detected, thus effectively deterred. The Commission, however, summarily dismisses the adequacy of the safeguards without sufficient explanation.[9]

The Order rejects the safeguards because they do not address the Commission's view that competition must be more robust before greater deregulation is justified.[10] However, safeguards are an interim means of accomplishing what "rigorous" competition would provide -- protection against behavior that results in unreasonable rates. With rigorous competition, safeguards are unnecessary.

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[8] Order, para. 42.

[9] Id., para. 45.

[10] Id.

The rejection of GAAP (generally accepted accounting principles) as a safeguard is not consistent with the Commission's regulations.[11] The policy expressed by the Commission's adoption of Section 32.12(a)[12] of its rules, which specifically requires carriers to follow GAAP to the extent permitted by the Uniform System of Accounts, is contrary to the view offered here that GAAP does not offer adequate protection for ratepayers.[13]

Finally, the Commission's position on the ineffectiveness of individual safeguards to protect against the Commission's concerns is essentially irrelevant because the Commission could adopt more than just one safeguard.[14] The extent of protection afforded by the entire list of safeguards supports the adoption of the price cap carrier option just as the "comprehensive set of nonstructural safeguards" justified relief from the enhanced service structural separation requirements.[15]

As a second basis for rejecting the price cap carrier option, the Order asserts that competition for the LECs is not

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[11] Order, para. 46.

[12] 47 C.F.R. §32.12(a).

[13] See Revision of the Uniform System of Accounts for Telephone Companies to Accommodate Generally Accepted Accounting Principles (Parts 31, 33, 42, and 43 of the FCC's Rules), CC Dkt. 84-469, Report and Order, FCC 85-581, released November 14, 1985.

[14] Order, para. 48.

[15] See Computer III Remand Proceedings: Bell Operating Company Safeguards and Tier 1 Local Exchange Company Safeguards, CC Dkt. No. 90-623, Report and Order, 6 FCC Rcd 7571 (1991).

sufficiently robust to safeguard against the degree of flexibility provided by the price cap carrier option.[16] However, the Order does not provide empirical evidence or sufficient analysis to support the unilateral pronouncement that competition is not sufficiently robust.

LECs are subject to increasing competition for interstate access. Recent Commission actions have opened the way for competition, as for example, the recent decision on interstate special access expanded interconnection.

> "The Commission has taken a historic step in the process of opening the remaining preserves of monopoly telephone service to competition."[17]

Competition is also evident from the collocation requests that have been filed. We understand that the majority of the requests have been filed in our territory, which reflects the concentration and vulnerability of our markets. The orders for collocation which we have received to date are for offices that currently provide 31% of our DS3 capacity.[18]

The inroads made by competitors for selected high profit services is well documented. Competitive Access Providers (CAPs)

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[16] Order, para. 45.

[17] Expanded Interconnection with Local Telephone Company Facilities, Amendment of the Part 69 Allocation of General Support Facility Costs, CC Docket 91-141, Report and Order and Notice of Proposed Rulemaking, 7 FCC Rcd 7369, para. 1 (1992).

[18] Reform of the Interstate Access Charge Rules, RM 8356, Reply Comments, Pacific Bell and Nevada Bell, dated November 15, 1993.

presently provide service in each of the major metropolitan areas within California. CAPs continue to expand their networks in key locations which target Pacific Bell's high volume customers and our dense traffic corridors in the Greater Bay Area, Los Angeles, Sacramento, and San Diego. In June of 1993, Time Warner AxS of California requested CPUC authorization to provide competitive access services across the state of California.[19] Further, once expanded interconnection is combined with intraLATA competition (which is imminent in California and which exists in other states) CAPs can combine to provide toll service that is fully competitive with that of the LECs.

Competition does not just exist in Pacific Bell territory. As just one example, MFS Intelnet, Inc. recently announced its first "one-stop shopping" local and long distance services in New York and intends to provide such services in 60 to 70 cities within five years.[20] Moreover, the fact that the Commission recognizes 1400 providers of interexchange access but only prescribes depreciation rates for 33 LECs is an indication of the state of competition for interstate access service.[21]

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[19] Telecommunications Reports, "Time Warner Unit Plans CAP Services in Calif.; Pacific Bell Objects" (BRP Publications, Washington, D.C.), June 28, 1993, at 8-9.

[20] "MFS Unveils 'One-Step' Local/Long Distance Services, Plans Rollout in 60 to 70 Cities Within Five Years," Telecommunications Reports, (BRP Publications, Washington, D.C.), October 11, 1993, at 9-10.

[21] Commissioner Barrett, p. 3.

While the Commission admits that there is some competition to protect against depreciation rates that are not in line with company operations, the Commission nonetheless requires competition to be more "robust".[22] The Order, however, does not provide a basis to understand how much competition will be sufficient to sustain the extent of flexibility available through the price cap carrier option. "Rigorous" competition is too subjective a criteria to support a decision as critical for carriers as depreciation rates. Based on the particular characteristics of our markets, Pacific Bell and Nevada Bell believe rigorous competition for interstate access exists and will continue to grow. If the extent of competition is the test for relaxing regulation, LECs need to know how much competition is sufficient to warrant procedures that will make true competition possible. The Commission should reconsider its decision based on facts about interstate competition.

IV. The Commission Should Revise The Basic Factor Range Option Or Simplification Gains Will Be De Minimus.

If the Commission affirms its decision to adopt the basic factor range option, Pacific Bell and Nevada Bell respectfully recommend revising specific aspects of the basic factor range implementation rules.

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[22] Order, paras. 28, 44.

A. A carrier should be permitted to select depreciation factors within an approved range at any time and without need for additional studies.

The basic factor range option may theoretically simplify the depreciation represcription process, but several implementation rules actually prevent simplification. First, the Order limits a LEC's move into a range only at the LEC's annual triennial review.[23] Carriers should also be permitted to move into a prescribed range at other than its triennial review.[24] An appropriate time, for example, would be if a carrier undertakes a technical update of accounts. A technical update may be made in years between represcriptions and is intended to reflect changes that have occurred in plant level by vintage and to depreciation reserves. Since the range parameters (life and future net salvage) have already been approved by the Commission as part of the basic factor range option, carriers should be able to adopt those approved parameters.

Second, carriers should be allowed to move into a range without being required to submit detailed studies.[25] The Order states that the basic factor range option allows a carrier to determine, within a specified reasonable range, the life and

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[23] Order, para. 57.

[24] If a carrier has been awarded a rate that is higher than the existing range, that rate should continue to apply. Having once proven the appropriateness of the rate, the carrier should be permitted to maintain that rate in spite of the development of "average" range of rates as a result of this proceeding.

[25] Order, para. 77.

salvage factors it uses in prescribed depreciation rates without undergoing the expense of submitting studies to justify its specification of those factors.[26] But even if only one parameter is outside of the range, a LEC must undertake a study to support moving that parameter either up or down into the range.[27] If both parameters are outside of the range, two studies would be required. Studies take money and time. The simplification goal is derailed by requiring a carrier to provide a detailed study for an account in order to move into a range. Since the range will be established by the Commission as appropriate and reasonable based on industry - wide averages, carriers willing to be within the range should be able to do so without need for further studies.

B. Ranges must be established on the basis of future parameters.

The Commission will establish ranges for specific accounts.[28] Ranges for all accounts will be set on the basis of historical information. As a result, before the first carrier can use that range, it will be at least three years old and out of date. The practice of relying on historical data from the previous represcription necessarily makes the most current represcription numbers stale and out of step with a carrier's

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[26] Order, para. 26.

[27] Id., para. 29.

[28] Id., para. 58.

immediate recovery needs. Some ranges might be as much as six years old before a carrier has an opportunity to change its rates to those within the approved range. Not only will a carrier be unable to effect the then-current rates except at three year intervals (at its triennial represcription), but those rates are likely to be insufficient. If the Commission really intends to provide flexibility within the context of the basic factor range option, ranges must be established using assessments of future technology, not historic responses. Historical data about technology cannot provide a basis for realistic recovery given the ever-increasing pace of technological advancement.[29]

Moreover, ranges must be set wider than one standard deviation from the industry-wide average.[30] The currently prescribed factors being used to set the ranges are at least one year old for the carriers prescribed in 1993 and two or three years old for the remaining companies. Thus, since the ranges will be used for setting future depreciation rates, they need to be set wider than one standard deviation from the currently prescribed factors. If the ranges are not wider, at least one

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[29] The Common Carrier Bureau has begun a proceeding to establish ranges of projection life and future net salvage factors for an initial group of accounts. Simplification of the Depreciation Prescription Process, Order Inviting Comments, CC Docket No. 92-296, FCC 93-492, released November 12, 1993.

[30] The task of developing ranges based on forward-looking technical innovation can be accomplished with some certainty and without difficulty. Industry studies by carriers and from commercial sources are available to assist the Commission in establishing forward-looking ranges that would provide meaningful regulatory reform in the area of capital recovery.

third of the companies will be outside of the ranges for many of their accounts. The narrowness of the range will, therefore, curtail the amount of simplification that companies can realize.

C. The requirement to provide data to support carrier-specific curves undercuts any simplification.

The Order provides that current equal life group ("ELG") procedures may only be used when data necessary to determine the curve shape is available for the specific account of an individual carrier. The company-specific curves reflect the carrier's actual experience and current curve-fitting techniques. Thus, the Order requires carriers to submit data supporting their curves with their proposed rates for range accounts as required by the Common Carrier Bureau.[31] This requirement undercuts the simplification effort.

Curve studies demand a significant amount of time and resources. For Pacific Bell, five programs are directly involved in the curve selection process. The programs take from a half hour to five hours for each account or category to run, analyze, print and verify. This effort amounts to about 420 hours or the equivalent of 10.5 work weeks to produce. Thus, the requirements to provide data supporting a carrier's curves will not simplify procedures at all.

Carriers should be permitted to retain their existing curves without supplying new data. Since the curves are

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[31] Order, para. 66, n. 110.

company-specific, little change is likely from year to year. When, however, a carrier makes a major change in its accounting structure, or if a company requests a change in curve shape, new studies would be appropriate. This approach would provide meaningful simplification.

Moreover, Pacific Bell and Nevada Bell believe that the life and salvage value of an account are more significant drivers of recovery than curve shape. A modest change in a curve shape would have minimal effect on the remaining life. Only a major change in curve shape would produce a measurable change in the remaining life. Thus, when the effort required to develop curve shape is weighed against that effect on ELG rates, there is little administrative benefit to be realized by a requirement for new support data.

D. Carriers should be able to use a composite to determine if study categories of an account are within the range.

The Order implies that establishing ranges for all plant accounts may not be immediately feasible because carriers have been permitted to divide some accounts into categories for depreciation study purposes.[32] Thus, the Commission states that more time will be needed to establish ranges for those accounts.

Rather than delay the establishment of ranges for these accounts, which further reduces the immediate benefit of the

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[32] Order, para. 65, n. 110.

Commission's simplification effort, the Commission should establish the range as for any other account and permit the carrier to apply that range so long as the composite of the study categories is within the range.

V. Conclusion

For the reasons provided above, Pacific Bell and Nevada Bell request that the Commission reconsider its adoption of the basic factor range option and instead adopt the price cap carriers option -- the method that will accomplish the Commission's intent in a significant manner. Failing such change, however, reconsideration and/or clarification of the implementation issues raised above will improve the extent to

which the Order accomplishes the simplification goals intended by this proceeding.

Respectfully submitted,

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Date: December 6, 1993

CERTIFICATE OF SERVICE

I, S. B. Ard, hereby certify that copies of the foregoing "PETITION FOR RECONSIDERATION OR CLARIFICATION BY PACIFIC BELL AND NEVADA BELL", re CC Dkt 92-296, were served by hand or by first-class United States mail, postage prepaid, upon the parties appearing on the attached Service List this 6th day of December, 1993.

By: S. B. Ard

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