

UNION
TELEPHONE
COMPANY

DOCKET FILE COPY ORIGINAL

December 15, 1993

RECEIVED

DEC 16 1993

FCC - MAIL ROOM

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20054

RM-8389

Dear Mr. Caton:

Re: In the Matter of The National Exchange
Carrier Association Inc. Proposed Revision of
Part 69 of the Commission's Rules to Allow
for Incentive Settlement Options for NECA
Pool Companies

The original and four copies of Union Telephone
Company's comments in the above matter are enclosed.

Sincerely,

James A. Sanborn

James A. Sanborn
Controller

JAS:kd
Enclosure

cc: Joanne S. Bochis, NECA
ITS

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

RECEIVED

DEC 16 1993

FCC - MAIL ROOM

In the Matter of

The National Exchange)
Carrier Association Inc.)
Proposed Revision of)
Part 69 of the)
Commission's Rules to)
Allow for Incentive)
Settlement Options for)
NECA Pool Companies)

RM 8389

COMMENTS OF UNION TELEPHONE COMPANY

Union Telephone Company (Union) recommends that the Federal Communications Commission (Commission) adopt the incentive settlement options proposed by the National Exchange Carrier Association, Inc. (NECA) in this rulemaking.

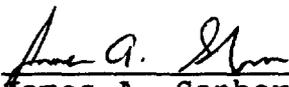
These incentive settlement options provide an incentive for an exchange carrier to become more efficient, with the long-term effect of lowering access charges, yet remain within the NECA pools and retain the administrative benefits of NECA tariff filings and access rates.

These incentive settlement options provide settlement stability, which will allow for a more accurate forecast of NECA pool settlements, and therefore, access rates.

Having reviewed these incentive settlement options with NECA staff, I believe that NECA is prepared to properly and efficiently implement and administer them.

These incentive settlement options should provide benefits to exchange carriers (an opportunity to increase earnings in the short term through increased efficiency and stimulation of usage), to interexchange carriers (lower access rates in the long term), and to the Commission (movement toward increased industry efficiency, lower long term access rates, and improved forecasting). Union recommends that the Commission adopt the incentive settlement options proposed by NECA.

Respectfully submitted,
Union Telephone Company

By 
James A. Sanborn
Controller

P.O. Box 577
Farmington, NH 03835
Telephone: (603) 859-3700

Date: December 15, 1993