

dy

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

RECEIVED

JAN 27 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Open Network Architecture Tariffs
of Bell Operating Companies

CC Docket No. 92-91

Commission Requirements for Cost
Support Material To Be Filed With
Open Network Architecture
Access Tariffs

COMMENTS

Allnet Communication Services, Inc. (Allnet) herein provides its support for both Petitions for Reconsideration, filed by MCI Telecommunications Corporation in the above captioned proceedings on January 14, 1994. The requests of MCI should be granted without question. MCI has identified serious illogical reasoning and erroneous predicates in the SCIS Disclosure Reconsideration Order, released December 15, 1993 and the ONA Investigation Final Order, released on December 15, 1993. Moreover, in the case of Allnet, to this day Allnet has not been allowed access to even the Redaction II version of the materials, even though Allnet signed the nondisclosure agreements.

The bottom line in this proceeding is that: 1) there was no reason for requiring any party to enter into non-disclosure agreements to view the highly redacted versions of the materials, and 2) to the extent the unredacted versions of the materials contained confidential information, those materials should have been made available to any party that signed a non-disclosure agreement.

Finally, the secret ratemaking identified by MCI that has come about as a

No. of Copies rec'd
List A B C D E

279

result of the close and extensive private conversations between the BOCs and the FCC violate every principle and requirement of openness and due process of the APA (5 U.S.C. §551 et. seq.) and the Communications Act. These secret ratemaking contacts have scandalously tainted this proceeding, compromised the entire ONA program, and raised grave doubts regarding the ability of the FCC to effectively and, more importantly, credibly regulate the BOCs.

Respectfully submitted,
ALLNET COMMUNICATION SERVICES, INC


Roy L. Morris
Deputy General Counsel
1990 M Street, NW, Suite 500
Washington, D.C. 20036
(202) 293-0593

Dated: January 27, 1994

Certificate of Service

I, Angela Slaughter, hereby certify that I have caused to be served on this date, January 27, 1994 a true copy of the forgoing Allnet Comments by postage-prepaid first class mail to the parties on the attached service list.

Angela Slaughter

January 27, 1994

Kathleen Levitz*
Chief, Common Carrier
Bureau
Federal Communications
Commission
1919 M Street N.W.
Washington, D.C. 20554

Gregory Vogt, Esq.*
Chief, Tariff Division
Common Carrier Bureau
Federal Communications
Commission
1919 M Street N.W.
Washington, D.C. 20554

Stan Wiggins, Esq.*
Senior Attorney
Tariff Division
Common Carrier Bureau
Federal Communications
Commission
1919 M Street N.W.
Washington, D.C. 20554

James F. Britt
Executive Director
Bell Communications Research
LCC 2E-243
290 West Mt. Pleasant Avenue
Livingston, NJ 07039

U S WEST Communications, Inc.
1020 19th Street, N.W.
Suite 700
Washington, DC 20036

James S. Blaszak
Charles C. Hunter
Gardner, Carton & Douglas
1301 K Street, N.W.
Suite 900 - East Tower
Washington, DC 20005

Larry Blosser
Frank Krogh
MCI Telecommunications Corp
1801 Pennsylvania Avenue, NW
Washington, D.C. 20006

Richard E. Wiley
Michael Yourshaw
William B. Baker
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006
Counsel for American
Newspaper Publishers Association

Francine J. Berry
David P. Condit
Peter H. Jacoby
Edward A. Ryan
American Telephone & Telegraph Co.
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Daryl L. Avery
Peter Wolfe
Public Service Commission
of the District of Columbia
450 Fifth Street, N.W.
Washington, DC 20001

Michael J. Ettner
General Services Administration
Personal Property Division
18th & F Streets, N.W.
Room 4002
Washington, D.C. 20405

Leon M. Kestenbaum
US Sprint Communications
Company Limited Partnership
1850 M Street, N.W.
Suite 1110
Washington, DC 20036

Peter A. Rohrbach
Karis A. Hastings
Hogan & Hartson
555 13th Street, N.W.
Washington, D.C. 20004

Randall B. Lowe
John E. Hoover
Michael R. Carper
Jones, Day, Reavis & Pogue
1450 G Street, N.W.
Washington, DC 20005
Counsel for Metromedia
Communications Corporation

Paul DeJongh
Northern Telecom, Inc.
P.O. Box 13010
Research Triangle
Park, NC 27709-3010

L. Michelle Boeckman
730 International Parkway
Richardson, TX 75081
Counsel for Ericsson Network
Systems

Albert Halprin
Stephen L. Goodman
Halprin, & Goodman
1301 K Street N.W.
Suite 1020 East
Washington, D.C. 20005

Jo Ann Goodard Riley
Director
Pacific Telesis
Federal Regulatory Relations
1275 Pennsylvania Avenue, N. W.
Suite 400
Washington, D.C. 20004

International Transcription
Service*
1919 M Street, N.W., Rm 246
Washington, D.C. 20554

Floyd S. Keene
Attorney for Ameritech
2000 West Ameritech Center Dr.
Rm. 4H64
Hoffman Estates, IL 60196-1025

Bell Atlantic
1710 H Street, N.W.
Washington, D.C. 20006

William B. Barfield
Attorney for BellSouth
1155 Peachtree St., N.E., Rm. 1800
Atlanta, GA 30367

Mary McDermott
Attorney for NYNEX
120 Bloomingdale Road
White Plains, NY 10605

William C. Sullivan
Attorney for Southwestern Bell
1010 Pine St., Rm. 2305
St. Louis, MO 63101