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

In the Matter of)
)
 Petition to Amend Part 68 of)
 the Commission's Rules to)
 Include Terminal Equipment)
 Connected to Basic Rate Access)
 Service Provided via Integrated)
 Services Digital Network)
 Access Technology)
)
 and)
)
 In the Matter of)
)
 Petition to Amend Part 68 of the)
 Commission's Rules to Include)
 Terminal Equipment Connected to)
 Public Switched Digital Service)
)
 and)
)
 Correction of Part 68)
 Typographical Errors,)
 Clarifications and a Proposal)
 for Part 68 Registration)
 Revocation Procedures)

CC Docket No. 93-268

RM 7815

RM 6147

COMMENTS

American Telephone and Telegraph Company ("AT&T") respectfully submits the following comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM"), FCC 93-484, released November 22, 1993.

The NPRM proposes amendments to Part 68 of the Commission's Rules to include provisions governing terminal equipment connected to (i) the Basic Rate Access (BRA) and

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Primary Rate Access (PRA) interfaces of the Integrated Services Digital Network (ISDN); and (ii) to the Public Switched Digital Service (PSDS).¹ The proposed rules largely embody proposals first advanced in Petitions for Rulemaking filed by Southwestern Bell regarding ISDN, and by Ameritech regarding PSDS, both of which AT&T supported. AT&T supports the ISDN and PSDS rules proposed in the NPRM except in two limited respects.

Ameritech's Petition had proposed a 2.2 to 3.0 volt pulse height range in Table IV A and a 2.3 volt point in Table IV B. AT&T's Comments pointed out that, because equipment will normally operate within a narrow range, it would be appropriate to establish a range for Table IV B comparable to the range in Table IV A. The proposed rule (§ 68.308(h)(i)) specifies pulse heights of 2.6 volts in Table IV A and 2.4 volts in Table IV B, in each case plus or minus five percent. These ranges are much too narrow to accommodate normal operation. AT&T thus urges the Commission to create broader ranges of at least plus or minus fifteen percent around the Commission's selected mid-points.

Ameritech proposed adding a new subsection (3) to § 68.314(a) making the required two-second billing

¹ The NPRM also proposes a registration revocation procedure, to which AT&T has no objection.

protection delay applicable to PSDS. Although AT&T did not oppose this proposal, AT&T suggested that the rules include a definition of PSDS so that customers would understand the service to which the rules are directed. In fact, the rules proposed in the NPRM define three types of PSDS service, including two -- Types I and III -- that are completely digital. The two-second billing delay requirement, however, is unnecessary for the digital services (Types I and III), because there is no risk that calls of less than two seconds, such as very brief bursts of data, will be subject to the billing problems that prompted the proposed rule. Thus, the Commission should specify that § 68.314(a) and subsection 68.314(a)(3) do not apply to PSDS Types I and III.

Southwestern Bell had recommended the ANSI standard eight position jack be adopted for connection to the ISDN BRA interface by means of the tariff description procedure specified in § 68.104(c) of the Rules. AT&T pointed out that another ANSI standard applied to equipment connected to the ISDN PRA interface and recommended that both be addressed. The NPRM (¶ 6) asks for comment on proposals for connection to both ISDN interfaces and to PSDS and provides information on earlier divergent positions by Ameritech, U S West, and the Exchange Carrier Standards

Association (ECSA)² on jacks connected to the ISDN BRA interface. There is now an industry consensus supporting the eight position jack specified for the ISDN BRA in ANSI T1.601-1992 and for ISDN PRA in ANSI T1.408-1990.³ Industry has also reached consensus on jack requirements for PSDS as specified in ANSI/TIA/EIA-596-92. Therefore, the Commission should adopt these configurations through the tariff description procedure referred to in § 68.104(c) of the rules.⁴

² ECSA is now called the Alliance for Telecommunications Industry Solutions.

³ Eight position jacks are required by the international standard (ISO/IEC 8877) and the Canadian standard (CS-03 Part III). Manufacturers today are offering products with eight position plugs.

⁴ As opposed to specifying the jacks in Part 68, Subpart F of the Commission's Rules, the tariff approach avoids rulemaking proceedings every time a change is needed in a specification detail, such as a dimension or a tolerance.

CONCLUSION

The Commission should adopt the rules proposed in the NPRM with the two changes suggested in these Comments and should adopt the agreed upon jack requirements referred to herein.

Respectfully Submitted,

AMERICAN TELEPHONE AND TELEGRAPH COMPANY

By



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