

Federal Communications Commission
February 15, 1994
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available, but several steps still remain to be completed. As soon as the remaining issues that delay commercially reasonable interconnection arrangements in the U.K., however, ACC will promptly so inform the Commission.

Very truly yours,

Helen E. Disenhaus

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CHRONOLOGY OF INTERCONNECTION NEGOTIATIONS BETWEEN
BRITISH TELECOMMUNICATIONS plc
AND
ACC LONG DISTANCE UK LIMITED

- | | |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 15th January 1992 | Submission of application by ACC Long Distance UK Limited ("ACC") to UK Department of Trade and Industry ("DTI") for International Simple Resale ("ISR") License. |
| 18 May 1992 | BT letter to UK Office of Telecom Minutes ("OfTel") arguing that ISR licensees are not entitled to interconnect with BT's network under Condition 13 of BT's License by using an individually negotiated agreement with wholesale rates, but rather must pay retail rates with no possibility of negotiation of terms. |
| 27th May 1992 | DTI letter to ACC's lawyers stating that ACC's ISR License application was agreed in principle. |
| 11th June 1992 | OfTel letter to BT refuting BT's arguments in their 18th May 1992 letter. |
| 23rd June 1992 | DTI letter to ACC's lawyers giving them for the first time a draft of the ISR License for ACC. |
| 26th June 1992 | Letter by ACC's lawyers to BT asking for a draft Interconnect Agreement to be supplied. |
| 8th July 1992 | Chasing letter by ACC's lawyers to BT asking for a response to their earlier letter of 26th June 1992. |
| 20th July 1992 | Meeting between ACC's external consultants in the UK and BT during which BT stated that they would not negotiate with ACC until such time as an ISR License had been granted to ACC. |
| 17th August 1992 | Further meeting between ACC's external consultants and BT during which BT repeated their earlier stance. |
| 20th August 1992 | Meeting between ACC's US personnel and BT in the UK. |

24th August 1992 Letter by ACC Corp to BT requesting availability of interconnect at both trunkside (i.e. at a trunk exchange) and lineside (i.e. at a local exchange) at wholesale rates under Condition 13 of BT's License.

9th September 1992 Letter by ACC's lawyers to BT stating that under Condition 13 of BT's License it was obliged to connect any holder of an individual license at either trunkside or lineside under Condition 13 and stating that this view was also held by the DTI and Oftel.

25th September 1992 Letter by BT to ACC Corp responding to the earlier letter of 24th August setting out various interconnect options made available by BT, none of which included lineside interconnect at wholesale rates under Condition 13.

25th September 1992 Grant of ACC's ISR License so that it is now the holder of an individual license and designation by the DTI of Canada, Australia and Sweden as equivalent to the UK for purposes of ISR.

30th September 1992 Further request by ACC's lawyers for a draft Interconnect Agreement from BT.

1st October 1992 Further request for a draft Interconnect Agreement from BT.

6th October 1992 Confidentiality agreement between ACC and BT signed governing information to be disclosed during pre-contract negotiations for an Interconnect Agreement.

13th October 1992 Letter by ACC Corp to BT in response to their letter of 25th September stating that the interconnect options offered by BT were unsatisfactory both for technical and price reasons and setting out key points on the services required of BT.

16th October 1992 Letter from BT to ACC's lawyers re-stating BT's position that the retail offering in their letter of 25th September meets ACC's requirements.

2nd November 1992

BT provides ACC's lawyers with a draft Interconnect Agreement for the first time but states that it is only suitable for trunkside as opposed to lineside interconnect as also requested by ACC.

3rd November 1992

Meeting between ACC's US representatives and BT in the UK at which BT said that they were not prepared to discuss interconnect charges because they were not in a position to determine what charges should be raised on ACC. ACC repeating is request for a draft Interconnect Agreement to be supplied and suggesting that it could be similar to existing agreements with Cable TV companies. BT repeating its position that ACC was only entitled to retail offerings and not wholesale rates. BT also stating that any equipment ACC wished to use to interconnect with BT's network must be "type approved" and that if it was not so approved then it was not a relevant connectable system. ACC replying that because it had an individual license its equipment did not need to go through the formal type approvals process. ACC stating that such equipment qualified as a relevant connectable system and therefore that BT was obliged under its license to connect its system with such equipment under Condition 13 even if it did not have type approval. ACC's representatives stating that their views were confirmed by the DTI in a letter from the DTI received on 27th May 1992.

4th November 1992

Meeting between ACC and Oftel to discuss problems with BT.

1st December 1992

Letter to ACC Corp from BT informing them that BT was not willing to provide lineside interconnect at wholesale prices and stating that it hoped to be able to shortly give ACC wholesale prices for trunkside interconnect provided this was from a relevant connectable system operated by ACC to a BT trunk exchange.

6th January 1993 Letter from ACC Corp's chairman to BT's chairman urging him to use his best efforts to bring interconnect negotiations to a rapid and successful conclusion.

12th January 1993 Submission by ACC to Oftel of a specially commissioned economists' report highlighting the fact that access deficit contributions ("ADC's") imposed by BT for interconnection to its network were a significant barrier to entry into the UK market place because they made services such as ISR not economically viable.

22nd January 1993 Letter by BT to ACC Corp giving for the first time conveyance prices and ADC's in respect of ISR on the assumption that ACC interconnected at trunkside rather than at lineside.

20th January 1993 Reply from BT to ACC Corp's letter of 6th January to BT's Chairman.

2nd February 1993 Letter from ACC to BT responding to BT's letter of 22nd January on pricing pointing out that application of ADC's made the overall cost of BT's services commercially unreasonable.

4th February 1993 Letter from ACC Corp to BT requesting meeting with senior official at BT.

4th February 1993 Letter from ACC Corp to Oftel requesting that Oftel waive ADC's sought to be levied by BT on ACC for interconnection with its system under Condition 12 of BT's License.

9th February 1993 Reply by Oftel to ACC's letter of 4th February setting out the procedure for waiver requests.

10th February 1993 Letter from ACC's lawyers to BT confirming earlier request for details of UK national i.e. domestic as opposed to international conveyance prices and relevant ADC's for the same.

24th February 1993 Chasing letter by ACC's lawyers to BT requesting prices sought in previous request of 10th February 1993.

25th February 1993 Letter from BT to ACC's lawyers in response to their letter of 24th February pointing out that BT was not able to quote national conveyance prices and therefore could not quote the relevant ADC in respect of such services.

19th March 1993 Letter from ACC's lawyers to Oftel pointing out that BT's conveyance prices were unacceptable to ACC.

22nd March 1993 Submission by ACC's lawyers of the first ACC draft of the ACC BT Interconnect Agreement to BT.

25th March 1993 Letter from Oftel to ACC's lawyers in response to their letter of 19th March 1993.

14th April 1993 Letter from ACC's lawyers to Oftel complaining about BT's slowness in providing conveyance rates for domestic resale and informing Oftel that BT had told ACC that it was not convinced it was obliged to provide such services anyway.

14th April 1993 First meeting between ACC's lawyers and BT's lawyers to discuss the draft ACC BT Interconnect Agreement at which BT presented a re-draft of the proposed Agreement and during which it became apparent that the draft offered was unsatisfactory. At such meeting BT offered to provide a re-draft.

20th April 1993 ACC's lawyers informed by BT that a re-draft of the ACC BT Interconnect Agreement would probably take 2 further weeks.

23rd April 1993 Letter from Oftel stating that BT is obliged to negotiate terms for provision of domestic resale services to ACC.

29th April 1993 Letter by ACC's lawyers to Oftel requesting clarification on whether BT is obliged to provide ACC with domestic resale services in the UK under Condition 13. Such letter also complaining about BT's delays in providing price information to ACC specifically that ACC had just been informed it would take a month for BT to give ACC a price for BT to transit calls from ACC to other operators such as PTO's, mobile operators and cable companies, such letter requesting Oftel's assistance for a speedy resolution.

6th May 1993 Submission by ACC to BT of a formal statement of requirements.

18th May 1993 Letter from Oftel to ACC's lawyers in response to their letter of 29th April stating that there was no justification for BT to have any doubts about its obligation to enter into agreement with ACC under Condition 13 for domestic resale services.

19th May 1993 Meeting between ACC and BT to discuss commercial issues.

26th May 1993 Letter from ACC pointing out that BT is not obliged to charge ACC an ADC and also suggesting that if it waived or reduced any such ADC it would not be discriminating against other customers under the terms of its License.

28th May 1993 Meeting between ACC and BT to discuss BT's charges at which BT said that they were not prepared to waive any ADC.

7th June 1993 Letter from ACC's lawyers to the DTI complaining about the delays in obtaining a satisfactory Interconnection Agreement with BT.

23rd June 1993 Meeting between ACC and BT to discuss technical issues relating to interconnection.

15th July 1993 Letter from BT to ACC's lawyers quoting for the first time to ACC wholesale rates for a certain type of lineside interconnect and offering to provide such services after ACC's lawyers had previously found out that contrary to earlier assurances, BT was in fact offering wholesale rates for lineside interconnect.

23rd July 1993 Submission of formal request by ACC's lawyers to Oftel for a determination of BT's conveyance prices and access deficit contributions in respect of both international and national simple resale services.

28th July 1993 BT signs Interconnect Agreement with NYNEX. The terms include agreement to not charge ADC's until such time as Oftel determines these are payable.

20th September 1993 Letter of complaint from ACC's lawyers to the EEC Commission on the BT/MCI joint venture and on BT's efforts to impede ACC's entry into the UK telecommunications market place.

22nd September 1993 Issue of a revised draft of the ACC BT Interconnect Agreement to BT by ACC's lawyers.

27th September 1993 ACC telephoned K. Moss and advised that equipment would be with him based on NYNEX and that ACC wanted to meet on commercial issues in 48 hours.

27th September 1993 Letter from J. Moore (ACC) to BT confirming meeting on Friday (1/10) and inviting BT to ask ACC for any clarification of ACC's requests under Statement of Requirements ("S. of R. ").

27th September 1993 Draft 1 of Interconnect Agreement (NYNEX version) to BT and D.E.

30th September 1993 Meeting with BT to discuss S. of R. Joe Moore and John Johnson representing ACC.

30th September 1993	MT (ACC) spoke to K. Moss (BT) on telephone (activity report of 30th September refers). Meeting with BT arranged for 15th October 1993.
30th September 1993	Letter MT to K. Moss at BT.
1st October 1993	Letter MT to D.E. complaining about BT's wish to introduce yet another draft.
7th October 1993	Letter to K. Moss chasing for comments to draft sent 27th September.
7th October 1993	Letter to DG (cc: BT) enclosing technical annexes to agreement.
11th October 1993	Issue 3 of S. of R. faxed to BT.
12th October 1993	Letter to BT requesting comments on 9/27/93 draft by 10/13/93 (prior to 10/15/93 meeting).
13th October 1993	Letter to Deputy D-G Wigglesworth asking for intervention with BT consistent with the Deputy D-G's expressed views that satisfactory interconnection arrangements are a prerequisite for competition and that ACC-UK's system should be treated as a Relevant Connectable System for interconnect purposes.
14th October 1993	Letter to BT cancelling scheduled 10/15/93 meeting because BT had refused to provide comments on the 9/27/93 draft and stating that ACC will seek tripartite meeting with BT and Oftel.
15th October 1993	Letter from ACC to D-G requesting tripartite meeting among ACC, BT, and Oftel with a view toward adoption of ACC's draft agreement; meeting with Oftel staff re scheduling of such a meeting.
18th October 1993	Receipt of letter dated 10/15/93 to ACC from BT forwarding prices for conveyance of calls from ACC's switch to BT and enclosing draft standard interconnection agreement and a suggested timetable for negotiation of UK domestic conveyance prices.

18th October 1993	Letter from ACC to BT acknowledging receipt of draft agreement and requesting full details of UK numbering plan.
20th October 1993	Letter from ACC to BT requesting use of ACC draft and commenting on BT standard draft as too unspecific to be useful.
21st October 1993	Letter to other UK telecommunications licensees seeking interconnection with BT suggesting they adopt the ACC draft.
22nd October 1993	Letter from BT to ACC enclosing billing annex to BT's draft agreement and an updated milestone plan.
25th October 1993	Oftel staff informed ACC that Oftel will convene a tripartite meeting with ACC and BT to discuss why ACC's draft interconnection agreement should not form the basis of further negotiations.
25th October 1993	Telephone call from ACC to BT informing BT of Oftel's intention to convene the tripartite meeting.
28th October 1993	Tripartite meeting among ACC, BT, and Oftel scheduled for 8th November 1993.
29th October 1993	Letter from BT to ACC enclosing a schedule for basic telephony, transit telephony, international telephony, and 2 Mbit links.
1st November 1993	Copy of letter and enclosures pertaining to forthcoming Oftel meeting sent to BT.
1st November 1993	Letter from BT identifying a proposed programme for interconnect arrangements to be finalized. ACC informed BT by telephone that the proposed timetable was unacceptable. BT agreed to a meeting within two weeks to discuss technical requirements, but will not agree to test ACC's switch prior to execution of an interconnection agreement, and has stated that its proposed standard agreement will not be ready until mid-December.

1st November 1993	Letter from ACC to Oftel confirming 8th November 1993 meeting and enclosing a draft meeting agenda and summary of the points of disagreement between BT and ACC.
5th November 1993	Letter from ACC to BT, with a copy to Oftel, enclosing a revised contract draft for discussion during the 8th November 1993 meeting, delineating changes from the cable operators' agreement with BT, which reflect in part the more limited range of services required by ACC.
12th November 1993	Letter to BT commenting on draft schedule for review of BT draft standard interconnection agreement.
12th November 1993	Letter from BT enclosing technical specifications and operating provisioning manual for comment by ACC.
16th November 1993	Letter from BT enclosing copy of license for BT's National Charging Information Package.
18th November 1993	Letter to BT commenting on main body of draft interconnect agreement.
18th November 1993	Letter to BT commenting on Technical Annex of draft interconnect agreement; letter to BT submitting ACC dialing plan.
18th November 1993	Meeting with DOJ re interconnection issues and international resale policies.
18th November 1993	Letter from BT to ACC asserting that BT is not required to offer ACC Indirect Access because ACC is not a Long Line PTO.
22nd November 1993	Letter from ACC to Oftel advising of ACC's view that the Director-General can determine that ACC is entitled to Indirect Access pursuant to Condition 13.1(c) of BT's Licence and inviting the D-G to determine this issue.

22nd November 1993

Letter from ACC to BT confirming receipt of national conveyance prices on 15th October 1993 and 11th November 1993, but stating these prices were supplied only after considerable delay and following numerous requests from ACC.

23rd November 1993

Letter to BT questioning the rationale for BT's refusal to provide Indirect Access (viz., a fear of establishing a precedent although BT acknowledges that Condition 13 of its Licence does not prohibit BT's offering Indirect Access to ACC but claims that Condition 13.1(c) of its license does not require BT to provide such Indirect Access); copy of letter sent to Oftel as request for determination of ACC's entitlement to Indirect Access.

23rd November 1993

Letter to BT commenting on draft Technical Specifications A, B, and C of BT's draft Interconnect Agreement.

23rd November 1993

Telephone call from ACC to Oftel advising that the failure of BT to offer Indirect Access seriously jeopardized ACC's presence in the UK market, with the response that the matter was under review but that if the matter arose from a defect in either BT's or ACC's licences the issue would require the involvement of the DTI.

24th November 1993

Letter from ACC's top management to Director-General stating that ACC would have to reconsider its UK investment if BT would not provide Indirect Access, which is a focal point of ACC's business in the UK, and requesting that a determination of ACC's entitlement to Indirect Access be made by 15th December 1993.

24th November 1993

Letter from ACC to BT commenting on licence to use BT's National Charging Information Database (which is required to develop ACC's billing system under interconnect arrangements with BT).

26th November 1993	Letter from ACC to BT refuting minutes of a meeting held on 12th November. The minutes erroneously stated that the "earliest" date for signing an interconnect agreement would be 25th January 1993, rather than that, as agreed among BT, ACC, and Oftel, the contract <i>will</i> be signed on that date.
26th November 1993	Letter from BT enclosing further draft interconnect documents: schedules for international and transit ISDN calls; three sections of the Operational Testing Manual covering Egress, Ingress, and Electrical Interface Testing.
1st December 1993	Letter from BT to ACC confirming agreed dates to finalize interconnect agreement.
2nd December 1993	Letter from ACC to BT providing comments on Operations and Maintenance Manual.
2nd December 1993	Letter from Oftel to BT advising BT that the provision of Indirect Access is a matter which the D-G could determine if the parties are unable to reach agreement.
3rd December 1993	Letter from BT to ACC enclosing draft interconnect schedules for Indirect Access, SDN In-Span Interconnection, and removing sections of the Operational Testing Manual.
8th December 1993	Letter from BT to ACC on Indirect Access disagreeing on ACC's comments on the scope or applicability of any potential determination and expressing a hope to be able to respond to ACC within two weeks.
9th December 1993	Letter from ACC to BT in response to BT's letter of 8th December reiterating ACC's and Oftel's view on Indirect Access and advising that satisfactory resolution is required by 15th December at the latest.

9th December 1993 Letter from ACC to BT providing comments on Operational and Provisioning Manual pursuant to interconnect negotiations.

10th December 1993 Letter from ACC to BT seeking details of locations of BT's TXEL exchanges into which interconnection will take place via Indirect Access.

13th December 1993 Letter from BT to ACC agreeing to provide Indirect Access to ACC on commercial grounds. BT stating it does not agree with ACC's analysis of Condition 13 of BT's License in all respects but nevertheless agreed so as not to impede ACC's entry into commercial service.

13th December 1993 Letter from BT to ACC enclosing contract documentation "which has incorporated [our] comments where possible."

15th December 1993 Letter from ACC to BT providing comments on draft Schedule 16 of the Interconnect Agreement.

17th December 1993 Letter from Oftel to ACC confirming Oftel's support for the allocation of access code 1601 to ACC and confirming access code 1602 will be held in reserve also.

20th December 1993 Letter from ACC to BT providing comments on draft Operational Test Manual.

21st December 1993 Letter from ACC to BT commenting on Schedule 16 of the draft Interconnect Agreement and advising that as BT does not agree in all respects with ACC's analysis of Condition 13 of BT's License the Schedule will require amendment to ensure that BT does not subsequently seek to deny indirect access to ACC. Also advising that no ADC's should be payable, if at all, until the Director General publishes his final determination following ACC's ADC waiver application submitted on July 30, 1993.

22nd December 1993

Letter from BT to ACC enclosing Pricing Schedules for National Operator Assistance Service, Directory Enquiry Service, Emergency Services, International Operator Assistance Services, International Directory Enquiry Services, Entries in BT's Number Information System and Phone Books, BT Phone Books, and Access to BT Directory Assistance System.

4th January 1994

The Daily Telegraph publishes erroneous article entitled, "Telecom agrees deal with ACC."

6th January 1994

Letters sent by ACC Long Distance UK Ltd.'s Managing Director and Corporate Counsel to the Business Editor of *The Daily Telegraph* stating that the newspaper's article of January 4, 1994, is fundamentally incorrect and that negotiations between BT and ACC are continuing, and noting that BT's refusal to negotiate waiver of ADC's has prolonged the negotiation process and forced ACC to seek the intervention of the Director-General of Telecommunications. (Copies of these letters are attached.)

7th January 1994

Letter from ACC to BT setting out remaining comments on the main body of the draft interconnect agreement.

13th January 1994

Letter from ACC to Oftel confirming access code number and asking Oftel to notify BT of the access code number.

14th January 1994

Letter from Oftel to ACC stating Oftel wrote to BT on December 15, 1993, asking BT to allocate a designated access code to ACC and that there should be no delay on the part of BT in allocating the code number.

17th January 1994

Letter from ACC to BT seeking confirmation that an access code has been allocated to ACC.

17th January 1994

Letter from ACC to BT confirming certain costs for interconnection work to be carried out by BT but reserving ACC's position on the reasonableness of

such costs.

19th January 1994

Letter from ACC to BT asking BT to provide points of interconnection within the local London calling area.

10th January 1994

Letter from BT to ACC advising that BT is happy to consider ACC's request for more flexibility in the interconnect configuration inside London subject to any impact on BT's network, with BT offering to supply timescales when BT has made an initial evaluation of the process.

21st January 1994

Letter from ACC to BT seeking clarification that if a determination is required on points not agreed on the draft interconnect agreement there will be no delay in the testing schedule (as per agreement with Oftel on November 18, 1993).

26th January 1994

Letter from ACC to BT advising that the letter covering Interconnect Links and Data Amendment changes (BT's letter of January 20, 1994, reflects) had not be initialled on page one, ACC requesting that the letter be initialled and one copy returned.

26th January 1994

Letter from BT to ACC enclosing "final draft" agreement.

28th January 1994

Letter from BT to ACC confirming that an access code number had been reserved for ACC, BT advising that certain analogue switches will not accept discrete 4 digit access codes, and BT further advising that ready for service date was now June 1994 as ACC had not placed orders until mid-January 1994.

31st January 1994

Letter from BT to ACC providing temporary conveyancing rates.

31st January 1994

Letter from ACC to BT (copy to Oftel) seeking prices omitted from the draft interconnect agreement schedules and advising that ACC did not agree with BT's proposals on transit traffic and ADCs.

2nd February 1994 Letter from ACC to BT (copy to Oftel) advising that the ADC payment period pending a determination from the Director General was the remaining point that prevented signature of the agreement.

2nd February 1994 Letter from ACC to BT advising that ACC required clarification of certain points contained in the agreement, annexes, and schedules. (Clarification of a technical nature only was sought.)

4th February 1994 Letter from BT to ACC advising that the 9-month limitation on suspension of ADCs had been removed from the agreement.

4th February 1994 Letter from ACC to Oftel seeing a determination of the review clause in readiness for signature of the agreement.

4th February 1994 BT have agreed to removal of nine-month limitation on suspension of ADCs.

4th February 1994 ACC requested that Oftel determine the review clause.

7th February 1994 Letter from BT to ACC enclosing revised pages to the standard interconnect agreement.

10th February 1994 Receipt of final determination of the Review Clause of the Interconnect Agreement signed by Anna Walker of Oftel.

10th February 1994 Letter from BT to ACC enclosing further copy of standard interconnect agreement with further revisions.

11th February 1994 Signature of standard Interconnect Agreement.

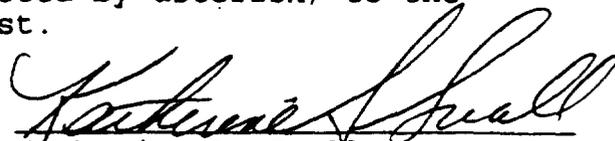
14th February 1994 Letter from ACC to BT referring to limitations imposed by points of interconnection offered by BT and seeking a realistic timescale to evaluate and decide upon an interconnection option which would provide ACC with the costing and planning efficiencies not currently available from BT.

To date

- Still no waiver of ADCs for ACC nor any reduction in BT's conveyance prices to ACC.

CERTIFICATE OF SERVICE

I hereby declare the that following documents were served
this 16TH day of February 1994 via first class postage prepaid
U.S. mail or by hand delivery (denoted by asterisk) to the
parties on the attached service list.


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