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

In the Matter of	)	
	)	DA 93-930
800 Data Base Access Tariffs and the	)	CC Docket No. 93-129
800 Service Management System Tariff	)	

RESPONSE TO OPPOSITIONS TO
DIRECT CASE OF BELL ATLANTIC

In spite of the volume of paper filed in opposition to the direct case of the Bell Atlantic telephone companies,[1] there is very little new or different in them -- and nothing at all that rebuts Bell Atlantic's showing that its rates are reasonable and were calculated in a manner consistent with the Commission's Rules and prior orders. For example, one objector merely refiled a copy of its petition asking to reject the tariff.[2] Another commentor tries to reargue fundamental rate structure issues that the Commission resolved years ago.[3]

Still others base their arguments on Bell Atlantic's original direct case and ignore the supplemental data submitted in March. For example, much of MCI's hefty appendices is simply beside the point, as the data it purports to analyze are out of date.[4] Other commentors spend pages attacking Bell Atlantic for

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[1] The Bell Atlantic telephone companies serving New Jersey, Pennsylvania, Delaware, Maryland, Virginia, West Virginia and the District of Columbia.

[2] Aeronautical Radio.

[3] Opposition of CompuServe at 3.

[4] *E.g.*, MCI.

including certain overheads as exogenous.[5] These costs, however, were excluded from the calculations in Bell Atlantic's supplemental direct case.[6]

Issue 1. Bell Atlantic's tariff clearly describes the services offered and its terms are reasonable.

The commentors do not question that Bell Atlantic's tariff clearly describes 800 data base access service and the terms under which it is offered. MCI's lengthy discussion of area of service routing is really a request that Bell Atlantic and others *change* the clear terms of their tariffs.[7] While Bell Atlantic's tariff clearly states that "a specific area of service can be a LATA, state, region, USA, or USA/Canada/Caribbean," MCI wants to require Bell Atlantic to offer additional area-of-service options as well. Whatever the benefits of the additional options, Bell Atlantic's failure to offer them does not make its tariff unclear or its terms unreasonable.[8]

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[5] *E.g.*, Allnet at 6, MCI at 31-37, Ad Hoc at 9-10 and Attachment A at 10 and 20-21, AT&T at 11-14.

[6] See Supplemental Direct Case at 6. "The basic query investment-related unit cost (excluding overhead) was added to the expense-related unit cost to develop the unit cost for the basic query." The exogenous cost calculations are shown in detail on Workpaper 2 in Bell Atlantic's Supplemental Direct Case.

[7] MCI at 51-56.

[8] Bell Atlantic can provide AOS below the LATA level (to the NPA or NPA-NXX level) at the basic query rate. However, at such levels, central office NXX changes can cause problems and end user customer confusion if the customer's 800 record is not updated promptly to reflect such changes.

MCI also complains that Bell Atlantic did not file any tariff for RESPORG services.[9] As Bell Atlantic indicated in its direct case,[10] these order-taking and other administrative functions do not constitute the provision of "communication" under the Communications Act and are, therefore, not subject to the tariffing requirements of section 203. If the Commission disagrees and requires exchange carriers to provide these services under tariff, then all entities which offer RESPORG services to others for hire should be required to do likewise.

Issue 2. Bell Atlantic used a reasonable method to restructure its baskets while adjusting for exogenous costs.

As described in its original Direct Case, Bell Atlantic used a variation of Method 1 to restructure its baskets while adjusting for exogenous costs.[11] Bell Atlantic's methodology achieves this objective and is consistent with the Commission's Rules.

AT&T and MCI claim that Method 3 should have been used.[12] However, Method 3 does not comply with the Commission's Rules, and, therefore, a rule change would be required before it could be used. This method states that the SBI upper and lower limits would not be adjusted for the change in the price cap

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[9] MCI at 60.

[10] Direct Case at 2.

[11] Direct Case at 2-3 & App. A.

[12] AT&T at 6, MCI at 40.

index ("PCI"). Section 61.47, however, requires that the upper and lower limits be adjusted for changes in PCI.[13]

Moreover, under Method 3, freezing SBI limits does nothing more than isolate the 800 exogenous costs to the 800 service category which could have been done by classifying 800 data base as a new service.

AT&T's Appendix B uses Bell Atlantic's data as an example of the change in pricing flexibility among the three methods for computing the 800 data base restructure/exogenous cost change. Some of the data and calculations in that example are flawed. For example, for the local switching category, the existing revenues shown under Method 3 are incorrect and should be consistent with the other methods. Also, for all three service categories, the incorrect change in PCI was used. To calculate the change in PCI, the price cap rules call for the use of the PCI at the end of the prior year instead of the existing PCI that AT&T used. In addition, the upper and lower SBI limits were not calculated correctly from the given (although incorrect)

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[13] Method 2 is also flawed in that it does not address the restructuring of the 800 NXX rates. It is unclear to Bell Atlantic how this method could be used in cases in which an existing rate no longer exists after a restructure.

This method would also result in different pricing flexibility between service categories after the restructure. Therefore, this method does not comply with the intent of Price Cap objectives.

Method 2 also results in the relationship of SBIs for Local Switching, Transport and Information service categories being different after the restructure even though the rates in these service categories did not change and the exogenous cost was associated only with the 800 data base service category.

change in PCI. Therefore, no conclusions can be drawn from Appendix B due to these and other errors.

Issue 3. Bell Atlantic's 800 data base access service rates are reasonable.

<u>Bell Atlantic's exogenous costs are reasonable</u>. As required by the Commission's 800 data base rate structure order,[14] the only costs for which Bell Atlantic seeks exogenous treatment are those incurred specifically to provide 800 data base access service on the terms prescribed by the Commission. To do this, it was necessary for Bell Atlantic to upgrade its SCP and to install or augment links between its local STPs and the regional STPs. None of the commentors has provided any reason to reject any of these costs or to treat them as endogenous.

The commentors question various individual cost items, and responses to these questions are in Appendix A to this response.

<u>Bell Atlantic's demand estimates are reasonable</u>. The interexchange carrier commentors generally poke little holes in the demand estimates made by the various exchange carriers. Estimating demand for a new service, of course, requires making numerous assumptions and predictions of the future, and it is hardly rocket science for opponents to quibble with them, especially more than a year after the fact. Howeer, nothing in

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[14] *Provision of Access for 800 Service*, 8 FCC Rcd 907, 911 (1993).

any of these filings suggests that the method used by Bell Atlantic was anything but reasonable.[15]

What is most noticeable in all the nit-picking by the interexchange carriers is that none of them provides any alternate estimates. AT&T, MCI and Sprint together account for the overwhelming share of 800 data base access demand; these carriers know what their marketing plans are; they operate nationally, while each one of the exchange carriers serves only a section of the country. It is these carriers, not Bell Atlantic, that are in the best position to know what their demand will be for access services. And yet, instead of providing the Commission with more authoritative estimates, they choose merely to carp and cavil. This behavior does not advance the regulatory process, and it surely does not support these carriers' claims that Bell Atlantic's rates are unreasonable.

Sprint wonders how actual demand compares to Bell Atlantic's forecast.[16] In fact, Bell Atlantic's query forecast has turned out to be quite accurate: As Bell Atlantic stated in its supplemental direct case, actual query demand for 1993, annualized, is only four percent less than Bell Atlantic's year 1

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[15] Bell Atlantic based its forecast of customer demand for 800 data base access on five-year historical trends for 800 services, on information received from its interexchange carrier customers and on industry reports.

[16] Sprint at 13.

forecast.[17] Table 1, below, summarizes actuals versus the year 1 forecast for total queries.

Table 1		
Query Forecast	1993 Annualized	Percent Difference
3,332,861,407	3,189,356,276	4 Percent

Bell Atlantic's estimate of demand for vertical features was less accurate -- estimating that the demand would be significantly greater than it turned out to be. This was corrected in Bell Atlantic's Supplemental Direct Case.

Some commentors criticize the assumptions used to split demand between basic and vertical services, which they claim resulted in the underestimation of the volume of basic queries.[18] Bell Atlantic did not split demand between basic and vertical features. Instead, Bell Atlantic estimated the number of vertical feature charges expected to be billed in addition to basic queries. 1993 data indicate that only .34 percent of total basic queries had a vertical feature charge applied to them, in addition to the basic query charge. Since the vertical feature rate element is assessed as an additive to the basic query, the vertical feature demand represents only that additive portion. Bell Atlantic, therefore, did not underestimate basic query demand.

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[17] Bell Atlantic's Supplemental Direct Case at 8.

[18] Allnet at 6-8, CompuServe at 6-7, First Financial Management at 6-7.

Finally, commentors question Bell Atlantic's use of levelized demand. As Bell Atlantic showed in its direct case[19] and as NDC agrees,[20] levelizing demand produces more accurate rates for the first year -- in fact, Bell Atlantic's query rate would have been approximately one-third higher in the absence of levelizing.[21] The concerns of AT&T and NDC[22] that Bell Atlantic will not properly take into account in future years' tariff filings the fact that it used levelized demand this year is a matter for those tariff proceedings, not this one.

Conclusion

For these reasons, Bell Atlantic urges the Commission to terminate this investigation.

Respectfully submitted,

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19 Direct Case at 5-6.

20 NDC Att. A at 29-30.

21 AT&T suggests that, by increasing first-year demand, levelizing overstates Bell Atlantic's exogenous cost adjustment. AT&T at 16. This is not the case. As Bell Atlantic indicated in its direct case, its exogenous costs would have been approximately the same had it used first-year demand instead. As long as costs are levelized consistently with demand, there is no issue.

22 AT&T at 15, NDC App. at 29-30.

APPENDIX A

Exogenous Costs

Issue: The Commission should deny exogenous treatment for STP investment because such costs are not clearly identified. MCI at 14-15. Bell Atlantic has inappropriately included costs associated with LSTPs and RSTPs. Ad Hoc at Attachment A at 9 and 23.

Response: Contrary to MCI's claim, Bell Atlantic's supplemental direct case, Workpaper 1, shows the annual costs for the portions of the LSTPs and RSTPs associated with 800 data base queries.[1] These annual costs, respectively for LSTPs and RSTPs, are $477,684 and $1,059,540.

Ad Hoc claims that the LSTPs and RSTPs should not be included as exogenous costs. The LSTP and RSTP capacities had to be sized to handle 800 data base traffic. Bell Atlantic used a reasonable method (the relative proportion of links carrying queries to total links) to identify LSTP and RSTP ports used to terminated "A" links and "D" links carrying 800 queries[2] to the SCP.

Furthermore, MCI states that no SS7 costs may be included as they are general network upgrades.[3] In fact, all of the investment deployed for 800 data base service is based on SS7

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[1] See Supplement to Direct Case of Bell Atlantic Alternate Cost Support, Workpaper 1, Lines 1K and 2O. ("Supplemental Direct Case").

[2] "D" links are the signaling links that carry queries between the LSTP and the RSTP. "A" links carry queries between the RSTP and the SCP.

[3] MCI at 14.

technology; therefore, such sweeping statements are incorrect and inconsistent with the Commission's orders.

Issue: Bell Atlantic, NYNEX and United include, as exogenous, costs of signaling links between local and regional STPs that appear to be excessive on their face. MCI at 17; Ad Hoc at Attachment A at 26-27.

Response: In Bell Atlantic's supplemental direct case, the annual cost associated with the STP/SCP signaling links ("A" links) is only $27,311, and the annual cost associated with the LSTP/RSTP links ("D" links) is only $134,511.[4] The annual cost of the ports at the LSTP and RSTP where these links terminate is $1,537,224.[5] The combined total of links and ports is approximately $1.7 million, significantly less than the $3.1 million figure MCI attributes to Bell Atlantic.

Ad Hoc states that LECs have failed to justify the reason for treating LSTP to RSTP links as exogenous. The only reason for including such links in the exogenous costs is that without 800 data base service, *95 percent of the traffic on these links would not exist*.[6] That fact provides sufficient justification for treating these links as exogenous.

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[4] Bell Atlantic's Supplemental Direct Case, Workpaper 1, Lines 4P and 5L.

[5] Supplemental Direct Case, Workpaper 1, Lines 1K and 2O.

[6] Bell Atlantic's supplemental direct case at 4. "Workpaper 1 shows that the majority (about 95 percent) of traffic carried over the "D" links is 800 queries...."

Issue: Inclusion of SCP costs. Ad Hoc at Attachment A at 21-22.

Response: Ad Hoc wonders whether SCPs dedicated to 800 service today will be dedicated tomorrow. The answer is yes. In addition, Ad Hoc argues that inclusion of costs associated with shared SCPs is inappropriate. It is appropriate for Bell Atlantic to include these costs because the size and capacity, and therefore cost, of the SCP depends upon the services offered.

Issue: All of Bell Atlantic's non-capital costs should be denied exogenous treatment. Ad Hoc at Attachment A at 24-25.

Response: Ad Hoc examines one of seven categories of noncapital-related expenses Bell Atlantic included in its exogenous costs. At least one of these items -- SCP/SMS signaling links -- was specifically recognized by the Commission as deserving of exogenous treatment. Further, the remainder of the expenses would not have been incurred without the deployment of 800 data base access. These expenses are listed below.

Six-digit translation: Bell Atlantic included the cost of labor for translations work required to transition calls from the switches to the SCP. These expenses are directly attributable to implementation of 800 data base access service because they would not have otherwise been incurred.

The billing system modifications are the costs related to re-design and equip billing systems to enable them to receive information from the 800 SCPs. These changes are over and above typical billing system modifications because most modifications simply add new rate elements or change the way existing rates are charged.

SMS administration costs are charges billed to SCP owner/operators by Database Service Management, Inc. These rates apply for 9.6 kbps dedicated access to the SMS (monthly port charge), record translation and downloading (monthly charge per network), and data base administration support and network management (monthly charge per data base). These monthly charges were itemized in Workpaper 9 of Bell Atlantic's direct case, and were based on estimates of proposed revisions to SCP owner/operator charges, finalized and published March 31st, two weeks after Bell Atlantic filed its supplemental direct case.[7] Obviously, these ongoing, recurring charges would not be incurred without the implementation of 800 data base service.

SCP technical support consists of one-time expenses for Bellcore work projects directly related to 800 data base implementation. The 800 project management project provided national coordination of activities to ensure that FCC requirements were met, and that technical, operational, and customer issues were addressed and resolved in a timely manner. The software development project was primarily for developing appropriate access billing measurements from SCP data, SCP traffic distribution software and software for the transition from low to high query volumes that would occur with mandatory

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[7] See the Bell Operating Companies SMS/800 Tariff, Transmittal No. 7, filed March 31, 1994 at Exhibit 1, lines 6 through 8.

data base access. The engineering and maintenance support projects developed basic SCP maintenance software, as well as enhancements to ensure performance reliability. These work projects were itemized on Workpaper 9 in Bell Atlantic's supplemental direct case.

800 trunking: Because of Bell Atlantic's extensive deployment of SS7 capabilities in its end office switches, it was unnecessary in many areas for Bell Atlantic to complete SS7 interconnection with interexchange carriers in order to satisfy the Commission's access time requirements. In certain such locations, however, Bell Atlantic was required to deploy additional interoffice trunking facilities (and related switch functions) in order to reduce access times to comply with the Commission's standards.

Bell Atlantic's method of recovery of these expenses is reasonable since these costs were included in the basic query rate by amortizing the total expense amount over five-years' worth of queries.

Issue: MCI states that Bell Atlantic's assertions are misleading, if not totally untruthful regarding the alternate cost support which supports a basic query rate 35 percent higher than originally filed. MCI at 23.

Response: Bell Atlantic stated that its supplemental direct case supports a query rate (not exogenous cost) 35 percent higher than that originally filed. This calculation is shown on Workpaper 3, and clearly includes an amount for reasonable overhead normally included with new services, and which overhead Bell Atlantic continues to believe should be fairly borne by 800 service.

MCI compares exogenous costs submitted in Bell Atlantic's supplemental direct case with those submitted in its original direct case. That exercise is fruitless, since the methodology outlined in the supplemental direct case is a "top down" approach, while the original direct case was based on results from the CCSCIS model.

For vertical features, MCI claims that the rate increase is due to a change in demand estimate, not an inability to use CCSCIS.[8] This is not true. The CCSCIS model was used to quantify the additional memory and processing time for a query with vertical features versus a basic query without vertical features. Vertical feature demand had virtually no impact on those CCSCIS calculations. Moreover, since Bell Atlantic cannot use the CCSCIS model now to justify its 800 data base costs, an alternate, more simple, albeit less accurate, method was developed to quantify vertical feature costs. Bell Atlantic was able to use the method employed in the supplemental direct case, which is demand sensitive, because by that time it had actual demand data available.

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[8] MCI at 23.

Issue: Interstate allocation of exogenous costs. MCI at 26-31 n.78; Ad Hoc at Attachment A, pp. 28-29; Sprint at 6.

Response: MCI, Ad Hoc and Sprint are right to take issue with the difference between separation allocators and 800 data base demand. For 800 data base service, the separations rules do not produce a realistic or cost-causative allocation of investment to the interstate jurisdiction. The majority of 800 data base demand is interstate (about 80 percent). However, Part 36 rules develop allocation factors at the account level rather than at the service level. The interstate and intrastate investments derived by separations will not compare with investments derived by applying demand for 800 data base service. For example, Bell Atlantic's total SCP investment is approximately $19 million.[9] Using the Part 36 rules for COE Cat 2, the interstate allocation is 36.05 percent and yields an interstate investment of $6.8 million. If Bell Atlantic's 800 interstate demand allocation of 82 percent were used instead, the interstate investment is about $15.6 million. Therefore, the use of separations factors to determine exogenous costs produces skewed results by underallocating costs to the interstate jurisdiction.

This underallocation contributes to Bell Atlantic's sharing obligation. Further, a reduction in exogenous costs because of separations factors coupled with existing sharing obligations would result in "double giveback" -- once for the impact 800 data base has on sharing, and twice to comply with separations rules

[9] Supplemental Direct Case, Workpaper 1, Line 3I.

that, at least in this instance, do not reasonably reflect the true nature of the service.

Issue: Bell Atlantic's claimed exogenous unit costs for the SCP/SMS signaling link increased 2300% under Bell Atlantic's revised methodology. Sprint at 16.

Response: The unit cost for the SCP/SMS signaling link in Bell Atlantic's original direct case was $.000026 and was unchanged in Bell Atlantic's supplemental direct case filed March 15, 1994.[10]

Issue: Treatment of overhead as exogenous. Allnet at 6; MCI at 31-37; Ad Hoc at 9-10 and Attachment A at 10 and 20-21; AT&T at 11-14. Also, MCI takes issue with the administration portion of the annual cost factor. MCI at 35.

Response: Bell Atlantic's supplemental direct case did not include overhead in the calculation of exogenous costs.[11] Further, Transmittal No. 566 filed on April 26, 1993, removed overhead amounts from Bell Atlantic's exogenous costs, so Bell Atlantic's currently effective query rate is based on exogenous costs with *no overhead included in them*. However, Bell Atlantic's original direct case, Appendix B contained a detailed explanation of the types of administrative activities involved in deploying 800 data base service. These activities and costs,

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[10] Bell Atlantic's original direct case, Appendix B, Workpaper B-1, Page B-1, "SCP/SMS Signaling Link," filed September 20, 1993. See also Bell Atlantic's alternate cost support, Workpaper 12, "SMS CKTS," filed March 15, 1994.

[11] Supplemental Direct Case at 6. "The basic query investment-related unit cost (excluding overhead) was added to the expense-related unit cost to develop the unit cost for the basic query." The exogenous cost calculations are shown in detail on Workpaper 2.

attributable directly to 800 data base service but not easily quantified, were estimated using an overhead loading factor normally applied to new services to ensure that the new service recovers its fair share of overhead costs. While 800 service was classified as a restructure, even the Commission's rate structure and pricing Order recognized that 800 data base service did not fall squarely within the definition of either a new or restructured service.[12] Even though 800 service was finally classified as a restructure, Bell Atlantic believes that 800 data base service should have been classified as a new service, and as such, should include reasonable overhead in the query rate. Even AT&T states "it may very well be appropriate to set 800 data base rates to recover a certain level of overhead...."[13] To do otherwise means that all other products and services that the personnel identified in Appendix B could have been working on instead of 800 data base will have subsidized the 800 data base restructure.

Furthermore, even though overhead had already been removed from the 800 data base exogenous costs, the 800 data base service category was reduced even more by the reallocation of general support facilities ("GSF").[14] In effect, the GSF reallocation removed overhead where it no longer existed. Bell Atlantic

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[12] Provision of Access for 800 Service, 8 FCC Rcd 907 ¶ 26 (1993).

[13] AT&T at 13-14.

[14] See Bell Atlantic Transmittal No. 577, filed June 17, 1993.

believes that the 800 data base service category should have been exempt from that reallocation.

AT&T tries to relate overhead costs for 800 data base to Bell Atlantic's sharing obligations for prior years. Overhead costs associated with 800 data base have no relationship to sharing because sharing is based on interstate price cap performance and not service category or basket performance. Return by service category is irrelevant for price cap purposes.

Further, a reversing adjustment is not required for any of Bell Atlantic's exogenous costs because all expenses were spread over a five-year period.

All of the overhead costs described in Appendix B of the original direct case are directly attributable to 800 service and were quantified using the standard overhead loading calculation used for new services.

Further, MCI questions the administration component of the direct costs. For Bell Atlantic, this portion of the annual cost factor is about .025 which equates to about only $200,000 in annual costs.

Issue: Repair center. MCI at 36; Sprint at 8; Ad Hoc at Attachment A at 24-25; AT&T at 12 n.22.

Response: The specific repair center costs for which Bell Atlantic seeks exogenous treatment include dedicated links to the SMS, software costs to enable repair center personnel to access the SMS, and the additional staffing of the center.

Bell Atlantic has already explained in detail the repair center costs and why they were included as exogenous costs.[15] Further, Bell Atlantic's original direct case explained that trouble reports were handled easily and quickly prior to data base implementation because repair personnel had only to consult a list that showed 800-NXX assignments to determine the associated interexchange carrier. Now, repair center personnel require on-line access to the SMS to perform the same function. The consolidated center handles 800 trouble reports from all customers. The center takes calls from interexchange carrier customers to allow them to report troubles experienced anywhere in the Bell Atlantic region. The center also assists local exchange carriers and end users by helping them identify the RESPORG for an 800 number that is experiencing problems.

A study conducted in January 1994 shows that a large part of the repair center activity consists of directing the interexchange carrier end user customers to the interexchange carriers themselves. The repair center received 7,500 calls during that month. 80 percent (about 6,000) of the calls were from end user subscribers, and the remainder were from a single interexchange carrier. Out of the 6,000 calls from subscribers, 84 percent (about 5,000) had to be referred to the appropriate RESPORG. These functions are vital to the effective operation of

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[15] See Opposition of the Bell Atlantic Telephone Companies, filed April 2, 1993 (replies to petitions against Transmittal No. 560).

800 data base access service, and the costs of the center should be borne by 800 data base customers.

Furthermore, for Sprint's clarification,[16] Bell Atlantic's repair center has nothing to do with RESPORG provisioning functions. Bell Atlantic's Dial Services Administration Center (DSAC) handles provisioning activities.

Sprint states that Bell Atlantic made no attempt to quantify the different level of resources necessary to handle NXX versus 800 data base trouble reports. That is exactly what Bell Atlantic did do, and included in its query rate.

Issue: None of the LECs have allocated costs to their interexchange basket and, therefore, they must assign costs to this service above and beyond access. MCI at 16.

Response: For Bell Atlantic this is not an issue because the query rate is based on total costs divided by total demand, which includes interstate intraLATA traffic.

Issue: "Bell Atlantic changed its discount rate from 12.9 percent...to 11.25 percent without explanation." MCI at 42.

Response: Bell Atlantic made this change because the Commission's recent ONA investigation order required this change for ONA BSE rates.[17] Bell Atlantic simply used 11.25 as the discount factor in its present value calculations.

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16 Sprint at 8.

17 Open Network Architecture Tariffs of Bell Operating Companies, CC Docket No. 92-91, Released December 15, 1993, ¶ 25

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Response to Oppositions to Direct Case of Bell Atlantic" was served this 5th day of May, 1994, by first class mail, postage prepaid, on the parties on the attached list.

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