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

MAY - 9 1994

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)
)
Price Cap Performance Review) CC Docket No. 94-1
for Local Exchange Carriers)

COMMENTS OF TELE-COMMUNICATIONS ASSOCIATION

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May 9, 1994

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Summary

This review of LEC price cap regulation presents a valuable opportunity to refine the Commission's service quality and infrastructure development monitoring program. That program already has been greatly improved since 1990, most notably by requiring the LECs to disclose actual performance data in order to permit benchmarking. Nonetheless, a recent survey of TCA members -- while suggesting that overall levels of service quality have not suffered under price cap regulation -- reveals certain danger signals confirming the need for enhanced scrutiny.

For example, 34 percent of U S West respondents stated that service personnel are less experienced than four years ago, 25 percent cited an increase in the level of held orders, and 26 percent said that multiple service visits generally are needed to correct troubles. Several respondents complained that their LEC was centralizing maintenance and repair operations, discontinuing the availability of local technicians who are familiar with local conditions, and in at least one case, failing to respond promptly to repeated outages affecting police and fire communications. Forty-one percent of U S West respondents and 25 percent of Pacific Bell respondents reported disparities in service quality and availability among geographic locations, with many suggesting that rural areas generally receive poorer service and fewer advanced capabilities. A number of respondents -- half of which are small or medium-sized businesses -- also urged disclosure of information on data transmission quality, which is not currently covered by the Commission's monitoring program.

Several developments confirm the need for vigilance as the Commission seeks to "help prepare for the network that is now emerging, the information superhighway of the future"¹:

- The BOCs have announced plans to lay off roughly 60,000 additional workers by 1997 -- nearly twice as many as already have been let go since the inception of price cap regulation in 1990. These layoffs almost certainly will result in further centralization of installation, maintenance, and repair functions, diminished experience levels and responsiveness, and -- quite possibly -- reduced network reliability.
- Incipient competition for local exchange and access services will develop unevenly. As the Notice recognizes, the LECs may respond to spotty competition by focusing network maintenance and investment resources on downtown business areas and wealthy residential subdivisions, exacerbating existing geographic disparities.
- Data transmission now accounts for 14 percent of all traffic, and is growing rapidly. Moreover, implementation of the National Information Infrastructure will both stimulate additional data traffic and increase the dependence on high quality data transmission services by consumers of all sizes.

These developments warrant three refinements to the service quality and infrastructure development monitoring reports. First, to identify geographic disparities in service quality (which may impede opportunities for economic growth in rural areas), the LECs should be required to provide exception reporting of wire centers that fall in the lowest ten percent of performance in any key category (installation and repair intervals, number of outages, and trouble reports) for three consecutive quarters. Second, to identify geographic disparities in service availability (which may constrain full participation in the National Information Infrastructure), the LECs should be

¹ Price Cap Review Notice at ¶ 8.

required to identify MSAs or non-MSAs that are in the lowest quartile in deployment of digital switching, ISDN and Signalling System 7 capabilities, and fiber optic transmission capacity, and to publish upgrade schedules for any area that appears in the exception report for four quarters. Third, the LECs should be required to include availability, errored second, and severely errored second measurements in their quarterly reports. Existing technology permits non-intrusive monitoring of these data transmission parameters, and such monitoring is highly desirable given the essential role of data communications in achieving social and economic objectives.

Finally, TCA urges the Commission to recognize that the utility of service quality monitoring will continually increase as competition develops in the access and local exchange marketplaces. Ready availability of accurate information about service quality and infrastructure development will enable consumers to make rational choices among vendors and to plan their networks to maximize efficiency and productivity.

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Tele-Communications Association ("TCA"), by its attorneys, respectfully submits its Comments regarding the Notice of Proposed Rulemaking ("Notice") in the above-captioned proceeding.¹ Because high quality, reliable service is essential to its members, TCA will focus its opening comments on those aspects of the LEC price cap plan dealing with service quality and infrastructure development.²

I. TCA'S SERVICE QUALITY SURVEY REVEALS CERTAIN DANGER SIGNALS

In preparing to participate in this proceeding, TCA conducted a survey of its members in early 1994. The survey sought responses to several questions dealing with key aspects of LEC service quality, and asked respondents to compare performance

¹ FCC 94-10 (released February 16, 1994). TCA is an association of telecommunications managers. Its members represent roughly 1000 small, medium, and large users of telecommunications services, including government agencies, public and private corporations, hospitals, and educational institutions.

² TCA may address other aspects of the price cap plan in its reply comments.

levels in 1994 with levels in 1990, before the adoption of price cap regulation.³

Because TCA members are concentrated in Pacific Bell and US West territory, the survey does not provide a basis for assessing service quality trends throughout the country.⁴ Nonetheless, TCA is pleased to report that for the carriers serving most TCA members, overall service quality does not appear to have suffered under price cap regulation. Of 144 qualified respondents,⁵ 49 (34 percent) reported that overall service quality had improved since 1990, 65 (45 percent) stated that service quality had remained the same, and 28 (19 percent) said that service quality had declined.⁶

At the same time, however, the responses reveal certain danger signals.⁷ For example, 26 percent of U S West respondents reported that it took multiple visits from service personnel before troubles were corrected. An alarming 34 percent of U S West respondents noted a decrease in the expertise of LEC personnel responsible for installing new circuits and clearing troubles. In addition, 25 percent of U S West

³ The survey form is attached as Appendix A hereto. Tabulations of the results for Pacific Bell and U.S. West -- the two carriers serving the vast majority of TCA members -- are attached as Appendix B. Interestingly, the results did not appear to vary significantly based on the size of the respondent, so the tabulations are not broken down by customer size.

⁴ The responses break down by carrier as follows: 64 from US West, 53 from Pacific Bell, 16 from GTE, 11 from Bell Atlantic.

⁵ Responses from members who had less than four years experience were not tabulated.

⁶ The other two respondents did not answer the question on overall service quality.

⁷ Most of the danger signals relate to U S West; Pacific Bell's customers generally note significant improvement in service over the past four years. The significant variations between these two carriers suggest that different LECs may be responding to the incentives created by price caps in different ways. Service quality monitoring reports that permit benchmarking -- as the Commission's now do -- should help determine whether this is the case, while providing incentives for carriers with inferior performance to strive to improve.

respondents cited an increase in held orders since 1990 (compared to 14 percent who perceived a decrease).

These danger signals suggest a need for heightened vigilance going forward. The seven RBOCs already have announced plans to lay off an additional 58,700 employees over the next four years -- nearly twice as many as have been let go over the past four years:

Table 1: RBOC Employment⁸

Carrier	Layoffs since 1990	Planned Layoffs 1994-1997
Ameritech	4,800	6,000
Bell Atlantic	6,000	0
BellSouth	4,250	10,200
NYNEX	1,900	22,000
Pacific Bell	14,000	10,000
Southwestern Bell	3,860	1,500
U S West	0	9,000
Total:	34,810	58,700

These further layoffs inevitably will place strains on responsiveness, quality, experience levels, and employee morale. There is only so much inefficiency that may be wrung out of a system before further cuts impair performance.

The survey responses also support TCA's long-held view that additional efforts must be made to identify variations in service quality between geographic areas served by the same carrier. Forty-one percent of U S West respondents and 25 percent of

⁸ Source: various reports in major newspapers. TCA understands that U S West has laid off workers since 1990, but has been unable to locate reports confirming specific numbers.

Pacific Bell respondents indicated that such disparities exist, with several stating that rural areas receive inferior treatment. For example, several respondents complained that their LEC had centralized maintenance and repair functions, eliminating on-site technicians in non-urban areas and relying instead on remote staff who have no familiarity with local conditions. Many respondents also commented that service offerings in rural areas lag behind those available in major cities. Particularly in light of the importance of telecommunications to economic growth in rural areas, the need for exception reporting of wire centers with chronically poor performance is more important than ever. TCA's suggestions in this regard are detailed in Section II, below.

In addition, the survey responses indicate a strong desire among TCA members to obtain information regarding data transmission quality. Many respondents -- half of them small and medium-sized businesses -- asked for information to be provided regarding availability, mean time to repair, error-free seconds, and similar indicators. Unfortunately, the Commission's current monitoring reports do not address data transmission quality. As TCA discusses in Section III, this omission can and must be corrected as we move toward implementation of a National Information Infrastructure that is intended to provide consumers with interactive access to a wide range of electronic information.

II. THE COMMISSION SHOULD REQUIRE EXCEPTION REPORTING OF POORLY PERFORMING WIRE CENTERS AND UNDERSERVED AREAS (Baseline Issue 7a).

The Price Cap Review Notice properly establishes a goal of ensuring universal service "to all geographic areas ... of equal type and quality."⁹ The current service quality monitoring reports, however, do not enable the Commission or consumers to determine whether this goal is being achieved, because they disaggregate information only between MSAs and non-MSAs. Nonetheless, recognizing that the Commission might decide in the instant proceeding to exercise greater scrutiny of geographic variations in service quality performance, the Bureau recently ordered the LECs to retain wire center level records.¹⁰ As discussed below, TCA now urges the Commission to direct the LECs to file exception reports regarding poorly performing wire centers. In addition, the LECs should be required to identify specific areas that lag behind in investment in digital switching, ISDN availability, Signalling System 7 deployment, fiber optic transmission, and other indicators of readiness to participate in the National Information Infrastructure.

The need for these expanded reporting requirements is confirmed by the responses to TCA's service quality survey. As noted in Section I, a substantial number of respondents indicated that service quality levels vary considerably among different

⁹ Notice at ¶ 36.

¹⁰ Policies and Rules Concerning Rates for Dominant Carriers, 8 FCC Rcd 7474, 7476 (Com. Carr. Bur. 1993).

areas served by the same LEC. Moreover, several specific comments stated that rural areas receive lower quality service and fewer advanced offerings. For example:

- A U S West customer in Arizona complained that "the Phoenix network is controlled from Denver. We have lost all dial tone on three separate occasions, severely affecting police and fire communications since they [the LEC] do not know who their critical customers are." Such a problem was predicted by a U S West customer in Washington, who explained that "I do not currently perceive a different level of service. However, as more and more functions (i.e., outside plant engineering) are centralized to Colorado and site visits are reduced or eliminated I expect this imbalance to surface."
- A U S West customer in Washington responded that "the service in rural areas is not as good because of the distance from major repair and installation centers."
- A U S West customer in Oregon noted that "many new services available in metro areas [are] not available to our area (pop. 100,000)," and that his service area "still had an analog central office and no local service representative."
- A U S West customer in Colorado reported that "many central offices are no longer staffed 24 hours, and problems sometimes take longer to fix due to lack of technician or qualified tech on-site."
- A U S West customer in Arizona lamented that "we still have rotary in some areas [and] no Centrex in some areas."
- A U S West customer in Washington responded that "we find the Yakima area (central Washington state) to have a greater incidence of LEC service problems."
- A U S West customer in Utah replied that "service in the larger metropolitan areas seems to be better. Installers in the small metropolitan areas sometimes fail to advise their superiors when they are unable to proceed with an installation."
- A Pacific Bell customer in California said that service "is better in S.F. bay area than Southern California and rural areas."

- A GTE customer in Washington stated that "Snohomish County has strong service offerings but Skagit and Whatcom (old Contel territory) still have different tariffs. Eastern Washington service is atrocious."
- A GTE customer in North Carolina wrote that "the level of service provided to the Research Triangle Park area by GTE is much higher than to more rural areas. Leading edge technology requires kid glove treatment."

These comments illustrate that the current, highly aggregated reports can mask serious differences among geographic locations. Moreover, as the Price Cap Review Notice recognizes, the uneven availability of incipient competitive alternatives may exacerbate the very disparities in service quality and availability that many TCA members already have noted:

Competition in local exchange access services is likely to develop unevenly. This in turn may encourage price cap LECs to direct repair, maintenance, introduction of new services and features, and other efforts toward downtown businesses and affluent residential customers. Inner cities, rural areas, and the less well-off might see fewer benefits from competition, or even declines in service quality.¹¹

To avoid creating a nation of urban "haves" and rural "have-nots," and to ensure that the Commission and the LECs themselves are aware of chronic problem areas and underserved locations, the monitoring reports should be revised in two respects:

First, the LECs should be required to list in their quarterly reports any wire center that falls within the lowest ten percent of actual performance in any of the following categories for three consecutive quarters:

¹¹ Notice at ¶ 98.

- installation interval for switched access service (a composite of Feature Groups B, C, and D), residential service, standard business service, voice grade private line service, DS1 service or DS3 service;
- repair interval for each of the above service categories;
- number of outages; and,
- trouble reports per 100 access lines.

Such exception reporting would be minimally burdensome, since the LECs already collect such information. At the same time, it would facilitate identification of locations receiving chronically inferior service and help assure that all consumers enjoy the same high standard of service quality.

Second, the infrastructure development reports should be modified to provide for exception reporting of individual MSA or non-MSA areas that lag behind in deployment of key technologies necessary for full participation in the National Information Infrastructure, such as digital switching, ISDN capabilities, Signalling System 7, and fiber optic transmission. These reports should identify each area falling in the lowest quartile in one or more of these categories. If an area appears on the list for more than four quarters, the LEC should be required to disclose its plans for deploying the technology needed to bring service up to par with the rest of its territory.

III. THE COMMISSION SHOULD EXPAND THE MONITORING REPORTS TO INCLUDE INFORMATION CONCERNING DATA TRANSMISSION QUALITY (Baseline Issue 7a).

The Bureau explicitly recognized the importance of data transmission quality reporting when it adopted the initial reporting requirements in May 1991.¹² Nonetheless, it declined to require data transmission reporting at that time because of its perception that the need for the information did not outweigh the burdens of reporting it. Subsequently, in October, 1993, the Bureau deferred for future consideration "the practicability or desirability of instituting a digital transmission quality reporting requirement."¹³ This decision was based in part on a belief that "high speed data transmission is generally a service provided on special access lines to large, sophisticated customers, and is usually among the first of a LEC's services to face competition," and that the technical feasibility of in-service monitoring had not been demonstrated.¹⁴

TCA respectfully submits that expansion of the monitoring reports to include data transmission quality is now both desirable and practicable. First, the emphasis on development of the National Information Infrastructure significantly increases the need for data transmission quality information. Data traffic already comprises roughly 14

¹² Policy and Rules Concerning Rates for Dominant Carriers, 6 FCC Rcd 2974, 2980 (Com. Carr. Bur. 1991).

¹³ 8 FCC Rcd at 7483.

¹⁴ *Id.*

percent of total domestic traffic,¹⁵ and the volume of such traffic is increasing at a dramatic rate. For example, use of on-line data bases is increasing by 40 percent each year.¹⁶ Although consumer access is generally on a dial-up basis, maintenance and support of these data bases relies on a network of dedicated, high-speed data lines. In addition, deployment of the NII will trigger huge increases in data usage, spurred by the ubiquitous availability of electronic libraries, expanded telecommuting, electronic document interchange, and other data-intensive capabilities.

Moreover, data communications services are no longer used exclusively by big businesses. Rather, businesses of all sizes utilize data transmission lines to increase efficiency and stimulate growth. Indeed, half of the requests for information on data transmission quality in the survey responses came from TCA members spending less than \$100,000 a month on telecommunications services.

At the same time that the need for information regarding data transmission quality has increased, the monitoring of data transmission has become technologically simpler. The Bureau has specifically noted evidence that "technology currently exists to allow non-intrusive, reasonably priced on-line measurement of data transmission quality,"¹⁷ and Pacific Bell has conceded that errored and severely errored seconds may be measured without taking a circuit out of service.¹⁸ Moreover, it is TCA's

¹⁵ 1993/1994 NATA Telecommunications Market Review and Forecast at 8.

¹⁶ Schmit, "High-tech has phones humming," USA Today, April 22, 1994, at A-1.

¹⁷ 8 FCC Rcd at 7483.

¹⁸ Id.

understanding that most LECs have implemented significant deployment of digital cross-connects, which are essential to facilitate non-intrusive monitoring of data transmission quality. TCA also notes that seven of the fifty Pacific Bell respondents and ten of the sixty-one U S West respondents have established service quality standards with their LEC that include transmission parameters.

Against this background, expansion of the quarterly monitoring reports to include information on errored and severely errored seconds and availability is plainly warranted. If the Commission nonetheless has reservations about the feasibility of non-intrusive monitoring, TCA suggests that it require the LECs to disclose the extent of their deployment of extended superframe technology (which enables non-intrusive monitoring) and digital cross-connects. Once this technology covers a significant portion of their data lines -- perhaps ten percent -- the carriers should be required to report availability and errored and severely errored seconds for those lines, broken down by DS-1 and DS-3 service in each state. As deployment of extended superframe is expanded, the LECs should be required to file quarterly transmission quality reports based on a random sample of their DS-1 and DS-3 lines.

IV. THE COMMISSION'S SERVICE QUALITY REPORTING REQUIREMENTS WILL CONTINUE TO PLAY A VALUABLE ROLE IN A COMPETITIVE ENVIRONMENT (Transition Issue 4).

The Commission seeks comment on streamlining regulation at the point when LECs no longer control essential "bottleneck" facilities.¹⁹ For two reasons, TCA

¹⁹ Notice at ¶ 95.

wishes to ensure that any eventual streamlining of the price cap rules does not include the service quality monitoring requirements.

First, as noted above, the Commission itself has recognized that competition is likely to develop unevenly, creating incentives for LECs to focus network maintenance and improvement resources on those areas where competition appears first. Augmenting the risk to service quality, competition is likely to spur additional layoffs of LEC personnel, increasing the trend towards centralization of maintenance and repair functions that used to be provided on a local level. Consequently, during the transition to competition, there will be a heightened need to monitor quality and investment.

Second, service quality reporting will assume even greater value when and if fully effective competition comes to the local exchange. As competition grows, customers will have an increasing need to compare objectively the service offerings of different providers. Competitive access providers generally are willing to share their service quality and reliability records with potential customers. Many LECs, in contrast, have resisted doing so, even when faced with potential competition. In this environment, the service quality reports will provide valuable data that will enable customers to assess alternative vendors and make informed choices.

V. CONCLUSION

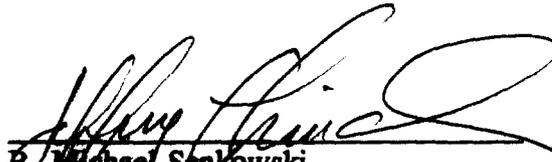
TCA commends the Commission for periodically re-evaluating and improving its service quality monitoring program, and particularly for revising the ARMIS reports

to facilitate benchmarking. TCA's service quality survey indicates, however, that further refinements are necessary to assure that an accurate picture of LEC performance is maintained in light of additional massive layoffs and incipient competition. Specifically, although the survey shows that most customers believe the overall level of service has not suffered under price cap regulation, it also reveals a need to focus more attention on rural areas and to require reporting of data transmission quality. Consequently, TCA urges the Commission to revise its service quality and infrastructure investment monitoring program as discussed above.

Respectfully submitted,

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May 9, 1994



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**TELE-COMMUNICATIONS ASSOCIATION
LOCAL EXCHANGE CARRIER SERVICE QUALITY SURVEY**

TCA's Government Liaison Committee has been asked to provide input in connection with an FCC proceeding that, in part, concerns local exchange carrier (LEC) service quality. Please take a few minutes to fill out this survey, which is being sent to all TCA members. TCA's legal counsel will aggregate the results and present them to the FCC.

Instructions:

1. If your company receives service from more than one LEC, please either rate the LEC that is your major provider or fill out a separate survey for each LEC.
2. If you have any questions, please call TCA's legal counsel, Jeff Linder of Wiley, Rein & Fielding, at (202) 429-7384.
3. TCA's legal counsel will keep individual company's responses confidential. Please mail your completed survey to Mr. Linder at Wiley, Rein & Fielding, 1776 K Street, N.W., Washington, D.C. 20006, or fax it to his attention at (202) 429-7207.
4. If you do not have the knowledge to complete the survey accurately, please give it to someone who does.
5. ***Please return this survey by March 11.***

**THANK YOU FOR TAKING THE TIME TO COMPLETE THIS SURVEY,
WHICH IS A CRITICAL PART OF TCA'S FEDERAL REGULATORY
PROGRAM.**

LEC SERVICE QUALITY SURVEY

Name: _____

Company: _____

1. How long have you been responsible for procuring your company's telecommunications services? _____

2. How much does your company spend on telecommunications services EACH MONTH?

<input type="checkbox"/> Less than \$10,000	<input type="checkbox"/> \$10,000 to \$100,000
<input type="checkbox"/> \$100,000 to \$1 million	<input type="checkbox"/> More than \$1 million

3. Which LEC are you rating in this survey? _____

4. Compared to 1990, is the overall level of service provided by your LEC --

Much better	Better	The same	Worse	Much worse
-------------	--------	----------	-------	------------

5. Does your LEC provide a significantly different level of service in different areas (e.g., from state to state, or rural vs. metropolitan areas)? Please explain:

6. Has your LEC's trouble reporting procedure changed since 1990 (for example, a local reporting number at remote locations replaced with an 800 number)?

<input type="checkbox"/> Yes	<input type="checkbox"/> No
------------------------------	-----------------------------

If so, please explain:

7. Compared to 1990, is the response time for clearing troubles on LEC circuits

Much better	Better	The same	Worse	Much worse
-------------	--------	----------	-------	------------

8. Check one: Are troubles on LEC circuits usually corrected (a) on the first visit

___, or (b) are multiple visits required to fix troubles ___?

9. Compared to 1990, have the number of troubles on LEC-provided circuits --

Increased Decreased Stayed the same

10. Does your LEC provide dedicated personnel for reporting and clearing troubles? Yes No

If no, did it discontinue providing dedicated personnel in the last four years?

Yes No

11. Does your LEC provide a dedicated service manager? Yes No

If no, did it discontinue providing a dedicated service manager in the last four years? Yes No

12. Compared to 1990, how would you rate the experience level of LEC personnel responsible for ordering new circuits and trouble clearing?

Much better Better The same Worse Much worse

13. Compared to 1990, how would you rate the quality of installation work done on new LEC circuits?

Much better Better The same Worse Much worse

14. Compared to 1990, has the level of held orders due to lack of LEC facilities --

Increased Remained the same Decreased

15. How would you compare the service provided by your LEC to the service provided by your long distance carriers(s)?

Better About the same Worse

16. At how many company locations does your LEC provide service?



**Analysis of Survey Responses for
Pacific Bell and U S West
(By number of respondents)**

Question 4: Overall level of service in 1994 compared to 1990

	<u>Much Better</u>	<u>Better</u>	<u>Same</u>	<u>Worse</u>	<u>Much Worse</u>
Pac. Bell	3	14	22	12	0
U S West	4	13	33	13	1

Question 5: Different service levels in different areas

	<u>Yes</u>	<u>No</u>	<u>Did not answer</u>
Pac. Bell	13	25	15
U S West	26	14	24

Question 6: Changes in trouble reporting procedures since 1990

	<u>Yes</u>	<u>No</u>	<u>Did not answer</u>
Pac. Bell	15	36	2
U S West	19	42	3