

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

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In the Matter of )  
 )  
Amendment of Part 36 and Part 69 of ) RM-8480  
the Commission's Rules to Effect )  
Comprehensive Reform of the Access )  
Charge System )

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JUL 1 1991  
FEDERAL COMMUNICATIONS COMMISSION

COMMENTS OF AMERITECH

Ameritech<sup>1</sup> submits these comments with respect to the petition for rulemaking filed by the Ad Hoc Telecommunications User's Committee ("Ad Hoc").

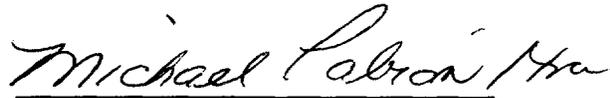
It its petition, Ad Hoc proposes that the Commission initiate a rulemaking proceeding looking towards the amendment of both Part 69 and Part 36 of the Commission's rules to effect comprehensive reform of the current access charge system. Ameritech supports, in general terms, Ad Hoc's proposal to "de-link" Part 69 access charge reform from Part 36 separations reform to permit both to proceed along separate but parallel tracks. Certainly, reform of the Commission's pricing rules, including those rules that relate to the introduction of new services, should be permitted to proceed at a more accelerated pace while issues related to separations can proceed at the more deliberate pace contemplated by the Joint Board process. Evolving competition and the accelerated pace of technological change justify the timely consideration of those changes to the Commission's pricing rules that reasonably respond to and anticipate transformation in the telecommunications environment. Failure to accord local exchange carriers appropriate pricing flexibility in a timely manner, only results in maintaining an anticompetitive price umbrella which denies the full benefits of competition to customers and sends inappropriate economic signals to potential market

<sup>1</sup> Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

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entrants.<sup>2</sup> It is clearly appropriate not to delay such changes until completion of separations reform.

Respectfully submitted,



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Dated: July 8, 1994

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<sup>2</sup> In the Matter of Expanded Interconnection with Local Telephone Company Facilities, CC Docket No. 91-141, Report and Order and Further Notice of Proposed Rulemaking, FCC 92-440 (released October 19, 1992) ("Special Access Interconnection Order") at ¶¶ 172, 178.

CERTIFICATE OF SERVICE

I, Deborah L. Thrower do hereby certify that a copy of the foregoing Comments of Ameritech has been served on the parties listed below, by first class mail, postage prepaid, on this 8th day of July 1994.

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