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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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

In the Matter of)	
)	
AD HOC TELECOMMUNICATIONS)	
USERS COMMITTEE)	
)	RM-8480
Petition for Amendment of Part 36)	
and 69 of the Commission's Rules)	
to Effect Comprehensive Reform)	
of the Access Charge System)	

REPLY COMMENTS OF BELL ATLANTIC

Ad Hoc's Petition¹ is the latest of several requests for the Commission to institute a comprehensive proceeding to reform the access charge system.² Those petitions have all generated a near-unanimity of opinion that comprehensive access reform is long overdue.³ The comments on Ad Hoc's Petition demonstrate that the enthusiasm for comprehensive reform has not abated.

¹ Ad Hoc Telecommunications Users Committee ("Ad Hoc"), Petition for Rulemaking (file April 15, 1994).

² See NARUC Petition for a Notice of Inquiry Concerning Access Issues, DA 93-847 (filed June 25, 1993); Petition of the United States Telephone Association for Reform of the Interstate Access Rules ("USTA"), RM-8356 (filed Sept. 17, 1993); Metropolitan Fiber System Communications Company's Petition for a Notice of Inquiry and *En Banc* Hearing, RM-8388 (filed Nov. 1, 1993).

³ The Commission's own Common Carrier Bureau staff has also issued a paper which comes to the same conclusion. Access Reform Task Force, Common Carrier Bureau, Federal Perspectives on Access Charge Reform: A Staff Analysis (April 30, 1993).

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Bell Atlantic⁴ joins the rest of the commenters in urging the Commission to institute a comprehensive access reform proceeding. In view of the urgent need, that proceeding should begin promptly and should conclude within one year of its commencement. The basis for the Commission's rulemaking should be the proposal of USTA in its petition which a large number of industry participants endorsed.

The Commission should not, as Ad Hoc urges, delay access reform pending revisions to the Part 36 separations rules. Separations policy should be part of any analysis of the subsidies in existing telecommunications pricing. However, any needed separations changes are better identified once the existing subsidies in the access system are quantified and once the Commission has determined how best to allocate any needed subsidies among industry participants. Ad Hoc's proposal, on the other hand, would cause the separations tail to wag the access reform dog. Once the Commission adopts the universal service and access policies needed in the present competitive environment, separations reform can take place expeditiously to implement those policies.

⁴ The Bell Atlantic Telephone Companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; and Bell Atlantic-West Virginia, Inc.

Accordingly, the Commission should promptly institute a comprehensive access reform proceeding, as all commenters urge.

Respectfully submitted,

**The Bell Atlantic Telephone
Companies**

By Their Attorney


Lawrence W. Katz

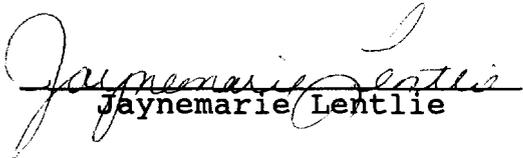
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July 25, 1994

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Reply Comments of Bell Atlantic" was served this 25th day of July, 1994, by first class mail, postage prepaid, on the parties on the attached list.


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