



rural telecommunications users. It is time to recognize the valuable contribution the LECs have made and can continue to make in the provision of universal telecommunications services. As Governor Michael Leavitt of Utah stated at the USTA New Services and Technology Issues Subcommittee meeting, in Salt Lake City, Utah:

As we move into a competitive environment it is important that we not practice reverse discrimination against those who have been heavily regulated in the past. We must make certain that the playing field is level and that those who have provided service in a highly regulated environment in the past are provided with adequate incentives to be there to play and play fair.

(January 24, 1994)

It is imperative that public policy makers recognize the importance of allowing the LECs an equal opportunity to compete in the provision of new, advanced telecommunications services that will benefit the American economy. It is inappropriate to handicap the LECs because customers throughout America are thus handicapped in an increasingly competitive, global, information-based economy.

Conclusion

The LECs now play an important infrastructure role in meeting the diverse customer needs of the widest possible range of customers throughout our country. More customers can be served in the future, with more services, more quickly, but only if those with the ability and know-how are given the freedom to do so. Simply put, this requires a new, forward-looking regulatory framework that sees the local exchange carrier as a dynamic, competitive player rather than a natural monopoly. If local exchange carriers are given equal business opportunities, with regulatory parity (with special consideration for unique rural responsibilities), LECs can continue the ongoing evolution of the ubiquitous, universally-accessible, and dependable service which are the characteristics at the very heart of the National Information Infrastructure. A public policy framework that promotes the continuing evolution of the PSN is both pro-infrastructure and pro-competitive. Action at the federal and state levels in both legislation and regulation must occur if the NII is to become a reality, for all Americans.

Local exchange carriers have been an essential part of the economic success of this country for decades. Now, more than ever, the ability to manage information routinely and effectively, in every form and for every purpose, will promote the productivity of American industry, maintain American leadership in world markets, and enhance the quality of life for all of the nation's citizens. Proactive, effective regulatory policy will let the local exchange carriers provide an essential core component of the future economic success of America, while enriching the quality of life of its citizens.

Glossary

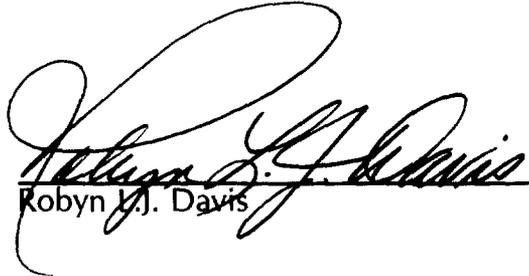
ADSL	asymmetrical digital subscriber line; a technology which provides for unidirectional DS-1 level transmission over copper loops from the central office switch to the subscriber and bi-directional transmission of analog POTS and a 32 Kbps signal.
AIN	advanced intelligent network; a grouping of network elements which begins to separate call switching functions from the definition and implementation of services; allows a common database to be shared among switches in a large geographic area and facilitates provision of common services on different switches having different software.
ATM	asynchronous transfer mode; a multiplexed information transfer method in which the information is organized into fixed length (53 octet) cells and transmitted according to each user's instantaneous need (bandwidth on demand).
BISDN	broadband integrated services digital network
CAI	common air interface; a standard radio and protocol definition which ensures interoperability of mobile and portable radios from one vendor with base stations to another.
CLASS	customized local area signaling services; a grouping of enhancements to basic local exchange service that utilize electronic switching and out-of-band digital network control signaling to give subscribers the ability to screen, reject, forward, trace and redial incoming calls.
DIGITAL	digital switching and transport facilities.
EM	electro-mechanical switching (eliminate it).
FR	frame relay; a high-speed wideband data service used to interconnect local area networks and host computers; based on ANSI and CCITT standards using statistically shared facilities.
IP	intelligent peripheral; an AIN network element that facilitates customer interaction.
ISDN	integrated services digital network; switched network providing end-to-end digital connectivity for simultaneous transmission of voice and/or data.
POTS	plain old telephone service; basic telephone service for voice transmission.
SCE	service creation environment; computer software and hardware used to create new telecommunications services for deployment within the AIN
SCP	service control point; a computer database system within SS7 which executes service logic programs to provide additional customer services through a switch (SSP); messages are exchanged with the SSP through the SS7 network; examples include 800 translations and calling card verification.
SMS	service management system; a computer system that support the operation, administration, management and provisioning needs of AIN.



- SMDS** switched multi-megabit data service; a high-speed packet-switched data service used to connect local area networks into metropolitan area networks and wide area networks and characterized by variable-length packet cells; based on IEEE 802.6 standards.
- SONET** synchronized optical network; an international standard family of optical transmission channels for speeds from approximately DS-3 (45 Mbps) to 2.4 Gbps (2400 Mbps) and higher.
- SSP** service switching point; software in a telephone switch (e.g., DMS-100 or 5ESS) equipped with SS7 hardware, software and signaling links.
- SS7** signaling system 7; a common channeling signaling system used between public network switches designed for the packet transmission of signals, not voice, associated with the set-up of a call; features "out-of-band" signaling for faster call processing; facilitates advanced services such as CLASS, AIN-based services, etc.
- STP** signal transfer point; a high speed, special purpose packet switch for signaling messages in the SS7 network.

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on July 27, 1994 copies of the Reply Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


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