

arbitrary. Moreover, any limitation should be structured in a way that permits maximum utilization of the basic platform. The Commission successfully met that issue in regard to BellSouth's application for a technical and market trial.³⁸ That arrangement, which avoids the risk of unused capacity while preserving the opportunity for multiple access, will work whether the programming is affiliated or nonaffiliated.

The Commission also asks if additional procedures should be required if a carrier must deny carriage due to a shortage of analog capacity.³⁹ We do not recommend additional procedures at this time. The carrier's obligation to notify the Bureau will permit the Commission to assess the effectiveness of its requirements as commercial offerings unroll. It is too soon to establish restrictions that can have the effect of impeding the development of competitive video dialtone offerings.

³⁸ BellSouth may assign excess analog capacity to a customer-programmer who previously has been assigned fifty percent of BellSouth's analog capacity if the customer-programmer agrees to relinquish capacity in excess of the fifty percent limitation if necessary to meet future demand. Application of BellSouth Telecommunications, Inc., W-P-C 6977, February 8, 1995, para. 17.

³⁹ The Commission requires that the carrier notify the Common Carrier Bureau within thirty days of an anticipated capacity shortfall or within five days of denying any video programmer access to the platform due to capacity limitations. The carrier must also advise the Bureau as to the steps taken to expand the capacity of the platform so as to accommodate the increased demand. Applications of the Ameritech Operating Companies, W-P-C- 6926 -6930, Report and Order, January 4, 1995, para. 72.

V. **MANDATORY PREFERENTIAL TREATMENT WOULD INFRINGE ON A CARRIER'S FIRST AMENDMENT RIGHTS.**

We responded to the Commission's inquiry into mandatory preferential treatment for commercial broadcasters, public, educational and governmental channels and other-not-for-profit programmers in our Reply Comments to the Third Further Notice of Proposed Rulemaking.⁴⁰

We said then that the Commission should not mandate preferential treatment, but that carriers should be permitted to include preferential treatment in their tariffed offerings. However, we oppose mandatory carriage or preferential rate treatment that would result in special burdens on video programmers or end users. If the Commission should decide to require such treatment it should be extremely limited, given the effects of such treatment on the carrier's business. Preferential carriage would reduce the channel capacity available for video programmers. Special rate treatment would require subsidization of the preferred rate recipient. Pacific Bell is committed to working with cities, schools and community groups to develop innovative approaches to public, educational & governmental ("PEG") services.⁴¹ The broadband network will enable these groups to develop the new services and applications that operate interactively, in contrast to the one-way broadcast format of traditional PEG channels. The Commission

⁴⁰ Reply Comments of the Pacific Telesis Group, Pacific Bell and Nevada Bell, January 17, 1995.

⁴¹ The transport of PEG channels would likely be under state jurisdiction. Reconsideration Order, paras. 121-123.

should reaffirm its conclusion that mandatory preferences will not be a part of the video dialtone model.⁴² To compete effectively against entrenched cable providers, carriers will require maximum flexibility.

VI. CONCLUSION.

The Commission developed the video dialtone common carrier model to permit telephone companies limited participation in the video marketplace given the prohibition of Section 553(b). That ban has been overturned by the courts, which recognized that the overbroad law violated telephone companies' First Amendment rights. Now, the Commission has an opportunity to further encourage the development of a viable video dialtone service. It can do so by adopting realistic regulations which will permit us to move forward with video dialtone offerings that will be in the public interest and which will accomplish the Commission's goals. Or, the Commission can reduce the value of the video dialtone common carriage model by adopting burdensome regulations that will disadvantage video dialtone in the competitive marketplace. We believe the Commission should conclude that our provision of programming should be treated as simply another nonregulated

⁴² First Report and Order, para. 44.

activity and that as such, affiliated programming activity will be subject to the existing effective competitive safeguards.

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CERTIFICATE OF SERVICE

I, Chuck Nordstrom, hereby certify that copies of the foregoing "COMMENTS OF THE PACIFIC TELESIS GROUP, PACIFIC BELL AND NEVADA BELL" concerning CC Docket No. 87-266 were served by hand or by first-class United States mail, postage prepaid, upon the parties appearing on the attached service list this 21st day of March, 1995.

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