

Sheryl (Sherry) L. Heraut
Director
Public Hearing Unit

1100 Pennsylvania Avenue, N.W.
Washington, D.C. 20540
Tel: 202/418-6700

PACIFIC  TELESIS
Group - Washington

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 14, 1995

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, DC 20554

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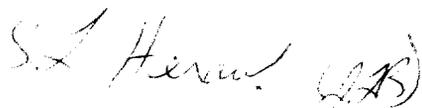
Dear Mr. Caton:

Re: CC Docket No. 95-72, End User Common Line Charges

On behalf of Pacific Bell, please find enclosed an original and six copies of its "Reply Comments" in the above referenced proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosure

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

End User Common Line Charges

CC Docket No. 95-72

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REPLY COMMENTS OF PACIFIC BELL

The comments reflected support from virtually all sectors for affordable, available, and uncomplicated ISDN. The general consensus was that the Commission should move forward with a change to its Subscriber Line Charge (SLC) rules as they apply to ISDN. The Commission should adopt the one SLC per facility rule.¹

This consensus suggests a unique opportunity for the Commission to act quickly in implementing forward-looking policy, signalling to all that the Commission believes in development of the National Information Infrastructure (NII). ISDN is an efficient and current NII technology whose deployment can be thwarted or supported by the Commission. The best way to support affordable ISDN is to apply the one SLC per facility rule.

The Commission can and should move forward now changing the rule for ISDN to one SCL per facility, whether permanently or on an interim basis. The issue of recovery of

¹ MCI p. 3; SWBT p. 3; GTE p. 9; Rochester p. 2; America Online Incorporated, CompuServe Incorporated, GE Information Services, Inc., and Prodigy Service Co. p. 12; American Petroleum Institute p. 6; Rural Telephone Coalition p. 4; NYNEX p. 22; Microsoft p. 4; Bell Atlantic p. 8; Information Technology Industry Council p. 2.

non-traffic sensitive (NTS) cost can and should be addressed later in the context of a broad-based access charge and subsidy reform proceeding. In the meantime, LECs should not have to impute the derived channel charges and be precluded from collecting the non-traffic sensitive costs through the carrier common line rate element.

Respectfully submitted,

PACIFIC BELL



LUCILLE M. MATES
TIMOTHY S. DAWSON

140 New Montgomery Street, Rm. 1526
San Francisco, California 94105
(415) 542-7654

JAMES L. WURTZ
MARGARET E. GARBER

1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 383-6472

Its Attorneys

Date: July 14, 1995

CERTIFICATE OF SERVICE

I, D. E. Van Laak, do hereby certify that on this 14th day of July, 1995, a copy of the foregoing "Reply Comments of Pacific Bell " for CC Docket 95-72, was mailed by U.S. first-class mail, postage prepaid, to the parties listed on the attached.



D. E. Van Laak

Service List
CC Docket 95-72

Steven G. Sanders,
President
NORTHERN ARKANSAS TELEPHONE
COMPANY, INC.
301 East Main Street
Flippin, AR 72634

Jeffrey S. Linder
WILEY, REIN & FIELDING
Attorney for CABLE & WIRELESS, INC.
1776 K Street, N.W.
Washington, DC 20006

Ronald L. Plesser
Julie A. Garcia
Mark J. O'Connor
PIPER & MARBURY, L.L.P.
Attorneys for THE COMMERCIAL INTERNET
EXCHANGE ASSOCIATION
1200 19th Street, N.W.
7th Floor
Washington, DC 20036

Jeanne Moran, Esquire
General Counsel
TENNESSEE PUBLIC SERVICE COMMISSION
460 James Robertson Parkway
Nashville, TN 37243

David Cosson
L. Marie Guillory
NATIONAL TELEPHONE COOPERATIVE
ASSOCIATION
2626 Pennsylvania Ave., N.W.
Washington, DC 20037

George Petrutsas
Paul J. Feldman
James A. Casey
FLETCHER, HEALD & HILDRETH, P.L.C.
Attorneys for ROSEVILLE TELEPHONE
COMPANY
11th Floor, 1300 North 17th Street
Rosslyn, Virginia 22209

Daniel J. Weitzner
Deputy Director
THE CENTER FOR DEMOCRACY AND
TECHNOLOGY
1001 G Street, N.W.
Suite 700 East
Washington, DC 20001

Jay C. Keithley
Leon M. Kestenbaum
SPRINT CORPORATION
1850 M. Street, N.W.
11th Floor
Washington, DC 20036

W. Richard Morris
P.O. Box 11315
Kansas City, MO 64112

R. Michael Senkowski
Jeffrey S. Linder
WILEY, REIN & FIELDING
Attorneys for TELE-COMMUNICATIONS
ASSOCIATION
1776 K Street, N.W.
Washington, DC 20006

Service List
CC Docket 95-72

John D. Bray
200 Bolinas Road, #38
Fairfax, CA 94930

Matthew O'Brien
CMA President
Senior Analyst
PRODIGY SERVICES COMPANY
1201 Mt. Kemble Avenue,
Morristown, NJ 07960-6628

Andrew Stratford
CMA Regulatory Chair
Vice President
CONGRESS FINANCIAL CORPORATION
1201 Mt. Kemble Avenue,
Morristown, NJ 07960-6628

Thomas E. Taylor
Christopher J. Wilson
FROST & JACOBS
Attorneys for CINCINNATI BELL TELEPHONE
COMPANY
2500 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202

Bill Franklin
ALL FREIGHT SERVICES
5311 Schneider Road
Newburgh, IN 47630

Mary McDermott
Linda Kent
Charles D. Cosson
UNITED STATES TELEPHONE ASSOCIATION
1401 H Street, N.W., Suite 600
Washington, DC 20005

David R. Poe
Catherine P. McCarthy
LeBOEUF, LAMB, GREENE & MacRAE L.L.P.
Attorneys for TIME WARNER
COMMUNICATIONS HOLDINGS INC.
1875 Connecticut Avenue, N.W.
Suite 1200
Washington, DC 20009

Michael S. Pabian
Attorney for AMERITECH
2000 West Ameritech Center Drive
Room 4H82
Hoffman Estates, IL 60196-1025

Lawrence W. Katz
THE BELL ATLANTIC TELEPHONE COMPANIES
1320 North Court House Road
8th Floor
Arlington, Virginia 22201

Henry D. Levine
Ellen G. Block
LEVINE, BLASZAK, BLOCK & BOOTHBY
1300 Connecticut Avenue, N.W.
Suite 500
Washington, DC 20036-1703

Stephen E. Nevas, Esq.
Vice President, Legal Affairs and General Counsel
NATIONAL PUBLIC RADIO, INC.
635 Massachusetts Avenue, N.W.
Washington, DC 20001-3753

Christopher Bennett
Analyst
MCI TELECOMMUNICATIONS CORPORATION
1801 Pennsylvania Avenue, N.W.
Washington, DC 20006

Service List
CC Docket 95-72

Robert M. Lynch
Durward D. Dupre
J. Paul Walters, Jr.
Attorneys for SOUTHWESTERN BELL
TELEPHONE COMPANY
One Bell Center, Suite 3520
St. Louis, Missouri 63101

Mark C. Rosenblum
Peter H. Jacoby
Seth S. Gross
Attorneys for AT&T CORP.
295 North Maple Avenue, Room 3244J1
Basking Ridge
New Jersey 07920

James T. Hannon
U S WEST COMMUNICATIONS, INC.
Suite 700
1020 19th Street, N.W.
Washington, DC 20036

Rhett B. Dawson
President
INFORMATION TECHNOLOGY INDUSTRY
COUNCIL
1250 Eye Street, N.W., Suite 200
Washington, DC 20005

Michael J. Shortley, III
Attorney for ROCHESTER TELEPHONE CORP.
180 South Clinton Avenue
Rochester, New York 14646

Randolph J. May
Brian T. Ashby
SUTHERLAND, ASBILL & BRENNAN
Attorneys for AMERICA ONLINE
INCORPORATED,
COMPUSERVE INCORPORATED,
GE INFORMATION SERVICES, INC.,
AND PRODIGY SERVICES COMPANY
1275 Pennsylvania Ave., N.W.
Suite 1000
Washington, DC 20004-2404

Gail L. Polivy
Attorney for GTE
1850 M Street, N.W.
Suite 1200
Washington, DC 20036

Wayne V. Black, Esq.
C. Douglas Jarrett, Esq.
Keller and Heckman
THE AMERICAN PETROLEUM INSTITUTE
1001 G Street, N.W.
Suite 500 West
Washington, DC 20001

M. Robert Sutherland
Richard M. Sbaratta
BELLSOUTH TELECOMMUNICATIONS, INC.
4300 Southern Bell Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

Caressa D. Bennet
THE RURAL TELEPHONE COALITION
1831 Ontario Place, N.W.
Suite 200
Washington, DC 20009

Service List
CC Docket 95-72

Jack Krumholtz
LAW AND CORPORATE AFFAIRS
DEPARTMENT
Attorney for MICROSOFT CORPORATION
5335 Wisconsin Avenue, N.W., Suite 500
Washington, DC 20015

Stanley M. Gorinson
PRESTON GATES ELLIS & ROUVELAS MEEDS
Attorney for MICROSOFT CORPORATION
1735 New York Avenue, N.W.
Washington, DC 20006

Edward R. Wholl
Joseph Di Bella
THE NYNEX TELEPHONE COMPANIES
1300 I Street, N.W.
Suite 400 West
Washington, DC 20005

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