

RECEIVED

NOV - 9 1995

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

November 9, 1995

Paul Walters
Attorney

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

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

Dear Mr. Caton:

This is in response to the Commission's oral request of November 1, 1995, asking Southwestern Bell Telephone Company (SWBT) to provide additional information to show the level of competition SWBT faces in the ISDN market.

Accordingly, SWBT is providing the following information in attachments I through VII. SWBT's ISDN services face competition from these competitors who either currently provide or can provide ISDN or substitutable services.¹

- Attachment I: List of Competitive Access Providers in SWBT's territory;
- Attachment II: List of competitors in the private line /special access market;
- Attachment III: List of COA and SPCOAs in Texas;
- Attachment IV: Marketing material reflecting direct competition with ISDN;
- Attachment V: Deposition of Gilbert Orozco in Civil No. 82-0192 filed with DOJ;
- Attachment VI: Microwave and VSAT Providers;
- Attachment VII: List of future competitors for ISDN type services.

One Bell Center
Room 3530
St. Louis, Missouri 63101

Phone 314 235-2516

¹ The material provided herein has been obtained from public record.

No. of Copies rec'd 0
List ABCDE

Mr. William F. Caton

Page 2

November 9, 1995

SWBT sought confidential treatment for the cost data provided to the Commission for ISDN and substitutable products. The release of this highly confidential cost data would provide SWBT's competitors with the floor and ceiling of SWBT's product line. With this knowledge, competitors can manipulate their prices to gain competitive advantage, while SWBT cannot.

Under 5 U.S.C. § 552(b)(4), materials may be given confidential treatment if they contain proprietary business information, the disclosure of which could substantially harm SWBT's competitive position.

We apologize for the voluminous nature of the attached documents, but there is no other way to demonstrate the level of competition which SWBT is facing for ISDN and other substitutable services.

SWBT does not know why other regions did not request confidential treatment for their cost data. It is apparent, however, that LECs no longer operate in homogenous environments. As competition grows, there will be fewer similarities in regions' operations and competitive products and services.

In addition, there are a number of future competitors. For example, the three major interexchange carriers -- AT&T, MCI and Sprint -- offer PRI service competing directly with SWBT, and are building partnerships with CPE vendors for (1) frame relay access, (2) access to multimedia products (videoconferencing, collaborative conferencing and data sharing), (3) disaster recovery, and (4) bulk access for telecommuters to corporate systems.

SWBT will also soon face ISDN competition from cable telephony. Time Warner has formally announced its intention to enter the local exchange market in 1996. Time Warner's relationship with U S WEST, an ISDN provider today, positions Time Warner well to compete with SWBT.

End users can also employ their own private microwave systems to bypass SWBT's ISDN offerings. In Texas alone, there are over 4,000 microwave paths from a transmitter tower to a receiving tower. SWBT will also experience future ISDN competition from wireless carriers, satellite services and ATM. Attachment VII is a list of future competitors for ISDN services.

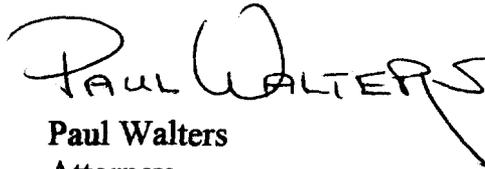
Mr. William F. Caton

Page 3

November 9, 1995

The attached documentation demonstrates beyond a reasonable doubt that SWBT currently faces serious competition for ISDN and substitutable services, and will face even greater competition in the future. SWBT thus renews its request for confidential treatment of its cost data.

Sincerely,

A handwritten signature in black ink that reads "PAUL WALTERS". The signature is written in a cursive style with a large, looped "P" and a long, sweeping underline that extends under the word "WALTERS".

Paul Walters
Attorney

CC: Christopher Bennett, MCI
Lisa Geld, Attorney, FCC

Competitive Access Providers In Southwestern Bell Telephone Company's Territory

CAP Operation	City	State	Mrkt Area	Status	Year Started	Route Miles	Bldgs Srvd (b)	Switches Installed
American Communications Services, Inc. (ACSI)	Little Rock	AR	A	Operational	1994	7	34	
Brooks Fiber Properties	Little Rock	AR	A	Operational	1994	19	24	
Time Warner Communications (TWC) of Fayetteville	Little Rock	AR	A	Planned	1996			
ACSI	Austin	TX	C&WT	Planned	1994			
MCI Metro	Austin	TX	C&WT	Developing	1995			
Metro Access	Austin	TX	C&WT	Operational	1995	40 (a)	28	
Metropolitan Fiber Systems (MFS)	Austin	TX	C&WT	Planned	1994			
TWC of Austin	Austin	TX	C&WT	Operational	1994	120 (a)	10	Installed
ACSI	El Paso	TX	C&WT	Operational	1994			
Brooks Fiber Properties	El Paso	TX	C&WT	Planned	1995	20		
GST Telecommunications	El Paso	TX	C&WT	Planned	1995			
Metro Access	El Paso	TX	C&WT	Planned	1995	15	12	
TWC of El Paso	El Paso	TX	C&WT	Developing	1995			
Teleport Communications Group (TCG)	Lubbock	TX	C&WT	Planned	1994			
MCI Metro	Dallas	TX	DFW	Operational	1994			Pending
Metro Access	Dallas	TX	DFW	Operational	1995			
MFS	Dallas	TX	DFW	Operational	1990	141	209	Installed
TCG	Dallas	TX	DFW	Operational	1990	303	90	Installed
TWC of Dallas	Dallas	TX	DFW	Planned	1995			
ACSI	Fort Worth	TX	DFW	Operational	1994		33	
Metro Access	Fort Worth	TX	DFW	Operational	1994	105	57	
TCG	Fort Worth	TX	DFW	Operational	1994			
MCI Metro	Houston	TX	H	Developing	1994			
MFS	Houston	TX	H	Operational	1989	259	165	
Phonoscope	Houston	TX	H	Operational	1989	400	35	
TCG	Houston	TX	H	Operational	1990	314	115	Installed
TWC of Houston	Houston	TX	H	Operational	1994			
MFS	Kansas City	MO & KS	KC	Planned	1992			
Kansas City Fibernet	Kansas City	MO & KS	KC	Operational	1986	250	60	
Springfield Fiber Net	Springfield	MO	KC	Planned	1992			
Kinnet	Various Cities	KS	KC	Operational	1989	1200		
Hyperion Telecommunications	Wichita	KS	KC	Operational	1993	130 (a)		
Brooks Fiber Properties	Oklahoma City	OK	O	Operational	1994	88 (a)	50	
Cox Fibernet (TCG Affiliate)	Oklahoma City	OK	O	Operational	1991	120		
Dobson Fiber	Oklahoma City	OK	O	Operational	1992			
Indian Nations Fiberoptic	Oklahoma City	OK	O	Developing	1994			
MFS	Oklahoma City	OK	O	Planned	1995			
Brooks Fiber Properties	Tulsa	OK	O	Operational	1986	105	42	
MFS	Tulsa	OK	O	Planned	1995			
Digital Teleport	St. Louis	MO	SL	Developing	1994			
Intermedia Communications	St. Louis	MO	SL	Developing	1993	200 (a)		
MCI Metro	St. Louis	MO	SL	Developing	1994			
MFS	St. Louis	MO	SL	Operational	1992	80	42	Installed
SP Telecom	St. Louis	MO	SL	Planned	1994			
TCG	St. Louis	MO	SL	Operational	1993	91	41	
CSW Communications	Corpus Christi, Harlingen, McAllen	TX	ST	Operational	1994	200		
CSW Communications	Laredo	TX	ST	Planned	1995			
TWC (Fibcom)	Laredo	TX	ST	Planned	1994			
ICG Access Services	San Antonio	TX	ST	Planned	1995	306		
Metro Access	San Antonio	TX	ST	Developing	1995	45	27	
TWC (Fibcom)	San Antonio	TX	ST	Operational	1992	248	64	

NOTES: (a) under construction, (b) at least

STATUS: Operational is defined as actually providing service to customers. Developing is defined from deploying fiber to marketing service to customers.

Planned is defined as expressing interest in establishing a network in that city.

Competitive Access Providers In Southwestern Bell Telephone Company's Territory

CAP Operation	Sources:
American Communications Services, Inc. (ACSI) - Austin	Austin American Statesman 02/08/95
ACSI - El Paso	Connecticut Research Report 10/01/95, Telco Competition Report 03/04/94
ACSI - Fort Worth	Connecticut Research Report 10/01/95, Fort Worth Star Telegram 04/27/94
ACSI - Little Rock	Connecticut Research Report 10/01/95, Public Utility Commission Filings 08/12/95
Brooks Fiber Properties - El Paso	City Franchise Filings 10/30/95
Brooks Fiber Properties - Little Rock	Connecticut Research Report 10/01/95
Brooks Fiber Properties - Oklahoma City	Connecticut Research Report 10/01/95, Telecommunications Reports 07/04/94
Brooks Fiber Properties - Tulsa (Formerly PSO MetroLink)	Connecticut Research Report 10/01/95, Press Release Newswire 02/08/95 FCC Fiber Deployment Update 04/94
Cox Fibernet (TCG Affiliate) - Oklahoma City	Connecticut Research Report 10/01/95, The Daily Oklahoman 08/31/94 Cox Cable Newsletter 3/91
CSW Communications, Inc. - Corpus Christi, Harlingen, McAllen, Laredo	Connecticut Research Report 10/01/95
Digital Teleport	St. Louis Post Dispatch 10/24/94, West Countian 12/01/94
Dobson Fiber	Weatherford Daily News 08/13/93
GST Telecommunications (Texas Lightwave) - El Paso	Faulkner Information Services 01/95
ICG Access Services - San Antonio	San Antonio Express News 10/19/95
Indian Nations Fiber optic - Oklahoma City	City Council Meeting Transcript of Lawton, OK 04/26/94
Intermedia Communications - St. Louis (Formerly St. Louis FiberNet)	Press Release Newswire 01/30/95, St. Louis Business Journal 03/21/94
Kansas City FiberNet (TCI controlling interest)	Multichannel News 07/17/95, Connecticut Research Report 10/01/95 Kansas City Star 01/18/94
KINNET	Wichita Business Journal 01/21/94
MCI Metro - Austin	Austin American Statesman 02/08/95
MCI Metro - Dallas	Connecticut Research Report 10/01/95, Reuters 01/04/94
MCI Metro - Houston	Reuters 01/04/94
MCI Metro - St. Louis	Reuters 01/04/94
Metro Access - Austin	Connecticut Research Report 10/01/95 Austin American Statesman 03/23/94, 02/08/95
Metro Access - Dallas	Connecticut Research Report 10/01/95
Metro Access - El Paso	Connecticut Research Report 10/01/95, Dallas Business Journal 10/07/94
Metro Access - Fort Worth	Connecticut Research Report 10/01/95, Fort Worth Star-Telegram 01/17/95
Metro Access - San Antonio	Connecticut Research Report 10/01/95, Dallas Business Journal 12/02/94
Metropolitan Fiber Systems (MFS) - Austin	Austin American Statesman 12/05/93
MFS - Dallas	Connecticut Research Report 10/01/95, Telecommunications Reports 8/23/93
MFS - Houston	Connecticut Research Report 10/01/95
MFS - Oklahoma	Application for Certificates of Public Convenience and Necessity 11/18/94
MFS - St. Louis	MFS PR Newswire 3/20/95, Connecticut Research Report 10/01/95
Multimedia Hyperion Telecommunications- Wichita	The Wichita Eagle 10/16/94, 03/07/94
Photoscope - Houston	Houston Post 10/26/92, Faulkner 01/94, Yankee Vision 12/94
SP Telecom	Application for Certificates of Services Authority 12/23/95
Teleport Communications Group (TCG) - Dallas	Connecticut Research Report 10/01/95, TCG Press Releases 11/09/94, 08/31/95
TCG - Fort Worth	Dallas Morning News 03/07/94, Fort Worth Star-Telegram 03/08/94
TCG - Houston	Connecticut Research Report 10/01/95, TCG Press Release 11/09/94
TCG - Lubbock	TCG Presentation Slide 03/23/94
TCG - St. Louis	Telco Competition Report 03/30/95, Connecticut Research Report 10/01/95
Time Warner Communications (TWC) of Austin	Connecticut Research Report 10/01/95, Cable World 08/29/94
TWC - Fayetteville	Connecticut Research Report - 10/01/95
TWC (Fibrcom) - Laredo	San Antonio Express News 01/28/95
TWC - El Paso	El Paso Times 03/11/95, Faulkner 03/95
TWC (Fibrcom) - San Antonio	San Antonio Express News 01/28/95, Connecticut Research Report 10/01/95
TWC of Houston	Communications Daily 04/06/94

11/06/95

REPORT NAME: 'MASTER DETAIL REPORT FOR PL/SP ACC'

REPORT DATE: 11/3/95



ARKANSAS'S PRIVATE LINE/ SPECIAL ACCESS COMPETITOR REPORT

COMPANY NAME:	REG CASE NO	REG FILE DATE	REG APPRV DATE
REGULATORY STATUS IS 'PENDING'			
American Communication Services of Little Rock (Dba - ACSL)	94-423 U		12/2/94
Brooks Fiber Communications of Arkansas, Inc.	95-227-U		4/27/95
Intellicom Solutions, Inc.	95-400 U		6/28/95

3 Companies provide PL/SP ACC service in Arkansas with the regulatory status of PENDING

REGULATORY STATUS IS 'PROVIDING - NO APPROVAL REQUIRED'

Ardis

Ram Mobile Data

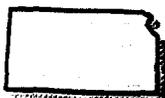
2 Companies provide PL/SP ACC service in Arkansas with the regulatory status of PROVIDING - NO APPROVAL REQUIRED

REGULATORY STATUS IS 'REGULATORY APPROVAL GRANTED'

AT&T	93-232-U		11/30/93	12/27/93
Business Telecom, Inc. (Dba - BTI)	92-226-U		9/26/93	1/28/94
Century Telecommunications	94-327U		9/19/94	11/18/94
Fronter Communications International, Inc.	94-111-U		4/13/94	8/3/94
Hertz Technologies	93-065-U		3/22/93	6/23/93
IDB WorldCom Services, Inc.	94-040-U		5/11/94	8/23/94
LCI International (Dba - LCI Telecom)	91-297-U		12/8/91	5/11/92
LCI Telemanagement	95-375-U		6/14/95	8/28/95
MCI	94-172-U		7/12/94	3/21/95
Norstan Network Services, Inc.	92-025-U		2/10/92	1/14/94
Pennsylvania Alternative Communications, Inc. (Dba - PACE)	94-060-U		3/1/94	4/18/94
Qwest Communications (Dba - Qwest Communications)	94-334-U		9/27/94	12/27/94
Qwest Communications Corp. (Dba - Qwest Communications)	94-334-U		9/27/94	12/27/94
Southwest Long Distance Network, Inc.	87-089-U		4/27/87	5/20/87
Sprint Communications (Dba - Sprint)	84-114-U		9/4/85	10/28/86
U. S. Communications, Inc. (Dba - NTS Comms/Western Div.)	92-179-U		7/15/92	6/11/93

16 Companies provide PL/SP ACC service in Arkansas with the regulatory status of REGULATORY APPROVAL GRANTED

21 Companies provide, or are planning to provide PL/SP ACC service in Arkansas



KANSAS'S PRIVATE LINE/ SPECIAL ACCESS COMPETITOR REPORT

COMPANY NAME:	REG CASE NO	REG FILE DATE	REG APPRV DATE
REGULATORY STATUS IS 'PENDING'			
Avant-Garde Telecommunications of Kansas	192,317 U		3/1/95
Hi-Plains NTS Communications	192,883-U		6/14/95
Kansas City Fiber Network			
Lyrith Communications (Dba - Community Spirit or Blue Earth Communications)	192,773-U		5/24/95
U.S. Telecom Group, Inc.	193,192-U		8/7/95

5 Companies provide PL/SP ACC service in Kansas with the regulatory status of PENDING

REGULATORY STATUS IS 'PROVIDING - NO APPROVAL REQUIRED'

Ardis

Ram Mobile Data

2 Companies provide PL/SP ACC service in Kansas with the regulatory status of PROVIDING - NO APPROVAL REQUIRED

REGULATORY STATUS IS 'REGULATORY APPROVAL GRANTED'

AT&T	139,661 U		12/30/93
Cable & Wireless			1/1/99
Corporate Telemanagement Group, Inc.	188,148-U	7/23/93	1/7/94
Frontier Communications International, Inc. (Dba - Frontier)	190,489-U	1/1/94	6/9/94
Great Lakes Telecommunications Corp. (Dba - Great Lakes)	189,482-U	11/8/93	9/7/94
Kansas City Fiber Network	190,388-U	3/31/94	9/2/94
KIN Network, Inc.	173,842-U	10/19/90	2/19/90
LCI International	179,943-U	1/23/92	4/14/92
LDC Telecommunications, Inc.	192,884-U	6/15/95	7/28/95
MCI			1/1/94
Multimedia Hyperion Telecommunications	189,881-U	12/9/93	9/28/94
Norstan Network Services Inc.	186,418-U	2/10/92	2/19/93
Qwest Comm. Corp. (Dba - SP Telecom)	191,488-U	9/20/94	1/11/95
Sprint Corp. (Dba - Sprint Communications Co. L.P.)	179,841-U		1/1/94
U.S. Communications, Inc.	187,945-U	7/19/93	3/4/94
WorldCom Network Services, Inc. (Dba - WITel Network Services, Inc.)	178,618-U	10/11/91	1/1/97

16 Companies provide PL/SP ACC service in Kansas with the regulatory status of REGULATORY APPROVAL GRANTED

23 Companies provide, or are planning to provide PL/SP ACC service in Kansas



MISSOURI'S PRIVATE LINE/ SPECIAL ACCESS COMPETITOR REPORT

COMPANY NAME:	REG CASE NO	REG FILE DATE	REG APPRV DATE
REGULATORY STATUS IS 'PENDING'			
Avant-Garde Telecommunications of Missouri, Inc.	TA 95-268		3/7/95
Harvey Hotel Management Corporation (Dba - Hospitality Telecom Solutions)	TA 95-313		4/13/95
MCI Metro Access Transmission Services, Inc.	193,317-U		8/22/95
Pantal Communications	TA 95-430		6/27/95

4 Companies provide PL/SP ACC service in Missouri with the regulatory status of PENDING

REGULATORY STATUS IS 'PROVIDING - NO APPROVAL REQUIRED'			
Ardis			
Ram Mobile Data			

2 Companies provide PL/SP ACC service in Missouri with the regulatory status of PROVIDING - NO APPROVAL REQUIRED

REGULATORY STATUS IS 'PROVIDING W/O NECESSARY APPROVAL'			
Local Area Telecommunications			

1 Companies provide PL/SP ACC service in Missouri with the regulatory status of PROVIDING W/O NECESSARY APPROVAL

REGULATORY STATUS IS 'REGULATORY APPROVAL GRANTED'			
AT&T	TA-87-103	3/13/87	6/5/87
Cable & Wireless, Inc.	TO-88-172	12/23/87	10/1/88
Calls for Less, Inc. (Dba - CPL, Inc.)	TA-88-286	2/28/88	3/21/88
Capital QSS Communications	TA 94-152	11/9/93	1/21/94
Cell Five Corporation	TA 95-328	4/21/95	8/18/95
Dial U.S.A.	TA 94-222	9/16/85	8/28/86
Digital Teleport, Inc.	TA-82-145	12/20/81	6/23/82
FiberNet St. Louis	TA 94-148	11/5/93	2/8/94
Hedges & Associates (Dba - Dial U.S.)	TR-84-140	1/25/84	4/17/88
Hertz Technologies	TA 93-274	4/8/93	6/13/93
IDB WorldCom Services	TA 94-287	3/17/94	5/24/94
IXC Long Distance (Dba - IXC-LD)	TA-88-387	5/23/88	8/13/88
Kansas City Fiber Network	TA 95-221	1/27/95	3/29/95
Lata 528/921/Microwaves Corp	TA-82-28	8/30/81	11/13/81
LCI International Telecom (Dba - LITel Telecommunications)	TA 88-204	4/17/88	8/28/88
LDC Telecommunications, Inc.	TA-88-466	6/7/88	8/31/88
LDDMETROMEDIA Communications	TA-87-1	5/8/87	7/28/87
Long Distance Services	TA-88-417	6/15/88	8/8/88
MCI	TA-84-82	11/2/83	2/10/87
MFS of Kansas City and St. Louis	TA-82-128	12/12/81	10/14/82
Midwest FiberNet (Dba - Consolidated Comm. Lg. Dist. and CallAdvantage)	TA-88-219	2/28/88	5/2/88
Multimedia Long Distance Co.	TA 95-83	9/21/94	11/28/94
Netel, Inc.	TA 95-292	3/28/95	8/1/95
Norstan Network Services, Inc.	TA-92-190	2/10/92	2/23/92
Popp Telecom, Inc. (Dba - LDB)	TA 95-301	4/5/95	6/14/95
QCC Corporation	TA95-68	9/7/94	11/14/94
Qwest Communications	TA 94-155	11/12/93	2/18/94
Springfield Fiber Net	TA-92-173	1/21/92	5/12/92
Switched Services Communications, L. L. C.	TA-88-388	5/23/88	8/13/88
TCG America	TA 94-168	11/16/93	6/1/94
Telecommunications Service Center	TA 94-369	6/13/94	9/8/94
TW Communications (Dba - TWC)	TA-95-236	2/14/95	7/20/95
US Sprint Communications Inc.	TA-87-45	11/17/86	3/3/87
UTS of St. Louis	TA 93-283	4/13/93	6/21/93
Western Union ATS	TA-93-208	12/24/92	3/22/93
WorldCom Network Services, Inc (Dba - WITel Network Services, Inc)	TA-92-68	10/9/91	1/14/92



MISSOURI'S PRIVATE LINE/ SPECIAL ACCESS COMPETITOR REPORT

COMPANY NAME:

REG CASE NO

REG FILE DATE	REG APPRV DATE
---------------------	----------------------

36 Companies provide PL/SP ACC service in Missouri with the regulatory status of REGULATORY APPROVAL GRANTED

43 Companies provide, or are planning to provide PL/SP ACC service in Missouri



OKLAHOMA'S PRIVATE LINE/ SPECIAL ACCESS COMPETITOR REPORT

COMPANY NAME:	REG CASE NO	REG FILE DATE	REG APPRV DATE
REGULATORY STATUS IS 'PENDING'			
Business Telecom, Inc.	PUD860000184		8/31/86
Frontier Communications International, Inc.	PUD860000189		8/1/86
LCI Telemanagement Corporation	PUD860000122		7/13/86
Qwest Communications Corporation	PUD860000198		9/11/86

4 Companies provide PL/SP ACC service in Oklahoma with the regulatory status of PENDING

REGULATORY STATUS IS 'PROVIDING - NO APPROVAL REQUIRED'			
Ardis			
Bratts Telecommunication Corp.			
Century Telecommunications, Inc.			
Consolidated Network, Inc.			
Dial USA			
Debeon Fiber Co.			
GTE Interactive Educational Network Svcs.			
GTE Service Corporation			
Herz Long Distance			
IOB Communications Group, Inc.			
Indian National Fiber Optic Network (Dba - Infranet)			
LCI, International Telecom Corp.	PUD860000196		9/11/86
LDB@telemedia			
LITEL Telecommunications Corp. (Dba - LCI International)			
National Video Network			
One-2-One Communications			7/8/84
Ram Mobile Data			
RCI Long Distance			
VYVX Telecom, Inc.			
Westel, Inc.			

20 Companies provide PL/SP ACC service in Oklahoma with the regulatory status of PROVIDING - NO APPROVAL REQUIRED

REGULATORY STATUS IS 'REGULATORY APPROVAL GRANTED'			
Allnet Communications Services	C:28821 C:288191	1/30/84	8/2/86
AT&T Communications		1/1/84	4/1/84
Cable & Wireless Comm., Inc. (Dba - TDS)	C:088242 C:387806	9/12/86	1/19/87
MCI Communications Corp.	C:38713 C:271381	12/7/83	1/11/86
Metropolitan Fiber Systems of Oklahoma	PUD860000488	11/23/84	8/21/86
Sprint Communications Svcs. Inc.	C:28788 C:273888,288883		3/1/86
Whitel (Dba - LDXNet, Inc.)	C:PUD860043 C:314278	3/23/87	7/6/87

7 Companies provide PL/SP ACC service in Oklahoma with the regulatory status of REGULATORY APPROVAL GRANTED

31 Companies provide, or are planning to provide PL/SP ACC service in Oklahoma



TEXAS'S PRIVATE LINE/ SPECIAL ACCESS COMPETITOR REPORT

COMPANY NAME:	REG CASE NO	REG FILE DATE	REG APPRV DATE
REGULATORY STATUS IS 'PROVIDING - NO APPROVAL REQUIRED'			
Ardis			
QWEST COMMUNICATIONS CORPORATION			
Raw Mobile Data			
TCG DALLAS		9/1/95	9/1/95
TelAtela Inc. (Dba - Tels/Tels)			
TelAmerica Network Services, Inc. (Dba - TelAmerica Network Services, Inc.)			
TELECOM AMERICAN, INC.			
TELEPORT COMMUNICATIONS HOUSTON, INC.			
		9/1/95	9/1/95
Westel, Inc. (Dba - Westel, Inc.)		9/8/95	9/8/95
Western Union ATS, Inc. (Dba - Western Union ATS, Inc.)		9/25/92	9/25/92

11 Companies provide PL/SP ACC service in Texas with the regulatory status of PROVIDING - NO APPROVAL REQUIRED

REGULATORY STATUS IS 'REGULATORY APPROVAL GRANTED'			
Action Telecommunications Company (Dba - Action Telecom Co.)		12/7/93	12/7/93
ALD Communications, Inc. (Dba - ALD Communications)		1/24/94	1/24/94
CapRock Fiber Network, LTD. (Dba - CapRock Fiber Network, LTD.)		10/12/94	10/12/94
FIBROCOM Incorporated (Dba - FIBROCOM Incorporated)		10/28/93	10/28/93
RWL Communications Inc. (Dba - RWL Connect)		7/30/94	7/30/94
LDX Net, Inc. (Dba - LDX Net, Inc.)		4/15/97	4/15/97
NTS COMMUNICATIONS INC. (Dba - NTS COMMUNICATIONS INC.)		12/27/93	12/27/93
Pennsylvania Alternative Communications, Inc. (Dba - Pennsylvania Alternative Communications, Inc.)		2/15/94	2/15/94
Phonoscope, Inc (Dba - Phonoscope, Inc)		7/13/94	7/13/94
Qwest Microwave, Inc. (Dba - Qwest Microwave, Inc.)		8/22/94	8/22/94
RCI Long Distance, Inc. (Dba - RCI Long Distance)		4/28/94	4/28/94
Teletel (Dba - Teletel)		7/15/93	7/15/93
Teleport Communications-Houston, Inc. (Dba - Teleport Communications-Houston, Inc.)		11/24/93	11/24/93
Time Warner Communications of Austin (Dba - Time Warner Communications of Austin)		2/3/94	2/3/94
Time Warner Communications of Houston,L.P. (Dba - Time Warner Communications of Houston,L.P.)		6/16/94	6/16/94
U.S. Communications, Inc. dba NTS Comm. (Dba - NTS Comm.)		1/7/92	1/7/92

16 Companies provide PL/SP ACC service in Texas with the regulatory status of REGULATORY APPROVAL GRANTED

REGULATORY STATUS IS 'UNKNOWN'			
Access Transmission Services, Inc (Dba - Access Transmission Services, Inc)			
Communications & Travel Services, Inc. (Dba - Communications & Travel Services, Inc.)			
Digital Direct of Dallas, Inc. (Dba - Digital Direct of Dallas, Inc.)			
Fibrom Inc. (Dba - Fibrom, Inc.)			
LDS-Metro Communications, Inc. (Dba - LDS-Metro Communications, Inc.)			
MCI Telecommunications Corporation (Dba - MCI Telecommunications Corporation)			
Metro-Link Telecom, Inc. (Dba - Metro-Link Telecom, Inc.)			
Metropolitan Fiber System of Houston, Inc. (Dba - Metropolitan Fiber System of Houston, Inc.)			
Metropolitan Fiber Systems of Dallas, Inc. (Dba - Metropolitan Fiber Systems of Dallas, Inc.)			
One To One Communications, Inc. (Dba - One-2-One Communications)			
Sprint Communications Company L.P. (Dba - Sprint Communications Company L.P.)			
TCG - Dallas (Dba - TCG - Dallas)			
Teleport Communications Dallas, Inc. (Dba - Teleport Communications Dallas, Inc.)			
TW Communications, Inc. (Dba - TW Communications)			

14 Companies provide PL/SP ACC service in Texas with the regulatory status of UNKNOWN

41 Companies provide, or are planning to provide PL/SP ACC service in Texas

COA & SPCOAs FILED**As Of October 30, 1995**

1.	TCG Houston		08/31/95	COA	Houston Area: Bellaire, Bunker Hill Village, Hedwig Village, Hilshire, Houston, Hunters Creek Village, Jersey Village, Piney Point, Southside Place, Spring Valley, West University Place, Humble	TCG Dallas intends to provide the entire range of local exchange and exchange access telecommunications services, as well as enhanced ISDN services.	Network is SONET capable and its switching network systems provide common channel signaling and database capabilities. TCG will use existing facilities to the maximum extent possible. Additional network will be obtained either by building its own or leasing constructed facilities by other companies.	Office in Houston; 36 marketing employees; headed by Vice President General Manager.
2.	TCG Dallas		08/31/95	COA	Dallas Area: Addison, Buckingham, Dallas, Farmers Branch, Highland Park, Irving, Plano, Richardson, University Park	TCG Dallas intends to provide the entire range of local exchange and exchange access telecommunications services, as well as enhanced ISDN services.	Network is SONET capable and its switching network systems provide common channel signaling and database capabilities. TCG will use existing facilities to the maximum extent possible. Additional network will be obtained either by building its own or leasing constructed facilities by other companies.	Office in Dallas; 42 marketing employees; headed by Vice President General Manager.

COA & SPCOAs FILED

As Of October 30, 1995

3.	American Telco	10/25/95	09/01/95	SPCOA	Existing service areas of Southwestern Bell, GTE, United Telephone, Alltel/Sugarland Telco & Fort Bend Telco	American Telco plans to provide, on a resale basis, monthly recurring, flat-rate local exchange services, toll restriction, call control options, tone dialing, custom calling services, Caller ID and any other services which are available on a resell basis from the underlying incumbent local exchange carrier or other certificated carrier within the service area.	American Telco is a switched-based, but not facilities-based, interexchange carrier. It has no plans to own any transmission facilities, either on the local or interchange basis. It does have points of presence established within the company's facilities in Houston, Dallas, Fort Worth, Austin and San Antonio.	29 Network staff technicians, 11 customer service districts in Texas (Houston, Dallas, Austin, Fort Worth and San Antonio).
4.	MFS Intelenet	10/05/95	09/01/95	SPCOA	Existing service areas of Southwestern Bell Dallas & Houston exchanges, GTE Plano exchange	MFS Intelenet intends to provide basic exchange services, including but not limited to basic lines, PBX trunks, Centrex and Centrex-like services, associated features, functions, services, and options, and local calling services, through the resale of any and all services available for resale in the State of Texas.	Not specified in filing.	Operated by a General Manager assisted by a professional technical and operations staff located in Texas who will have both marketing and operations responsibility for MFSI-TX.

COA & SPCOAs FILED

As Of October 30, 1995

5.	Kingsgate Telephone		09/01/95	COA	Houston Area: Kingsgate (Northeast Harris County)	Kingsgate intends to provide the entire range of voice grade telecommunications services, including residential and business services, as well as enhanced ISDN services. Kingsgate will have the capability of providing custom calling features as well as class features. ISDN will be offered on all new facilities.	Kingsgate will employ a hybrid, twisted pair copper pair and fiber optics network. Local loops will support modem traffic of at least 9.6 Mb.. Kingsgate plans to own and operate a digital, class 5 switch capable of providing state of the art features such as custom calling, CLASS, ISDN, etc. Local transport from Kingsgate to the local access provider(s) will be over fiber optic facilities.	Not specified in filing.
6.	U.S. Long Distance	10/25/95	09/01/95	SPCOA	Existing service areas of Southwestern Bell, GTE, Centel, United Telephone, & any other electing local exchange carrier.	USLD intends to resell all local exchange services in Texas.	USLD owns and operates a DSC DEX 600 series digital switch in Houston, and a DSC DEX 400 digital switch in Waco,	Not specified in filing.
7.	LDDS Worldcom	10/25/95	09/01/95	SPCOA	Statewide: Existing service areas of Southwestern Bell, GTE, Central Telephone Co., United Telephone, Alltel/Sugarland Telco, Lufkin-Conroe Telco	LDDS Worldcom intends to offer local exchange telephone services	Not specified in filing.	Not specified in filing.

COA & SPCOAs FILED

As Of October 30, 1995

8.	MFS-Houston MFS-Dallas		09/05/95	SPCOA	<p>Houston Central: SWBT's Clay C.O.; Houston North: Greens Road C.O.</p> <p>Dallas Central: SWBT's area served by 308 S. Akard; Dallas North: SWBT's Farmers Branch, Alpha Drive, and Richardson C.O.s; Plano: GTE's Avenue K, Plano C.O.</p>	<p>Local exchange services include basic dial tone lines, private branch exchange ("PBX") trunks, direct inward dial (DID) trunks, digital PBX and DID trunks and Centrex-type system lines. Local Exchange Usage which will provide users of MFS' local exchange lines direct dial calling, operator assisted calling, directory assistance service, access to emergency 911 service. Switched access services providing trunk-side access to MFS' switched network to allow other carriers to originate and terminate calls.</p>	<p>Services will be provided over MFS digital fiber optic network and will resell unbundled local loops purchased from incumbent LECs. MFS utilizes an Ericsson AXE digital switch configured as both a tandem and an end office switch. MFS has contracted with an established operator service center to provide the full range of local and toll operator services to its customers. The network features SS7 and database capabilities. MFS has set up a Network Operations Control Center.</p>	Not specified in filing.
9.	MCIMetro	Denied	09/06/95	SPCOA	<p>Territories served by SWBT, GTE Central, Sprint/Central Tel, Sprint/United Tel, Lufkin-Conroe Tel, ALLTEL Sugar Land Tel. and/or any local exchange company serving 31,000 or more access lines.</p>	<p>Telecommunications services include various intrastate switched services. MCIMetro intends to offer local exchange services and exchange access services.</p>	<p>Network will include high reliable fiber rings using synchronous optical networks (SONET); digital switches; special application computers, software and databases.</p>	Not specified in filing.

COA & SPCOAs FILED

As Of October 30, 1995

10.	Valu-Line of Longview, Inc.		10/11/95	SPCOA	All exchanges served by SWBT, GTE Southwest, Inc., Central Telephone Company, United Telephone Company, Inc., Alltel-Texas, Sugarland Telephone Company, and Lufkin-Conroe Telephone Exchange, Inc.	Valu-Line plans to resale flat rate local exchange service, EAS service, toll restrictions, call control options, toll dialing, custom calling services and caller ID.	Not specified in application	Not specified in application
11.	Coastal Telecom Limited Company		10/16/95	SPCOA	All exchanges currently served by GTE, SWBT, Contel Texas, Central Telephone Company, United Telephone Company, Sugarland Telephone Company and Century	All Local Exchange Telephone Services	Not specified in application	Not specified in application
12.	ACTION Telcom Co.		10/17/95	SPCOA	All exchanges currently served by SWBT, GTE, GTE TX/Contel, United Telephone, and Centel.	Resale of local exchange telephone service	Operates a digital switching facility utilizing fiber optic and SS7 technologies.	Not specified in application
13.	Westel, Inc.		10/18/95	SPCOA	All exchanges served by SWBT, GTE, Central Tel., United, Alltel, Sugarland & Lufkin-Conroe; any other electing local exchange carrier or any LEC that files a resale tariff available to SPCOAs.	Resale: Flat rate local exchange service, EAS, Toll restrictions, call control Options, toll dialing, customer calling & caller ID.	Operates multiple switches remotely monitored 24 hours/7 days a week by its Network Operation Center located in Austin. Provides switched access originating services; also supports direct connect services on DS-0 and DS-1.	Not specified in application

COA & SPCOAs FILED

As Of October 30, 1995

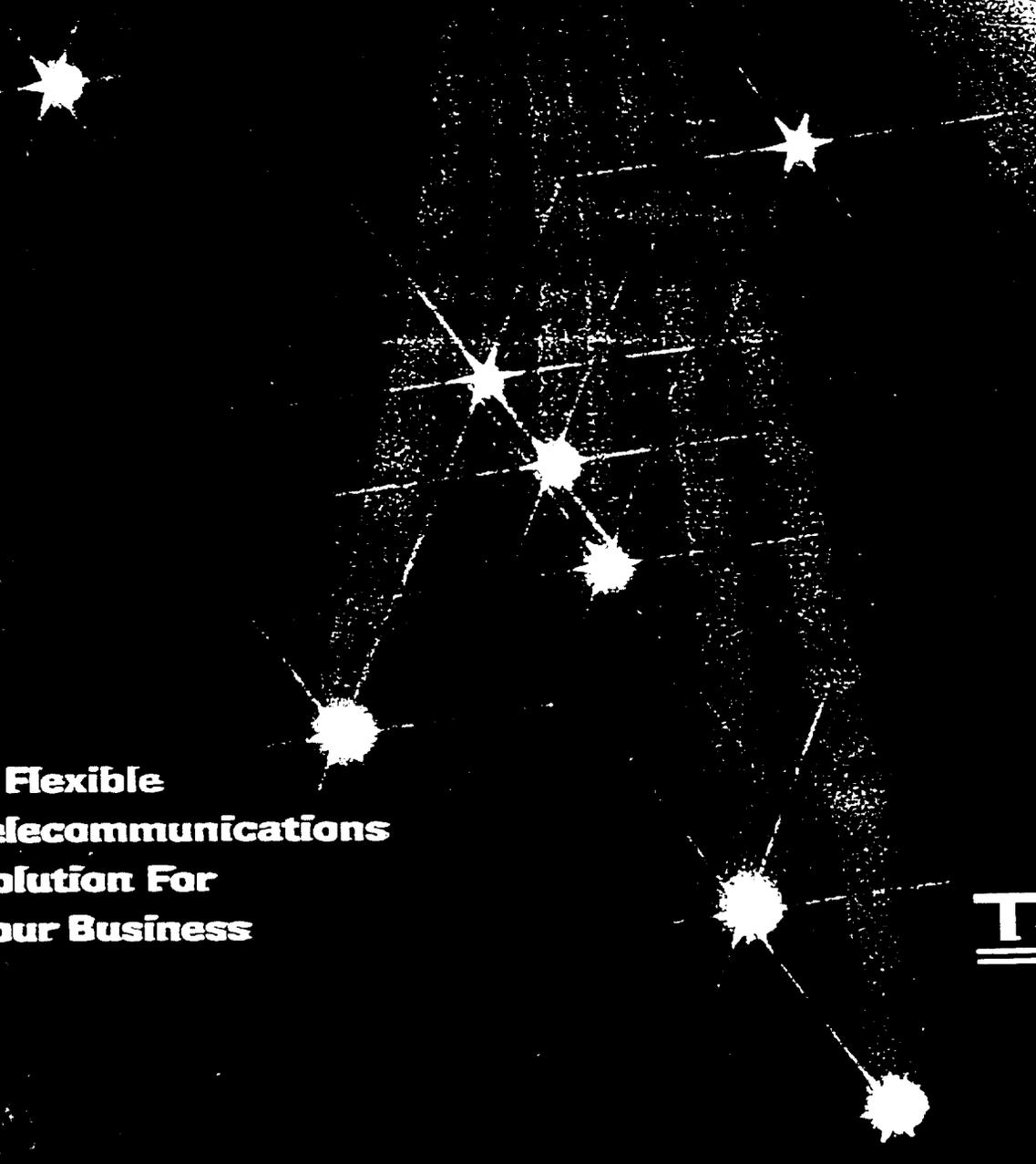
14.	LCI International		10/24/95	SPCOA	LCI will not operate in any area where the incumbent LEC, along with any affiliates, serve less than 31,000 access lines.	LCI will provide flat rate business and residential local exchange service.	Not specified in application	Not specified in application
-----	-------------------	--	----------	-------	---------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------	------------------------------	------------------------------

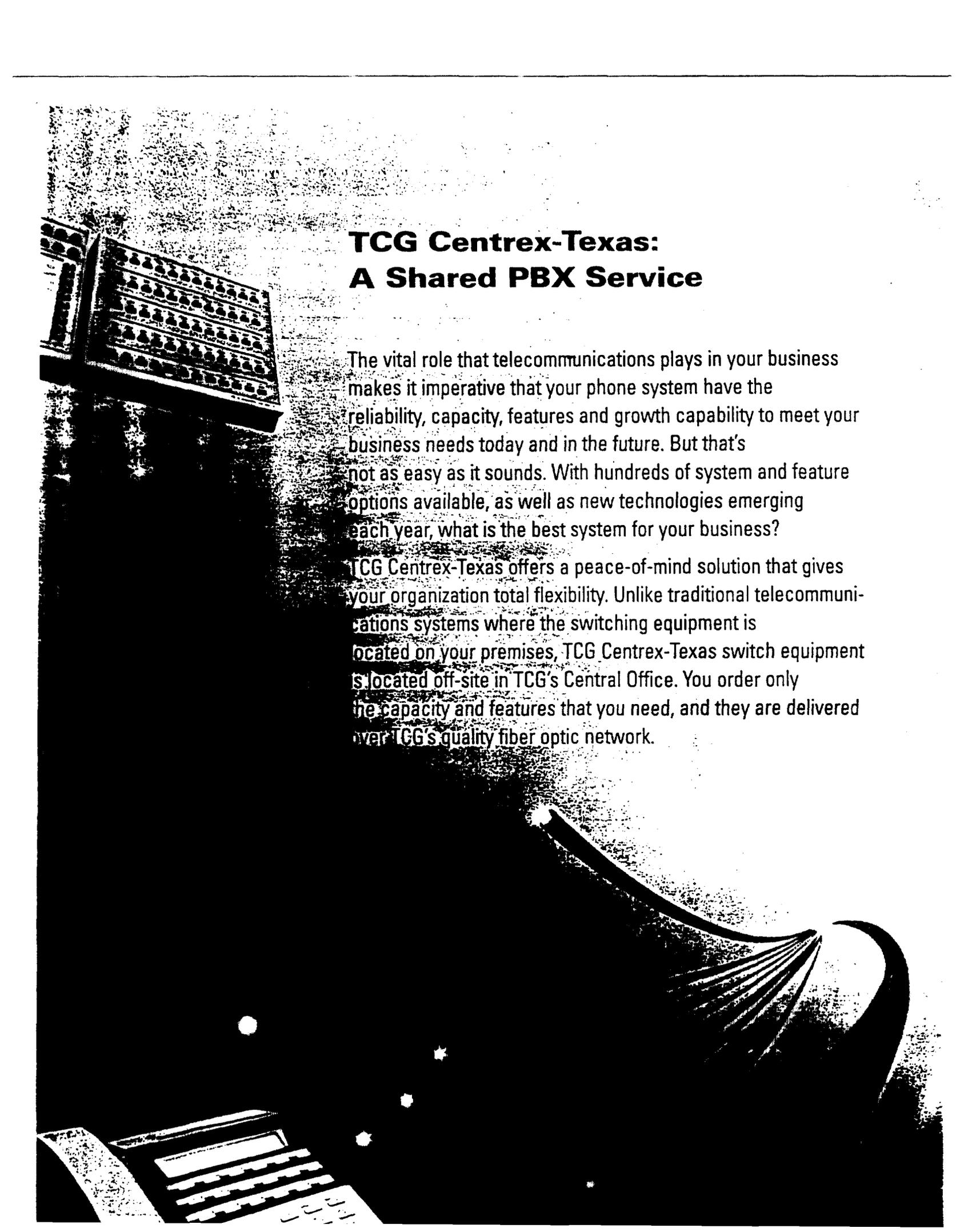
TCG Centrex-Texas
"A Shared PBX Service"

ATTACHMENT IV, PART 1

**A Flexible
Telecommunications
Solution For
Your Business**

TCG





TCG Centrex-Texas: A Shared PBX Service

The vital role that telecommunications plays in your business makes it imperative that your phone system have the reliability, capacity, features and growth capability to meet your business needs today and in the future. But that's not as easy as it sounds. With hundreds of system and feature options available, as well as new technologies emerging each year, what is the best system for your business?

TCG Centrex-Texas offers a peace-of-mind solution that gives your organization total flexibility. Unlike traditional telecommunications systems where the switching equipment is located on your premises, TCG Centrex-Texas switch equipment is located off-site in TCG's Central Office. You order only the capacity and features that you need, and they are delivered over TCG's quality fiber optic network.



The Advantages of TCG Centrex-Texas Over a PBX

TCG Centrex-Texas Service provides significant advantages over owning and operating your own PBX:

Cost Effective. TCG Centrex-Texas customers do not have to purchase, lease or maintain their own switching equipment. Therefore, you don't need to pay for additional floor space, commercial power, heating or ventilation to accommodate this equipment. You also do not have to worry about the cost of system upgrades.

Reliable. Only TCG Centrex-Texas offers built-in redundancy of switching, processing and networking components for unsurpassed reliability. TCG Centrex-Texas also offers an uninterrupted power supply and a self-correcting monitoring system.

Flexible. TCG Centrex-Texas is completely flexible. Order features when you need them. Quickly add or delete telephone lines as business needs dictate without disrupting staff operations.

Multiple Site Support. TCG Centrex-Texas can support your multiple business locations with a single system.

Expandable Service, On-Demand. As your business expands or your needs change, TCG Centrex-Texas will be there with the extra capacity and technological upgrades you need, when you need them.

Worry-Free. Subscribe to the features you want and leave the rest to us. Whether it is system maintenance, moves, adds or changes, new technologies, or added capacity, TCG Centrex-Texas will handle the telecommunications, so you can focus on your business.

Ready For Tomorrow. Technologies are changing rapidly in the 90's, particularly in the telecommunications industry. By offering leading edge technology, TCG Centrex-Texas can provide you with the latest software and hardware updates so your system never becomes obsolete.





Reasons For Selecting TCG Centrex-Texas Service

By offering significant advantages over private PBX systems, TCG Centrex-Texas has become a viable communications solution that can be implemented in a variety of ways for any size company.

TCG Centrex-Texas can be used:

- As your primary telecommunications system
- To supplement your existing PBX system or enhance it with minimal investment
- To replace your existing PBX system or Centrex service
- To provide diversity and protection from catastrophe as primary or back-up service

Diversity. With TCG Centrex-Texas, your business receives critical protection against catastrophic outages.

Network Quality. TCG's all-fiber digital network delivers unsurpassed quality. Day in and day out, TCG operates at less than one errored bit in 100 billion—a remarkable achievement and benchmark for the entire industry. In addition, TCG switches provide state-of-the-art features and reliability.

Network Reliability. Our fully redundant electronics ensure that no single component failure can cause a customer service problem. In addition, our "self healing" backbone fiber optic network in each city is made up of diversely routed cables, so that unexpected cable cuts won't affect service.

Responsive Customer Service. When you need additional features, lines or services, TCG Centrex-Texas responds immediately with the caliber of customer service that has made us the nation's leading competitive local telecommunications company.

A Full Menu of Standard Features For Increased Business Efficiency

TCG Centrex-Texas Service offers an extensive menu of **standard features** — all designed to provide additional telecommunications control, flexibility, increased efficiency and cost savings. A representative sample of standard features includes:

Add-On Conferencing — easily add a third party to your call without going through the attendant.

Automatic Identified Outward Dialing — you're automatically provided with an accurate record of all toll calls made by each line. This enables your company to more effectively monitor and control telephone costs.

Call Forwarding, Busy Line — when your calls reach a busy signal, they are automatically forwarded to another line.

Call Forwarding, Don't Answer — after a preselected number of rings, incoming calls can be rerouted to another station. Eliminates endless ringing, no answer and reduces abandoned calls.

Call Pick-Up and Hold — lets you answer a ringing phone in another office by dialing a simple code.

Call Transfer — transfer calls without attendant assistance.

Call Waiting — an audible tone alerts you to a call on your other line. Now you have the choice of putting the original call on hold while you answer the second line.

Centralized Answering — select a station as the centralized answering point for incoming calls to your main number. TCG Centrex-Texas also makes it easy to change this station as your business needs change.

Conference Calling — a feature available to individual lines that allows a customer to establish a voice connection between that line and two other lines.

Direct Inward Dialing (DID) — lets callers reach extensions without going through the attendant.

Direct Outward Dialing (DOD) — no more waiting for a free line when you're dialing out. Pick up the phone and dial; DOD finds the line for you.

Intra-Office Communications — save time with direct communications to anyone in the system.

Line Hunting — calls to busy numbers are automatically rerouted to any preselected phone number in the system. Callers won't get busy signals and your business won't miss calls.

Night Connection — you don't need to switch to night service since all lines are connected 24 hours-a-day.

Speed Calling — allows a user to dial selected numbers using fewer digits than normally required. One and two-digit speed calling lists are available.



TCG Centrex-Texas: How It Works For You

Full Range of Services

TCG Centrex-Texas Service includes analog lines, digital voice-only services with multiple line appearances, Basic Rate Interface (ISDN-BRI) lines for voice and data applications and customized billing and reporting. Circuits are provisioned from TCG's high quality switch through our local fiber optic network to a remote switching unit. We assume total responsibility for switch maintenance, switch UPS (Uninterrupted Power Supply), system upgrades, and new features and functionality.

Easily Accessible Features

Today's most desirable features are available for each telephone in your business. A representative sample of optional features includes:

Your employees can dial outgoing calls and receive incoming calls directly at their own desks without going through an attendant. Telephone sets may be either leased or purchased from TCG or the customer's vendor of choice.

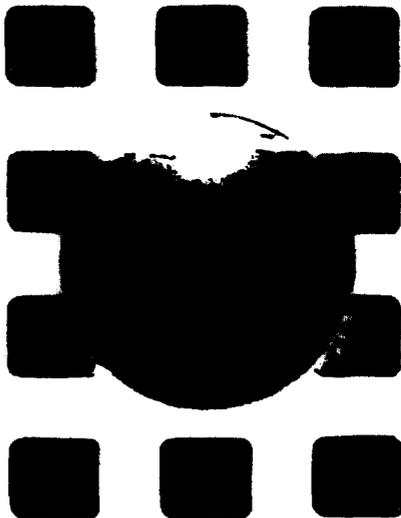
TCG Centrex-Texas customers may also select voice messaging, customer-controlled Recent Change and Automatic Call Distribution (ACD). In addition, you may purchase DS1 access to the interexchange carriers for the delivery of your long distance traffic or you may utilize 1+ dialing.

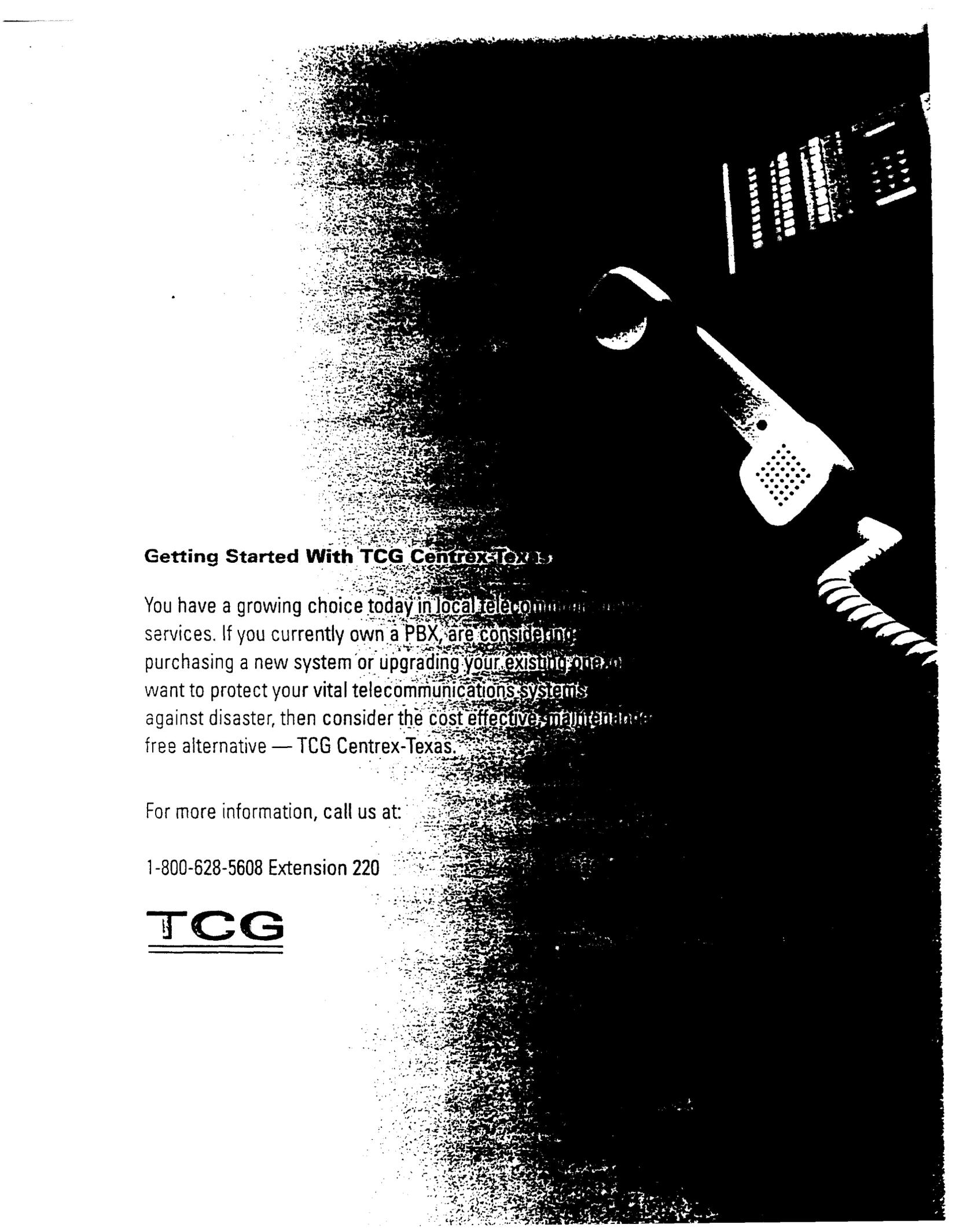
Moves, Adds and Changes

With TCG Customer System Administration, moves, adds and changes are easy to make and won't disrupt your business. Customers can move stations from one location to another, take contracted-for Direct Inward Dial (DID) numbers in and out of service, and add or change features on sets.

Cost Effective Upgrade for PBX Users

TCG Centrex-Texas is a shared PBX service which offers PBX users an alternative to either expanding or replacing an existing PBX when additional capacity or new services are required. TCG Centrex-Texas lines can be added alongside PBX lines and be fully integrated with existing PBX services. TCG Centrex-Texas also makes it easier for PBX users to add newer, more advanced services such as Automatic Call Distribution and ISDN without upgrading the PBX.





Getting Started With TCG Centrex-Texas

You have a growing choice today in local telecommunications services. If you currently own a PBX, are considering purchasing a new system or upgrading your existing one, or want to protect your vital telecommunications systems against disaster, then consider the cost effective, maintenance-free alternative — TCG Centrex-Texas.

For more information, call us at:

1-800-628-5608 Extension 220

TCG

**Light Years Ahead
In Local Telecommunications Services**

TCG

**Teleport
Communications
Group**

TCG Dallas
777 North Harwood Street
Suite 510
Dallas, TX 75201
214-922-8832 (phone)
214-922-8855 (fax)

TCG Houston
1303 Fannin
Suite 1290
Houston, TX 77002
713-752-0122 (phone)
713-752-1756 (fax)