

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

In the Matter of)
)
Amendment of the Commission's)
Rules and Policies to Increase)
Subscribership and Usage of the)
Public Switched Network)

CC Docket No. 95-115

FEDERAL COMMUNICATIONS
COMMISSION
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AMERITECH'S REPLY COMMENTS

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SUMMARY

Ameritech continues to believe that the Commission should not adopt any additional federal mandates to increase subscribership based on the record in this docket. In particular, the Commission should not adopt a rule barring disconnection of local service for non-payment of interstate toll because, among other reasons, many companies, like Ameritech, already offer free toll restriction (interstate and intrastate toll) for those customers who are at the point of denial for non-payment, as long as the customer honors payment arrangements for the arrearage. Nothing more is required at this time.

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AMERITECH'S REPLY COMMENTS

The Ameritech Operating Companies¹ ("Ameritech" or the "Company") respectfully offer the following reply to the initial comments on the Notice of Proposed Rulemaking ("NPRM") released in this docket on July 20, 1995. Some sixty parties filed comments in this docket, including various local exchange carriers ("LECs") and associations, interexchange carriers ("IXCs"), state regulatory and governmental bodies and a host of other interested parties.

Having reviewed those comments, Ameritech continues to believe that the Commission should not adopt any additional federal mandates to increase subscribership based on the record in this docket. In particular, the

¹ The Ameritech Operating Companies are: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company and Wisconsin Bell, Inc.

Commission should not adopt a rule barring disconnection of local service for non-payment of interstate toll because, among other reasons, many companies, like Ameritech, already offer free toll restriction (interstate and intrastate toll) for those customers who are at the point of denial for non-payment, as long as the customer honors payment arrangements for the arrearage. Nothing more is required at this time.

I.

INTRODUCTION

In its initial comments, Ameritech pledged its continued cooperation in helping to make access to the switched telephone network available as far as possible at a reasonable charge. The Company argued, however, that the Commission's universal service goals would not necessarily be furthered by a rule prohibiting disconnection of local service for non-payment of interstate toll charges. The Company explained that there currently are a number of initiatives in place to increase the level of accessibility to the wireline network and that additional federal programs -- including a local service disconnection policy which arguably is beyond the Commission's interstate jurisdiction to adopt -- are not necessary, particularly since these types of social engineering programs can create unintended and uneconomic

dislocations in the increasingly competitive telecommunications marketplace.²

This same basic view is reflected in the comments of many other parties in this docket.³ However, some filing comments offer a different perspective not only about the means for achieving the goals the Commission has established in this docket,⁴ but also concerning what the Commission's goals should be for increasing the nation's overall level of subscribership.⁵

It must be noted at the outset that the Commission has specifically recognized that subscribership varies among certain groups of people "even when income is held constant."⁶ In other words, there are a variety of

² See also Pacific and Nevada Bell at 3; Earthcall Communications 4-5.

³ E.g., GTE at 4; Ameritel at 1-5.

⁴ Teleport, for example, supports a policy which would bar disconnection of local service for non-payment of toll charges. Teleport at 5. Time Warner also supports such a policy because it thinks toll is a discretionary service (Time Warner at 8); MCI, on the other hand, thinks that long-distance service in many cases is just as important as local service. MCI at 19-20.

⁵ The People of the State of California and the Public Utilities Commission of the State of California (at 5), for example, say that a carrier should not be able to disconnect some of its services for non-payment of other services provided by the same carrier and, therefore, suggests that the Commission should not limit a disconnection policy to non-payment of interstate toll. See also Public Utility Law Project of New York at 5. The Consortium for School Networking says the goal of universal service should extend not only to households, but to tax supported public entities, and should extend not only to basic local exchange service, but access to the Internet and other on-line information services, as well. CoSN at 1-5. Several other parties think the Commission's goal in this docket should include the goals which the Commission established in the DEM Weighting/Universal Service Fund proceeding, CC Docket No. 80-286.

⁶ NPRM at par. 1.

reasons having nothing to do with income which may explain why some people do not subscribe to telephone service.⁷ Therefore, in evaluating the various proposals made in the NPRM, and others which have been proposed by some of the parties, the Commission should be as specific as possible about the goals it seeks to achieve through the action it takes in this docket.

It is clear that the Commission generally is interested in increasing the overall level of subscribership to the public switched network. But, more specifically, the Commission's goal may be to increase the national level of subscribership to a particular percentage above the current 94%. Or the Commission's goal may be to raise the penetration rate in all of the states to the 94% level.⁸ The goal may be to target an increase in subscribership among particular ethnic and socio-economic groups.⁹ The goal may be to focus, not on any particular level of actual subscribership, but on policies that can make

⁷ E.g. US West at 2 (a person may have a variety of reasons for not subscribing to telephone service, including many which involve private decisions beyond the purview of legitimate federal interest); see also Pacific and Nevada Bell at 10; New York State Department of Public Service at 5-6 (there are factors other than high toll charges which may influence a customer's decision to stay on the public network).

⁸ The Iowa Utilities Board (at 1) argues that it is not an appropriate statistical correlation to direct the focus on national penetration rates, but more relevant to focus on individual state penetration rates.

⁹ See NPRM at par. 1 ("Telephone subscribership is apparently also lower among African Americans and Hispanics than in other parts of the population, even when income is held constant."); Montana Independent Telecommunications Systems, Inc. at 5 (discussing the use of debit cards as an effective way for maintaining and increasing subscribership among the Native American population in its area); Indiana Utility Regulatory Commission at 9-10 (some people simply do not want telephone service, like many Old Order Amish in Indiana); Southwestern Bell at 11-14.

access more reasonably available. Accordingly, the goal may be to institute policies that are designed to increase subscribership among those who have been disconnected for non-payment.¹⁰ The goal may be to help people control toll calling or it may be to allow them to avoid disconnection when they do not pay their toll bill. It is important that the Commission and the parties have a common understanding of the specific goals for this docket because depending on the goal to be achieved, any one of the particular proposals to increase subscribership could be viewed as reasonable or unreasonable.¹¹ In this respect, the reasonableness of the means -- by definition -- must be evaluated in relation to the desired ends.

II.

PROPOSALS TO INCREASE SUBSCRIBERSHIP

It is apparent from the initial comments in this docket that a variety of steps already have been taken in the states to ensure that those who want to

¹⁰ Ameritel says that a small percentage (1.8% based on a California study) lack telephone service because they have been disconnected for non-payment. Ameritel at 3-4; MCI at 13-18 (less than 1% of MCI's customers have been disconnected for failure to pay; MCI also cites the Texas Telephone Association as concluding that less than 2% of customers are disconnected industry-wide and almost 3/4 are reconnected within one month); see also AT&T at 6-8 (customers are rarely disconnected solely for failure to pay long distance charges).

¹¹ However, the goal should not be to achieve a particular level of subscribership through additional federal mandates regardless of the negative repercussions which those mandates may cause. See GTE at 3-4 (e.g., incentive to evade lawful charges, significant costs and administrative burdens, technical limitations, competitive issues associated with asymmetrical regulation); see also Gateway Technologies at 5-7 (universal service was not designed as a policy to protect Americans from the consequences of their purchasing decisions; differentiating between those who cannot pay for service and those who refuse to pay for service they use).

subscribe to wireline telephone service have a reasonable opportunity to do so.¹² The Commission should take those programs into account in this docket, together with the state interests which helped create those programs, and not order any additional federal mandates to increase subscribership until the root causes of non-subscribership are better understood, all competitive implications are weighed and cost recovery issues are addressed and resolved.¹³

A. Disconnection Related to Failure to Pay Interstate Long-Distance Charges

Ameritech said in its initial comments that it would be unreasonable for a variety of reasons for the Commission to adopt a rule prohibiting disconnection of local exchange service for non-payment of interstate long distance service.¹⁴ Many others agreed arguing that such a policy would not necessarily lead to increased subscribership, would be expensive or

¹² E.g. Pacific and Nevada Bell at 4-6, 13; US West at 3-10; Bell Atlantic at 4-5; Cincinnati Bell at 4-8; Mid-Rivers at 2-3; NTCA at 8-12; NYNEX at 3-4; Southwestern Bell at 15-21; TDS Telecommunications at 4, 8-9; Telephone Association of Maine at 1-2.

¹³ See also USTA at 3. The Commission should be especially reluctant about adopting a rule against disconnection of local service for non-payment of toll given that some states have considered the issue and specifically declined to adopt such a policy even though their commitment to universal service is no less resolute than this Commission's. Alaska Telephone Assn. ("ATA") at 4; Bell Atlantic at 8-11.

¹⁴ Ameritech, like many other companies, offer several toll restriction services to which a customer may subscribe. See Ameritech at Attachment A; ATA at 2; GTE at 18-24.

impractical to implement¹⁵ and is beyond the Commission's interstate jurisdiction to adopt.¹⁶

Several commentators specifically noted that some states with a policy barring disconnection of local service for non-payment of toll have a subscription rate lower than the national average and some states without such a policy have a subscription rate higher than the national average.¹⁷ Pacific and Nevada Bell point out that Pennsylvania, a state where the Commission suggested that an increase in subscribership was due to a policy barring disconnection of local service for non-payment of toll, is no longer the subscription leader; those parties counsel against adopting regulatory prescriptions based on fluctuating statistics.¹⁸ Bell Atlantic reports that Delaware has a program similar to Pennsylvania and the subscribership rate in Delaware has remained flat. Bell Atlantic also reports that the District of Columbia has a series of low-priced services available, together with mandatory toll restriction which allow disconnected customers to remain on the network, but until very recently the penetration rate declined steadily under that program.¹⁹ The Alaska Public Utilities Commission says in its

¹⁵ E.g. AT&T at 6-8; CompTel at 2-3; LDDS at 3.

¹⁶ E.g. MCI at 9-13.

¹⁷ E.g. US West at 3-4; Bell Atlantic at 4-6.

¹⁸ Pacific and Nevada Bell at 16; contra OPASTCO at 6.

¹⁹ Bell Atlantic at 4-5.

comments that the Commission cannot assume a policy that may promote subscribership in one state will work effectively in another state.²⁰ The Puerto Rico Telephone Company says that any toll blocking requirement should be the IXCs' responsibility²¹ and that alternative, according to the Public Utilities Commission of Ohio, is something the Commission still needs to investigate.²² In short: the record does not support the premise that subscribership can be increased by prohibiting disconnection for non-payment of interstate toll.²³

Besides being ineffective, a rule barring disconnection of local service for non-payment of interstate toll would be prohibitively expensive for the entire industry. Bell Atlantic points out that when such a policy was implemented in Pennsylvania, uncollectibles increased nearly 400% and administrative costs rose more than \$24 million per year (even though

²⁰ Alaska Public Utilities Commission at 1-2; see also Idaho Public Utilities Commission at 5 (given the unique characteristics of each state, it is better for each state to individually identify and address factors that affect subscribership); Indiana Utility Regulatory Commission at 6 (state regulatory agencies are more uniquely situated to determine local disconnection policies than the Commission).

²¹ Puerto Rico Telephone Company at 5-6.

²² Public Utilities Commission of Ohio at 5; GTE at 12-13 (nothing in record that addresses how IXCs might contribute to achieving the goal of increased subscribership).

²³ See also Sprint at 3; Bell South at 2-4; NYNEX at 4-5 (nothing has changed since 1986 to justify the reversal of the Commission's position of deferring to the states); Rochester at 2-3 (far more information is needed before the Commission adopts additional mandates); OAN at 2-4 (no cause and effect relationship established between the Commission's proposal and the desired result); Pennsylvania Public Utility Commission at 15-16 (state's subscription rate cannot be attributed solely to the policies discussed in the NPRM).

growth in the level of subscribership is below the national average).²⁴

Rochester Telephone Company, like Ameritech, says that the Commission's proposal would require major modifications to billing, collection, treatment and cash systems costing several million dollars.²⁵ And, as GTE notes, there must be a vehicle to recover these additional costs (perhaps through an exogenous adjustment to the price cap) but that issue has not even been addressed, let alone resolved.²⁶

Part of the reason why costs would increase with the Commission's proposal is due to customer confusion. The fact is that notwithstanding 11 years of educational effort, many customers still are not aware of or interested in the regulatory characteristics of their toll calls, *i.e.*, intraLATA, interLATA, intrastate, or interstate. Therefore, restrictions based on one or another type of characteristic is not likely to be effective as a way of increasing subscribership, even if it were technically feasible to switch or block toll traffic at that level of granularity.²⁷

²⁴ Bell Atlantic at 4; MCI at 13-18. In addition, the Commission's proposal would generate substantial additional expense associated with those customers who simply move from one IXC to another as their toll charges become delinquent.

²⁵ Rochester at 4-5.

²⁶ GTE at 16-17.

²⁷ Montana Independent Telecommunications Systems, Inc. at 4-5.

The additional costs associated with the Commission's proposal cannot be justified given the availability of less onerous alternatives.²⁸ For example, Ameritech explained in its initial comments that toll restriction services are available to its subscribers who want to control their toll calling.²⁹ Moreover, Ameritech offers free toll restriction (without inter/intrastate distinction) for those customers who are at the point of denial for non-payment, as long as the customer honors payment arrangements for the arrearage. Other carriers offer similar alternatives.³⁰ These toll restriction services can reduce the deposit that may be required to obtain service.³¹ Debit cards also are available for subscribers who want more real-time control of their toll charges. Thus, if inability to pay for interstate toll charges is a reason for non-subscribership, that issue can be addressed (and, in fact, is being addressed) through alternatives which are far more reasonable than a blanket policy against disconnection of local service for non-payment of interstate toll.

²⁸ Some alternatives, however, such as long-distance restrictions based on usage by minute or dollar amount, generally are not feasible. See Ameritech at 6; ATA at 3; Cincinnati Bell at 9; TDS Telecommunications at 6-8; AT&T at 3-6 (the LECs' ability to implement the Commission's proposal is unclear and requires further study).

²⁹ Ameritech at Attachment A.

³⁰ E.g. BellSouth at 6-7; Cincinnati Bell at 8-9; Pacific and Nevada Bell at 23-27; Florida Public Service Commission at 2-3.

³¹ E.g. Ameritech at 6; ATA at 3; Illinois Consolidated at 2.

Various commentators also agreed with Ameritech that the Commission would exceed its jurisdiction by adopting a policy barring disconnection of local service for non-payment of interstate toll.³² Others, however, suggest that such a policy could fall within the Commission's interstate jurisdiction as long as the Commission did not try to control disconnection of local service.³³ Yet, that is exactly what the Commission's proposal would do; denying a LEC the option of disconnecting local service for non-payment of interstate toll amounts not to the regulation of interstate toll service but to the regulation of local service which is beyond the Commission's interstate jurisdiction.³⁴

As an adjunct to the issue of disconnection for non-payment of local service, the Commission asked whether it should try to promote subscribership by extending Lifeline benefits (a) to those who have the financial ability to pay for the services to which they subscribe and (b) to multi-line entities such as schools and libraries. Ameritech counseled against

³² E.g. Bell Atlantic at 8-11; BellSouth at 5-6; NYNEX at 5-6; Pacific and Nevada Bell at 20-22; Rochester at 3-4; Telephone Electronics Corporation at 5-10; Maine Public Utilities Commission at 2; Public Utilities Commission of Ohio at 3-5; Pennsylvania Public Utility Commission at 5-7.

³³ Colorado Public Utilities Staff at 6. Later in its comments, however, the CPUS raises a question about the Commission's jurisdiction in this regard. CPUS at 10-11.

³⁴ See also Public Utilities Commission of Ohio at 1-4 (Commission lacks appropriate jurisdiction to prohibit LECs from disconnecting a subscriber's local service for non-payment of either intrastate or interstate toll).

such mandates.³⁵ Many agreed;³⁶ some disagreed.³⁷ Ameritech continues to believe that the Commission should not expand Lifeline benefits in this fashion, but if it does, then the increased costs should be made explicit and be eligible for exogenous treatment under the price cap or distributed equitably among all participants in the industry through a bulk-billing mechanism.³⁸

B. Services Targeted for Low-Income Populations That are Highly Mobile

The Commission invited comments in this docket on how better to address the telephone service needs of low-income, highly mobile Americans. In response, Ameritech explained its program (which it continues to monitor) of providing voice-mailboxes to low-income, highly mobile persons through fifteen social agencies which serve the homeless in

³⁵ Ameritech at 9.

³⁶ E.g. ATA at 4; GTE at 45-49; USTA at 13; United Utilities at 3 (there is no need for the Commission to create high-volume, low-cost central calling facilities; nobody has asked United Utilities for such a facility and it is not likely that such a facility would target highly mobile, low-income persons any better than debit cards or voice mail services); AT&T at 10-12; Time Warner at 9, 10-11.

The Idaho Public Utilities Commission (at 5) believes that the subscriber line charge should be waived for any customer that has restricted toll services even though that line still may be used to originate and terminate toll calls. The Pennsylvania Public Utility Commission (at 10) suggests that waiver of the subscriber line charge for those with toll restrictions would encourage the poor to take advantage of voluntary toll restrictions, but stops short of saying that only the poor should be eligible for such a waiver.

³⁷ The Consortium for School Networking says that universal service should extend not only to households, but to tax supported public entities as well.

³⁸ See also NYNEX at 8-9; Pacific and Nevada Bell at 29; Iowa Utilities Board at 4-5.

Cleveland, Ohio.³⁹ The Company agreed to cooperate in an inquiry into the needs of low-income populations that are highly mobile, the current alternatives for meeting those needs (including the availability of pay telephones and debit cards)⁴⁰ and the appropriate agency to address these specialized communications issues. Many other commentors expressed similar sentiments.⁴¹ The Iowa Utilities Board suggested that the Commission should obtain information from the states that implemented programs to assist the highly mobile, low-income subscriber and assess that information before any additional federal mandates are created.⁴² This makes sense.

C. Extending Telephone Service to Unserved Areas

In its initial comments, Ameritech explained that if there are states in which the provision of wireline service is prohibitively expensive, then that is a matter to be considered and resolved by the regulatory authorities in

³⁹ MFS cited its Opportunity Calling voice mailbox program in New York as a useful tool for addressing the needs of the highly mobile, low income population. MFS at 4-6.

⁴⁰ The Telecommunications Resellers Association also endorses the use of pre-paid calling cards as a tool to help control toll calling. TRA at 4-5.

⁴¹ E.g. ATA at 5; Cincinnati Bell at 10; Illinois Consolidated at 3-4; NTCA at 15-16. Some, however, caution against subsidizing voice-mail even for the laudable purpose of serving the country's low-income, highly mobile population. Information Technology Association of America at 3-5.

⁴² Iowa Utilities Board at 4.

those states, not by this Commission through increased subsidies flowing from companies and customers in other parts of the country.

Some commentators suggested that various wireless applications are available to provide local exchange service to rural areas.⁴³ Others believe that wireless applications do not have the capacity to replace traditional, wired basic local exchange service.⁴⁴ Ameritech believes that the Commission should create the conditions whereby available spectrum is put into use for a wide variety of applications and then let customers in the marketplace decide which application best suits their particular needs.

III.

SUBSCRIBERSHIP BARRIERS AND MEASURES

Ameritech said in this part of its initial comments that the Commission should supplement existing measures by monitoring and reporting the availability of access to the public switched network, and not simply subscribership.⁴⁵

⁴³ E.g. ATA at 5-6; AMSC Subsidiary Corporation at 7.

⁴⁴ AT&T at 14-17.

⁴⁵ Ameritech at 11-12.

Others proposed additional ideas which have some merit. For example, Pacific and Nevada Bell suggest that the Commission should ask the Census Bureau to determine whether customers who do not have wireline telephone service have access to an alternative, such as paging, voice mail or an answering bureau.⁴⁶ Southwestern Bell reminds us that some who report no residential service, in fact, may work out of their home and use a business line to satisfy their telecommunications needs.⁴⁷ Others suggest that the Commission collect additional information from the state regulatory commissions.⁴⁸ Each of these suggestions make sense and the Commission should take them into account in its final order in this docket.

IV.

CONSUMER AWARENESS ISSUES

In response to the Commission's general question about what it might do to facilitate an educational process to enhance the level of subscribership in the country, Ameritech suggested that the Commission first should inventory all of the various ways in which customers and would-be

⁴⁶ Pacific and Nevada Bell at 12.

⁴⁷ Southwestern Bell at 14.

⁴⁸ Pennsylvania Public Utility Commission at 16.

customers currently are advised about their options for obtaining telephone service. After that inventory is completed, the Commission could determine if any additional measures were necessary and whether any particular proposal would be cost justified.⁴⁹

Based on the initial comments, it is clear that the LECs, like many others in the industry, have a substantial interest in increasing subscribership and many educational programs to promote subscribership already have been put into place in cooperation with state regulatory commissions and community-based organizations.⁵⁰ The Commission should continue to work with the industry to develop voluntary efforts designed to educate consumers about the availability of and options for their telephone service. However, additional federal mandates in this area are not necessary.⁵¹

⁴⁹ Ameritech at 12-13.

⁵⁰ Accord, Bell Atlantic at 6-7; BellSouth at 7-8; Cincinnati Bell at 10-11; GTE at 41; USTA at 17-18; Pacific and Nevada Bell at 12-14.

⁵¹ Nor would it be reasonable, as Consumer Action suggests (at 7), for Commission to establish a \$25 million fund -- an amount that would be funded by a surcharge on consumers' bills -- for educational grants to organizations like Consumer Action, notwithstanding its belief that is the only way consumers will get "unbiased" information about their telephone service.

V.

CONCLUSION

Ameritech continues to support increased subscribership and making access to the public switched telephone network available as far as possible at a reasonable cost. In particular, Ameritech already has a plan in place to restrict toll at no charge for those customers who are at the point of denial for non-payment, as long as the customer honors payment arrangements for the arrearage. Additional federal mandates to increase subscribership, including a rule prohibiting disconnection of local service for non-payment of interstate toll, are not warranted based on the record in this docket.

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November ²⁰~~14~~, 1995

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