

DOCKET FILE COPY ORIGINAL

NOV 20 1995

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of )  
)  
Amendment of the Commission's Rules ) CC Docket No. 95-115  
and Policies to Increase Subscribership )  
and Usage of the Public Switched Network )

**REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.**

U S WEST Communications, Inc. ("U S WEST") hereby files its Reply  
Comments in the above-referenced docket.

In its initial Comments, U S WEST pointed out the great promise which  
radio technology offers in bringing telephone service to remote areas which might  
otherwise be deprived of service.<sup>1</sup> Some question has been raised in the initial  
comments as to the number of subscribers who might actually be served only by  
radio technology.<sup>2</sup> Since filing its initial Comments, U S WEST has conducted a  
study of those areas within its territory which can be served only by radio at this  
time. The following chart lists each state within U S WEST's territory and the  
number of lines forecasted to be requested during 1996 which cannot be  
economically served with a wireline solution -- but which could be economically  
served via one of the wireless solutions discussed in U S WEST's initial Comments:

<sup>1</sup> Comments of U S WEST Communications, Inc., filed herein Sep. 27, 1995 ("Comments").

<sup>2</sup> Comments of Southwestern Bell Telephone Company, filed herein Sep. 27, 1995 at 22.

No. of Comments  
Listed  
004

## Shortages for 1996 That Could Be Solved Using Radio Technology

Arizona	2,205	Nebraska	587
Colorado	1,490	New Mexico	1,650
Iowa	728	Oregon	1,369
Idaho	509	South Dakota	138
Minnesota	208	Utah	2,391
Montana	193	Washington	1,001
North Dakota	110	Wyoming	75
Total U S WEST			12,654

As can be seen within the context of total number of lines, the number of people to whom service can be brought via radio technology is, at least in U S WEST's territory, not inconsequential. Therefore, U S WEST reiterates its recommendation in its initial Comments that the "Commission consider a rulemaking to examine frequency assignments for Fixed Wireless Loop local exchange service in remote areas -- exempt from the competitive bidding process in much the same way as BETRS assignments are currently handled."<sup>3</sup>

In addition, some commentors suggested that the Federal Communications Commission ("Commission") should enact rules prohibiting disconnection of service for non-payment of carrier bills. California recommends that the Commission should prohibit disconnection of local service for non-payment of interstate long distance charges.<sup>4</sup> Time Warner recommends that disconnection of local service for

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<sup>3</sup> Comments at 15.

<sup>4</sup> Comments of the People of the State of California and the Public Utilities Commission of the State of California on the Notice of Proposed Rulemaking, filed herein Sep. 27, 1995 at 3-4 ("California").

non-payment of bills for “discretionary service” be banned.<sup>5</sup> The Public Utility Law Project of New York goes further, suggesting that disconnection of local service for non-payment of any toll charges, intrastate as well as interstate, should be prohibited.<sup>6</sup>

As noted in its initial Comments, U S WEST does not, as a matter of policy, disconnect local service for non-payment of long distance carrier charges, even in those states where it would be lawful to do so. However, this policy of U S WEST should not be read as indicating support of a federal prohibition on disconnection services for those carriers who feel compelled to utilize them. Over the years, U S WEST has experimented with a number of disconnection and toll restriction devices designed to keep both billing uncollectables at a minimum and maximize telephone subscribership. Some have worked well, others have not, and U S WEST’s efforts in this area are continuing. The optimum balance, we believe, will ultimately be some combination of toll restriction service and toll/carrier disconnection for non-payment. However, it is U S WEST’s experience that this optimum will best be realized if carriers are given the ability to work their way through these issues on their own, pursuant to Commission encouragement (and monitoring, if deemed appropriate), but free of a regulatory structure which could well inhibit the development of the best ways to balance the (at least superficially)

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<sup>5</sup> Comments of Time Warner Communications Holdings, Inc., filed herein Sep. 27, 1995 at 7-8 (“Time Warner”).

<sup>6</sup> Comments of the Public Utility Law Project of New York, Inc. on Proposed Policies to Increase Subscribership and Usage of the Public Switched Network, filed herein Sep. 26, 1995 at 8-10.

countervailing needs of seeking minimization of uncollectables and maximization of telephone subscribership.

Respectfully submitted,

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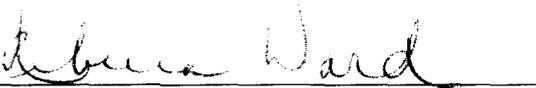
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November \_\_\_\_, 1995

## CERTIFICATE OF SERVICE

I, Rebecca Ward, do hereby certify that on this 20th day of November, 1995, I have caused a copy of the foregoing **REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.** to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.

  
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