



MCI Telecommunications Corporation

1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

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November 20, 1995

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

Re: **Bell Atlantic Telephone Companies, Revision to Tariff F.C.C. No. 10, Transmittal Nos. 741 and 786, Rates, Terms, and Regulations for Video Dialtone Service in Dover Township, New Jersey, CC Docket No. 95-145**

Dear Mr. Caton:

Enclosed herewith for filing are the original and four (4) copies of MCI Telecommunications Corporation's Motion for Extension of Time, regarding the above-captioned matter.

Please acknowledge receipt by affixing an appropriate notation on the copy of the MCI Motion for Extension of Time, furnished for such purpose and remit same to the bearer.

Sincerely yours,

Don Sussman
Regulatory Analyst

Enclosure
DHS

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:)	
)	
Bell Atlantic Telephone Companies)	Transmittal Nos. 741,
)	and 786
Revision to Tariff F.C.C. No. 10)	CC Docket No. 95-145
)	
Rates, Terms, and Regulations)	
for Video Dialtone Service in)	
Dover Township, New Jersey)	

MOTION FOR EXTENSION OF TIME

I. Introduction

MCI Telecommunications Corporation ("MCI"), pursuant to Section 1.46 of the Commission's Rules, hereby files its Motion for Extension of Time in the above-captioned proceeding. Pursuant to the Common Carrier Bureau's ("Bureau's") Designation Order, released September 8, 1995, Bell Atlantic filed its Direct Case on October 26, 1995.¹ Interested parties were to have 34 days to evaluate and comment on Bell Atlantic's Direct Case.² In its Direct Case, Bell

¹ Order Designating Issues for Investigation, Transmittal Nos. 741, 786, CC Docket No. 95-145 (released September 8, 1995) ("Designation Order").

² Pursuant to the Designation Order, Bell Atlantic was required to file its Direct Case October 26, 1995, Oppositions/Comments are to be filed November 30, 1995, and Rebuttals are due December 20, 1995.

Atlantic redacted essential cost information which interested parties must view in order to assess the reasonableness of Bell Atlantic's proposed Video Dialtone rates.³ MCI has attempted to negotiate a mutually acceptable nondisclosure agreement with Bell Atlantic, but Bell Atlantic has refused to permit MCI to obtain its cost information under reasonable terms and conditions.⁴

The Commission is attempting to mediate the differences between the two parties. However, due to the temporary government shut down and Bell Atlantic's unwillingness to negotiate a reasonable nondisclosure agreement, meetings scheduled between the two parties and Commission staff have not yet occurred. MCI, therefore, requests that the Commission extend the comment deadline in the above-captioned proceeding from November 30, 1995, until 30 days from the date which MCI gains access to Bell Atlantic's redacted cost information. Such an extension is in the public interest because it will ensure a complete record, and afford interested parties the opportunity to submit a meaningful, thorough analysis of Bell Atlantic's proposed Video Dialtone rates.

³ Attached is an example of the public information that Bell Atlantic filed in its Direct Case. Without access to the information that Bell Atlantic has filed confidentially, it is impossible for interested parties to determine the reasonableness of Bell Atlantic's purported investment costs, and therefore, of its proposed Video Dialtone rates.

⁴ The proposed Bell Atlantic nondisclosure agreement would not only preclude MCI from obtaining Bell Atlantic's cost information, but it would require MCI to obtain and pay for outside counsel to perform functions that MCI typically performs internally.

II. MCI's Interest In Obtaining Bell Atlantic's Cost Information

MCI's interest in Bell Atlantic's offering of Video Dialtone is limited to its long-standing concern that Bell Atlantic is currently able to shift the costs of building and deploying a Video Dialtone network to its telephone customers.⁵ Until such time as there is widespread availability of competitive alternatives to Bell Atlantic's bottleneck network, MCI must depend upon its ability to purchase interstate switched and special access from Bell Atlantic at reasonable rates. MCI has therefore participated in various phases of the Video Dialtone proceeding in an effort to ensure that the Commission is vigilant in protecting telephone ratepayers from potential cross-subsidies that could cause telephone rates to be unreasonably high.⁶

⁵See, e.g., MCI Opposition to Bell Atlantic Petition for Waiver of Part 69, filed December 14, 1994 (explaining why Bell Atlantic's proposal was insufficient to protect telephone ratepayers from paying for Video Dialtone investment and other costs).

⁶47 U.S.C. Section 201(b)

III. Conclusion

To ensure a complete record, and to guarantee that interested parties have sufficient time to prepare meaningful comments on Bell Atlantic's Direct Case, MCI requests that the Commission extend the comment deadline in the above-captioned proceeding from November 30, 1995, until 30 days from the date which MCI gains access to Bell Atlantic's redacted cost information.

Respectfully submitted,
MCI TELECOMMUNICATIONS CORPORATION



Don Sussman
Regulatory Analyst
1801 Pennsylvania Ave., NW
Washington, D.C. 20006
(202) 887-2779

November 20, 1995

STATEMENT OF VERIFICATION

I have read the foregoing and, to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on November 20, 1995.

A handwritten signature in black ink, appearing to read 'Don Sussman', written over a horizontal line.

Don Sussman
1801 Pennsylvania Avenue, NW
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(202) 887-2779

Optical Network Unit Location: Video Plus Dial Tone

Product Description	Units Needed	Unit Price*	Total Material Price	Maximum Service Capacity	Utilization
Broadband Controller (BBC) Card BBC CARD	1	[REDACTED]	[REDACTED]	8	84%
Power Supply/Test (PST) Card PST 1101 CARD	1	[REDACTED]	[REDACTED]	8	84%
Service Definition Module (SDM) Card SP SDM 1002 CARD	3	[REDACTED]	[REDACTED]	8	73%
Aerial or Above Ground Assembly FLX 1100 AG PEDISTAL ASSY: or FLX POLE MOUNT ASSY:	1	[REDACTED]	[REDACTED]	8	84%

POLE MOUNT ONU ASSY (for Aerial)
 PEDISTAL ASSY (for Above Ground)
 PEDISTAL ELECTRONICS MODULE
 MOUNTING KIT
 CABLE ACCESS ENCLOSURE
 2 FIBER DIB FCPC JUMPER CABLE
 FIBER LOCK SPLICE TRAY
 TERMINAL BLOCK
 VIDEO TERM KIT W/O SPLICE

	Labor Hours	Job Function Code	Labor Rate	Labor Inv.	Material Plus Labor Inv.	Investment per Pot Sub	Utilized Investment per Pot Sub
Broadband Controller (BBC)	0.5	3250	\$54.66	\$27.33	[REDACTED]	[REDACTED]	[REDACTED]
	0.5	4220	\$50.91	\$25.46	[REDACTED]	[REDACTED]	[REDACTED]
Power Supply/Test (PST) C	0.5	3250	\$54.66	\$27.33	[REDACTED]	[REDACTED]	[REDACTED]
	0.5	4220	\$50.91	\$25.46	[REDACTED]	[REDACTED]	[REDACTED]
Service Definition Module (S	0.5	3250	\$54.66	\$27.33	[REDACTED]	[REDACTED]	[REDACTED]
	0.5	4220	\$50.91	\$25.46	[REDACTED]	[REDACTED]	[REDACTED]
Aerial or Above Ground Ass	0.5	3250	\$54.66	\$27.33	[REDACTED]	[REDACTED]	[REDACTED]
	8	4220	\$50.91	\$407.28	[REDACTED]	[REDACTED]	[REDACTED]
Total:						\$432.12	\$535.57

Note:

The maximum capacity of an ONU is eight circuits. Using 6.7 of the available eight produces a utilization of 84%.
 The maximum capacity of a Service Definition Module card is four circuits. Three cards provide a maximum of twelve circuits. Using 8.7 of the available twelve produces a utilization of 73%.

* TAB N

CERTIFICATE OF SERVICE

I, Stan Miller, do hereby certify that copies of the foregoing Motion for Extension of Time, were sent via first class mail, postage paid, to the following on this 20th day of November, 1995.

Regina Keeney**
Chief, Common Carrier Bureau
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Washington, D.C. 20554

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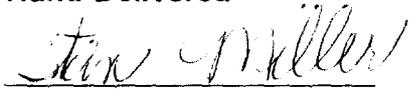
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Hand Delivered**

A handwritten signature in cursive script that reads "Stan Miller". The signature is written in dark ink and is positioned above a horizontal line.

Stan Miller