

Sprint does not believe that unbundling loop elements and offering such elements to competitors at wholesale rates is a sufficient basis for relaxing the regulation of (much less deregulating) LEC interstate access services beyond the measures discussed in Section II above. Resale alone does not ensure long term, viable competition, because a reseller is dependent upon the underlying carrier -- the entity against which it is competing -- for key facilities. True competition requires the presence of two or more facilities-based alternative access providers.

The presence of facilities-based competitors was a key factor in the Commission's analysis of competition in the interexchange market. In its order granting AT&T nondominant status, the Commission noted that:<sup>20</sup>

...AT&T faces at least two full-fledged facilities-based competitors. Both MCI and Sprint have nationwide networks that are capable of offering most consumers an alternative choice of services relative to AT&T. In addition, there is at least one other nationwide facilities-based provider (WorldCom, formerly LDDS/WilTel), which primarily serves the business market and could enter the residential market segment, and dozens of regional facilities-based carriers. There are also several hundred small carriers that primarily resell the capacity of the largest interexchange carriers. We believe that the significant excess capacity and large number of long-distance carriers limits any exercise of market power by AT&T.

Until these conditions are present in the local services market, deregulation of interexchange access services is not warranted.

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<sup>20</sup> *Motion of AT&T Corp. to be Reclassified as a Non-Dominant Carrier, Order* released October 23, 1995, ¶70 (FCC 95-427).

**IV. IT IS PREMATURE TO CONSIDER IMPLEMENTATION OF STREAMLINED REGULATION FOR INTERSTATE ACCESS SERVICES.**

As part of its Phase II analysis, the Commission has proposed to condition streamlining on a showing of actual competition by the LEC (§127). It further proposed to use the analytical framework used to streamline AT&T's services as the basis for relaxing regulation of LEC price cap services (§128).

As an initial matter, Sprint would emphasize that the local markets -- both local service and interstate access -- are nowhere near the point where streamlined regulation is at all warranted. As Sprint and other parties demonstrated in previous filings in CC Docket No. 94-1,<sup>21</sup> the LECs retain bottleneck control over exchange access facilities, and what competition may exist is minimal. Competitive access providers (CAPs) account for less than 1% of access revenues; cellular carriers, PCS providers, and cable and utility companies pose even less of a competitive threat than do CAPs. Even in Nynex's LATA 132 -- which the Commission has found is one of the most competitive access markets in the country -- Nynex receives 96% of Sprint's access dollars, either directly or via CAPs, despite Sprint's policy of giving as much of its access business to CAPs as they are able to handle, given service standard and cost considerations. Under

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<sup>21</sup> See, e.g., Sprint Corp.'s Reply Comments filed June 29, 1994, pp. 28-29.

these conditions, there is no justification for granting streamlined regulatory treatment for any interstate access service.

Sprint would further note that there currently are no mechanisms in place for measuring market share, demand responsiveness, or supply responsiveness in the interstate access market, three of the factors which the Commission has proposed to use in considering whether to streamline access regulation. The Commission is only now soliciting comments on proposed reporting requirements that would apply to companies that provide access to interstate telecommunications services.<sup>22</sup> Once reporting mechanisms have been adopted, it will take several data points before any reasonable analysis of competitive trends can be made. Thus, it is premature to try to assess whether the three factors proposed by the Commission (market share, demand and supply responsiveness) are comprehensive enough, or even whether the requisite data are available, for the analysis needed here.

As discussed in Section III above, Sprint believes that any analysis of whether streamlined regulation is warranted should focus on whether the criteria on a comprehensive competitive checklist (such as Sprint's "Essential Elements of Local Telephone Competition") have been satisfied. Legal and regulatory barriers to entry and expansion must be eliminated; equitable interconnection and compensation arrangements must be estab-

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<sup>22</sup> See TAPS Public Notice, supra n. 16.

lished; equal access to numbering resources must be available; universal service support and embedded subsidies must be resolved; and rational and equitable regulations for both incumbents and new market entrants must be established, before the existence of effective and viable competition in the local services market can be posited.

Sprint agrees with the Commission's tentative conclusion that market share should be one of the major factors to be considered in determining the level of competition in a given market for purposes of streamlined regulation (§143). While it is not at all clear at this point what level of market share erosion would indicate the need for additional regulatory flexibility for the provision of interstate access services, Sprint would note that AT&T was not afforded streamlined regulatory treatment of its interexchange Basket 3 (business) services until it had lost approximately half of its share in that market to its competitors, which included at least two national, facilities-based IXCs, numerous regional facilities based IXCs, and hundreds of resellers.

Once the structural barriers to competition have been removed, and the presence of actual, facilities-based competition has been established, it might be reasonable to allow price cap LECs some additional pricing flexibility in the provision of interstate access service. For example, LECs' downward pricing flexibility might be increased to -15% at the service band level;

certain filings might become effective on shorter notice and with less cost support; and the ability to target the application of the productivity offset to baskets or service categories beyond the RIC and CCLC might be granted.

**V. IT IS FRUITLESS AT THIS POINT TO SPECULATE ON THE CONDITIONS UNDER WHICH NONDOMINANT TREATMENT OF INTERSTATE ACCESS SERVICES WOULD BE WARRANTED.**

The Commission has stated that it would consider a LEC non-dominant and forbear from price regulation when it is shown to lack market power (§152). It has thus sought comments on "whether any LECs are likely to lose market power for any geographic and product markets in the foreseeable future, and if not, whether it is premature at this time to adopt rules governing nondominant local exchange carriers at this time" (§155).

In principle, Sprint agrees that LECs should be eligible for nondominant regulatory treatment when they no longer have market power in the provision of interstate access service. However, at this point, it is fruitless to speculate on when this phase may be reached, and impossible to identify what specific, measurable criteria should be adopted to define when this phase has been reached. There are so many unknown factors which affect the competitive landscape -- RBOC entry into the interexchange market, the viability of CAPs, and the development of new technologies such as PCS, to name only a few -- that any attempt to set the terms under which nondominant regulation of price cap LECs is warranted is bound to be either too lenient or too harsh. There

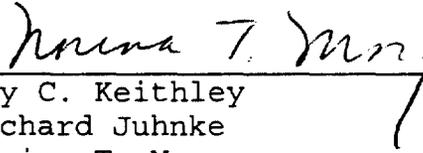
is time for the Commission to reexamine the issue of LEC deregulation, and deferral of this issue to a later date is clearly in the public interest.

#### **VI. CONCLUSION.**

As discussed above, the Commission should adopt three measures to rationalize access pricing as part of its Phase I reform: phase out the CCLC and RIC; allow price cap LECs to implement zone density pricing even if they do not have operational expanded interconnection arrangements; and expand zone density pricing to include the CCLC and local switching elements. The Commission should also adopt a comprehensive "competitive checklist," such as Sprint's "Essential Elements for Local Telephone Competition," as a tool for assessing whether barriers to competitive entry into the local services market have been removed. Once the criteria on this checklist have been satisfied, and the presence of actual, facilities-based competition has been established, it might be reasonable to allow price cap LECs some additional pricing flexibility in the provision of interstate access services.

Respectfully submitted,

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## ESSENTIAL ELEMENTS OF LOCAL TELEPHONE COMPETITION

### 1. FRANCHISES AND ENTRY REQUIREMENTS

Federal, state or local restrictions that limit or prohibit competitors from offering a full range of local telephone services and regulatory requirements that unreasonably restrict market entry must be abolished. Specifically:

**No Exclusive Franchises** – No firm should have an exclusive franchise, license or certificate to provide local telephone service.

**No Need to Prove Existing Services are Inadequate** – No new market entrant should have to prove that the incumbent's service is inadequate as a prerequisite to offer competing local telephone service.

**No Discrimination Against New Market Entrants** – No laws or regulations should impose more onerous requirements on new market entrants than apply to incumbent telephone companies or discriminate against new market entrants. However that does not mean that new market entrants should be subject to the same regulatory requirements as the incumbent local telephone company (see below).

**Equal Access to Rights of Way** – Any exclusive or preferential treatment of pole, conduit and rights-of-way of the incumbent local telephone company must be eliminated so that new entrants have access to those rights of way on the same rates, terms and conditions as the incumbent.

**No Unreasonable Requirements for Market Entry** – Entry into a local telephone market should not be artificially restricted by unreasonable requirements imposed on new market entrants (e.g., requirements to offer facilities-based service to 100% of a given geographic area, excessive performance bonds, extended certification processes).

**Quid Pro Quos should not be a Condition of Market Entry** – Entry into a local telephone market should not be contingent on actions of the incumbent local telephone company or unreasonably delayed by lengthy, cumbersome regulatory proceedings concerned with ill-defined, open-ended issues (e.g., no local competition authorized until and unless the incumbent local telephone company realigns its current rates, or no local competition until and unless a comprehensive universal service protection/subsidy replacement plan has been developed, debated and adopted by regulators).

□

## 2. INTERCONNECTION & COMPENSATION

Interconnection of local telephone networks at reasonable rates is critical to local telephone competition. Competing networks should be interconnected so that customers can seamlessly receive calls that originate on another carrier's network and place calls that terminate on another carrier's network without dialing extra digits, paying extra, or doing anything out of the ordinary. New market entrants should be interconnected with incumbent providers in a manner that gives them seamless integration into and use of local telephone company signalling and interoffice networks in a manner equivalent to that of the incumbent local telephone company.

**Reasonable Compensation for Call Termination** – Mutual compensation for call termination should be set at a level that encourages the development of competition and interconnection while covering the associated costs. Compensation should:

***Be economically viable*** – not set at a level that makes provision of competing local service uneconomic (e.g., set at a level greater than the market price of local service);

***Be administratively efficient and minimize carrier conflicts*** – structures that are simple and easy to verify (e.g., flat rate charges);

***Create incentives for competitive infrastructure development*** – reward greater investment in infrastructure development by local telephone company competitors;

***Minimize competitive distortions*** – not discourage entry into all segments of the market;

***Not be a source of universal service subsidy*** – should not be designed to produce contribution, subsidies, or universal service support;

***Promote competitive innovation*** – not tied to existing local telephone company price structures so as to force new market entrants to mimic existing pricing structures; and,

***Not mirror existing access charges levels*** – compensation based on current access charges will be uneconomic.

**Uniform Standards and Administrative Interconnection** – Basic network functions must be provided in a nationally uniform manner, and conform to quality and interoperability standards. The incumbent must cooperate in ordering, billing, circuit provisioning, maintenance and repair.

**Service Unbundling** – The incumbent local telephone company's services should reflect an unbundling of service components so that a new market entrant is not forced to purchase services that it does not want in order to obtain essential telecommunications capabilities. Unbundling should be performed in response to a *bona fide* request.

**Collocation** – Collocation of facilities to achieve interconnection should reflect two characteristics:

***Collocation at aggregation points*** – collocation should be made at the local telephone company's primary aggregation points (e.g., tandems, central offices, serving wire centers); and,

***Physical or virtual*** – collocation can either be physical collocation or virtual collocation that is economically and technically equivalent to physical collocation from the perspective of the interconnector.

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### 3. NUMBERING RESOURCE ISSUES

Non-discriminatory access to numbering resources is critical. The following numbering resource issues are critical:

**Access to Telephone Numbers** – New entrants should have non-discriminatory access to sufficient blocks of telephone numbers (i.e., access to NXXs) to offer service.

**Number Portability** – Customers must be able to change service providers and retain the same local telephone number at the same location (service provider number portability) without having to dial extra digits or be burdened by "special" actions in order to achieve number portability. Interim number portability mechanisms, such as remote call forwarding, are an inferior form of number portability that impairs a new market entrant's service, and such impairment should be reflected in interconnection charges.

**Access to and Inclusion in DA, LIDB, AIN, 800 and Other Databases and Telephone Directories** – Competitive local service providers should be allowed to have their customers' telephone numbers included in telephone directories, directory assistance, LIDB, AIN, 800 and other databases and have access to such resources equal in price, functionality and quality as do incumbent local telephone providers.

**Access to 911, TRS and Local Operator Services** – Competitive local service providers should have access to 911, relay services and operator services provided by the incumbent local telephone company on the same terms and conditions as enjoyed by the incumbent local telephone company.

**Number Administration** – Numbering policy must be broadly developed and administered in a competitively neutral manner. The local exchange carrier must not be able to control the administration and assignment of numbering resources. NPA assignments must be handled in a neutral and non-discriminatory manner.

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4. **UNIVERSAL SERVICE SUPPORT & EMBEDDED SUBSIDIES**

**Competition and Universal Service.** Local service competition enhances universal service. Competition for access services and competition in the local service market may well stimulate the development of new products, stimulate demand and produce higher revenues and earnings for the incumbent local telephone company just as competition in the interLATA long distance market did for AT&T.

**Embedded Subsidies Should be Transitioned Away.** In order to encourage efficient competition in all market segments, it is important to eliminate uneconomic/non-competitive subsidies embedded in telecommunications pricing structures over a reasonable transition period (e.g., reduce access charges that are priced substantially above costs and raise those rates that are substantially below costs.)

**Explicit Subsidies.** Subsidies to preserve universal service should have the following characteristics:

***Explicitly Identified.*** If subsidies are required, they should be explicitly identified rather than embedded in various prices;

***Needs Based Targeting.*** If subsidies are required, they should be needs based either on a showing of low income by consumers or based on service to high cost areas;

***Broad-Based Support.*** If subsidies are required, all telecommunications service providers should contribute to such subsidies in a competitively neutral manner based on their telecommunications revenues net of payments to intermediaries;

***Neutral Administration.*** Collection and distribution of subsidies should be done by a neutral administrator;

***Only Basic Residential Telephone Service Subsidized.*** Only basic residential telephone services should be subsidized, limited to (1) single party local service, (2) access to touch tone dialing, (3) access to carriers of choice, (4) access to operator services; and, (5) access to emergency (911) services.

***Competitive Access to Subsidies.*** If subsidies are required, then all competitive local telephone service providers should have the opportunity to receive such subsidies when selected by an eligible customer.

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## 5. REGULATION OF INCUMBENTS AND NEW MARKET ENTRANTS

**Differential Regulation of Incumbents and New Market Entrants.** As long as there is not parity in the marketplace, there should not be parity in regulation. Regulation of local telephone providers should be a function of market power as well as the incumbent telephone company's ability to leverage its control of essential facilities. As long as the incumbent local telephone provider possesses substantially more market power than new market entrants, it is appropriate to subject the incumbent to greater regulatory oversight.

**Elimination of Rate Base Regulation.** Traditional rate-base regulation should be abandoned and replaced with appropriately designed price and service regulation to provide the appropriate incentives as competition emerges. Traditional rate-base, rate of return regulation creates a regulatory predisposition to avoid actions that could affect the incumbent's revenues/earnings (e.g., rules that prohibit competitive entry into local telephone markets) and seek out mechanisms to ensure revenue neutrality for the incumbent (e.g., "make whole" compensation mechanisms in intraLATA toll markets to recover competitive revenue losses). Traditional rate-base regulation also contributes to uneconomic infrastructure investment incentives and discourages efficient pricing and cost reductions. Instead, appropriately styled price and service regulation, with pricing rules to transition rates to more efficient levels, enables local telephone companies to respond to emerging competition, and prevents cross-subsidization and abuse of market power.

**Imputation** In determining the price floor for their competitive services, incumbent local telephone companies should impute in the aggregate the same charges for essential network services and functionality as are paid by their competitors to them for the same services and functionality plus the costs of other services and functionalities actually used by the incumbent telephone company.

**Resale & Sharing.** Telecommunications services and functions should be provided without any restrictions on resale and sharing, provided that resale is of the same class of service (e.g., should not be able to repackage and resell local residential services as business services).

**Provider of Last Resort** In a competitive market, there is no provider of last resort, only competitors, all seeking to provide services to customers. Because incumbent local telephone companies typically have universal coverage, even though competitors are entering the market, regulators should continue to restrict incumbent telephone companies from exiting markets or market segments until competitive alternatives become available (i.e., being the carrier of last resort). However, restrictions on market exit should diminish as competition develops.

□

## CERTIFICATE OF SERVICE

I, Joan Hesler, hereby certify that I have on this 11th day of December, 1995, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments" in the Matter of Price Cap Performance Review for Local Exchange Carriers, Treatment of Operator Services Under Price Cap Regulation, Revisions to Price Cap Rules for AT&T, CC Docket No. 94-1, CC Docket No. 93-124, CC Docket No. 93-197, filed this date with the Acting Secretary, Federal Communications Commission, to the persons on the attached service list.

  
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