DOCKET FILE COPY ORIGINAL

ORIGINAL

RECEIVED
APR - 5 1996
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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

In the Matter of Telephone Number Portability Policies	)	CC Docket No. 95-116

SUPPLEMENTAL REPLY COMMENTS

MCI Telecommunications Corporation and MCIMetro (collectively MCI) respectfully submit these supplemental reply comments herein. Several of the Regional Bell Operating Companies (RBOCs), with the notable exception of Ameritech, present a two-part message in their supplemental comments: (1) keep local number portability (LNP) implementation open-ended and study it to death; and (2) don't halt the financial "gravy train" we have in selling interim portability to our dependent competitors. Both positions are contrary to the requirements of the Telecommunications Act of 1996 (1996 Act) and are designed to keep competitive local exchange carriers (CLECs) at a maximum disadvantage for the longest time possible.

I. The Commission Has the Authority To Regulate Both Interim and Long-Term Number Portability

Although the 1996 Act gives the Federal Communications Commission (FCC or Commission) plenary authority to address and resolve numbering issues on a national basis (Section 251(e), Pacific Bell (PacBell) and BellSouth incorrectly claim that the FCC cannot address issues related to interim local number portability (ILNP). The fact that the Act requires LECs to provide ILNP until a permanent solution can be implemented does not impair the FCC's authority to regulate

No. of Copies rec'd 0+4

interim measures. The 1996 Act clearly gives the FCC the authority to implement both "true" and interim portability (Sections 251(b)(2) and 271(c)(2)(B)(xi)). Furthermore, under the Communications Act (Section 4(i)) the Commission clearly possesses the authority to institute whatever steps are necessary to achieve number portability.[1]

II. The Commission Should Find that True Provider Number Portability Is Feasible using the Location Routing Number Solution and Establish an Implementation Date

With respect to long-term number portability, the FCC should take several actions consistent with the 1996 Act. First, it should find that true service provider portability is technically feasible using the Location Routing Number (LRN) solution that has been adopted in a number of state workshops. Second, the FCC should establish a schedule for implementation nationwide, with deployment beginning in third quarter, 1997.

The LRN routing solution has been selected in state workshops in Illinois, Maryland, Georgia and Colorado, and is the routing solution identified as the best call model by the broadest cross-section of the industry: Ameritech, AT&T, Bell Atlantic (Maryland), BellSouth (Georgia), MCI/MCIMetro, Metropolitan Fiber Systems, Sprint/Centel, Teleport Communications Group, Time Warner, and US West (Washington).

---

[1] See New England Tel. & Tel. v. FCC, 826 F.2d 1101, 1108 (D.C. Cir. 1987) (citation omitted); and Mobile Communications Corp. of America v. FCC, 1996 WL 99415 (D.C. Cir. Mar. 8, 1996).

LRN is technically feasible and all major switch vendors have agreed that it can be implemented by third quarter, 1997.[2] Therefore, as Ameritech (at 5) recommends, "the Commission can expedite deployment and help prevent waste and inefficiency if it prescribes the [LRN] architecture that has already been adopted in several states."

In contrast, however, several of the RBOCs have suggested alternatives to competitively-neutral LNP and numerous reasons to delay implementation. On examination, none of these has merit and all should be rejected. PacBell (at 4) advocates "carrier choice," or allowing each carrier to select its own triggering mechanism, because of its concern with "high cost and technical ramifications" of LRN. Under the guise of choice, PacBell is asking the Commission to sanction the LEC's ability to subject calls to ported customer to inferior routing compared to routing enjoyed by nonported customers.

PacBell advocates "Query on Release" (QOR) routing, under which the incumbent LEC's network would route all calls to ported numbers first to the incumbent switch where the NPA-NXX of the dialed number would reside. Under QOR, the call would be "released" back to a previous switch in the call path, from which a query to the database would be launched to determine the routing number of the new serving switch. Calls to ported numbers (i.e., most CLEC calls) would be routed over one or

---

[2] MCI supports the joint statement attesting to the technical feasibility of LRN that is attached to reply comments of The Association for Local Telecommunications Services (ALTS).

more additional trunks and through one or more additional switches before completing, thus subjecting CLEC calls to additional post-dial delay and greater call blocking potential. Meanwhile, calls to nonported numbers (i.e., most incumbent LEC calls) would route directly to the correct terminating end office.

Such inequitable routing is contrary to the 1996 Act's requirement that number portability be provided "without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another" (Section 3(a)(46). Ironically, PacBell itself gives an indication of how it would use such an inequity to its competitive advantage when it states (at 9) that QOR would "enjoy some reliability advantage." Any reliability advantage achieved with QOR for the nonported calls would be gained through degradation of service to ported calls.

With respect to the cost, PacBell claims (at 7) that LRN would impose "massive financial burdens" compared to QOR. It contends that LRN would cost $1 billion over a three-year period. This astronomical estimate and claims about the comparative cost advantage of QOR over LRN are offered with no support whatsoever. First, PacBell's own estimate for LRN submitted to the California workshop[3] (Attachment A hereto) includes an estimate for LRN in the amount of $148 million in

---

[3] California Local Number Portability Task Force Report, dated Feb. 29, 1996, Att. 3 (PacBell estimates dated Dec. 15, 1995).

fixed costs, plus $26 million in recurring costs. Second, PacBell provides no estimate at all for QOR. However, its estimates to the California workshop for Release-to-Pivot (RTP)[4] (Attachment B hereto) show costs of $102 million in fixed costs, plus $19 million in recurring costs; this estimate does not take into account the significant network transit costs it would incur (e.g., for additional trunk and switching capacity) to accomplish the inefficient RTP/QOR routing. Thus, any cost advantage, if it exists at all, is likely to be negligible and would not justify implementation of disparate routing schemes.

PacBell's assertion (at 8) that pursuit of QOR would not delay availability of LNP because vendors are still in the preliminary stages of writing their requirements could not be further from the truth. Vendors have had completed LRN specifications in hand since November, 1995, while they have nothing more than an inquiry letter, delivered in the last three weeks, for QOR (attached to PacBell's supplemental comments). LRN and QOR are not in the same stages of development and allowing PacBell to pursue its "choice" would clearly delay portability implementation.

Several RBOCs suggest various reasons and methods to delay moving forward rapidly with LRN. For example, NYNEX (at 4) asks for a Further Notice of Proposed Rulemaking to develop

---

[4] PacBell has apparently backed off support for the RTP approach and is now supporting its ugly sibling QOR.

a comprehensive record. BellSouth, SBC and Bell Atlantic suggest variations of how "the industry" should develop a long-term solution. These commenters would have the FCC ignore the fact that the industry already has developed a technically feasible solution -- LRN -- and instead ask the Alliance for Telecommunications Industry Solutions (ATIS), the North American Numbering Council (NANC), or an industry task force to develop a portability solution. ATIS is known for its inability the achieve consensus on complex issues in a timely manner; the NANC does not even exist yet; and another industry task force would merely duplicate the efforts of state workshops already working around the country. BellSouth and Bell Atlantic are already participating in LRN implementation efforts in Georgia and Maryland, respectively. These types of recommendations would result in unnecessary delay, not expeditious implementation.

Certain points raised in comments with respect to LRN must be clarified. NYNEX (at 5) is incorrect in its contention that LRN will not support services that are available to customers today such as Automatic Recall and Automatic Callback. NYNEX itself resolves this issue when it acknowledges, in footnote 6, that "the software being developed by vendors to provide LRN does not deny these features in the switches." In other words, it is only the current switch architecture that would not accommodate these features and vendors have addressed this deficiency in the

upgrades that will be available during the first quarter of 1997 for LRN number portability. Thus, there will be no loss of features with LRN.

NYNEX further claims (at 5) that the mid-1997 date for implementation of number portability using the LRN solution is based on the erroneous assumption that LRN will resolve all issues. In fact, much more that the routing arrangement has been agreed to by industry participants in the Illinois proceeding. Significantly, as noted by Time Warner (at 6-7), these carriers have reached consensus on all relevant technical obstacles to the deployment of LRN, including requirements for switching, operator services, signal transfer points, service control points, billing and rating, and service management systems.

Despite these RBOC attempts to convince the Commission to delay expeditious LRN deployment, or perhaps because of them, the FCC should establish a schedule for implementation nationwide, with deployment beginning no later than September of 1997. Substantial rollout for the major markets should occur within three years. The Commission should track the progress by requiring carriers to report achievement of certain milestones. For example, carriers could be required to implement portability to 40 percent of major markets by the end of 1998, an additional 40 percent by the end of 1999, and an additional 20 percent by the end of 2000. Penalties should be included to enforce the implementation schedule. For

example, after 12/97, RBOCs would assume all costs of providing RCF and DID; an RBOC applying for in-region interLATA services would be denied, unless the RBOC can show detailed plans to implement true number portability by 12/97, or that it has implemented true number portability after 12/97; and an RBOC that fails to implement true number portability after 12/97 would be subject to enforcement provisions of Section 271(d)(6).

III. The Commission Can and Should Regulate Interim Portability Measures

As noted in Section I above, the Commission has the authority to regulate interim portability. At a minimum, the Act allows the FCC to determine how the competitively-neutral requirements apply.[5] It is clear, however, through a complete reading of the Act, that where the Act refers generally to competitively-neutral recovery of number portability costs (Section 251(e)(2)), this section <u>must</u> apply to both interim and permanent number portability. Congress recognized the importance of number portability and intended that new entrants not be disadvantaged by RBOC control of numbers. The allowance for ILNP was no more than a concession to the present unavailability of a permanent portability solution, not an authorization for incumbents to keep new entrants at a

---

[5] Indeed, NYNEX (at 3, n.2) acknowledges that "the Commission may wish to include in its rules implementing Section 251 a requirement that rates for interim number portability be consistent with Section 251(e)(2) of the Act.

maximum disadvantage by forcing them to bear all the costs of ILNP through unilateral pricing of RCF and DID.

Despite RBOC claims to the contrary (Bell Atlantic at 3; BellSouth at 5; Ameritech at 6), there is a need as a result of the Act for the Commission to take action on ILNP arrangements.[6] The RBOCs currently have the incentive and ability to delay implementation of true number portability. While interim portability continues, the RBOCs can create large revenue streams from the sale of high-priced bottleneck RCF and DID. Also, at least some RBOCs (e.g., NYNEX) intend to keep all the access revenues associated with calls to CLECs that first go through the RBOC for RCF and DID routing.

In order to comply with the Act, the Commission should clearly establish that the costs of providing interim portability must be recovered on a competitively-neutral basis, in accordance with Section 251(e)(2). Failure to interpret the "competitively-neutral" requirement to include interim portability would frustrate competitive entry into the local market and rapid availability of true provider number portability.

Further, MCI suggests that the interim portability cost recovery requirements adopted by the New York Department of

---

[6] Bell Atlantic and BellSouth state that there is no need for FCC action on ILNP cost recovery because the states have already resolved these issues (e.g., by allowing incumbents to sell ILNP to dependent competitors as retail services), while Ameritech goes so far as to suggest that the Commission is precluded from addressing ILNP ratemaking because ILNP does not fit the statutory definition of "number portability."

Public Services should serve as a model in developing and implementing a mechanism for such competitively neutral interim portability cost recovery. Basically, this model requires competitively-neutral sharing of interim portability costs on the basis of subscriber lines.[7]

IV. Conclusion

The 1996 Act reposes in the Commission plenary authority to deal with numbering issues, including both interim and permanent solutions to local number portability. MCI respectfully requests that the Commission find that true service provider number portability is feasible using the LRN solution. Further, the FCC should establish a timeframe for commencement and completion of number portability for the major markets. And, the Commission should ensure that interim portability measures are provided in a competitively-neutral manner.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION
MCIMetro

By: Loretta J. Garcia

Loretta J. Garcia
Donald J. Elardo
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 887-2082
Its Attorneys

Dated: April 5, 1996

---

[7] The New York commission determined that all customers benefit from number portability and that, therefore, all carriers should contribute to its development. Contributions are based on the number of subscribers.

ATTACHMENT A

Local Number Portability Economic Assessment

Kevin Moisan
Pacific Bell

December 15, 1995

The information contained herein is preliminary. Pacific Bell makes no representations or warranties of any nature whatsoever with respect to any information furnished herein. In particular, it should be noted that national standards regarding the subject matter may not exist, and are furthermore subject to change. Pacific Bell makes no commitment to purchase, or standardize any products or services utilizing this information.

PACIFIC BELL

DRAFT

Results

- MCI - Carrier Portability Code:
  - -Initial Cost (1997 dollars) = $175,000,000
  - -Recurring Cost (1997 dollars) = $29,000,000
- ATT - Location Routing Number:
  - -Initial Cost (1997 dollars) = $148,000,000
  - -Recurring Cost (1997 dollars) = $26,000,000
- GTE - Non-geographic Number (10% ported traffic):
  - -Initial Cost (1997 dollars) = $102,000,000
  - -Recurring Cost (1997 dollars) = $29,000,000

ATTACHMENT B

Local Number Portability Economic Assessment

Kevin Moisan
Pacific Bell

December 15, 1995

The information contained herein is preliminary. Pacific Bell makes no representations or warranties of any nature whatsoever with respect to any information furnished herein. In particular, it should be noted that national standards regarding the subject matter may not exist, and are furthermore subject to change. Pacific Bell makes no commitment to purchase, or standardize any products or services utilizing this information.

PACIFIC BELL

DRAFT

Results

- GTE - Non-geographic Number (40% ported traffic):
  - -Initial Cost (1997 dollars) = $111,000,000
  - -Recurring Cost (1997 dollars) = $29,000,000

- Pacific Bell - RTP (10% & 40% ported traffic):
  - -Initial Cost (1997 dollars) = $41,000,000
  - -Recurring Cost (1997 dollars) = $17,000,000

CERTIFICATE OF SERVICE

I, Vernell V. Garey hereby certify that the foregoing "SUPPLEMENTAL REPLY COMMENTS", CC Docket No. 95-116 was served this 5th day of April, 1996, by mailing true copies thereof, postage prepaid, to the following persons at the addresses listed below:

Vernell V. Garey

Vernell V. Garey

*HAND-DELIVERED

Peter Arth, Jr.
Edward W. O'Neill
Ellen S. Levine
Attorneys for the People of the State of California and the Public Utilities Commission of the State of California
505 Van Ness Avenue
San Francisco, CA 94102

Mark C. Rosenblum
John J. Langhauser
Clifford K. Williams
AT&T
Room 3244J1
295 North Maple Avenue
Basking Ridge, NJ 07920

Richard J. Metzger
General Counsel
Association for Local Telecommunications Services
1200 19th Street, N.W., Suite 607
Washington, D.C. 20009

Betsy L. Anderson
Duane K. Thompson
Bell Atlantic
1320 N. Court House Road
Arlington, VA 22201

Alan F. Ciamporcero
Pacific Telesis
Federal Regulatory Relations
1275 Pennsylvania Avenue, N.W.
Suite 400
Washington, D.C. 20004

Lucie M. Mates
Theresa L. Cabral
Sarah Rubenstein
Pacific Telesis
140 New Montgomery Street, Room 1526
San Francisco, CA 94105

Brian Conboy
Sue D. Blumenfeld
Thomas Jones
WILLKIE FARR & GALLAGHER
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036
Attorneys for Time Warner Communications Holdings, Inc.

Maureen Thompson
New England Telephone and Telegraph Company
New York Telephone Company
1095 Avenue of Americas
New York, NY 10036

Judith St. Ledger-Roty
John W. Hunter
REED SMITH SHAW & MCCLAY
One Franklin Square
Suite 1100 East Tower
Washington, D.C. 20005

Genevieve Morelli
Vice President and
General Counsel
The Competitive Telecommunications
Association
1140 Connecticut Avenue, N.W.
Suite 220
Washington, D.C. 20036

Danny E. Adams
Steven A. Augustino
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, D.C. 20006
Attorneys for The Competitive
Telecommunications Association

Paul Rodgers, General Counsel
Charles D. Gray, Assistant General Counsel
James Bradford Ramsay, Deputy Assistant
General Counsel
National Association of Regulatory
Utility Commissioners
1102 ICC Building, Post Office Box 684
Washington, D.C. 20044

Ann E. Henkener
Assistant Attorney General
Public Utilities Section
180 East Broad Street
Columbus, OH 43266-0573

Rowland L. Curry, P.E.
Director
Telephone Utility Analysis Division
Public Utility Commission of Texas
7800 Shoal Creek Boulevard
Austin, TX 78757-1098

Richard A. Muscat
Assistant Attorney General
State of Texas
Counsel for TX-ACSEC
Office of the Attorney General
P.O. Box 12548
Austin, TX 78711-2548

Richard F. Nelson, Chair
Florida 9-1-1 Coordinator Group
Marion County
Board of County Commissioners
2631 S.E. 2nd Street
Ocala, FL 34471-9101

Joel H. Levy
Cohn and Marks
Suite 600
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036
Attorneys for National Wireless Resellers
Association

William B. Barfield
Jim O. Llewellyn
BellSouth Corporation
1155 Peachtree Street, N.E., Suite 1800
Atlanta, GA 30309-3610

M. Robert Sutherland
Theodore R. Kingsley
BellSouth Telecommunications, Inc.
4300 Southern Bell Center
675 West Peachtree Street
Atlanta, GA 30375

Larry A. Peck
Frank Michael Panek
Attorneys for Ameritech
Room 4H86
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

Robert M. Lynch
Mary W. Marks
J. Paul Walters, Jr.
Attorneys for SBC Communications Inc.
175 E. Houston, Room 1262
San Antonio, TX 78205

Robert M. Wiekski
Sam LaMartina, Esq.
ITN Legal & Regulatory Affairs
8500 W. 110th Street, Suite 600
Overland Park, KS 66210

Jay C. Keithley
Norina T. Moy
Kent Y. Nakamura
Sprint Corporation
1850 M Street, N.W., Suite 1110
Washington, D.C. 20036

Glen S. Richards
Fisher Wayland Cooper Leader & Zaragoza L.L.P.
2001 Pennsylvania Avenue, N.W.
Suite 400
Washington, D.C. 20006

Mary E. Burgess
Staff Counsel
State of New York Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin, Chartered
3000 K Street, N.W.
Washington, D.C. 20007
Attorneys for MFS Communications Company, Inc.

Harold L. Stoller
Richard S. Wolters
Special Assistant Attorney General
527 East Capitol Avenue
P.O. Box 19280
Springfield, IL 62794-9280

Dan L. Poole
Jeffrey S. Bork
U.S. West
1020 19th Street, N.W., Suite 700
Washington, D.C. 20036

J. Manning Lee
Vice President, Regulatory Affairs
Teleport Communications Group, Inc.
Two Teleport Drive, Suite 300
Staten Island, NY 10311

Mary McDermott
Linda Kent
Charles D. Cosson
U.S.Telephone Association
1401 H Street, N.W.
Suite 600
Washington, D.C. 20005

Michael F. Altschul, Vice President
and General Counsel
Randall S. Coleman, Vice President
Regulatory Policy & Law
Brenda K. Pennington
Cellular Telecommunications Industry
Association
1250 Connecticut Avenue, N.W., Suite 200
Washington, D.C. 20036

Mark Stachiw
AirTouch Paging
Three Forest Plaza
12221 Merit Drive, Suite 800
Dallas, TX 75251

Carl W. Northrop
Bryan Cove, L.L.P.
Arch Communications Group
700 Thirteenth Street, N.W.
Suite 700
Washington, D.C. 20005

Lisa M. Zaina
General Counsel
oPASTCO
21 Dupont Circle, N.W.
Suite 700
Washington, D.C. 20036

Stephen G. Kraskin
Thomas G. Moorman
Kraskin & Leese
U.S. Intelco Networks, Inc.
2120 L Street, N.W., Suite 520
Washington, D.C. 20037

David J. Gudino
GTE Service Corporation
1850 M Street, N.W., Suite 1200
Washington, D.C. 20036

Robert S. Foosaner
Senior Vice President
Government Affairs
Lawrence R. Krevor
Director - Government Affairs
Laura L. Holloway, General Attorney
Nextel Communications, Inc.
800 Connecticut Avenue, N.W., Suite 1001
Washington, D.C. 20006

Mark J. Golden
Vice President of Industry Affairs
The Personal Communications
Industry Association
1019 19th Street, N.W., Suite 1100
Washington, D.C. 20036

R. Michael Senkowski
Jeffrey S. Linder
Stephen J. Rosen
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
Attorneys for The Personal Communications
Industry Association

Kathy L. Shobert
Director, Federal Affairs
General Communication, Inc.
901 15th Street, N.W., Suite 900
Washington, D.C. 20005

Catherine R. Sloan
Richard L. Fruchterman
Richard S. Whitt
WORLDCOM, INC.
D/b/a/ LDDS World Com
1120 Connecticut Avenue, N.W., Suite 400
Washington, D.C. 20036

Margot Smiley Humphrey
KOTEEN & NAFTALIN
1150 Connecticut Avenue, N.W., Suite 100
Washington, D.C. 20036
Attorneys for TDS Telecom

Charles H. Helein
General Counsel
Helein & Associates, P.C.
8180 Greensboro Drive, Suite 700
McLean, VA 22102
Attorneys for America's Carriers
Telecommunication Association

William L. Roughton, Jr.
1133 20th Street, N.W.
Washington, D.C. 20036
Attorneys for PCS Prime Co., L.P.

Charles C. Hunter
Kevin S. DiLallo
Hunter & Mow, P.C.
1620 I Street, N.W., Suite 701
Washington, D.C. 20006

John A. Malloy, Esq.
Vice President and General Counsel
Leo R. Fitzsimon, Esq.
GO Communications Corporation
201 North Union Street, Suite 410
Alexandria, VA 22314

Daniel L. Brenner
Neal M. Goldberg
David L. Nicoll
1724 Massachusetts Avenue, N.W.
Washington, D.C. 20036
Counsel for the National Cable
Television Association, Inc.

Mark J. O'Connor
Piper 7 Marbury L.L.P.
1200 19th Street, N.W.
Seventh Floor
Washington, D.C. 20036

Richard A. Askoff
National Exchange Carrier Association, Inc.
100 South Jefferson Road
Whippany, NJ 07981

Roger W. Steiner
Assistant General Counsel
Attorney for the Missouri Public Service
Commission
P.O. Box 360
Jefferson City, MO 65102

Cynthia B. Miller
Associate General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 301, Gerald L. Gunter Building
Tallahassee, FL 32399-0850

Robert C. Schoonmaker
Vice President
GVNW Inc./Management
2270 LaMontana Way
Colorado Springs, CO 80918

Werner K. Hartenberger
Laura H. Phillips
J.G. Harrington
Dow, Lohnes & Albertson
1255 Twenty-third Street, N.W.
Suite 500
Washington, D.C. 20037
Attorneys for The Ad Hoc Coalition of
Competitive Carriers

Emily C. Hewitt
General Counsel
General Services Administration
18th & F Streets, N.W., Room 4002
Washington, D.C. 20405

Snavely, King & Associates, Inc.
1220 L Street, N.W.
Washington, D.C. 20004
Economic Consultant

James R. Hobson
Donelan, Cleary, Wood & Maser, P.C.
1100 New York Avenue, N.W., Suite 750
Washington, D.C. 20005-3934
Attorneys for the National Emergency Number Association

David Cosson
L. Marie Guillory
National Telephone Cooperative Association
2626 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

John T. Scott, III
Cromwell & Moring
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2595
Attorneys for Bell Atlantic Nynex Mobile, Inc.

Pamela Portin
Director of External Affairs
U.S. AirWaves, Inc.
10500 N.E. 8th St., Suite 625
Bellevue, WA 98004

Jeffrey H. Olson, Esq.
Paul, Weiss, Rifkind,
Wharton & Garrison
1615 L Street., N.W., Suite 1300
Washington, D.C. 20036

Robert M. Gurss
Wilkes, Artis, Hedrick & Lane,
Chartered
1666 K Street, N.W., Suite 1100
Washington, D.C. 20006

Paul Gist
Christopher W. Savage
John C. Dodge
Cole, Raywid & Braverman, L.L.P.
1919 Pennsylvania Avenue, N.W.
Suite 200
Washington, D.C. 20006
Attorneys for Jones Intercable, Inc.

Peggy A. Peckham
Director - Legislative 7 Regulatory
Planning
Cincinnati Bell Telephone
201 E. Fourth Street
P.O. Box 2301
Cincinnati, OH 45201-2301

Jere W. Glover, Esq.
Chief Counsel
Barry Pineles, Esq.
Assistant Chief Counsel
Office of Advocacy
United States Small Business Administration
409 Third Street, S.W., Suite 7800
Washington, D.C. 20416

Gordon F. Scherer
President and Chief Executive Officer
Scherers Communications Group, Inc.
575 Scherers Court
Worthington, OH 43085

Gregory M. Casey, Esq.
Senior Vice President
Victoria A. Schlesinger, Esq.
Telemation International, Inc.
6707 Democracy Boulevard
Bethesda, MD 20817

David L. Kahn
c/o Bellatrix International
4055 Wilshire Blvd., Suite 415
Los Angeles, CA 90019