"CPNI" rules for different carriers -- some statutory and some of regulatory vintage[53] -- should be rejected. All carriers should be regulated equally under Section 222.[54] That provision incorporates whatever competitive balancing Congress deemed appropriate and encompasses all carriers.

In the end, Section 222 is a "privacy statute." A consumer's privacy interests do not depend upon the size or name of a telecommunications carrier. Therefore, the FCC should not create rules that unnecessarily burden certain carriers without furthering privacy interests. Thus, absent language in the statute or some supportive legislative history (of which there is none), the FCC cannot impose on some carriers mechanical, password-restricted ID requirements, while exempting others. Such unequal treatment is neither mandated by Section 222 nor necessary to carry out its intent.

All remaining iterations of the FCC's CPNI rules should be vacated (including those found in Part 22), upon the enactment of its statutory implementation rules. While, as stated above, those rules often stem from a sound market and customer-expectation foundation, the rules that emanate from the continued validity of that foundation should be predicated on the recently enacted statute and should have equal applicability to telecommunications carriers, across the board.

V. CONCLUSION

Section 222 of the 1996 Act is capable of a broad interpretation. It can be interpreted to allow CPNI use for both product development and joint marketing across various telecommunications service package components. And, it can be interpreted to allow for even broader use, when the CPNI is held by carriers who are

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[53] Id. and ¶ 35. For example, the FCC suggests that AT&T might be relieved of its existing CPNI obligations, while the "computerized safeguards and manual file indicators" currently deployed by the BOCs and GTE might remain obligatory for these carriers, but not others, post-1996 Act.

[54] House Report 103-559, at 60, from the Energy and Commerce Committee, associated with H.R. 3626, 103rd Cong., 2d Sess., on a predecessor iteration of Section 222 (that iteration that changed the legislative provision to one applicable to all common carriers), observed correctly, that there was no apparent reason to distinguish among classes of service providers in imposing obligations to protect the privacy of customer information.

horizontally or vertically integrated. At most, these latter types of carriers should be permitted to secure customer approval for such uses *via* a one-time disclosure to customers, describing the uses of the information and providing customers with an opportunity to request that their information not be so used.

The above interpretation is promoted by the facts that, in line with the statutory mandate, the interpretation and implementation can easily be made applicable to all carriers; it is in line with related Congressional approaches to privacy concerns within a particular industry segment; and it produces the least adverse impact on the marketplace. The interpretation proposed by U S WEST produces the least amount of market discombobulation from a quality service delivery perspective and the broadest of public interest benefits.

The FCC should embrace the instant opportunity to change regulatory history by moving away from the arbitrary categorization of services and moving toward a regulatory regime more focused on and framed by market expectations and desires. While the FCC's existing CPNI rules most often reach the correct market result, they do so within a context of categorization of both service offerings and market segments. While categorization is a hallmark of regulatory regimes, in light of the deregulatory thrust of the 1996 Act, any implementing CPNI rules should keep categorizations to a minimum, introducing such only upon a showing of a compelling need.

And no compelling need can be demonstrated. Neither the language of Section 222 nor its legislative history requires the strict construction suggested by the FCC. Thus, the FCC should seize this opportunity to fashion CPNI rules that take their lead from the marketplace, yet in no way compromise Congressional intent. It should construe Section 222 in a more holistic way than initially proposed and avoid crafting rules that are interventionist in that marketplace.

The public interest is best served by CPNI rules that allow customers to pursue, largely unencumbered, their desires for one-stop shopping; and that allow telecommunications carriers to satisfy those desires in a quality fashion. This quality aspect requires broad use of CPNI in the design and development of innovative future products and services, and the ability to package those offerings in ways that best accommodate wide-ranging

and distinct customer needs. The FCC should strive to promote this public interest in its implementation of Section 222.

Respectfully submitted,

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June 11, 1996

APPENDIX A

Customers want one-stop shopping

BOC CPE Relief Order, 2 FCC Rcd. 143, 147-48 ¶¶ 29, 31 (1987). "These requirements also prevent the BOCs from satisfactorily serving customers that desire integrated telecommunications systems solutions and designs. The polls and surveys conducted . . . on this issue . . . indicate that a broad spectrum of communications users desire vendors that can be single sources for telecommunications products. . . . We see substantial benefits for users in permitting the BOCs to respond to marketplace demands by organizing their CPE and basic service operations in the most efficient way to satisfy their customers' needs."

Phase I NPRM, 50 Fed. Reg. 33581, 33592 n.58 (1985) ("[S]ubscribers desire [ ]'one stop shopping.'")

McCaw/AT&T Transfer of Control Recon. Order, 10 FCC Rcd. 11786, 11795-96 ¶¶ 15-16 (1995). "We believe that the benefits to consumers of 'one-stop shopping' are substantial . . . The ability of a customer, especially a customer who has little or infrequent contact with service providers, to have one point of contact with a provider of multiple services is efficient and avoids the customer confusion that would result from having to contact various departments within an integrated, multi-service telecommunications company . . . 'One-stop shopping' promotes efficiency and avoids consumer confusion."

Compare AT&T CPE Relief MO&O and NPRM, 102 FCC 2d 627, 639-40 ¶ 23 1985) ("It prevents the public from dealing with a single vendor for both network service and CPE needs.")

AT&T CPE Relief Order, 102 FCC 2d 655, 693 ¶ 64 (1985) ("To prohibit AT&T from offering a single point of contact would eliminate one of the benefits to AT&T of removing structural separation, and we are unwilling to so limit the relief we are granting in this Order.")

McCaw/AT&T Transfer of Control Order, 9 FCC Rcd. 5836, 5886¶ 83 (1994) ("[W]e reject the suggestion . . . that we prohibit AT&T from disclosing its customers' CPNI to McCaw, because such a prohibition would undercut one of the benefits of the AT&T/McCaw combination: the ability . . . to offer its customers the ability to engage in 'one-stop shopping' for their telecommunications needs.")

SBC Communications, Inc. et al. v. FCC, 56 F.3d 1484, 1494 (1995) ("The Commission refused to impose that limitation [prohibiting AT&T from disclosing CPNI to McCaw] because it regards AT&T/McCaw's ability to offer one-stop shopping for all of a customer's telecommunications needs as one of the benefits to the public resulting from the merger. . . . We agree with the Commission . . . that . . . the intensified price and service competition that follows is . . . a clear public benefit.")

1991 USWC Comments, Appendix B at 3.

Restriction of CPNI is a form of passive structural separation

Phase II Recon. Order, 3 FCC Rcd. at 1173 n. 83. "A prior authorization approach would result in the imposition of a limited, but significant, form of structural separation between a BOC's enhanced service and network services operations pending a customer's CPNI authorization. We have repeatedly recognized that structural separation rules deny customers the efficiencies and other benefits that integrated operations can provide." (emphasis added; footnotes omitted).

Phase I Order, 104 FCC 2d at 1088 ¶ 258, restrictions on the use of customer information "impose a burden on all contacts between carriers and their customers, . . . substantially increase the difficulties attendant with providing customers a single point of contact, and prove extremely expensive to implement;" 1089 ¶ 260.

AT&T CPE Relief Order, 102 FCC 2d at 692-93 ¶ 64, noting that to deprive AT&T of CPNI access/use would deprive it of the ability to offer one-stop shopping and would eliminate one of the fundamental consumer benefits associated with integration and access to such information.

AT&T CPE Relief Recon. Order, 104 FCC 2d at 755 ¶ 50.

Structural Separation is not in the public interest

AT&T CPE Relief NPRM, 102 FCC 2d at 640 ¶ 23. BOC CPE Relief Order, 2 FCC Rcd. at 148 ¶ 29 and n.86. Structural separation prevents the public from dealing with a single vendor.

AT&T CPE Relief Order, 102 FCC 2d at 678 ¶ 38; BOC CPE Relief Order, 2 FCC Rcd. at 147 ¶ 29. Structural separation prevents customers from securing integrated systems solutions, which they desire.

AT&T CPE Relief Order, 102 FCC 2d at 678-79 ¶ 39; BOC CPE Relief Order, 2 FCC Rcd. at 147 ¶ 29. Structural separation results in higher prices to consumers and a reduction in the quality and variety of services available to the public, due to an inhibition of research, development, and innovation.

Phase I Order, 104 FCC 2d at 1003-04 ¶¶ 80-81 (noting that structural separation has an even more significant impact on the development of enhanced services than CPE), 1008 ¶¶ 89-91.

Prior Authorizations are not in the public interest

1994 Public Notice, 9 FCC Rcd. 1685 (1994). "[T]he Commission concluded that a prior authorization rule would as a practical matter deny to all but the largest business customers the one-stop-shopping benefits of integrated marketing of basic and enhanced services by BOCs."

Computer II Remand Order, 6 FCC Rcd. 7571, 7610 n.155 (1991). "Applying a prior authorization rule for other than the largest customers likely would require a BOC to establish separate enhanced and basic service marketing forces for those customers. . . . Under a prior authorization rule, a large majority of mass market customers are likely to have their CPNI restricted through inaction, and in order to serve them the BOCs would have to staff their business offices with network-services-only representatives, and establish separate marketing and sales forces for enhanced services. Thus, a prior authorization rule would vitiate a BOC's ability to achieve efficiencies through integrated marketing to smaller customers -- one of the benefits sought through adoption of nonstructural safeguards rather than structural separation."

See, e.g., Phase II Order, 2 FCC Rcd. 3072, 3094 ¶ 153, 3116 n.300; Phase II Recon. Order, 3 FCC Rcd. at 1162 ¶ 96.

AT&T/MCI Order, 7 FCC Rcd. at 1045 ¶ 44. "Carriers have had little success in having customers return the LOA and it tends to discourage competition."

Bureau Waiver Order, 101 FCC 2d at 942 ¶ 21. "We recognize, however, that end users who make a verbal commitment to use a carrier's service may not return signed authorizations promptly." (In this Order, the Bureau changed the Commission's absolute requirement that carriers have written LOAs in their possession, as a part of the presubscription process.) See also 1985 FCC Waiver Order, 102 FCC 2d 503, 506 ¶ 6 (1985).

APPENDIX B

Bumps in the road

Elusive alliances gridlock TCI's route to multimedia marketplace

(Continued from Page 4)
helped as-yet unmade plans for an Internet trial by Microsoft and TCI in Seattle early next year.

Despite such snags, TCI officials insist they are "on track" with plans to launch digital TV, telephony and online services this fall in Arlington Heights, Ill.; Hartford, Conn.; and the San Francisco Bay Area, which will be managed and monitored by a specially created TCI unit.

'Just do it'

"The trick now is to get it into the home and make it work," said Brendan Clouston, executive vice president of TCI, and president and chief executive officer of TCI Communications, its core business unit.

"The only way to deal with the credibility issue is to just do it, and we are," Mr. Clouston said.

TCI officials are betting the company's dominant national footprint of 17 million subscribers by year's end, combined with its strategic ownership stake in nearly 100 key program services and a flair for financial engineering will prove a secure springboard into the unknown.

"If we do this right, customers will get what they say they want: one place to call for service, one bill for all of the services into the home; and a tailored, integrated system to meet their individual needs," Mr. Clouston said.

TCI officials are so bullish on the long-term prospects for their newer services that they are considering plans to publicly spin off any one of the company's Internet, telephone, three-dimensional TV, direct satellite and educational programming operations.

"We are going to be very active financially creating securities, creating value, and continuing to grow through mergers and acquisitions the way we always have," said Bernard Schotters, TCI's treasurer and senior vice president of finance.

But even analysts bullish on TCI's efforts to reinvent itself from a cable-only giant say it cannot enter the multimedia marketplace too soon.

Merging Baby Bells, which are more service-oriented, branded and well-heeled, present an obstacle as they bundle new-media options with upgraded phone services.

Direct satellite competitors, who have carved for themselves a profitable niche TV market in less than two years, are finding ways to compete with cable operators with special pricing and even their versions of local programming.

Its detractors see TCI as running from the multipronged ambitions of its competitors and sometime business partners—such as Time Warner and the Baby Bells—to pursue a future that will be as linked to the personal computer as to the television.

First things first

Now that a more than two-year wait on digital converter boxes has ended, Mr. Clouston predicts digital television will be "the most important new product launch in cable's history" because of its expanded shelf space and program choice.

As with all of the new non-cable services being offered, TCI assumes that if it builds a new platform, users will come.

"The average satellite subscriber pays $45 a month for service, and the average high-end cable subscriber pays $35 a month for service. It would appear there is a willingness to pay more per month for more choice," Mr. Clouston said.

TCI initially will battle head-to-head with direct satellite companies already offering 150 channels of programming, but will vault to more than 200 options using its multiplexing of popular program services such as the movie channels Encore and Starz!.

Even absorbing the high cost of digital converter boxes and cable modems for online service, TCI can more than break even on digital TV, telephony and online services by the end of the decade, Mr. Clouston said.

Between 50,000 and 100,000 digital converter boxes will be manufactured monthly by six makers beginning in this year's fourth quarter for an average cost of $350 per box. Cable modems will cost about $450.

The equipment costs will be passed on to cable subscribers as part of a monthly $35 to $45 charge for cable online or digital TV services.

Even with hefty equipment and transmission charges, analyst Jessica Reif of Merrill Lynch Co. projects that TCI's cash flow could grow from an estimated $2.9 billion in 1996 to more than $4 billion in the year 2001, nearly half of which will be generated by digital operations and reinvested.

However, Wall Street points to the widening gap between TCI's increased new service costs and the eventual return on that investment.

Analysts predict TCI will continue to spend an average $1 billion annually through the year 2002 to roll out new services and upgrade existing cable systems.

Going online

Online services such as @Home could comprise a $5 billion business by the year 2005, some analysts predict.

The biggest draws will be education, information, local and sports content, consumer transactions, and online extensions of Liberty Media Group's program services.

Before it introduces @Home, Work@Home, @Work and @School in major markets next year, TCI it trying to secure distribution deals for its new online services with other major cable operators who want a share of the subscriber and advertising revenues generated.

Having no sure formula for estimating such numbers has made negotiations difficult.

"We set out to build a company with or without partnerships. We don't have any partnerships and we may not have any. We can build a great business on TCI's 30 percent cable penetration alone if we have to," said Bruce Ravenel, president and CEO of Internet services for TCI Communications.

There also is no sure way to estimate how many users of the new services will be enticed by full-motion video capabilities allowing them to view TV-type entertainment on a personal computer, analysts say.

Early phase testing of @Home with technology-friendly users in Sunnyvale, Calif., indicate a willingness to shift alliances.

As @Home is rolled out, it will help to define an industry standard by which cable modems can be manufactured, at which point modems will be affordable enough for consumers to buy in mass.

It will take until the end of the decade for levels of PC penetration to grow enough to support such online services, despite the recent growth spurt in both.

Of the estimated PC households in the United States today, only about 15 million are online.

However, TCI is setting its online sights on the worldwide market.

About 35 percent of traffic on the Internet in the United States are requests for information overseas, and more than half of overseas Internet traffic is destined for the United States, Mr. Ravenel said.

Mr. Ravenel, who once helped design IBM personal computers and Intel hardware, says @Home will spark a content explosion.

However, with the valuation of new Internet businesses in flux, and TCI eager to reproduce the strategic equity alliance base of its Liberty operations, analysts caution TCI against investing too much, too soon in the wrong places.

David against the Goliaths

Gerald Gaines, senior vice president telephony services, TCI Communications, says TCI's position as a telephony upstart is a competitive advantage in battling the regional Bell operating companies.

"Among the RBOCs, there is very little innovation and little drive for cost efficiency.

"The RBOCs aren't even coming close to what you're going to see in telephony services the next five years," said Mr. Gaines, a former US West executive.

TCI's digital telephone service over upgraded coaxial fiber cable lines will eventually include special features such as voice activated dialing, video telephony, and advanced problem monitoring.

"There will be no background noise and a very clear transmission," Mr. Gaines said.

At least for now, TCI plans a low-key, unobtrusive marketing campaign for telephony services to its cable customers, such as informational billing inserts and on-air cable promotion.

"We think there is a fair piece of the market that realizes it has had no choice and would be willing to try a new service even if it duplicates what they have at the same price," Mr. Gaines said.

TCI has planned to rely heavily on the Sprint brand name to market its wireline service to residents and businesses.

TCI has been unable to reach a wireline deal with Sprint because of differences over revenue splits and division of tasks.

Without the advantage of the Sprint name and cross-promotions—as TCI will have in its wireless telephone rollout—wireline telephony growth will

'If we do this right, customers will get what they say they want: one place to call for service, one bill for all of the services into the home; and a tailored, integrated system to meet their individual needs.'

—TCI's Brendan Clouston

Malone backing off to shift focus to team

John Malone was at his summer house in Maine launching a new boat last week while his cable brethren were at their annual conclave in Los Angeles.

And that's just the way he wanted it.

TCI's chief executive officer and president has for weeks been repositioning himself into what one TCI official calls "a more traditional CEO role' while shifting the spotlight to his rejuvenated and expanded senior management team.

Mr. Malone was missing from TCI's annual investors meeting in New York last month because of the flu, TCI company officials said.

Others speculated that he doesn't want to be put on the spot discussing Time Warner's pending acquisition of Turner Broadcasting System, in which TCI has a 23 percent stake and which is undergoing intense antitrust scrutiny.

But his absence underscored the strength and depth of a management team comprised of TCI veterans and new, hand-picked specialists.

At the investors meeting, TCI Communications President and Chief Executive Officer Brendan Clouston took command of the podium to deliver the company message: "There is more risk in preserving the status quo, so we're changing."

JOHN MALONE
TCI CEO and president

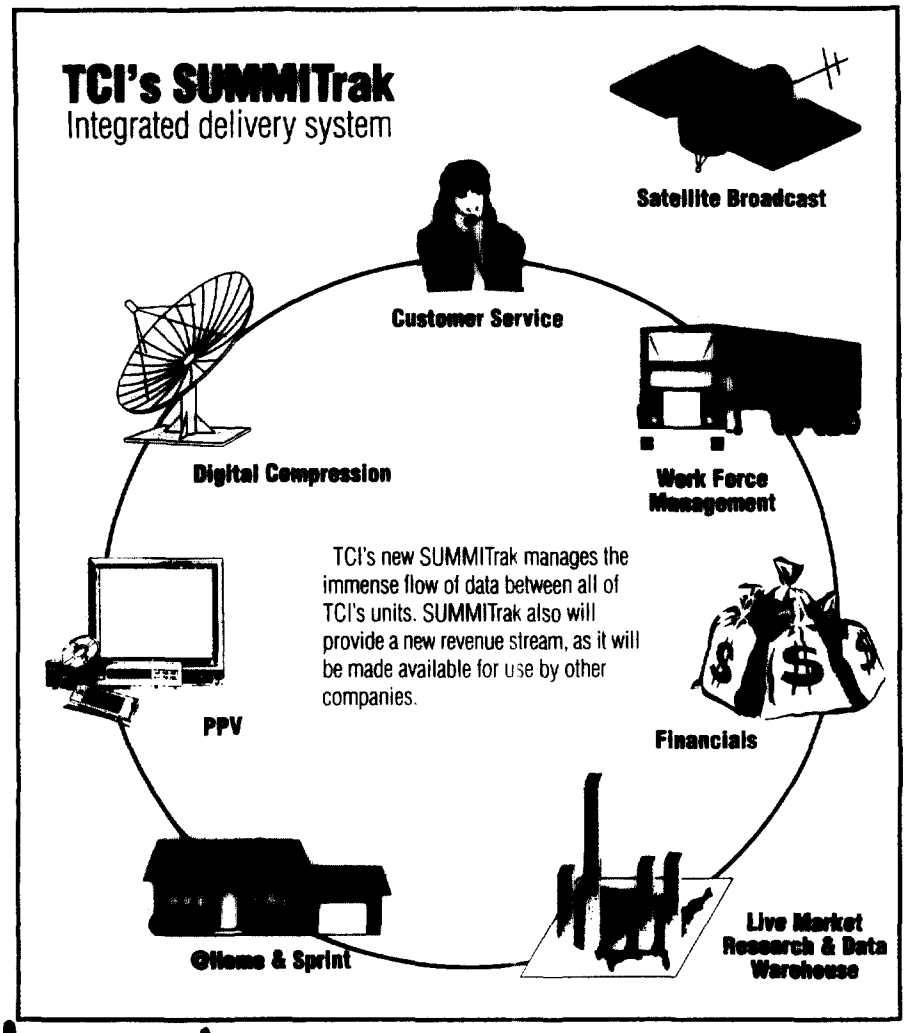
In an off-handed reference to his boss' continuing absence, Mr. Clouston quipped, "Every time John gets the flu, I get to catch a plane."

"John still is very much in charge. But it's not possible for him to be involved in the day-to-day operations like he once was. It's time for the new management team he has put into place to accept responsibility for the success of the operations," said Robert Thomson, senior vice president of communications and policy planning for TCI Communications.

Mr. Malone's next public appearance could be the Liberty Media Group's annual shareholders meeting in New York on May 14.#

—Diane Mermigas

Three new executives blazing PR trail for TCI



BY DIANE MERMIGAS
FINANCIAL EDITOR

DENVER—Sadie Decker, Barbara Mowry and Camille Jayne are having a field day bringing to TCI, and even much of the cable industry, what it has often lacked: high-tech internal systems and more customer-friendly external services.

And all of it is wrapped in the kind of marketing savvy that has usually been reserved for more traditional consumer products, like soap.

"But we ain't sellin' soap here," quips Ms. Jayne, senior vice president of digital TV for TCI Communications, who cut her marketing teeth at Procter & Gamble Co. "We're selling a whole new approach to telecommunications."

All three female executives, like so many other new faces in TCI's top management circle, are new to the cable industry.

But TCI President and Chief Executive Officer John Malone is betting that TCI's place in cable—and the company's spot in the rapidly changing telecommunications universe—will be strengthened by their unique skills.

Launching SUMMITrak

Ms. Decker helped launch rockets and build military defense businesses as an advanced information systems specialist at Martin Marietta. At TCI Communications she holds the new title of senior vice president of advanced systems technology.

The telecommunications industry is making mad raids on aerospace companies because of that industry's unique command of building and maintaining integrated delivery systems, Ms. Decker said.

"It is very complicated when you start to rack and stack these products. For example, we can offer our cable subscribers Sprint telephone service discounted while we give you cable plus discounts at McDonalds, which might be running a promotion with one of the program cable channels part-owned by Liberty," Ms. Decker said.

"It's going to be a whole new world of marketing and promoting. What people really haven't thought through is once you start layering all these products and services, how to keep straight who gets paid and who is being paid for what, and how much. Then it becomes a significant data and technology problem," Ms. Decker said.

Ms. Decker designed and built the SUMMITrak internal data system, which she is in the process of plugging in and turning on to TCI's fiber-coaxial cable systems nationwide. TCI publicly demonstrated the system for the first time at the National Cable Television Association convention in Los Angeles last week.

Sources say designing and constructing the system cost about $250 million, which will be made back quickly as SUMMITrak begins to service the needs of other telco and cable competitors later this year.

AT&T, US West, Time Warner and other major cable multiple system operators have expressed interest in the new internal data system.

"Companies who want our

(Continued on Page 29)

be even more modest.

"I still believe Sprint will be our primary telephony platform. Sprint needs our local cable connections and we need its brand name," Mr. Clouston said.

"We don't necessarily have to go beyond the Sprint alliance to build a 10 to 20 percent telephony business, and still provide access to MCI and AT&T," he said.

TCI concedes it will wrestle with some reluctance by cable subscribers who are skeptical about cable companies' abilities to rectify their poor service records enough to provide new ventures such as telephony and online.

However, users in a recent Connecticut telephony trial rated TCI as highly as local electric and telephone companies.

Raymond Katz of Bear Stearns, estimates TCI will spend more than $1.6 billion between 1995 and 2002 to install 1.7 million new residential and business retail telephony subscribers, and 1.3 million wholesale telephony lines.

Total telephony revenues are expected to be $770 million by the year 2002 based on 2.57 million residential and business lines, or between 7 percent to 10 percent penetration. Telephony pre-tax earnings should exceed $363 million on 50 percent margins, Mr. Katz said.

Packaging of long-distance, wireless and cable in the Washington area where a Sprint-TCI trial is 18 months ahead of its business plan with 60,000 subscribers "demonstrates the power of discounted bundled services," Mr. Gaines said.

Although TCI has spent an estimated $1 billion on telephony so far, the lion's share going to its Sprint alliance, the company is about to increase its spending.

Based on a potential 75 percent wireless coverage of the nation, and introduction of the service in 25 markets by year's end, TCI and Sprint already have seen nearly a four-fold appreciation in the value of their alliance—which they estimate to be worth about $9 billion based on prices being paid for personal communications service licenses.

Teleport Communications, the competitive access provider in which TCI has a one-third stake and which will go public later this year, will be a strategic link in the Sprint-TCI wireless and residential wireline service.

Millions of dollars of additional revenue remain on the table until the Federal Communications Commission and other regulatory bodies sort out the telephony issues raised by the new Telecommunications Act, Mr. Gaines said.

"You could argue that this already is incredibly undervalued if we think we can get 40 percent penetration across the wireless and wired world, and we do," Mr. Gaines said.

DBS: No afterthought

Direct satellite is perhaps the one new business where the power to team up with other companies and exploit brand names will be most readily apparent this year.

Some industry analysts estimate there is a potential 15 million to 20 million potential subscriber base for direct broadcast satellite in the United States that can be realized by the year 2000.

Although it has spent about $1 billion developing its medium-powered satellite strategy to date, TCI is about to spend many times that to enter the high-powered satellite circle.

Already, TCI's partnership in PrimeStar has rendered more than 1 million subscribers, which could grow to 2.5 million subscribers generating more than $1.4 billion in revenues within the next several years.

TCI will likely buy out other of its PrimeStar cable partners, or link up with one or more high-powered satellite players in the future, analysts say.

'When you are the largest cable operator in the world, people find a way to do business with you.'

—TCI's Gary Howard

Sources say MCI and News Corp. had until recently been encouraging TCI to secure its sell and lease-back satellite deal with Telesat Canada since it could extend their North American satellite reach if TCI finally struck a high-powered satellite deal with them.

News Corp. and MCI have since filed objections to TCI's Telesat plans, having been unable to secure its own high-powered satellite agreement with the cable giant.

TCI's satellites would allow MCI and News Corp. to begin their high-powered satellite service later this year, nearly a year ahead of schedule.

Additionally, MCI is pursuing an internal satellite communications system for companies, much like TCI is contemplating, which would provide them with another common interest for a partnership.

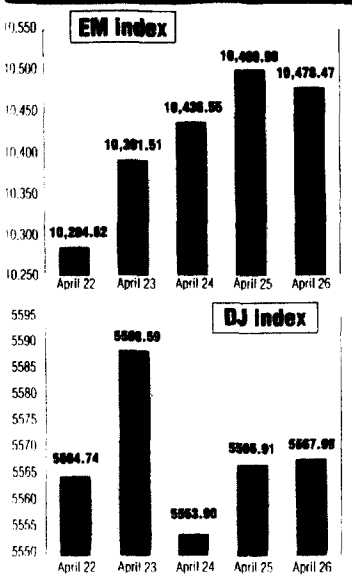
TCI's PrimeStar partnership and unrelated considerations involving News Corp.'s 24-hour cable news and MCI's local telephone ambitions have complicated the negotiations, which continue.

The convoluted nature of its potential high-powered relations is just one example of the difficulty TCI can have negotiating plain old vanilla deals.

"It can be difficult to get even the most logical deals done because people have too many different agendas, and there are too many moving parts," admits Gary Howard, senior vice president, TCI satellite unit, TCI Communications, and formerly the head of TCI's mergers and acquisition unit.

"But, when you are the largest cable operator in the world, people find a way to do business with you."#

Next week: *Liberty Media's plans and TCI's growing global empire.*



Winners

	April 25	Change from April 19
NTN Communications	$4.75	+15.15%
Granite Broadcasting	$12.88	+12.57%
Clear Channel Communications	$65.63	+11.46%
Spelling Entertainment	$9.63	+8.45%
Times-Mirror	$42.00	+7.01%
A.H. Belo	$38.50	+6.94%
Scientific Atlanta	$19.50	+6.85%
All American Communications	$11.50	+5.75%
New World Communications	$18.88	+4.86%
Matsushita	$174.75	+4.72%
Meredith Corp.	$44.88	+4.66%
News Corp.	$23.63	+3.85%
Sony	$64.63	+3.82%
Knight-Ridder	$72.38	+3.39%
Harte Hanks	$23.56	+3.01%
Renaissance Communications	$28.13	+2.74%
Westinghouse	$19.13	+2.68%
BellSouth	$40.13	+2.56%
US West	$32.88	+2.33%
IBM	$107.75	+2.25%
BET	$29.25	+2.18%
Washington Post (cl. B)	$295.75	+1.81%
Heritage Media	$38.88	+1.30%
Gaylord Entertainment	$26.75	+0.94%
Gannett	$69.00	+0.91%
Adelphia Communications	$7.63	+0.83%
Silver King	$30.75	+0.82%
McGraw Hill (s)	$44.25	+0.71%
Ameritech	$58.63	+0.43%
Pacific Telesis	$34.13	+0.37%
SBC Communications	$49.88	+0.25%

Losers

	April 25	Change from April 19
TBS (cl. B)	$27.50	-0.45%
Chris-Craft	$42.38	-0.59%
Viacom (cl. B)	$41.50	-0.60%
Media General	$38.63	-0.64%
Jones Intercable	$14.88	-0.83%
Comcast (cl. A)	$17.31	-1.07%
King World	$43.13	-1.15%
Time Warner	$40.00	-1.54%
GE	$77.88	-1.58%
Disney	$61.88	-1.98%
Century Communications	$9.75	-2.50%
Falcon Cable	$9.50	-2.56%
IFE	$15.88	-3.79%
Cablevision	$51.00	-4.23%
Starsight	$5.50	-4.35%
Zenith	$6.13	-5.77%
NYNEX	$49.75	-6.13%
TCI (cl. A)	$18.63	-6.29%
Playboy	$12.25	-6.67%
Graff PPV	$2.88	-8.00%
Unapix Entertainment	$4.06	-9.72%

Unchanged

	April 25
Scripps-Howard	$43.00
Tribune	$70.00
HSN	$12.00

Note: Closing figures are price per share
(s)=stock split
Source: Nimrod International

Three new women executives blazing a PR trail for TCI

(Continued from Page 19)

distribution will buy this service as well. The big players will have to do this themselves," Ms. Decker said.

TCI will likely license its 25 SUMMITrak-related patents to competitors scrambling to find a way to coordinate their customer service, programming, new services, transmission, billing and marketing information.

Getting TCI to fly right

Ms. Mowry, who made the deregulated airlines more sensitive to customer loyalty issues with her development of the Mileage Plus program at United Airlines a decade ago, sees SUMMITrak's "one-stop shopping" capabilities as paramount to improving cable customer relations.

Ms. Mowry, senior vice president of consumer satisfaction for TCI Communications, will use the new internal data system to track what subscribers watch and why, what mix of cable and other media services they would like to get or have been offered and at what price, and what kind of service calls have been made.

Late last year, TCI paid out $25 million in one-time bonuses to executives who staved off 8,500 subscriber defections.

This year, TCI is relying solely on Ms. Mowry's ability to revamp and sell customer service. In anticipation of the same kind of deregulated growth the airlines and banks once knew, TCI has revamped its pricing and customer service infrastructure "so we're ready for whatever comes," she said.

Like the airline industry, cable is a service business that is highly capital intensive and labor intensive, and services many locations.

Cable, like the airlines, "has to learn a lot about quality control and how to deliver a consistent product that people have a lot of confidence in," Ms. Mowry said.

"They have got to learn how to enter the game and what it costs to win the game, and it all comes down to satisfying customer needs as they define them," Ms. Mowry said.

Consequently, brand and loyalty have suddenly become buzzwords around

'Brands mean something very powerful to people. So, we're going to build a national brand.'

—Barbara Mowry, senior VP

TCI's glossy Tech Center headquarters in Denver, where a team of 40 internal and external consultants have been analyzing and reshaping attention to the customer and the media.

"One of the things that some of the RBOCs [regional Bell operating companies] and other potential competitors have that we don't necessarily have as an industry is a brand. Brands mean something very powerful to people. So, we're going to build a national brand," Ms. Mowry said.

"We will have a communications and entertainment superstore with lots of wonderful brands in it including all the Liberty programming," she said.

As a new generation of cable emerges with an array of new digital TV, high-speed data and telephony services built on the core cable business, customer service becomes paramount.

Ray Katz of Bear Stearns estimates that TCI will incur more than 6 percent more in customer service and marketing costs as a result of its new approach.

The comprehensive makeover involves new service technician uniforms, changing the appearance and function of monthly bills, and retraining employees.

"They will start seeing a different company evolve over several years time," Ms. Mowry said.

A new high-tech system will allow TCI to answer initial customer service calls nationally and more efficiently dispatch them locally, not unlike many of the telephone companies.

"It will provide better service to customers, will not add cost," she said. "Most of our customers still have 12:00 flashing on their VCRs. They do not like technology, so this is about positioning us to make them understand there is a company to help them through that technology, to meet their entertainment and communications needs."

The big unknown, TCI officials concede, is how the customers will respond.

"How do we take big corporations like this and successfully navigate them through change, and erase their past mistakes?" Ms. Mowry asked.

"Ten years from now, we'll know if we were able to pull it off."

In an effort to sell its story about change and spruce up its public image, TCI recently has made its top executives more accessible for interviews.

In the process, TCI even has hired Bender, Goldman & Helper, a L.A.-based public relations firm, to lend more organization and presence to its major public splashes: its annual investor's meeting last month, the NCTA convention last week, and the rollout of new services later this year.#

Live TV makes its way to Antarctica

(Continued from Page 12)

Institute Bremerhaven, said his nation's winter station lacks television for technical reasons.

"We do not feel it to be necessary to install or use any special transmitting/receiving equipment," Mr. Kohnen said.

Television, by way of tapes shipped from the United States and broadcast over low-power television transmitters, has existed for years at the largest U.S. base, McMurdo Station.

"The McMurdo area is a very small area," said Bill Kohutanycz, shore division head at the Naval Media Center's broadcasting department. "In the early days, there was no way to get satellite service."

Three years ago NSF scientists discovered that the Intelsat satellite they use for communications also carried the Armed Forces Radio and Television Service's live Pacific television feed.

AFRTS's "SatNet" provides live broadcasts of news and sporting events, as well as morning and network news programs from ABC, NBC, CBS and CNN. The service is used by U.S. military bases around the world for their low-power television stations.

A long, long winter

Antarctica's seasons are opposite that of the Northern Hemisphere. During McMurdo's "summer," roughly Oct. 1 to Feb. 20, as many as 1,500 people—male and female military personnel, scientists, blue-collar workers—call McMurdo home and temperatures sometimes rise above freezing.

'This guy says . . ."Gee, the clubs are awfully dead, and they're not all out hiking." The best he could tell, they were all watching live TV.'

—Pat Smith, National Science Foundation

But the station slows down its operations in late February, when the last plane heads out until August and the population shrinks to 233.

Mr. Smith said live TV helps keep people sane during the long, isolated winter.

With Antarctica wired, habits are changing. Mr. Smith said one contractor, who returned this year for the first time since live TV was introduced, noticed a difference at McMurdo's two bars.

"This guy comes back this past season and says, 'Gee, the clubs are awfully dead, and they're not all out hiking.' The best he could tell, they were all watching live TV," Mr. Smith said. "I guess we're making some cultural changes."

Sunday night science lectures

SatNet is just one of six channels on McMurdo's cable TV system. Another channel runs tapes of U.S. shows sent weekly during the summer by AFRTS, including broadcast network shows from the previous season.

Not all programming comes straight from the United States.

"In the summer, my staff goes down and we do a local production every two weeks," said Naval Support Force Antarctica Journalist Chief Brady Bautch. "It's a half-hour production, a 'PM Magazine'-like project."

One of the most popular programs is produced in-house: Sunday night science lectures, which often get too crowded to seat everyone, are videotaped and rebroadcast in prime time.

The U.S. Navy provides an inventory of videotapes for a movie channel, and several channels offer flight, weather and other information.

Besides TV, McMurdo is also home to *two low-power FM stations. The stations* broadcast audio programming feeds from AFRTS, but also give residents the chance to play guest D.J.

"It's strictly volunteer," Mr. Smith said. "It adds to the local color."#

Can Cable Customers Get Satisfaction?

After many years in the airline industry, including nine years running United Airlines' Mileage Plus program for frequent fliers, Barbara Mowry brings her expertise in developing long-term relationships with customers to an industry sorely in need of such assistance. cable TV. As senior vice president of customer satisfaction for Tele-Communications Inc., Mowry is convinced that just as cable providers can reinvent their industry, they can also transform their public image. She spoke by telephone with Executive Editor Carol Wilson.

Your background is in the airline industry — how did you wind up at TCI?

When I left United Airlines, I formed my own consulting company. It was a combination of different skill sets, all aimed at helping companies develop long-term relationships with customers. My clients were predominantly Fortune 500 companies: Disney, Epson and Schwab. What we were applying were essentially the ideas that people now call mass customization. A lot of the principles that apply in a program, such as Mileage Plus, apply across industries.

What prompted me to come here was the people who are here. There is an incredible brain trust that I find invigorating. As a consultant, I worked with lots of opportunistic CEOs. One of the things you find is that you can take a horse to water but can't make them drink. At United I liked making things happen. And here I have an incredible opportunity to make things happen.

Also, I am going into an industry that is completely reinventing itself. What is going on in the communications industry right now is bigger than the industrial revolution. You don't often get the chance to come into an industry so ready for growth, for a leading player, in a key job that can have real impact.

Survey after survey shows that the cable industry is not well-rated by the public, even after major campaigns to improve its image. How do you meet this challenge?

Lots of companies and lots of different kinds of entities have gone through massive transformations. Look at 'Made in Japan' — it used to mean one thing and it has come to mean something entirely different. Anytime you are in the service business, you will have dissatisfied customers. A lot of it has to do with when you compare our industry to other industries, some of it has to do with how people use our products.

People often compare us to the telephone industry. But you use your telephone at a point in time. And you turn the TV on and leave it on. With a phone you don't know if there's a problem unless you happen to pick up the phone at that moment.

But I think you have to look at how this industry grew up. This was an industry that was formed through massive acquisition, a lot of little mom-and-pop entities purchased and put together through acquisition very quickly. The service itself is popular. If people really hated us, we wouldn't have 66 percent penetration of the market. But do we need to enhance our relationship to the customer? You betcha.

What kind of systems do you expect to put into place to compete with the telephone companies?

Phone companies face huge legacy issues, with massive cost structures and lots of employees. What they have to do is really rip apart, in order to kind of rebuild what they are going to do for the future. We haven't had most of that. We're a $6 billion company but it's almost a $6 billion start-up. We don't have a lot of infrastructure.

The bad news about that is that we have to create it from scratch. The good news is that we *can* create it from scratch and use state-of-the-art systems to do it.

What we have created is SummitTrack, our new system that is basically our operation system. It will do billing; it will track all customer information; and it will provide information to our customer service people to guide what they say. It is the complete operating infrastructure, like an airline reservation system, and everybody that touches the customer will have access.

Was that developed in-house?

Yes, it's based on client-service computing, state-of-the-art systems including a number of patents, and it is designed for anything that we want to sell. As a company, we are heavily investing in infrastructure to get ready for this convergence. My part is deploying Summit and creating a whole infrastructure for customer support. I view our operation as very retail. If you look at Nordstrom or McDonald's, they may sell different products, but the way they deliver it has many similarities.

When will you have the system up and running?

We already have it. It's up and running in test in Greeley, Colo., right now. We'll be rolling that out across the country in conjunction with the new operating model that my group has developed. It will take some time to do.

Barbara Mowry

What are some of the other things that you need to do?

There are people issues. With cable, a lot of the problems have to do with rapid growth. Everybody wanted cable and it had to grow very fast. The company had to hire temporary people, put together what it could to meet demand. It's very hard to manage that growth. We suffered from success.

But now the cable part of our business is more of a mature business.

It's still going to grow, but not at wild rates. From a people point of view, we have people who have been fabulous at taking a lack of infrastructure and making it work for them. Now we can give them the infrastructure they need to do an even better job.

In addition, we have brought in talent from outside the company to supplement the talent base we already have. There are core competencies that we need to add. But we have always had good people. We have people that go way out of their way to help customers that you don't hear about.

How do you convince customers that you've improved things?

We've got to get the word out. And we have to do that on a national basis. This company is really a loose confederation of entrepreneurs. We've had really good people at different sites [each doing their own version of] everything. We have a little different perception in every place instead of a national brand like AT&T.

It's really marketing — what counts is not what happened to a customer, but what they perceive. We haven't spent a lot of time and effort packaging the good job we are doing. We need to keep reminding them — customers are fickle, and they are bombarded with messages. But we need to do that [reminding] because we are going to be creating a national brand. The total relationship — the whole interaction they have with us, whether it's the trucks they see or what their bill looks like — is part of that process. The way we define anything they see touch, smell or hear about us will determine how they begin to perceive us.

[Opinions] can change, but it requires effort. Our strategy is to really look at the future. And really look at what customers want. It all starts with the customer at the end of the day. The challenge we have right now is kind of like describing an airbag to someone who's never seen a car. Since they've never seen an integrated communications company and they've never seen Internet access over a ▶

▼ cable modem, it's hard to describe this and see what they want.

You mentioned a new operating model. Can you talk about that?

The new operating model is all about integrating all these products and services that we are going to be developing over the next few years and making it very easy for the customer to do business with us.

Customers don't want technology; they want solutions. In fact, they hate technology. They still have flashing 12s on their VCRs. They want life to be simpler, to be easier.

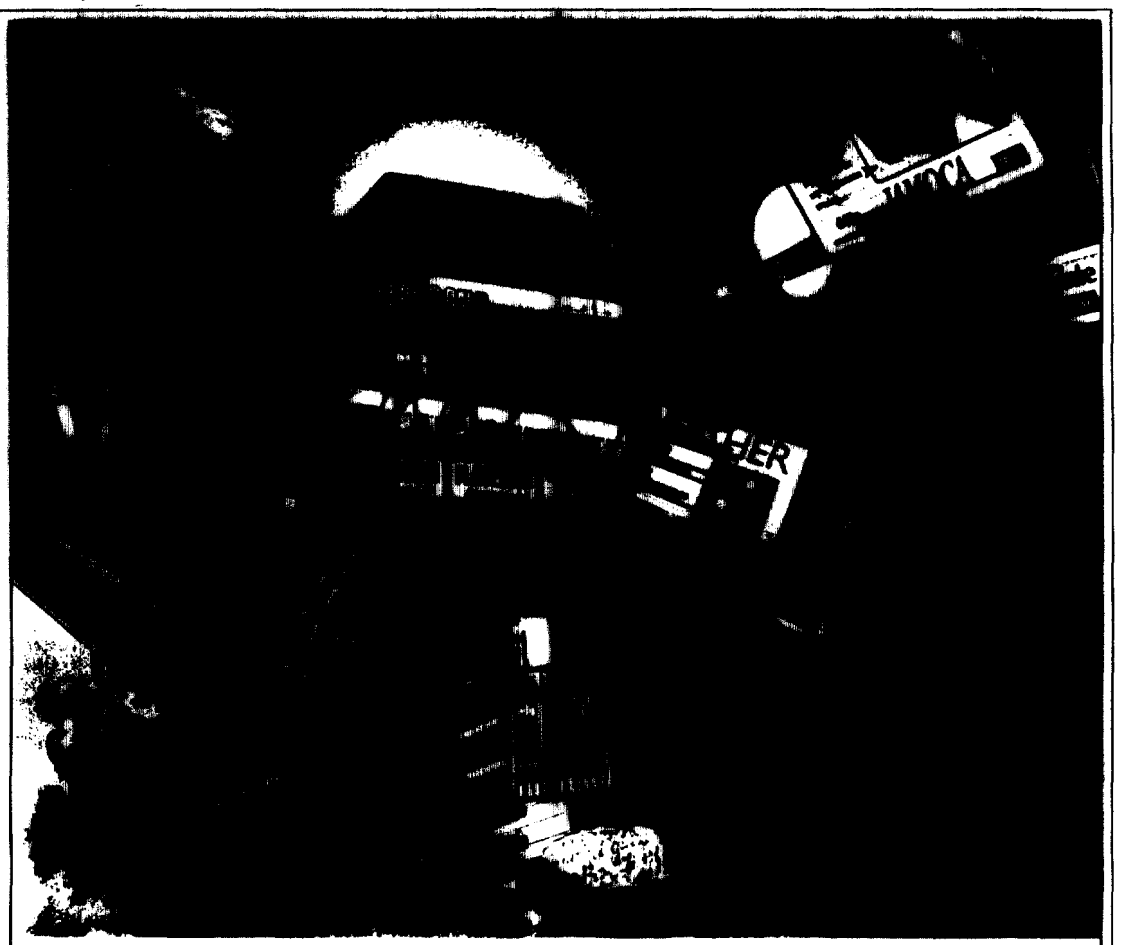
We are going to be much more proactive in terms of helping customers understand their needs. We will have a comprehensive database that will include information that customers have given us about them and their lives. So the customer service rep can be sorting through the complicated array of things for the customer. We can put together a package that makes sense for you.

We're also looking at other aspects of customer service. People use our products 24-hours-a-day, 7-days-a-week. It's not been cost-effective for us to provide service all the time. That will change. We are going to be available when customers need us. We are going to communicate more effectively with them, so they really know how to sort through this barrage of stuff. Because of the new infrastructure we're building, we will make it easy to do business with us.

Are other cable companies taking this approach?

No, not like we are doing. Everybody is doing pieces here and there. Everybody is looking at expanding their product line in terms of service. There are all kinds of different models. Other people are investing in their infrastructure in terms of systems. But there is nobody that has put this whole notion together.

Hopefully, it is going to be a pleasant experience. ▲



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Obstacles slow TCI's multimedia journey

TCI
INTO THE FUTURE

BY DIANE MERMIGAS
FINANCIAL EDITOR

DENVER—Just as TCI is solving the equipment problems that have plagued the rollout of new digital and online services, it faces more formidable obstacles: mushrooming competition and slippery partnerships.

That may prove the ultimate irony for the company John Malone, TCI's president and chief executive officer, has forged on strategic alliances and acquisitions.

In recent weeks, TCI has failed to secure a wireline agreement with its wireless telephony partner, Sprint Corp., forcing it to file with state utility commissions in Illinois, Connecticut and California about going it alone with local wireline when it rolls out its trial telephony services there this fall.

Its fragile negotiations with MCI and News Corp. for a stake in their high-powered satellite business have soured due primarily to a number of unrelated issues involving the three companies.

And just to make sure TCI doesn't move forward on its own, MCI and News Corp. have filed with the government to block TCI's soon-to-be-announced definitive agreement with Telesat Canada to sell it two spare satellites, on which it will lease back time.

On another front, TCI still is lacking affiliate agreements with major cable operators such as Comcast and Cox to offer its proposed @Home broadband network, which rolls out in three cities this fall, for the World Wide Web.

A strategic alliance with Microsoft—rooted in TCI's $125 million, 20 percent stake in the new Microsoft Network—appears on shaky ground as the companies scramble to respond to a rapidly changing marketplace with potentially conflicting competitive strategies.

The Microsoft Network has since been repositioned as a World Wide Web service that competes with @Home.

TCI's 11 percent stake in Microsoft rival Netscape Communications Corp., whose Web browser navigator it is exclusively using, hasn't

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Lawsuits fly after launch of TV Land

MCA, Viacom trade punches

BY LEE HALL
STAFF REPORTER

The lawsuits between MCA and Viacom have an Oct. 1 court date, but few expect the cases to last that long.

While the lawsuits are ostensibly about the new TV Land cable channel, observers say what's really behind the legal wrangling is the desire by both parties to own all of USA Networks, in which they are 50-50 partners.

And, observers say, any settlement will revolve around what one party can wrestle from the other for its interest in USA, valued in excess of $4 billion.

MCA fired the first shot last week, suing Viacom over the launch of TV Land, a Nickelodeon spinoff that is part of Viacom's MTV Networks.

MCA's lawsuit accuses Viacom of "breaches of contractual and fiduciary obligations" by starting TV Land, which MCA considers a competitor to USA.

Under terms of their joint venture, neither partner can independently introduce such a service.

Viacom says it considers TV Land, launched last week at the National Cable Television Association show in Los Angeles, to be a spinoff of Nick at Nite and not a new service.

Viacom's countersuit alleges MCA's true motive is to force Viacom to sell its interest in USA "at an unfairly low price."

The Viacom suit contends that although USA has enjoyed ratings success, its advertising revenue has "con-

(Continued on Page 30)

Photo by Lyle Leduc

29 seasons after taking to the air on WLWD-TV, Dayton, Ohio, Phil Donahue taped his last episode of "Donahue" in New York May 2. The taping was followed by a champagne shower from staffers. Mr. Donahue produced nearly 7,000 episodes of his talk show, was seen in 45 countries, earned 20 Emmy Awards and spawned dozens of competitors by creating a genre. Mr. Donahue is taking his staff and some former staffers, along with some of their family members, on a thank you cruise.

Nielsen deliberately underreports black viewers, producer charges

BY JON LAFAYETTE
STAFF REPORTER

Perhaps beating persistent critic Fox to the punch, a small producer of African American-oriented programming has sued Nielsen Media Research for $10 million claiming that Nielsen deliberately provided ratings that were "inaccurate and/or unreliable."

SI Communications President Robert Dockery Jr. claims Nielsen's failings threaten to put his company out of the programming business.

He said the company lost advertising and other revenues on its syndicated television programs and had to cancel "24/7," a magazine program for younger viewers.

"We're not going to be able to produce those programs if we're going to have to rely on these ratings to get paid," he said.

The underrepresentation of black viewers is "costing us millions in revenue and preventing significant and diverse programming from being shown on tele-

(Continued on Page 30)

KCCN news to return in June, new owner says

BY JON LAFAYETTE
STAFF REPORTER

The new manager of KCCN-TV, the CBS affiliate in Monterey, Calif., where the entire staff was fired and newscasts were suddenly canceled late last month, promises the station will be back in the news business next month.

Ackerley Communications, running the station under a local marketing agreement with station owner Harron Communications, has gotten a bum rap, said Dennis Curley, executive vice president and chief financial officer of the company.

Mr. Curley said rather than trying to weaken money-losing KCCN, Ackerley has already moved to strengthen the station's signal. He said that by combining KCCN's news operation with those of KCBA-TV, the Fox affiliate in Salinas, Calif., also owned by Ackerley, the stations will be able to cover twice as much news.

Nevertheless, the shocking events at the station had industry observers raising new questions about the value of allowing LMAs now and television duopolies in the future.

Critics contend that even when a newscast is relaunched at the Monterey station, an independent voice in the community will have been lost.

Those critics include actor Clint Eastwood, former mayor of nearby Carmel.

Local interests may challenge the deal, pointing out that when the owner of NBC affiliate KBSW-TV proposed an LMA with KCCN, Ackerley protested the deal to the FCC.

Mr. Curley said Ackerley didn't do anything improper at the station.

For example, Mr. Curley said, Ackerley didn't fire anyone at the station. Harron, which still holds the license for KCCN and still owns its assets, fired the station's staff as soon as the LMA was signed, he said.

Ackerley began interviewing and rehiring staffers as soon at it assumed management of the station, hiring master control operators almost immediately.

While KCCN employed about 70 full- and part-time workers, Ackerley plans to hire about 35. So far, it has hired 25 of the 28 KCCN staffers who have applied for jobs.

The cost savings provided by the LMA allowed Ackerley to pay more than other bidders for the stations. Sources said Harron was seeking $11 million for the station, which was losing $1 million a year.

Ackerley had no choice but to cancel the stations three newscasts because no one was working at the station, Mr. Curley said.

"We took the news off the air because quite honestly there was no one there to do the news," he said, explaining that it takes longer to hire news staffers than technicians.

Having recently suffered a multimillion-dollar judgment in a wrongful ter-

(Continued on Page 20)

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