



MCI Communications Corporation

1801 Pennsylvania Avenue, NW
Washington, DC 20006
202 872 1600

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JUN 17 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

June 17, 1996

ORIGINAL

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

DOCKET FILE COPY ORIGINAL

Re: Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, Petition for Order Directing That Discovery Be Permitted; CC Docket No. 96-98

Dear Mr. Caton:

Enclosed herewith for filing are the original and four (6) copies of MCI Telecommunications Corporation's Reply Comments, regarding the above-captioned matter.

Please acknowledge receipt by affixing an appropriate notation on the copy of the MCI Reply Comments furnished for such purpose and remit same to the bearer.

Sincerely yours,

Don Sussman
Regulatory Analyst

Enclosure
DHS

No. of Copies rec'd 0+6
List ABCDE



Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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JUN 17 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of:)
)
Implementation of the Local)
Competition Provisions in the) CC Docket No. 96-98
Telecommunications Act of 1996)
)
Petition for Order Directing That)
Discovery Be Permitted)

MCI REPLY COMMENTS

MCI Telecommunications Corporation ("MCI") hereby files its comments in response to the Petition for Order Directing That Discovery Be Permitted, filed by U S West, Inc. ("US West") on June 13, 1996.¹ In the Petition to Order Discovery, US West requests that the Federal Communications Commission ("Commission") enter an order directing that AT&T Corp. ("AT&T") and MCI make available for discovery, review and copying all documents related to all variations of the Hatfield Model which have been reference in the instant docket.² In this petition, US West implies that AT&T and MCI are obstructing the regulatory

¹ In The Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, Petition for Order Directing That Discovery Be Permitted, filed June 13, 1996 ("Petition to Order Discovery").

² The Hatfield Model is an economic model developed by Hatfield Associates, sponsored by AT&T and MCI.

process by withholding critical information needed by interested parties to evaluate the reasonableness of the model upon which these carriers have asked the Commission to base interconnection and unbundled rates. US West misrepresents the facts.

In response to the Notice of Proposed Rulemaking in the above-captioned docket,³ MCI filed its initial comments recommending that the Commission utilize the attached Hatfield Model to set presumptive ceilings for interconnection and unbundled rates.⁴ On May 30, 1996, MCI filed reply comments in the instant proceeding, where it urged the Commission to set presumptive ceilings for interconnection and unbundled rates based on an updated version of the Hatfield Model.⁵ The results of the updated version of the Hatfield Model were appended to AT&T's Reply Comments,⁶ and were referenced by MCI's Reply Comments.

Since referring to the updated Hatfield Model in its Reply Comments, MCI has made it a priority to place the model on the public record, in a manner that will allow the Commission and all interested parties to run and to analyze the model and its results. As the June 4, 1996 letter from MCI to the General Counsel of the Commission (Attachment 1) clearly indicates, just three working

³Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, FCC 96-182, released April 19, 1996 ("Notice of Proposed Rulemaking").

⁴ MCI Comments, filed May 16, 1996.

⁵ MCI Reply Comments, filed May 30, 1996.

⁶ AT&T's Reply Comments, filed May 30, 1996 at Appendix D.

days after referencing the updated version of the Hatfield Model, MCI offered to donate to the Commission two personal computers that the Commission staff indicated they would need to run and evaluate the Hatfield Model. This request was approved by the General Counsel on June 6, 1996 (Attachment 2). MCI is coordinating for the delivery of computers with a vendor now.

The computers that MCI donated to the Commission, however, cannot run the Hatfield Model without Local Exchange Routing Guide ("LERG") data, which provides the location of switches in the public network. LERG is provided only by Bellcore -- to anyone that is willing to pay for it. It is not proprietary information; it is simply the location of switches needed by carriers so that they can route their traffic. LERG data is updated constantly because the location of switches in the public network change. As the Affidavit of Leonard S. Sawicki demonstrates (Attachment 3), MCI has had daily discussions with Bellcore for nearly two weeks trying to convince Bellcore to allow MCI to purchase the LERG information on behalf of the Commission and to simultaneously announce to all interested parties how to obtain LERG data in a manner that is useable by the Hatfield Model. Bellcore expressed concerns initially that unrestricted use of LERG data would threaten its future revenues (Attachment 4). However, based on recent conversations between MCI and Bellcore, MCI understands that Bellcore will soon provide access to the information in a manner that will accommodate the Commission and other parties' needs to use that data.

US West's contention that MCI and AT&T have tried to keep the Hatfield Model "a secret" is disingenuous.⁷ Clearly, the sponsors of the Hatfield Model (AT&T and MCI) have made every effort to ensure that a working model is available to all interested parties as soon as possible. As was illustrated above, not only has MCI arranged to donate to the Commission computers required to run the Hatfield Model, but it has pursued on-going direct negotiations with Bellcore to ensure that all parties which want to evaluate the Hatfield Model have immediate access to the data upon which it is based.

Also, US West inaccurately claims in its petition that MCI and AT&T have "refused to make the Hatfield Models public."⁸ The sponsors of the Hatfield Model have not refused to place the Hatfield Model on the public record. As is illustrated above, the sponsors of the Model have made every effort to place the most updated version of the model on the public record in a format useable by all interested parties.

US West also implies that the sponsors of the Hatfield Model continue to change the model upon which they would like the Commission to rely. The Hatfield Model is an economic model aimed at determining the cost of unbundled network elements and interconnection. The sponsors originally submitted a version of the Hatfield Model that was based on a "scorched earth" approach,

⁷ US West Petition at 2.

⁸ US West Petition at 3.

which assumed a blank slate. This was a starting point. The Hatfield Model, with the benefit of time, has since become more sophisticated. Among other things, the more recent version of the Hatfield Model assumes the locations of existing central offices (for which LERG data is needed) and made refinements to transport and signaling assumptions. US West's effort to dismiss the Hatfield Models because more than one version exists is baseless. The new version of the Hatfield Model reflects the sponsors' commitment to ensuring that the Commission has the most complete, up-to-date economic modeling available upon which to base its analysis.

US West recommends that the Commission issue an order that would require US West to serve interrogatories to AT&T and MCI within four days of receiving the Hatfield Models and the input information.⁹ US West suggests that the order allow AT&T and MCI seven days to respond to the interrogatories, and then permit US West ten days from receiving AT&T's and MCI's responses to reply.¹⁰ The Commission has only until August 8, 1996 to issue an Order on interconnection and unbundling. If the Commission were to adopt US West's delaying tactic, then it would be left with only two to three weeks to analyze the Hatfield Model, and its results. MCI wants all interested parties to have the

⁹ US West Petition at 4.

¹⁰ US West Petition at 5.

ability to run and to analyze the Hatfield Model immediately, not in three to four weeks, as suggested by US West's petition.

Ironically, in a footnote on the last page of US West's petition, US West claims that all economic models should be made public sufficiently in advance of the Commission's decision in the interconnection docket to permit meaningful public comment.¹¹ If the Commission grants US West's request and suggested time line for disclosure, the Commission would have only a few weeks to analyze the model. No doubt, US West would then complain that the time frame which it recommended afforded interested parties insufficient time to evaluate the model.

The solution is clear. The Commission should dismiss US West's frivolous petition. If Bellcore, which is owned by the local exchange carriers, does not provide the LERG data to all interested parties in a manner that is useable by the Hatfield Model immediately, then the Commission should order it

¹¹ US West Petition at n.9.

to do so. This will ensure that every interested party will have sufficient time to run and to evaluate the Hatfield Model. It will also ensure that a situation does not occur whereby the Commission staff is the last to have access to a working Hatfield Model.

Respectfully submitted,
MCI TELECOMMUNICATIONS CORPORATION

A handwritten signature in black ink, appearing to read 'Don Sussman', with a long horizontal flourish extending to the right.

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

June 17, 1996

Attachment 1:

**Letter From MCI Offering
To Donate Computers**

MCI Telecommunications
Corporation

101 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: 202 387 2551
Fax: 202 387 2221
Internet: 00063-10251 MCI@MAIL.COM

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JUN 4 '96

June 4, 1996

William E. Kennard
General Counsel
Federal Communications Commission
Room 614
1919 M Street NW
Washington, D.C. 20554

Re: Request for approval of unconditional donation of computer equipment for Commission use in evaluating the record in CC Docket No. 96-98

Dear Mr. Kennard:

Pursuant to Section 1.3002(b) of the Commission's rules, MCI hereby offers to provide to the Commission two personal computers that can be used by Commission staff to run an economic model that MCI and AT&T have jointly developed. The results of the model (named the "Hatfield" model after the consulting firm that developed it) were filed on the record in this proceeding by AT&T and MCI.

Commission staff have requested that MCI and AT&T provide the model in a form that permits them to use it to evaluate positions of the various parties concerning the economic cost of network functions. Based on expected demand among the staff for the model, MCI would provide one system to the Competitive Pricing Division of the Common Carrier Bureau, and one to the Competition Division in the Office of General Counsel.

MCI seeks permission to provide two personal computers, configured with sufficient memory to run the model. MCI plans to rent the computers for the Commission's use for a 3-month period, at an estimated market value of approximately \$7,000. Based on our conversations with Commission staff, the Commission does not currently have a personal computer available with sufficient memory to run the model in an efficient manner.

William E. Kennard

June 4, 1996

This donation of computer equipment is being made unconditionally, without any expectation that it will influence the Commission's views on the final rules in this docket. In addition, at the same time as the model is made available to Commission staff, AT&T and MCI will file the model on the record of this docket, allowing interested parties to obtain copies of it from the Commission's copy contractor.

Yours truly,



Mary L. Brown

cc: Pat Carney, OGC
William F. Caton (2 copies)
James Schlichting, CCB
Jim Olson, OGC
Joel Lubin, AT&T

Attachment 2:

Letter From FCC Approving Donation of Computers



Federal Communications Commission
Washington, D.C. 20554

June 6, 1996

Ms. Mary Brown
Director, Corporate Rates &
Federal Regulatory Analysis
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, N.W.
Washington, DC 20006

Dear Ms. Brown:

On behalf of the Federal Communications Commission, I am pleased to advise you of the acceptance of your offer, extended on behalf of MCI, to loan the Commission two personal computers to run the economic model (the "Hatfield" model) being filed jointly with AT&T in CC Docket 96-98.

Arrangements to deliver these computers may be made with Mr. James Schlichting of the Common Carrier Bureau and Mr. James Olson, of the Competition Division, Office of General Counsel.

We appreciate your assistance in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "William E. Kennard".

William E. Kennard
General Counsel

Attachment 3:

Affidavit of Leonard S. Sawicki

In the Matter of)
)
Implementation of the Local)
Competition Provisions in the)
Telecommunications Act of 1996)

CC Docket 96-98

U S West Petition For Order Directing
That Discovery Be Permitted

Affidavit of Leonard S. Sawicki

Leonard S. Sawicki, being duly sworn and under oath, deposes and states as follows:

1. I am employed by MCI Telecommunications Corporation (MCI) as the Director, FCC Affairs. My office address is 1801 Pennsylvania Avenue NW, Washington, D.C. 20006. In this capacity, I am responsible for the staff that, among other things, files MCI documents at the Federal Communications Commission. My duties also include representing MCI at the FCC and in industry meetings. I deal with MCI customers and other industry members in a variety of roles, including resolving issues that affect MCI's efforts before the FCC.

2. On May 30, AT&T and MCI filed at the FCC the results of an economic model developed by Hatfield Associates (the "Hatfield model"). MCI and AT&T have since tried to get a working version of the model into the hands of the FCC and get the actual computer model on the record of this proceeding. This engineering-economic model computes the cost of local service using, among other inputs the locations of all central offices in service in the contiguous forty-eight states. There are three elements necessary to run the model. First, the user needs sufficient computing capacity to run the model. MCI offered to loan the FCC two computers and on June 6, the FCC accepted. Second, the Hatfield computer model itself must be loaded on the computers. This is ready for filing. Third, data that provides the location of the central offices must be loaded into the model. This data is available only from Bell Communications Research's (Bellcore) Traffic Routing Administration. U S West is one of the owners of Bellcore. MCI and AT&T have been trying to get this data and supply it to the FCC for over two weeks.

3. The data is extracted from the Local Exchange Routing Guide (LERG) and is used by telephone companies to route traffic. In a letter to AT&T, dated June 3, 1996, Bellcore refused to allow MCI and AT&T to buy the data and provide it to the FCC. This data is available to anyone who wishes to buy it for \$1000 per copy, but Bellcore restricts the use to the purchaser's internal business operations. Bellcore would not let us buy it and give it to the U.S. Government.

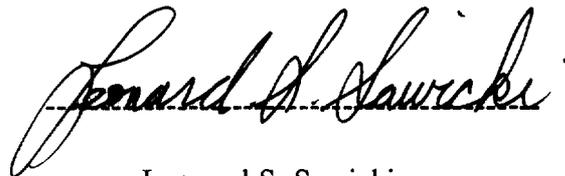
4. I became involved in the daily discussions of this matter about June 5 after receiving a copy of the Bellcore letter and being given instructions to take care of the matter. Since that

time, I have dealt with a number of people at Bellcore (Joanne Akhavan, Michael Slomin, Stan Rosen), the FCC, reporting on progress (James Schlichting, James Olson, Patrick Carney), AT&T (Mike Lieberman), and within MCI. I have had contact on this matter with Bellcore almost every day.

5. MCI and AT&T have been willing to pay for the LERG information and provide it to the FCC. We are anxious to get the model on the record for the FCC to use it and other parties to evaluate it. Bellcore's account team for MCI has been instrumental in getting this matter escalated in Bellcore. I have spoken to Joanne Akhavan, Bellcore's Director for the Southern Region three times. She was able to put MCI in touch with two attorneys in Bellcore's headquarters, Michael Slomin and Stan Rosen. I spoke with these individuals a total of three times. This is in addition to numerous voice mail messages. I gave them the names of individuals at the FCC to contact and encouraged them to work with the FCC to find a way to get this information on the record and still satisfy Bellcore's commercial requirements. I gave the FCC staff daily updates and apprised them of who we were dealing with at Bellcore. It is my understanding that AT&T was also working with other groups in Bellcore.

6. Bellcore explained to me that they wanted to protect the value of their investment in the LERG information and did not want it placed on the public record where others could access it for free. I believe that, as this is being written, Bellcore will provide the information in a manner that will accommodate the FCC and other parties' needs to use that data. If this fails, U S West could use its good offices as an owner and help us get this information from Bellcore. MCI's goal has been to get a working computer model and documentation to the FCC as quickly as possible.

Further Affiant saith not.



Leonard S. Sawicki

Subscribed and sworn to before me this
17th day of June, 1996



Notary Public

DOLORES VISMARA

Notary Public District of Columbia

My Commission Expires: 6/14/99

Attachment 4:

Letter from Bellcore Restricting Availability of LERG Data

Bellcore

Bell Communications Research

Donald O. Baechler, P.E.
Managing Consultant/Director
Traffic Routing Administration

6 Corporate Place, 1H27B
Piscataway, NJ 08854-4157
Voice: 908 899-6800
Fax: 908 336-0000
Pager: 1-800-SKY-PAGE. PIN 35510
Internet: dob2@cc.bellcore.com

June 3, 1996

Mr. Mike Lieberman
AT&T

Voice: 908-221-5467
Fax: 908-221-4628

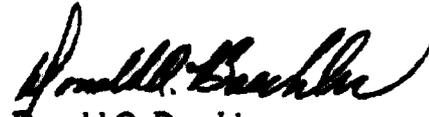
Mr. Lieberman

Attached is a sample file layout for a proposed file which the Traffic Routing Administration (TRA) can derive from the June 1, 1996 Local Exchange Routing Guide (LERG). This extract can be completed 2 days after we receive an order form and prepayment of \$1000 for each copy. The order form requires a Customer's signature on the front, by which the customer agrees to the terms and conditions on the reverse side of the form. An important part of the terms and conditions is that the customer agrees to use the product in the Customer's own internal business operations and that the material will not be copied, in whole or in part, or used or made available for use by third persons, including clients, subsidiaries or affiliates of Customer.

We are concerned that, if this material is used in litigation, it may become subject to discovery and, if the customer is a public agency, this material may become available under the Freedom of Information Act. Therefore, before providing the data, we must insure that the customer who signs the order form understands that he or she should not sign the form and obtain the data unless he or she can agree to the limitations on subsequent distribution.

If you wish us to proceed, please have each customer complete a copy of the order form, enclosed, and return it to us with the appropriate payment.

Thanks for your interest in TRA data products.


Donald O. Baechler

Data Extract From Local Exchange Routing Guide

1	2	3	4	5	6	7	8	9	10	11	12
CLLI™	LATA and Sub- LATA	blank	Vert.	Horiz.	OCN	Eq Type	E O	T D M	O T D M	S T P	Wire- less
12345678901	12345	1234	12345	12345	1234	12345	1	1	1	1	1

- Column 1.** CLI™ is a standard eleven-character identifier of the switch. Positions 1, 2, 3 and 4 are an abbreviation of the town, 5 and 6 is an abbreviation of the state, 7 and 8 are a building code and 9, 10 and 11 indicate the unit within the building.
- Column 2.** LATA. The Local Access and Transport Area defines the area in which the Local Exchange Carrier can carry calls.
- Column 3.** Four blank characters
- Column 4.** Vertical Coordinates of the switch identified by the CLI in column 1.
- Column 5.** Horizontal Coordinates of the switch identified by the CLI in column 1.
- Column 6.** OCN is the Operating Company Number assigned by TRA to identify the company who "owns" the record. A complete list of OCNs is provided in another file.
- Column 7.** Eq Type is the language standards department's standard code for designating each type of switch. The equipment type codes are not "decoded" in this file. A language standards brochure is available to decode this entry.
- Column 8.** EO. The LEC which input the data indicated that the switch serves the End Office function.
- Column 9.** TDM. The LEC which input the data indicated that the switch serves the function of a Feature Group (FG) B, C and/or D tandem.
- Column 10.** OTDM. The LEC which input the data indicated that the switch serves the function of an Operator Service Tandem.
- Column 11.** STP. The LEC which input the data indicated that the switch serves the function of a Signaling Transfer Point (STP).
- Column 12.** Wireless. The LEC which input the data indicated that the switch serves the function of a wireless office.

9083366999

MAY-30-96 14:56 FROM BELLCORE TRA

ID: 9083366999

PAGE 2/2

1.0 GENERAL

- 1.1 All products furnished to Customer are copyrighted by Bell Communication Research, Inc. (Bellcore) which retains title to intellectual property in such products.
- 1.2 (a) Each product furnished hereunder is licensed for use solely in Customer's own internal business operations and is not to be copied, in whole or in part, or used or made available for use by third persons, including clients, subsidiaries or affiliates of Customer. If the product is provided via diskette, CD-ROM, tape or NDM Sections 1.2 (b), (c) and (d) shall apply.
- (b) Each product furnished hereunder is licensed for use solely on a single central processing unit (such as mainframe, minicomputer, desktop, laptop or other computer of Customer's own internal business operations and is not to be copied, in whole or in part, used or made available for use by third persons, including clients, subsidiaries or affiliates of Customer, unless the Product Price, accurately reflecting the "No. of Clients Served or Copies Made", together with applicable tax (see Section 2.3), is paid according to the formula set forth on the reverse side hereof, and such third persons agree in writing to provisions consistent with the foregoing restrictions.
- (c) Customer shall keep full, clear and accurate records of the number of copies made (in whole or part), used or made available by such third persons, and of the identities and locations of such third persons.
- (d) Bellcore shall have the right through its accredited auditing representatives to audit Customer's records required to be kept pursuant to Section 1.2 (c) and such other records as may under recognized accounting principles contain information bearing upon the amount which should be payable hereunder.
- 1.3 Bellcore reserves the right, in whatever manner it chooses, to modify, revise or update products (including prices therefore) from time to time and assumes no responsibility for protecting products furnished hereunder against obsolescence. Customers shall destroy any product no longer being used. Do not return to Bellcore.
- 1.4 The construction and performance of this Order shall be governed by the laws of the State of New Jersey without regard to choice of law principles. The terms hereof set forth the entire understanding between Customer and Bellcore and all prior discussions merged herein. No provision appearing on any form originated by Customer shall be applicable unless such provision is expressly accepted in writing by Bellcore.

2.0 PAYMENT

- 2.1 Orders for one-time delivery of products must be accompanied by payment in full. Orders for monthly delivery of products total less than \$100 per month must be accompanied by payment in full. Make all checks payable to BELLCORE-TRA.
- 2.2 Orders which do not require prepayment may be prepaid at the option of the Customer. Refunds are not provided for prepay products. If prepayment does not accompany the order, Customer will be billed monthly. Payment is due and shall be made within thirty (30) days from the date of such bill. Thereafter, Customer shall be subject to late payment charge which is compounded and calculated at an annual rate of one percent (1%) over the lowest prime rate in effect in the New York City edition of the V Street Journal on the first Monday (or next legal business day if such Monday is a holiday) following payment due date. If the amount of such charge exceeds the maximum permitted by law for such charge, it shall be reduced to such maximum amount.
- 2.3 Pricing in the catalog does not include state and local tax. Customer shall add all tax amounts and include them in its payment to Bellcore. Customers located in the following states shall include applicable state and local taxes: Arizona, California, Colorado, Connecticut, DC, Florida, Georgia, Illinois, Indiana, Maryland, Massachusetts, Nebraska, New Jersey, North Carolina, Oklahoma, Pennsylvania, Texas, Washington and Wisconsin.
- 2.4 Cancellation - If payment is not received within 45 days of the bill's, the order will be canceled without notice and subsequent products will not be sent. If the Customer wishes to renew distribution, payment of past due amounts and late payment charges must be made, and a new order must be submitted with prepayment for one year. After the year covered by the prepayment, the Customer may re-elect to be billed monthly as long as payment is received in a timely manner.
- 2.5 Regional Bell Operating Companies (RBOCs) and affiliate companies are exempt from product price per Bellcore TRA agreement.

3.0 LIMITED WARRANTY

- 3.1 Bellcore warrants that the products furnished hereunder shall be free from defects in materials and workmanship under normal use for a period of ninety (90) days from the date of delivery. Bellcore's entire liability and Customer's exclusive remedy shall be replacement of any defective product which is returned to Bellcore.

The Foregoing Warranty is in Lieu of All Other Warranties of Any Kind, Either Expressed or Implied, Including, But Not Limited to, The Implied Warranties of Merchantability and Fitness for a Particular Purpose. In No Event Will Bellcore Be Liable for Damages, Including Any Lost Profits, Lost Savings or Other Incidental or Consequential Damages Arising Out of the Use or Inability to Use Such Products.

4.0 TECHNICAL CONTACT

- 4.1. All Communication relating to subject matter hereof shall be addressed to: **BELLCORE Traffic Routing Administration,**
6 Corporate Place, Room PYA-1G298
Pliscataway, NJ 08854-4157
Phone 908-699-6700 Fax 908-336-6999

STATEMENT OF VERIFICATION

I have read the foregoing and, to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on June 17, 1996.

A handwritten signature in black ink, appearing to read 'Don Sussman', with a long, sweeping horizontal line extending to the right.

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

CERTIFICATE OF SERVICE

I, Stan Miller, do hereby certify that copies of the foregoing Reply Comments were sent via first class mail, postage paid, to the following on this 17th day of June, 1996.

Reed E. Hundt**
Chairman
Federal Communication Commission
Room 814
1919 M Street, NW
Washington, DC 20554

James H. Quello**
Commissioner
Federal Communication Commission
Room 802
1919 M Street, NW
Washington, DC 20554

Rachelle E. Chong**
Commissioner
Federal Communication Commission
Room 844
1919 M Street, NW
Washington, DC 20554

Regina Keeney**
Chief, Common Carrier Bureau
Federal Communications Commission
Room 500
1919 M Street, N.W.
Washington, D.C. 20554

Richard Welch**
Chief, Policy and Program Planning
Division
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, D.C. 20554

International Transcription Service**
1919 M Street, NW
Washington, DC 20554

Gloria Shambley** (3)
Common Carrier Bureau
Federal Communications Commission
Network Services Division
Room 235
2000 L Street, N.W.
Washington, D.C. 20554

Mary DeLuca**(2)
Common Carrier Bureau
Federal Communications Commission
Network Services Division
2000 L Street, N.W. , Room 210
Washington, D.C. 20554

Susan P. Ness**
Commissioner
Federal Communications Commission
1919 M Street, N.W. , Room 832
Washington, D.C. 20554

Gerald Matisse**
Chief Network Services Division
Common Carrier Bureau
Federal Communications Commission
2000 M Street, M Street, Room 832
Washington, DC 20554

Kevin C. Gallagher
360° Communications Co.
8725 West Higgins Road
Chicago, IL 60631

Rodney L. Joyce
AD HOC Coalition
1250 Connecticut Avenue, N.W.
Washington, D.C. 20036

Bettye Gardner
Afro-American Life and History, Inc.
1407 Fourteenth St., N.W.
Washington, D.C. 20005

David A. Gross
Kathleen Q. Abernathy
AirTouch Communications, Inc.
1818 N Street, N.W., Suite 800
Washington, D.C. 20036

Mary Newmeyer
John Gardner
Alabama Public Service Commission
P.O. Box 991
Montgomery, Alabama 36101

Don Schroer
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, Alaska 99501

James Rowe
Alaska Telephone Association
4341 B Street, Suite 304
Anchorage, AK 99503

Dr. Barbara O'Connor
Mary Gardiner Jones
Alliance for Public Technology
901 15th Street Suite 230
Washington, D.C. 20005

Curtis T. White
Allied Associated Partners, LP
4201 Connecticut Ave., N.W.
Washington, D.C. 20008-1158

Carolyn C. Hill
ALLTEL Telephone Service Corp.
655 15th Street, N.W., Suite 220
Washington, D.C. 20005

Brad E. Mutschelknaus
Steve A. Augustino
Marieann K. Zochowski
American Communications Servs, Inc.
1200 19th Street, N.W. Suite 500
Washington, D.C. 20036

Alan Dinsmore
American Foundation for the Blind
1615 M Street, N.W., Suite 250
Washington, D.C. 20036

Alan R. Shark
American Mobile Telecommunications Association, Inc.
1150 18th Street, N.W. Suite 250
Washington, D.C. 20036

Danny E. Adams
Steven A. Augustino
American Network Exchange, Inc. and U.S. Long Distance, Inc.
1200 19th Street, N.W., Suite 500
Washington, D.C. 20036

Anne P. Schelle
American Personal Communications
One Democracy Center
6901 Rockledge Drive, Suite 600
Bethesda, MD 20817

Wayne V. Black
C. Douglas Jarrett
Susan M. Hafeli
American Petroleum Institute
1001 G Street, N.W., Suite 500 West
Washington, D.C. 20001

Albert H. Kramer
Robert F. Aldrich
**American Public Communications
Council**
2101 L Street, N.W.
Washington, D.C. 20037

James Baller
Lana Meller
American Public Power Association
1820 Jefferson Place, N.W., Suite 200
Washington, D.C. 20036

Charles H. Helein
**America's Carriers Telecommunication
Assoc.**
8180 Greensboro Drive, Suite 700
McLean, VA 22102

Antoinette Cook Bush
Linda G. Morrison
Ameritech
1440 New York Avenue, N.W.
Washington, D.C. 20005

Paul J. Berman
Alane C. Weixel
Anchorage Telephone Utility
1201 Pennsylvania Ave., N.W.
P.O. Box 7566
Washington, D.C. 20044-7566

Carl W. Northrop
Christine M. Crowe
Arch Communications Group, Inc.
1299 Pennsylvania Ave., N.W., 10th Floor
Washington, D.C. 20004-2400

Christopher C. Kempley
Deborah R. Scott
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Richard J. Metzger
Emily M. Williams
**Association for Local
Telecommunications Servs.**
1200 19th Street, N.W., Suite 560
Washington, D.C. 20036

Mark C. Rosenblum
Roy E. Hoffinger
Stephen C. Garavito
Richard H. Rubin
AT&T Corporation
295 North Maple Avenue
Room 3245I1
Basking Ridge, New Jersey 07920

James U. Troup
L. Charles Keller
Bay Springs Telephone Co.
1801 K Street, N.W., Suite 400K
Washington, D.C. 20006

Michael E. Glover
Leslie A. Vial
James G. Pachulski
Lydia Pulley
Bell Atlantic
1320 North Court House Road, 8th Fl.
Arlington, VA 22201

John T. Scott, III
Bell Atlantic Nynex Mobile, Inc.
1001 Pennsylvania Ave., N.W.
Washington, D.C. 20004

M. Robert Sutherland
Richard M. Sbaratta
A. Kirven Gilbert III
BellSouth
1155 Peachtree Street, N.E., Ste 1700
Atlanta, GA 30309-3610

Mark J. Palchick
Stephen M. Howard
Buckeye Cablevision
1828 L Street, N.W., Suite 1111
Washington, D.C. 20036

Danny E. Adams
John J. Heitmann
Cable & Wireless, Inc.
1200 19th Street, N.W.
Washington, D.C. 20036

Michael F. Altschul
Randall S. Coleman
**Cellular Telecommunications
Industry Association**
1250 Connecticut Ave., N.W. Suite 200
Washington, D.C. 20036

Richard Rubin
Steven N. Teplitz
Centennial Cellular Corporation
1400 Sixteenth St., N.W. Suite 600
Washington, D.C. 20036

Winston Pittman
Chrysler Minority Dealers Association
27777 Franklin Road, Suite 1105
Southfield, MI 48034

Thomas E. Taylor
Jack B. Harrison
Cincinnati Bell Telephone Company
2500 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202

Richard M. Tettelbaum
Citizens Utilities Company
1400 16th Street, N.W. Suite 500
Washington, D.C. 20036

Norman D. Rasmussen
Colorado Independent Telephone Assoc.
3236 Hiwan Drive
Evergreen, Colorado 80439

Robert J. Hix
Vincent Majkowski
Colorado Public Utilities Commission
1580 Logan Street, Office Level 2
Denver, CO 80203

Terrence P. McGarty
COMAV, Corporation
60 State Street - 2nd Floor
Boston, MA 02109

Howard J. Symons
Cherie R. Kiser
Russell C. Merbeth
COMCAST Corporation
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Gerald M. Zuckerman
Edward B. Myers
**Communications and Energy
Dispute Resolution Associates**
1825 I Street, N.W. Suite 400
Washington, D.C. 20006

Ronald J. Binz
Debra Berlyn
Competition Policy Institute
1156 15th Street, N.W. Suite 310
Washington, D.C. 20005

Reginald J. Smith
**Connecticut Department of
Public Utility Control**
10 Franklin Square
New Britain, CT 06051