

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

RECEIVED

JUN 25 1996

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

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

CC Docket No. 96-98

DOCKET FILE COPY ORIGINAL

**U S WEST'S REPLY TO COMMENTS ON ITS PETITION FOR
ORDER DIRECTING THAT DISCOVERY BE PERMITTED**

U S WEST, Inc. ("U S WEST") hereby files its Reply to a Response by AT&T Corp. ("AT&T") and Reply Comments by MCI Telecommunications Corporation ("MCI") to its Petition for Order Directing that Discovery be Permitted.

U S WEST's Petition sought the ability to review something called the Hatfield Model, which AT&T and MCI were advocating be used as a vehicle for determining the costs and prices they would pay for interconnection services and facilities purchased from incumbent local exchange carriers.

The MCI "Reply" is essentially humorous. MCI contends as follows: 1) the Model is already public; and 2) it is U S WEST's fault that the Model is not public. MCI contends that Bell Communications Research, Inc.'s ("Bellcore") actions in enforcing its property rights in certain information used in a part of the Model is the only barrier standing between the Model and its release to the public. As is discussed below, both of these contentions are wrong and frivolous.

At 6

AT&T's position is more sinister, because it indicates either that AT&T has a serious internal communications gap or that AT&T is attempting to mislead the Federal Communications Commission ("Commission" or "FCC"). AT&T first asserts that "[t]o AT&T's knowledge, no party to this FCC proceeding has heretofore requested the material sought by U S WEST."¹ This statement is simply false. AT&T has been trying, with varying degrees of success, to utilize the Hatfield Model against U S WEST in various rate proceedings since early this year. As the attached Affidavit of Peter Copeland documents, U S WEST has been striving mightily to obtain the very rights of review it seeks here, and has been the victim of a consistent and obvious shell game by AT&T. AT&T's first position was that it would not make the model available at all. Next it allowed only limited access to the Model, subject to a stringent nondisclosure agreement which prohibited the U S WEST person reviewing the Model from sharing any knowledge obtained during the review with the FCC in this proceeding (which nondisclosure prohibition remains in effect). A member of the AT&T law department was present at this review and prohibited representatives of the Hatfield firm from answering any U S WEST questions -- despite the fact that the "review" did not include any manuals, software documentation or other material necessary to conduct a meaningful examination of the Model. Finally, when the entire Model was made available for review in May of this year, inspection was limited to use in the

¹ AT&T Response at 1 (emphasis in original).

U S WEST Utah rate proceeding, which commenced a mere three days after inspection was permitted.

While one could quibble over whether AT&T's behavior concerning release of the Model constituted patent obstructionism or not (U S WEST would contend that it did), AT&T's assertion that U S WEST never asked for the right to review the Model before is bizarre. An AT&T attorney was physically present at one of the unsuccessful efforts by U S WEST to review the Model and took the lead role in preventing Hatfield personnel from speaking with the U S WEST representative.

AT&T's (and MCI's) excuse for not permitting U S WEST to review the Model in this proceeding is almost as strange. Both AT&T and MCI contend that the only reason they have not permitted such inspection is "Bellcore's refusal to authorize the release of Local Exchange Routing Guide information (part of the Hatfield model's input data), to allow its filing at the Commission, unless each recipient (including the FCC) agrees both to pay Bellcore a \$1000 fee and undertake to use the information solely for its own internal purposes. . . ."² The Local Exchange Routing Guide is a Bellcore trade secret, and we understand that arrangements have been made to permit the FCC to review the Routing Guide subject to proper protections. But the copyright on the Routing Guide is owned by Bellcore and its owners, including U S WEST. To refuse to permit U S WEST to review the Hatfield Model because of a copyright which U S WEST itself owns is a preposterous

² AT&T Response at 2 (emphasis in original).

position. Apparently even AT&T came to realize this fact, as it ultimately permitted the U S WEST representative to review the entire Model, including Routing Guide information (although without software documentation or manuals). What AT&T has not done is permit U S WEST to use the results of the review in this proceeding, or to review the software documentation behind the Hatfield Model. In other words, AT&T's claim that the existence of U S WEST proprietary information in the Hatfield Model was a legitimate excuse for preventing U S WEST to review the Model is simply not well founded, and is contradicted by AT&T's own actions.

In short, AT&T has consistently and wrongfully refused to permit U S WEST to review the Hatfield Model, or to use even that information which it could glean from limited review of the Model in the instant proceeding. AT&T's claim that U S WEST had never requested access to the Model is simply false. The Commission should grant U S WEST's Petition and AT&T and MCI should be directed to permit meaningful review of the Hatfield Model. Given AT&T's past conduct in preventing such review, Commission-supervised discovery such as is requested in the Petition is plainly necessary, and the Petition should be granted.

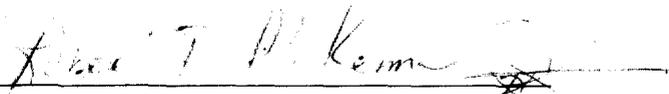
A final observation is necessary. AT&T has managed to forestall review of the Hatfield Model for more than six months now. The Commission's decision in the instant docket is due in less than two months. We submit that unless U S WEST is permitted meaningful review of the Model in sufficient time to have

its own analysis considered seriously by the Commission, any use of the Model in this proceeding would taint the entire proceeding and risk fatal legal error.

Respectfully submitted,

U S WEST, INC.

By:



Robert B. McKenna
Suite 700
1020 19th Street, N.W.
Washington, DC 20036
(303) 672-2861

Its Attorney

Of Counsel,
Dan L. Poole

June 25, 1996

ATTACHMENT

STATE OF Kansas)
)
 COUNTY OF Johnson) SS.

AFFIDAVIT

I, Peter Copeland, first being duly sworn, hereby state that the following information is true and correct to the best of my knowledge, information and belief:

1. I am a Manager, Issues Management, Public Policy, for U S WEST Communications, Inc. ("U S WEST"). In this capacity, I developed the U S WEST High Cost Fund Targeting Model, the predecessor targeting model to the Benchmark Cost Model ("BCM"). Among my responsibilities over the past six months, I have been charged with examining the Hatfield Costing Model submitted by AT&T Corp. ("AT&T") and MCI Telecommunications Corporation ("MCI") in CC Docket No. 96-98. I have reviewed the U S WEST, Inc. Petition for Order Directing that Discovery be Permitted, and the responses of AT&T and MCI.

2. I have been attempting to conduct an analysis of the Hatfield Model since early 1996 when AT&T introduced the Model in the U S WEST rate proceedings in the State of Utah. In order to conduct a proper analysis of the Model, it is necessary to examine the Model's algorithms, modules and inputs. Accordingly, when AT&T submitted the results of the Hatfield Model (as it then existed) to the Utah Public Service Commission, U S WEST requested that it be permitted to review a copy. U S WEST's efforts were rebuffed by AT&T, which simply refused to permit the Model to be inspected, essentially on the basis that AT&T had no legal obligation to make the Model available to U S WEST.

3. Finally, on April 25, 1996, I was permitted to see a copy of the Model for one day in the offices of Professor Hatfield in Boulder, Colorado. In order to see the Model at all, I was required to sign the nondisclosure agreement (Attached as Exhibit 1), in which I promised not to use the information obtained in the review of the Model for any purpose other than the Utah proceeding -- I was expressly prohibited from using the information in any other regulatory or judicial proceeding. Moreover, AT&T's actions made the review, which I was permitted to conduct, practically useless. I was shown spread sheets from various files, but no manuals, software documentation or other explanatory materials were supplied, and it was impossible to identify the areas where the data was input or the order in which the algorithms were carried out within the model. When we tried to ask questions on the Model, an AT&T attorney, stationed in the room, told Hatfield personnel that they

were not to answer any of my questions (or those of anyone else). Moreover, AT&T refused to supply all of the modules used in the Model -- primarily the BCM base loop modules. I was told by the AT&T attorney that I could not see these modules because they were copyrighted -- even though U S WEST holds the applicable copyrights.

- 4. In early May (May 3-May 17), I was permitted to study the entire Model, subject to the nondisclosure agreement noted above (which prohibits me from using my knowledge of the Model to participate in the ongoing CC Docket No. 96-98 interconnection proceeding at the FCC). However, as I could use knowledge gained from the review solely for the Utah proceeding, this review was of limited value because the Utah proceeding commenced on Monday, May 6. In addition, the copy of the Model with which I was provided was read-only, and sensitivity analyses could not be conducted. As was the case on April 25, no model documentation or manuals were provided.
- 5. I am still bound by the nondisclosure agreement which prohibits me from discussing the results of my examination of the Model in the ongoing interconnection proceedings before the Federal Communications Commission.

Peter Copeland

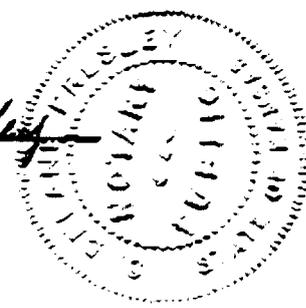
Peter Copeland

Subscribed and sworn to before me this 25 day of June, 1996, by Peter Copeland.

WITNESS my hand and official seal.

S. DeLore Prentiss

Notary Public



My Commission Expires: 2-22-2000

EXHIBIT 1

NONDISCLOSURE AGREEMENT

RAC
OH

THIS NONDISCLOSURE AGREEMENT (this "Agreement"), effective as of the day of May 3, 1996, 1996, is by and between Harfield Associates, Inc., a Colorado corporation, having its principal place of business at 737 29th Street, Suite 200, Boulder, Colorado 80503 (hereinafter "HAI"), and U S WEST Communications, a Colorado corporation, having its principal place of business at 1801 California St. Denver, Colo (hereinafter "U S WEST").

This Agreement is made in order for U S WEST to review certain HAI technical information described herein, under terms that will protect the confidential and proprietary nature of such HAI information. Such technical information is being provided to U S WEST for the sole purpose of reviewing the Harfield Cost Model as it pertains to, and in connection with, proceedings currently before the Public Service Commission of Utah, specifically, Dockets 95-2306-01, 94-2302-01, 94-099-01 and 95-049-T16 (the "Review").

U S WEST agrees that any and all technical information including, but not limited to, specifications, drawings, charts, models, samples, computer programs or documentation, computer media, spreadsheet model algorithms, spreadsheet documentation, spreadsheet descriptions, and copyrights furnished or disclosed, whether verbally, in writing, or otherwise, to U S WEST by HAI shall be deemed the property of HAI (collectively the "Confidential Information"). HAI represents, and U S WEST agrees, that the Confidential Information is the property of HAI, contains copyrighted material and proprietary information, and has monetary value.

U S WEST agrees that it shall hold the Confidential Information in confidence and shall use the same solely for the Review. U S WEST further agrees that it shall not make disclosure of the Confidential Information to anyone except employees and agents of U S WEST who are directly involved with the Review, and shall appropriately notify each such employee or agent to whom such disclosure is made in confidence of the proprietary nature of the Confidential Information, shall require the employee or agent to maintain such Confidential Information in confidence, shall require each such person to sign a nondisclosure/confidentiality agreement that comports with the terms and conditions stated herein, and shall promptly furnish HAI with a copy of each such agreement. U S WEST further agrees that it shall not use the Confidential Information in any other regulatory or judicial proceeding, nor in any other jurisdiction whether in the State of Utah or elsewhere.

above. This Agreement shall be binding upon the parties hereto and their respective heirs, successors or assigns.

This agreement contains the entire agreement of, and supersedes any and all prior understandings, arrangements and agreements between, the parties hereto, whether oral or written, with respect to the subject matter hereof.

Amendment or alterations of this Agreement will be binding and enforceable only if made in writing and signed by authorized representatives of the parties hereto.

The Agreement shall be governed and interpreted according to the laws of the State of Colorado.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be signed by their duly authorized representatives as of the date and year first written above.

U S WEST

HATFIELD ASSOCIATES, INC.

By Luisa M. Jara

Richard Adams

Title VP CFO

Title Senior VP

Miguel Sanchez Manager

Ed Freye

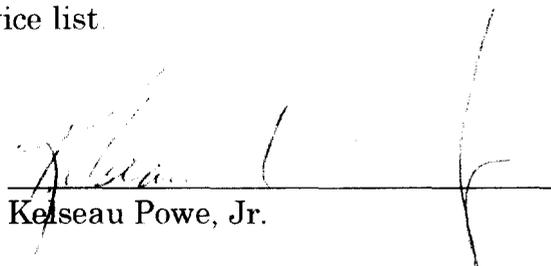
Received from Hatfield Associates, Inc, instructions and one CD-Rom containing Hatfield Extensions.

Miguel Sanchez

Pete Capel

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 25th day of June, 1996, I have caused a copy of the foregoing **U S WEST'S REPLY TO COMMENTS ON ITS PETITION FOR ORDER DIRECTING THAT DISCOVERY BE PERMITTED** to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.


Kelseau Powe, Jr.

***Via Hand-Delivery**

(CC9698F.COS/BM/lh)
Phase I

*James H. Quello
Federal Communications Commission
Room 802
1919 M Street, N.W.
Washington, DC 20554

*Reed E. Hundt
Federal Communications Commission
Room 814
1919 M Street, N.W.
Washington, DC 20554

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

*Rachelle B. Chong
Federal Communications Commission
Room 844
1919 M Street, N.W.
Washington, DC 20554

*Lauren J. Belvin
Federal Communications Commission
Room 802
1919 M Street, N.W.
Washington, DC 20554

*John Nakahata
Federal Communications Commission
Room 814
1919 M Street, N.W.
Washington, DC 20554

*James Casserly
Federal Communications Commission
Room 832
1919 M Street, N.W.
Washington, DC 20554

*Daniel Gonzalez
Federal Communications Commission
Room 844
1919 M Street, N.W.
Washington, DC 20554

*Regina M. Keeney
Federal Communications Commission
Room 500
1919 M Street, N.W.
Washington, DC 20554

*A. Richard Metzger
Federal Communications Commission
Room 500
1919 M Street, N.W.
Washington, DC 20554

*Kathleen Levitz
Federal Communications Commission
Room 500
1919 M Street, N.W.
Washington, DC 20554

*Mary Beth Richards
Federal Communications Commission
Room 500
1919 M Street, N.W.
Washington, DC 20554

*Richard K. Welch
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554

*Janice Myles
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554

*Lisa Gelb
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554

*David Sieradzki
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Joseph Farrell
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Steve Weingarten
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*William E. Kennard
Federal Communications Commission
Room 614
1919 M Street, N.W.
Washington, DC 20554

*Robert Pepper
Federal Communications Commission
Room 822
1919 M Street, N.W.
Washington, DC 20554

*Michele Farquhar
Federal Communications Commission
Room 5002
2025 M Street, N.W.
Washington, DC 20554

*International Transcription
Services, Inc.
Suite 140
2100 M Street, N.W.
Washington, DC 20037

Theodore V. Morrison, Jr.
Virginia State Corporation Commission
Staff
1300 East Main Street
Richmond, VA 23219

Susan Drombetta
Scherers Communications Group, Inc.
575 Scherers Court
Worthington, OH 43085

Terrence P. McGarty
COMAV, Corp.
22nd Floor
60 State Street
Boston, MA 02109

Thomas P. Hester
Kelly R. Welsh
John T. Lenahan
Ameritech Operating Companies
30 South Wacker Drive
Chicago, IL 60606

Antoinette Cook Bush
Linda G. Morrison
Skadden, Arps, Slate, Meagher
& Flom
1440 New York Avenue, N.W.
Washington, DC 20005

AMERITECH

Robert M. Lynch
Durward D. Dupre
Michael J. Zpevak
Southwestern Bell Telephone Company
Room 3520
One Bell Center
St. Louis, MO 63101

R. Michael Senkowski
Richard E. Wiley
Jeffrey S. Linder
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

GTE

William P. Barr
Ward W. Wueste
Gail L. Polivy
GTE Service Corporation
Suite 1200
1850 M Street, N.W.
Washington, DC 20036

Encarnita Catalan-Marchan
Maria Pizarro-Figueroa
Telefonica Larga Distancia
de Puerto Rico, Inc.
Metro Office Park
Building No. 8, Street No. 1
Guaynabo, PR 00922

Philip L. Malet
Alfred Mamlet
Colleen A. Sechrest
Steptoe & Johnson, LLP
1330 Connecticut Avenue, N.W.
Washington, DC 20036

TLDDPRI

Pat Wood, III
Robert W. Gee
Judy Walsh
Laurie Pappas
Public Utility Commission of Texas
Suite 290-E
7800 Shoal Creek Boulevard
Austin, TX 78757

Jim Whitefield
Gary L. Mann
Texas Statewide Telephone Cooperative, Inc.
Suite 200
3721 Executive Center Drive
Austin, TX 78731-1639

Tim Raven
Texas Telephone Association
Suite 1005
400 West 15th Street
Austin, TX 78701-1647

James U. Troup
L. Charles Keller
Arter & Hadden
Suite 400K
1801 K Street, N.W.
Washington, DC 20006
(2 copies)

VARTEC
BSTC, ET AL.

Bruce Hagen
Susan E. Wefald
Leo M. Reinbold
North Dakota Public Service Commission
12th Floor
State Capitol
Bismarck, ND 58505-0480

W. Benny Won
Oregon Public Utility Commission
1162 Court Street, N.E.
Salem, OR 97310

Richard A. Finnigan
Washington Independent Telephone
Association
Suite B-1
2405 Evergreen Park Drive, S.W.
Olympia, WA 98502

Jot D. Carpenter, Jr.
Telecommunications Industry Association
Suite 315
1201 Pennsylvania Avenue, N.W.
Washington, DC 20044-0407

Steve Hamlen
Unicom
5450 A Street
Anchorage, AK 99518-1291

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

Elizabeth R. Sachs
Lukas, McGowan, Nace & Gutierrez
12th Floor
1111 19th Street, N.W.
Washington, DC 20036

AMTA

Wayne V. Black
C. Douglas Jarrett
Susan M. Hafeli
Keller & Heckman
Suite 500 West
1001 G Street, N.W.
Washington, DC 20001

TAPI

Danny E. Adams
John J. Heitmann
Steven A. Augustino
Kelley, Drye & Warren, LLP
Suite 500
1200 19th Street, N.W.
Washington, DC 20036
(2 copies)

C&W

ANE/USLDI

Rachel J. Rothstein
Ann P. Morton
Cable & Wireless, Inc.
8219 Leesburg Pike
Vienna, VA 22182

Scott Harshbarger
Daniel Mitchell
Attorney General's Office of the
Commonwealth of Massachusetts
4th Floor
200 Portland Street
Boston, MA 02114

John B. Howe
Mary Clark
Janet Gail Besser
The Commonwealth of Massachusetts
Department of Public Utilities
12th Floor
100 Cambridge Street
Boston, MA 02202

Joel B. Shifman
Maine Public Utilities Commission
State House Station No. 18
242 State Street
Augusta, ME 04333-0018

Karen Finstad Hammel
Montana Public Service Commission
1701 Prospect Avenue
POB 202601
Helena, MT 59620-2601

Lowell C. Johnson
Nebraska Public Service Commission
300 The Atrium
1200 N Street
POB 94927
Lincoln, NE 68509-4927

E. Barclay Jackson
New Hampshire Public Utilities Commission
8 Old Suncook Road
Concord, NH 03301-7319

David Kaufman
New Mexico State Corporation Commission
POB 1269
Santa Fe, NM 87504-1269

Stephen F. Mecham
Utah Public Service Commission
160 East 300 South
POB 45585
Salt Lake City, UT 84145

Michael L. Ginsberg
Assistant Attorney General
160 East 300 South
POB 146751
Salt Lake City, UT 84145

Sheldon M. Katz
Vermont Department of Public Service
Drawer 20
Montpelier, VT 05620-2601

George E. Young
Vermont Public Service Board
Draw 20
Montpelier, VT 05620-2701

Rolayne Ailts
South Dakota Public Utilities Commission
500 East Capital
Pierre, SD 57501

Thomas E. Taylor
Jack B. Harrison
Frost & Jacobs
2500 Central Trust Center
201 East Fifth Street
Cincinnati, OH 45202

CBTC

Martha S. Hogerty
NASUCA
Suite 550
1133 15th Street, N.W.
Washington, DC 20005

Philip L. Verveer
Jennifer A. Donaldson
Angie Kronenberg
Willkie, Farr & Gallagher
Suite 600
Three Lafayette Center
1155 21st Street, N.W.
Washington, DC 20036-3384
(2 copies)

CTIA
TCI

Michael F. Altschul
Randall S. Coleman
Cellular Telecommunications
Industry Association
Suite 200
1250 Connecticut Avenue, N.W.
Washington, DC 20036

Bradley Stillman
Mark N. Cooper
Consumer Federation of America
Suite 604
1424 16th Street, N.W.
Washington, DC 20036

Ann Kutter
Douglas Elfner
New York State Consumer Protection Board
99 Washington Avenue
Albany, NY 12210

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

*Mark C. Rosenblum
Richard H. Rubin
AT&T Corp.
Room 324511
295 North Maple Avenue
Basking Ridge, NJ 07920

David W. Carpenter
Peter D. Keisler
David L. Lawson
David M. Levy
Sidley & Austin
One First National Plaza
Chicago, IL 60603

AT&T

Margaret E. Garber
Pacific Telesis Group
4th Floor
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004

Marlin D. Ard
Randall E. Cape
John W. Bogy
Pacific Telesis Group
Room 1530-A
140 New Montgomery Street
San Francisco, CA 94105

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

Saul Fisher
William J. Balcerski
NYNEX Corporation
1111 Westchester Avenue
White Plains, NY 10604

James D. Ellis
David F. Brown
SBC Communications, Inc.
Room 1254
175 East Houston
San Antonio, TX 78205

Andrew D. Lipman
Russell M. Blau
Dana Frix
Eric J. Branfman
Swidler & Berlin, Chartered
Suite 300
3000 K Street, N.W.
Washington, DC 20007
(4 copies)

MFS
HYPERION
WINSTAR
GST

David N. Porter
MFS Communications Company, Inc.
Suite 300
3000 K Street, N.W.
Washington, DC 20007

J. Manning Lee
Teresa Marrero
Teleport Communications Group, Inc.
Suite 300
Two Teleport Drive
Staten Island, NY 10311

Brad E. Mutschelknaus
Steve A. Augustino
Marieann Zochowski
Kelley, Drye & Warren, LLP
Suite 500
1200 19th Street, N.W.
Washington, DC 20036

ACSI

Riley M. Murphy
Charles Kallenbach
American Communications Services, Inc.
Suite 100
131 National Business Parkway
Annapolis Junction, MD 20701

Agris Pavlovskis
Michigan Exchange Carriers Association
1400 Michigan National Tower
Lansing, MI 48901-0025

Glen A. Schmiede
Mark J. Burzych
Foster, Swift, Collins & Smith, PC
303 South Washington Square
Lansing, MI 48933

MECAI

Steven T. Nourse
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43266-0573

Maureen O. Helmer
Public Service Commission of the
State of New York
Three Empire State Plaza
Albany, NY 12223

Robert S. Tongren
Ohio Consumers Council
15th Floor
77 South High Street
Columbus, OH 43266-0550

Aaron I. Fleischman
Richard Rubin
Mitchell F. Brecher
Steven N. Teplitz
Fleischman and Walsh
Suite 600
1400 16th Street, N.W.
Washington, DC 20036
(2 copies)

TWCHI

CCC

Paul B. Jones
Janis A. Stahlhut
Donald F. Shephard
Time Warner Communications
Holdings, Inc.
300 Stamford Place
Stamford, CT 06902

Anne K. Bingaman
Donald J. Russell
Luin Fitch
U.S. Department of Justice
Room 8104
555 4th Street, N.W.
Washington, DC 20001

Jeffrey L. Sheldon
Sean A. Stokes
Utilities Telecommunications
Council
Suite 1140
140 Connecticut Avenue, N.W.
Washington, DC 20036

Raymond G. Bender, Jr.
J. G. Harrington
Peter A. Batacan
Werner K. Hartenberger
Dow, Lohnes & Albertson, LLC
Suite 800
1200 New Hampshire Avenue, N.W.
Washington, DC 20036-6802
(2 copies)

VANGUARD

COX

Timothy R. Graham
Robert M. Berger
Joseph M. Sandri, Jr.
Winstar Communications, Inc.
1146 19th Street, N.W.
Washington, DC 20036

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

Peter A. Rorhbach
Linda L. Oliver
Kyle D. Dixon
Hogan & Hartson, LLP
555 13th Street, N.W.
Washington, DC 20004
(2 copies)

LDDS

TCFC

Charles C. Hunter
Hunter & Mow, PC
Suite 701
1620 I Street, N.W.
Washington, DC 20006

TRA

Steve Ellenbecker
Kristin H. Lee
Wyoming Public Service Commission
700 West 21st Street
Cheyenne, WY 82002

Robert S. Foosaner
Nextel Communications, Inc.
Suite 1001
800 Connecticut Avenue, N.W.
Washington, DC 20006

Albert H. Kramer
Robert F. Aldrich
Dickstein, Shapiro & Morin, LLP
Suite 800
2101 L Street, N.W.
Washington, DC 20037-1526
(2 copies)

INTELCOM

APCC

Cindy Schonhaut
Intelcom Group (U.S.A.), Inc.
9605 East Maroon Circle
Englewood, CO 80112

Jere W. Glover
David W. Zesiger
United States Small Business
Administration
Suite 7800
409 3rd Street, S.W.
Washington, DC 20416

Maureen A. Scott
Veronica A. Smith
John F. Povilaitis
Pennsylvania Public Utility Commission
POB 3265
Harrisburg, PA 17105-3265

Stephen L. Goodman
Halprin, Temple, Goodman & Sugrue
Suite 650 - East Tower
1100 New York Avenue, N.W.
Washington, DC 20005

NTI

John G. Lamb, Jr.
Northern Telecom, Inc.
2100 Lakewide Boulevard
Richardson, TX 75081-1599

Mark J. Golden
Personal Communications Industry
Association
Suite 700
500 Montgomery Street
Alexandria, VA 22314-1561

Eric E. Breisach
Christopher C. Cinnamon
Howard & Howard
Suite 400
107 West Michigan Avenue
Kalamazoo, MI 49007

SCBA

Madelyn M. DeMatteo
Alfred J. Brunetti
Maura C. Bollinger
Southern New England Telephone
Company
227 Church Street
New Haven, CT 06510-1806

Rodney L. Joyce
J. Thomas Nolan
Henry M. Rivera
Ginsburg, Feldman and Bress
8th Floor
1250 Connecticut Avenue, N.W.
Washington, DC 20036
(3 copies)

SNET
AD HOC CCTM
METRICOM

Stephen R. Rosen
Theodore M. Weitz
Lucent Technologies, Inc.
475 South Street
Morristown, NJ 07962-1976

James A. Eibel
Network Reliability Council II Secretariat
7613 William Penn Place
Indianapolis, IN 46256

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
Sprint Communications Company, Inc.
Suite 1100
1850 M Street, N.W.
Washington, DC 20036

Robert J. Aamoth
Wendy I. Kirchick
Jonathan E. Canis
Judith St. Ledger-Roty
Reed, Smith, Shaw & McClay
Suite 1100-East Tower
1301 K Street, N.W.
Washington, DC 20005-3317
(4 copies)

CTA
INTERMEDIA
LCHTC
PNI

Genevieve Morelli
Competitive Telecommunications
Association
Suite 220
1140 Connecticut Avenue, N.W.
Washington, DC 20036

Cynthia Miller
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Robert N. Kittel
Cecil O. Simpson, Jr.
Office of the Judge Advocate General
Suite 713
901 North Stuart Street
Arlington, VA 22203-1837

Emily C. Hewitt
Vincent L. Crivella
Michael J. Ettner
General Services Administration
Room 4002
18th and F Streets, N.W.
Washington, DC 20405

Snavelly, King, Majoros, O'Connor
& Lee, Inc.
1220 L Street, N.W.
Washington, DC 20005

William H. Smith, Jr.
Allan Kniep
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Colleen Boothby AD HOC TUC
Levine, Blaszak, Block and Boothby
Suite 500
1300 Connecticut Avenue, N.W.
Washington, DC 20036-1703

Veronica M. Ahern
Nixon, Hartgrove, Devans & Doyle
Suite 800
One Thomas Circle, N.W.
Washington, DC 20005

GUAM

Charles H. Helein ACTA
Helein & Associates, PC
Suite 700
8180 Greensboro Drive
McLean, VA 22102

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

Pamela Riley
AirTouch Communications, Inc.
One California Street
San Francisco, CA 94111

Don Schroer
Alaska Public Utilities Commission
Suite 400
1016 West 6th Avenue
Anchorage, AK 99501

Mary E. Newmeyer
John Garner
Alabama Public Service Commission
100 North Union Street
POB 991
Montgomery, AL 36101