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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

JUL 15 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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In the Matter of

Implementation of the Pay Telephone)
Reclassification and Compensation)
Provisions of the)
Telecommunications Act of 1996)

CC Docket No. 96-128

Reply Comments of the
Bell Atlantic Telephone Companies¹

Bell Atlantic, as a member of the RBOC Payphone Coalition, has today filed reply comments concerning the substantive issues raised in this proceeding. As indicated in that filing, Bell Atlantic submits that nonstructural safeguards equivalent to those under Computer III rules will prevent anti-competitive cross-subsidization and promote fair and full competition. (Reply Comments of RBOC Payphone Coalition at 22)

As a supplement to that filing, Bell Atlantic avers that the unsupported claims of the New Jersey Payphone Association ("NJPA"), alleging discrimination and impropriety by Bell Atlantic - New Jersey, are baseless and plainly wrong. The NJPA's call for extraordinarily stringent regulation of Bell Atlantic based on these unjustified accusations is an undisguised attempt to place RBOCs at a competitive disadvantage. The NJPA's unfounded generalizations should not in any way be considered a factor in the Commission's assessment of the appropriate nonstructural safeguards for RBOC payphone operations.

NJPA fails to explain that the state regulatory body before whom NJPA's complaint has been pending for several years has made no finding of any improper cross subsidy or discrimination by

¹ The Bell Atlantic telephone companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; and Bell Atlantic-West Virginia, Inc.

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Bell Atlantic in the conduct of its payphone operations. All rates for payphone calls in effect now have been subject to tariff filings and consequent regulatory scrutiny. Also, despite repeated invitations by Bell Atlantic, NJPA has failed to provide any substantive evidence in support of its insinuations. Thus, NJPA's plea for more stringent separation requirements should be accorded no credence.

Bell Atlantic believes that Computer III safeguards have proven effective and efficient in the past, and will serve the payphone industry well in the future.

Of Counsel
John M. Goodman


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Atlantic telephone companies

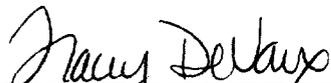
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July 15, 1996

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of July, 1996 a copy of the foregoing "Reply Comments of the Bell Atlantic Telephone Companies" was served on the parties on the attached list.



Tracey DeVaux

* Via hand delivery.

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