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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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

In the Matters of	)	
	)	
Implementation of the Local Competition Provisions of the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	
Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers	)	CC Docket No. 95-185
	)	
Area Code Relief Plan for Dallas and Houston, Ordered by the Public Utility Commission of Texas	)	NSD File No. 96-8
	)	
Administration of the North American Numbering Plan	)	CC Docket No. 92-237
	)	
Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech-Illinois	)	IAD File No. 94-102

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REPLY OF SBC COMMUNICATIONS INC.

SBC Communications Inc. (SBC) files its Reply in the captioned matter.

I. EXISTING CUSTOMERS SHOULD BE ALLOWED TO STAY WITH THEIR PRESENT CARRIER IF THEY DO NOT MAKE A TIMELY PIC SELECTION.

SBC concurs with NYNEX that the Second Report and Order (Order)[1] allows LECs to continue serving their present customers if the customers do not select a carrier after a consumer education and carrier selection program has taken place.[2] As SBC stated in its Petition for Reconsideration (PFR), if an existing customer who fails to make a timely PIC selection is forced

[1] FCC No. 96-333 (August 8, 1996).

[2] NYNEX, p. 5.

to dial an access code to place an intraLATA toll call, such will constitute a degradation of service. Certainly, the Commission does not intend to force an existing customer, who prior to the implementation of dialing parity could place an intraLATA toll call without dialing an access code, to now use an access code to place the same call, merely because the customer did not affirmatively select an intraLATA toll provider. The fairest and least disruptive approach is to allow the existing customer to remain with his current intraLATA toll carrier unless and until the customer has made an affirmative selection that evidences a clear desire to change carriers. If an existing customer has not requested to switch his intraLATA toll carrier selection, after receiving the deluge of marketing materials that will most likely accompany the implementation of intraLATA dialing parity, then it would be quite reasonable to conclude that this customer is satisfied with his current intraLATA toll provider or is not interested in changing carriers. Accordingly, absent an affirmative showing by an existing customer of a desire to change his intraLATA toll carrier, the Commission's rules should allow the existing customer to remain with his current carrier.

II. THE COMMISSION SHOULD CLARIFY CROSS BOUNDARY DIALING PARITY ISSUES.

SBC's PFR requested clarification that the applicable cross boundary procedures will be those of the state in which dialtone is provided. SBC believes that BellSouth's recommendation, that LECs should not be required to implement dialing parity for customers in LATAs which cross state boundaries until both states implement intraLATA presubscription, is also a viable alternative.[3]

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[3] BellSouth, p. 6.

III. SBC SEEKS CLARIFICATION OF DIALING PARITY PROCEDURES.

BellSouth[4] has discovered an apparent error in the Order, which, at page 29, states:

> A LEC, other than a BOC, that begins to provide in-region, interLATA or in-region, interstate toll services in a state before August 8, 1997, must implement intraLATA and interLATA toll dialing parity based on LATA boundaries by August 8, 1997 [emphasis added].

Proposed rule 51.213(c)(2), however, mandates a dialing parity implementation plan filing requirement "for LECs that begin providing in-region, interLATA or in-region, interstate toll service before August 8, 1997, no later than 90 days after these rules are published in the Federal Register." Apparently, the words "other than a BOC" have been inadvertently omitted from proposed rule 51.213(c)(2). This phrase should be returned to the rule to affect the Commission's intent.

IV. CONCLUSION

The Commission's overriding objective in this proceeding should be to implement as quickly and as painlessly as possible the Telecommunications Act of 1996. Taking the steps outlined above will further that goal.

Respectfully Submitted,

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[4] Id. , p. 5.

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CERTIFICATE OF SERVICE

I, Kelly Brickey, hereby certify that the foregoing Reply OF SBC Communications Inc.", has been served November 20, 1996, to the Parties of Record.

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