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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Local Competition Provisions in 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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MFS COMMUNICATIONS COMPANY, INC. REPLY TO COMMENTS ON PETITION FOR RECONSIDERATION OF SECOND REPORT AND ORDER

David N. Porter
Vice President, Government Affairs
MFS COMMUNICATIONS COMPANY, INC.
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7709

Andrew D. Lipman
Russell M. Blau
SWIDLER & BERLIN, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7500
Fax (202) 424-7645

Attorneys for
MFS Communications Company, Inc.

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	)	
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MFS COMMUNICATIONS COMPANY, INC.
REPLY TO COMMENTS ON PETITION FOR
RECONSIDERATION OF SECOND REPORT AND ORDER

MFS Communications Company, Inc. ("MFS"), by its undersigned counsel, hereby replies to the comments filed with the Commission in response to MFS' Petition for Limited Reconsideration and Clarification of the *Second Report and Order* in the above-captioned dockets, FCC 96-333, released August 8, 1996 (the "*2nd R&O*").[1]

[1] Comments filed in response to petitions for reconsideration or clarification are cited by name of party only. Petitions for reconsideration or clarification of the *2nd R&O* are cited as "[Name of Party] Petition."

I. AREA CODE OVERLAYS

A. The Commission Should Require Permanent Number Portability as a Prerequisite for Any Area Code Overlay Plan

In its Petition, MFS asked the Commission to prohibit the introduction of any area code overlays until permanent number portability has been implemented in the area to be affected by the overlay plan.[2] This request was opposed by a number of incumbent LECs, who argued generally that the Commission had already considered and rejected this approach in the *2nd R&O*.[3]

It is obviously true that the Commission has considered and rejected this proposal—that is precisely why reconsideration is necessary. MFS' Petition, along with other Petitions addressing this issue, demonstrated that the conditions adopted by the Commission as prerequisites for area code overlays were inadequate to achieve the Commission's stated goal of competitive neutrality. The Commission's decision, in other words, was predicated on an incorrect belief that adoption of less stringent prerequisites—chiefly the "one-NXX" rule and a 10-digit dialing requirement—would allow overlay plans to be implemented in a competitively neutral manner. In fact, the anticompetitive impacts of overlays would not be materially ameliorated by the measures. Only permanent number portability will be sufficient to eliminate the perceived stigma associated with

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[2] A number of incumbent LECs filed comments suggesting that MFS had also sought reconsideration of the Commission's requirement that one NXX code be available for assignment to each certificated local exchange carrier in any area proposed for an overlay. Although MFS did point out that this "one-NXX" rule was inadequate to prevent competitive inequity in an area code overlay, MFS did not seek modification of this rule because it believes that *only* permanent number portability is an adequate safeguard. MFS is generally supportive of other parties' petitions which did seek changes to the "one-NXX" rule, particularly those of AT&T and Teleport, but it will not address that issue further in this reply.

[3] *See, e.g.*, Bell Atlantic NYNEX Mobile, *passim*; BellSouth at 1-2; GTE at 12-13; Pacific Telesis at 2-3; U S West at 11-12; USTA at 2-5. On the other hand, MFS' position was supported by AT&T at 15; Cox at 2-4; NCTA at 1-6; and Teleport at 3-6.

overlay area codes, and the resulting disadvantage to competitive entrants who would be forced to assign a disproportionate share of telephone numbers in these overlay area codes.

Contrary to the assertions of opponents that MFS and other parties seeking reconsideration have raised no new arguments to justify imposing a permanent number portability prerequisite for overlays, the Petitions in fact demonstrate that the analysis of this issue in the *2nd R&O* was flawed and should be reconsidered.

II. DIRECTORY LISTING SERVICES

A. The Commission Should Confirm That LECs Publishing Directories Are Required to Offer Listing Services to Requesting Carriers

In its Petition, MFS asked the Commission to reconsider its discussion and interpretation of the term "directory listing" as used in Section 251(b)(3). MFS Petition at 8-12. As MFS pointed out, the Commission interpreted the statutory phrases "directory assistance and directory listing" in a manner that failed to differentiate between the two concepts, and therefore failed fully to implement the intent of Congress. "Directory listing" refers to the act of placing a customer's listing information in a published directory compilation (which may be a printed book or some another medium such as a CD-ROM), rather than to information provided by a directory assistance operator.

Bell Atlantic (at 7) agreed with MFS that the Commission's interpretation of Section 251(b)(3) was erroneous in this particular respect, and agreed that a LEC that publishes a directory does have a duty to incorporate listing information supplied by competing carriers. (MFS does not, however, agree with Bell Atlantic's further assertion that the Commission erred in requiring LECs to provide directory listing information in magnetic tape or other electronic formats.) No other party appears to have commented upon this issue.

MFS respectfully submits that the lack of controversy on this topic confirms that the Commission must have inadvertently overlooked the implications of Section 251(b)(3) with respect to directory publication, and that there is no material dispute that Congress did intend to require LECs to include their competitors' listings in any directory that they publish (or cause to be published by a contractor or other agent). The Commission should correct this error by granting MFS' petition and adding to its rules a provision requiring LECs, if they publish (or arrange for publication of) a directory in any medium, to include therein listing information supplied by a requesting carrier on a non-discriminatory basis.

III. CONCLUSION

For the reasons stated above, MFS' Petition for Limited Reconsideration and Clarification should be granted.

Respectfully submitted,

Russell M. Blau

Andrew D. Lipman
Russell M. Blau
SWIDLER & BERLIN, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7500
Fax (202) 424-7645

Attorneys for
MFS Communications Company, Inc.

David N. Porter
Vice President, Government Affairs
MFS COMMUNICATIONS
COMPANY, INC.
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7709

175794.1

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of December 1996 copies of MFS Communications Company, Inc.'s Reply To Comments On Petition For Reconsideration of Second Report and Order were served on the attached service list by first class mail, postage prepaid.

Celia Petrowsky

Celia Petrowsky

WILLIAM F. CATON
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

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

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

GERALDINE MATISSE
Chief Network Services Division
Common Carrier Bureau
Federal Communications Commission
2000 M Street, N.W., Room 235A
Washington, D.C. 20554

JANICE MYLES** (via diskette + 4 copies)
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 544
Washington, D.C. 20554

INTERNATIONAL TRANSCRIPTION SERVICE**
Federal Communications Commission
1919 M Street, N.W., Room 246
Washington, D.C. 20554

Mr. Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, D.C.

Mr. James H. Quello
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Room 802
Washington, D.C.

Ms. Rachelle B. Chong
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Room 844
Washington, D.C.

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

360° Communications Company
Kevin C. Gallagher, Sr. Vice President
-- General Counsel and Secretary
8725 West Higgins Road
Chicago, IL 60631

Ad Hoc Coalition of Corporate Telecommunications Managers
Rodney L. Joyce
Ginsburg, Feldman and Bress
1250 Connecticut Avenue, N.W.
Washington, DC 20036

Ad Hoc Telecommunications Users Committee
Laura F. H. McDonald
Levine, Blaszak, Block & Boothby
1300 Connecticut Ave., NW, Suite 500
Washington, DC 20036-1703

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

Alabama Public Service Commission
Mary E. Newmeyer
John Garner
100 N. Union Street
P.O. Box 991
Montgomery, AL 36101

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

Alliance for Public Technology
Dr. Barbara O'Connor, Chairwoman
Mary Gardiner Jones, Policy Chair
901 15th Street, Suite 230
Washington, DC 20005

ALLTEL Telephone Services Corporation
Carolyn C. Hill
655 15th Street, N.W., Suite 220
Washington, DC 20005

American Communications Services, Inc.
Brad E. Mutschelknaus
Steve A. Augustino
Marieann K. Zochowski
Kelley Drye & Warren
1200 19th Street, NW, Suite 500
Washington, DC 20036

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

American Network Exchange, Inc. and U.S. Long Distance, Inc.
Danny E. Adams
Steven A. Augustino
Kelley, Drye & Warren, LLP
1200 19th Street, NW, Suite 500
Washington, DC 20036

American Personal Communcations
Anne P. Schelle, Vice President,
External Affairs
One Democracy Center
6901 Rockledge Drive, Suite 600
Bethesda, MD 20817

American Public Communications Council
Albert H. Kramer
Robert F. Aldrich
Dickstein, Shapiro & Morin, LLP
2101 L Street, NW
Washington, DC 20037-1526

American Public Power Association
James Baller
Lana Meller
The Baller Law Group
1820 Jefferson Place, NW, Suite 200
Washington, DC 20036

Ameritech
Antoinette Cook Bush
Linda G. Morrison
Skadden, Arps, Slate, Meagher & Flom
1440 New York Ave., NW
Washington, DC 20005

Anchorage Telephone Utility
Paul J. Berman
Alane C. Weixel
Covington & Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, DC 20044-7566

Arch Communications Group, Inc.
Carl W. Northrop
Christine M. Crowe
Paul, Hastings, Janofsky & Walker
1299 Pennsylvania Avenue, N.W., 10th Floor
Washington, DC 20004

Association for Local Telecommunications Services
Richard J. Metzger
Emily M. Williams
1200 19th Street, NW, Suite 560
Washington, DC 20036

AT&T Corporation
Mark E. Haddad
James P. Young
Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006

Bay Springs Telephone Co., Inc.,; Crockett Telephone Co.; National Telephone Company of Alabama; Peoples Telephone Company; Roanoke Telephone Company; and West Tennessee Telephone Company
James U. Troup
Arter & Hadden
1801 K Street, N.W., Suite 400 K
Washington, DC 20006

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

Bell Atlantic Nynex Mobile, Inc.
John T. Scott, III
Crowell & Moring
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004

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

Buckeye Cablevision
Mark J. Palchick
Stephen M. Howard
Vorys, Sater, Seymour & Pease
1828 L Street, N.W., Suite 1111
Washington, DC 20036

Cable & Wireless, Inc.
Danny E. Adams
John J. Heitmann
KELLEY DRYE & WARREN LLP
1200 19th Street, NW
Washington, DC 20036

Cellular Telecommunications Industry Association
Michael F. Altschul, Vice President,
General Counsel
Randall S. Coleman, Vice President for
Regulatory Policy and Law
1250 Connecticut Avenue, NW, Suite 200
Washington, DC 20036

Centennial Cellular Corp.
Richard Rubin
Steven N. Teplitz
Fleischman and Walsh, L.L.P.
1400 Sixteenth Street, N.W., Suite 600
Washington, DC 20036

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

Colorado Independent Telephone Association
Norman D. Rasmussen
Executive Vice President
3236 Hiwan Drive
Evergreen, CO 80439

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

Communications and Energy Dispute Resolution Associates
Gerald M. Zuckerman
Edward B. Myers
International Square
1825 I Street, N.W., Suite 400
Washington, DC 20006

Competitive Telecommunications Association
Robert J. Aamoth
Wendy I. Kirchick
Reed Smith Shaw & McClay
1301 K Street, NW, Suite 1100 East Tower
Washington, DC 20005

Competition Policy Institute
Ronald J. Binz, President
Debra Berlyn, Executive Director
1156 15th Street, N.W., Suite 310
Washington, DC 20005

Connecticut Department of Public Utility Control
Reginald J. Smith, Chairperson
10 Franklin Square
New Britain, CT 06061

Consumer Federation of America (CFA) and Consumers Union (CU)
Bradley C. Stillman, Esq.,
Consumer Federation of America
1424 16th Street, N.W.
Washington, DC 20036

Cox Communications, Inc.
Werner K. Hartenberger
Leonard J. Kennedy
Laura H. Phillips
J.G. Harrington
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, NW, Ste. 800
Washington, DC 20036

Department of Defense, Office of the Secretary
Rebecca S. Weeks, Lt Col, USAF
Staff Judge Advocate
Carl W. Smith, Chief Regulatory
Counsel Telecommunications, DOD
Defense Information Systems Agency
701 S. Courthouse Road
Arlington, VA 22204

Department of Defense
Robert N. Kittel, Chief Regulatory Law Office
Cecil O. Simpson, Jr., General Attorney
Office of the Judge Advocate General
U.S. Army Litigation Center
901 N. Stuart Street, Suite 713
Arlington, VA 22203-1837

Department of Justice
Anne K. Bingaman, Assistant Attorney General
Antitrust Division
555 4th Street, N.W., Room 8104
Washington, DC 20001

District of Columbia Public Service Commission
Lawrence D. Crocker, III
Acting General Counsel
450 Fifth Street, NW
Washington, DC 20001

Excel Telecommunications, Inc.
Thomas K. Crowe
Law Offices of Thomas K. Crowe, P.C.
2300 M Street, N.W.
Washington, DC 20037

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

Frontier Corporation
Michael J. Shortley, III
180 South Clinton Avenue
Rochester, NY 14646-0700

General Communication, Inc.
Kathy L. Shobert
Director, Federal Affairs
901 15th Street, N.W., Suite 900
Washington, DC 20005

General Services Administration
Emily C. Hewitt, General Counsel
Vincent L. Crivella, Associate General
Counsel, Personal Property Division
18th & F Streets, N.W., Room 4002
Washington, DC 20405

Georgia Public Service Commission
Dave Baker, Chairman
B.B. Knowles, Director of Utilities
244 Washington, Street, SW
Atlanta, GA 30334-5701

GTE Service Corporation
Richard E. Wiley
R. Michael Senkowski
Jeffrey S. Linder
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

Guam Telephone Authority
Veronica M. Ahern
Nixon Hargrave Devans & Doyle LLP
One Thomas Circle, NW, Suite 800
Washington, DC 20005

GVNW Inc.
Robert C. Schoonmaker, Vice Pesident
P.O. Box 25969
(2270 La Montana Way)
Colorado Springs, CO 80936 (80918)

Home Telephone Company, Inc.
H. Keith Oliver, Accounting Manager
200 Tram Street
Moncks Corner, SC 29461

Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

Illinois Independent Telephone Association
Dwight E. Zimmerman, Executive Vice President
RR 13, 24B Oakmont Road
Bloomington, IL 61704

Indiana Utility Regulatory Commission
Robert C. Glazer, Director of Utilities
Indiana Government Center South
302 West Washington, Suite E306
Indianapolis, IN 46204

Information Technology Industry Council
Fiona Branton, Director, Government Relations and Regulatory Counsel
1250 Eye Street, N.W.
Washington, DC 20005

Intelcom Group (U.S.A.), Inc.
Albert H. Kramer
Robert F. Aldrich
Dickstein, Shapiro & Morin, LLP
2101 L Street, NW
Washington, DC 20037-1526

Intermedia Communications, Inc.
Jonathan E. Canis
Reed Smith Shaw & McClay
1301 K Street, NW
Suite 1100 East Tower
Washington, DC 20005

International Communications Association
Brian R. Moir
Moir & Hardman
2000 L Street, NW, Suite 512
Washington, DC 20036-4907

Iowa Utilities Board
William H. Smith, Jr., Chief
Bureau of Rate and Safety Evaluation
Lucas State Office Building
Des Moines, IA 50319

John Staurulakis, Inc.
Michael S. Fox, Director, Regulatory Affairs
6315 Seabrook Road
Seabrook, MD 20706

Jones Intercable, Inc.
Christopher W. Savag
Navid C. Haghighi
Cole, Raywid & Braverman, LLP
1919 Pennsylvania Avenue, NW, Ste. 200
Washington, DC 20006

Kansas Corporation Commission
David Heinemann, General Counsel
Julie Thomas Bowles, Asst. Gen. Counsel
1500 SW Arrowhead Road
Topeka, KS 66604

Kentucky Public Service Commission
May E. Dougherty
PO Box 615
Frankfort, KY 40602

LCI International Telecom Corp.,
Robert J. Aamoth
Reed Smith Shaw & McClay
1301 K Street, NW, Suite 1100, East Tower
Washington, DC 20005

LDDS Worldcom, Inc.
Peter A. Rohrbach
Linda L. Oliver
Kyle Dixon
Hogan & Hartson, LLP
555 Thirteenth Street, N.W.
Washington, DC 20004

Lincoln Telephone and Telegraph Company
Robert A. Mazer
Albert Shuldiner
Mary Pape
Vinson & Elkins
1455 Pennsylvania Avenue, N.W.
Washington, DC 20004-1008

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

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

Maryland Public Service Commission
Bryan G. Moorhouse, General Counsel
Susan Stevens Miller, Asst. General Counsel
6 St. Paul Street
Baltimore, MD 21202

Massachusetts Attorney General Scott Harshbarger
Daniel Mitchell, Asst. Attorney General
Regulated Industries Division, Public Protection Bureau
200 Portland Street, Fourth Floor
Boston, MA 02114

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

MCI Telecommunications Corporation
Don Sussman
Larry Fenster
Charles Goldfarb
Mark Bryant
Mary L. Brown
1801 Pennsylvania Ave., NW
Washington, DC 20006

Metricom, Inc.
Henry M. Rivera
Larry S. Solomon
J. Thomas Nolan
Ginsburg, Feldman & Bress, Chtd.
1250 Connecticut Avenue, N.W.
Washington, DC 20036

Michigan Exchange Carriers Association
Glen A. Schmiege
Mark J. Burzych
Foster, Swift, Collins & Smith, P.C.
313 South Washington Square
Lansing, MI 48933

Michigan Public Service Commission
John G. Strand
Ronald E. Russell
John L. O'Donnell
6545 Mercantile Way
Lansing, MI 48911

Minnesota Independent Coalition
Richard J. Johnson
Michael J. Bradley
Moss & Barnett
4800 Norwest Center
90 South Seventh Street
Minneapolis, MN 55402-4129

Missouri Public Service Commission
Harold Crumpton, Commissioner
P.O. Box 360
Jefferson City, MO 65102

MobileMedia Communications, Inc.
Gene P. Belardi, Vice President
2101 Wilson Boulevard, Suite 935
Arlington, VA 22201

Montana Public Service Commission
Karen Finstad Hammel, Esq.
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601

Municipal Utilities
James N. Horwood
Scott H. Strauss
Wendy S. Lader
Spiegel & McDiarmid
1350 New York Avenue, NW
Washington, DC 20005

Natl. Association of Regulatory Utility Commissioners
Paul Rodgers
Charles D. Gray
James Bradford Ramsay
1201 Constitution Avenue, N.W., Suite 1102
1102 ICC Building
P.O. Box 684
Washington, DC 20044

National Association of State Utility Consumer Advocates (NASUCA)
Martha S. Hogerty
1133 15th Street, N.W., Suite 550
Washington, DC 20005

National Cable Television Association, Inc.
Daniel L. Brenner
Neal M. Goldberg
David L. Nicoll
1724 Massachusetts Ave., NW
Washington, DC 20036

National Exchange Carrier Association, Inc.
Joanne Salvatore Bochis
100 South Jefferson Road
Whippany, NJ 07981

National Wireless Resellers Association
Douglas L. Povich
Kelly & Povich, P.C.
1101 30th Street, NW
Washington, DC 20007

Nextlink Communications, L.L.C.
J. Scott Bonney, Vice President, Regulatory
External Affairs
155 108th Avenue, NE
Bellevue, WA 98004

Nextel Communications, Inc.
Robert S. Foosaner, Sr. Vice President, Gen. Couns.
Lawrence R. Krevor, Director
Laura L. Holloway, General Attorney
800 Connecticut Avenue, N.W., Suite 1001
Washington, DC 20006

North Carolina Public Utilities Commission Public Staff
Antoinette R. Wike, Chief Counsel
PO Box 29520
Raleigh, NC 27626-0520

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

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

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

Office of the Ohio Consumers' Counsel
David C. Bergman
Thomas J. O;Brien
77 South High Street, 15th Floor
Columbus, OH 43266-0550

Ohio Public Utility Commission
Steven T. Nourse
Jodi Jenkins Bair
180 East Broad Street
Columbus, OH 43215-3793

Oklahoma Corporation Commission
Ernest G. Johnson, Director
Public Utility Division
John Gray, Senior Asst. General Counsel
Office of General Counsel
Maribeth D. Snapp, Deputy General Counsel
PO Box 25000-2000
Oklahoma City, OK 73152-2000

Omnipoint Corporation
Mark J. Tauber
Mark J. O'Connor
Piper & Marbury, L.L.P.
1200 19th Street, N.W., Seventh Floor
Washington, DC 20036

Oregon Public Utility Commission
W. Benny Won
Public Utility Section
1162 Court Street, NE
Salem, OR 97310

Pacific Telesis Group
Marlin D. Ard
Randall E. Cape
John W. Bogy
140 New Montgomery Street
Room 1625
San Francisco, CA 94105

Margaret E. Garber
1275 Pennsylvania Avenue, NW
Washington, DC 20004

Paging Network, Inc.
Judith St. Ledger-Roty
Paul G. Madison
Reed Smith Shaw & McClay
1301 K Street, N.W., Suite 1100
Washington, DC 20005-3317

Pennsylvania Public Utility Commission
Maureen A. Scott, Assistant Counsel
P.O. Box 3265
Harrisburg, PA 17105-3265

Personal Communications Industry Association
Mark J. Golden, Vice President
-- Industry Affairs
Robert R. Cohen
500 Montgomery Street, Suite 700
Alexandria, VA 22314-1561

ProNet Inc.
Jerome K. Blask
Daniel E. Smith
Gurman, Blask & Freedman, Chtd.
1400 Sixteenth St., NW, Suite 500
Washington, DC 20036

Puerto Rico Telephone Company
Joe D. Edge
Richard J. Arsenault
Tina M. Pidgeon
Drinker, Biddle & Reath
901 15th Street, N.W.
Washington, DC 20005

Roseville Telephone Company
George Petrutsas
Paul J. Feldman
Fletcher, Heald & Hildreth, P.L.C.
1300 North 17th Street, 11th Floor
Rosslyn, VA 22209

Rural Telephone Coalition
Margot Smiley Humphrey
NRTA
Koteen & Naftalin, LLP
1150 Connecticut Avenue, NW, Ste. 1000
Washington, DC 20036

SBC Communications Inc.
James D. Ellis
Robert M. Lynch
David F. Brown
175 E. Houston, Room 1254
San Antonio, TX 78205

Scherers Communications Group, Inc.
Susan Drombetta
Manager - Rates and Tariffs
575 Scherers Court
Worthington, OH 43085

SDN Users Association, Inc.
Reginald R. Bernard, President
P.O. Box 4014
Bridgewater, NJ 08807

Small Business Administration
Jere W. Glover, Esq., Chief Counsel
David W. Zesiger, Esq., Assistant
Chief Counsel
Office of Advocacy
409 Third Street, S.W., Suite 7800
Washington, DC 20416

Small Cable Business Association
Eric E. Breisach
Christopher C. Cinnamon
Howard & Howard
107 W. Michigan Ave., Suite 400
Kalamazoo, MI 49007

South Carolina Public Service Commission
R. Glenn Rhyne, Manager-Research Dept.
111 Doctors Circle (P.O. Drawer 11649)
Columbia, SC 29203 (29211)

Southern New England Telephone Company
Rodney L. Joyce
J. Thomas Nolan
Ginsburg, Feldman and Bress
1250 Connecticut Avenue, N.W.
Washington, DC 20036

Sprint Corporation
Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
1850 M Street, NW, 11th Floor
Washington, DC 20036

Sprint Spectrum
Jonathan D. Blake
Kurt A. Wimmer
Gerard J. Waldron
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, DC 20044-7566

TCA, Inc.
Chris Barron
3617 Betty Drive, Suite 1
Colorado Springs, CO 80917

TDS Telecommunications Corporation
Margot Smiley Humphrey
Koteen & Naftalin, L.L.P.
1150 Connecticut Avenue, N.W., Suite 1000
Washington, D.C. 20036

Tele-Communications, Inc.
Philip L. Verveer
Sue D. Blumenfeld
Thomas Jones
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036

Telecommunications Carriers For Competition
Peter A. Rohrbach
Linda L. Oliver
Kyle D. Dixon
Hogan & Hartson L.L.P.
555 Thirteenth Street, N.W.
Washington, DC 20004

Telecommunications Industries Analysis Project
University of Florida
College of Business Administration
Carol Weinhaus et al.
121 Mt. Vermon Street
Boston, MA 02108

Telecommunications Industry Association
Jot D. Carpenter, Jr.
Vice President, Government Relations
1201 Pennsylvania Ave., NW, Suite 315
Washington, DC 20044-0407

Telecommunications Resellers Association
Charles C. Hunter
Hunter & Mow, PC
1620 I Street, NW, Suite 701
Washington, DC 20006

Teleport Communications Group Inc.
J. Manning Lee, Vice President,
Regulatory Affairs
Teresa Marrero, Sr. Regulatory Counsel
One Teleport Drive, Suite 300
Staten Island, NY 10311

Texas Public Utility Commission
Pat Wood, III
Robert W. Gee
Judy Walsh
7800 Shoal Creek Blvd.
Austin, TX 78757

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

Time Warner Communications Holdings, Inc.
Aaron I. Fleishman
Richard Rubin
Mitchell F. Brecher
Steven N. Teplitz
Fleischman and Walsh, LLP
1400 16th Street, NW
Washington, DC 20036

TLD (Telefónica Larga Distancia De Puerto Rico, Inc.)
Alfred M. Mamlet
Philip L. Malet
Colleen A. Sechrest
Steptoe & Johnson LLP
1330 Connecticut Avenue, N.W.
Washington, DC 20036

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

United Calling Network, Inc.
Perry W. Woofter
1200 29th Street, N.W., Suite 200
Washington, DC 20007

United States Telephone Association
Roy M. Neel
Bob A. Boaldin
1401 H Street, NW, Suite 600
Washington, DC 20005

US West, Inc.
Robert B. McKenna
Kathryn Marie Krause
James T. Hannon
1020 19th Street, NW, Suite 700
Washington, DC 20036

UTC
Jeffrey L. Sheldon
Sean A. Stokes
1140 Connecticut Avenue, NW, Suite 1140
Washington, DC 20036

Vanguard Cellular Systems, Inc.
Raymond G. Bender, Jr.
J.G. Harrington
Peter A. Batacan
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, NW, Suite 800
Washington, DC 20036

Vartec Telecom, Inc., Transtel, Telephone Express, CGI and Communigroup Inc. of Mississippi
James U. Troup
L. Charles Keller
Arter & Hadden
1801 K Street, N.W., Suite 400K
Washington, DC 20006

Virginia Electric & Power Company
Richard D. Gary
Charles H. Carrathers, III
Hunton & Williams
951 East Byrd Street
Richmond, VA 23219

Virginia State Corporation Commission
Edward C. Addision, Director
Division of Communications
P.O. Box 1197
Richmond, VA 23218

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

Washington Utilities and Transportation Commission
Steve McLellan, Executive Secretary
P. O. Box 47250
Olympia, WA 98504-7250

Western Alliance
Charles H. Kennedy
Morrison & Foerster, LLP
2000 Pennsylvania Avenue, N.W., Ste. 5500
Washington, DC 20006

Wisconsin Public Service Commission
Cheryl L. Parrino, Chairman
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

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

Southwestern Bell Telephone Co.
Durward D. Dupre
Mary W. Marks
Jonathan W. Royston
One Bell Center, Room 3520
St. Louis, Missouri 63101

NTCA
David Cosson
L. Marie Guillory
2626 Pennsylvania Avenue, N.W.
Washington, DC 20037

Perkins COIE
Greg P. Mackay
411 - 108th Avenue NE, Suite 1800
Bellevue, Washington 09004-5584

NU System Companies
Daniel P. Venora
Northeast Utilities Service Co.
P.O. Box 270
Hartford, CT 06141-0270

Ohio Edison Company
Linda R. Evers
Ohio Edison Company
76 South Main Street
Akron, OH 44308

Pacific Gas and Electric Company
Shirley A. Woo
P. O. Box 7442
San Francisco, CA 94120

The Local Exchange Carrier Coalition
William F. Maher, Jr.
David Colton
Halprin, Temple, Goodman & Sugrue
1100 New York Avenue, N.W.
Suite 650 East
Washington, D.C. 20005

Pilgrim Telephone, Inc.
Walter Steimel, Jr.
Marjorie K. Conner
Hunton & Williams
1900 K Street, N.W.
Washington, D.C. 20006

The National Cable Television Association, Inc.
Howard J. Symons
Christopher J. Harvie
Sara F. Seidman
Mintz, Levi, Cohn, Ferris, Glovsky
& Popeo, P.C.
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Delmarva Power & Light Company
Dale G. Stoodley
Joanne M. Scanlon
Delmarva Power & Light Company
800 King Street
P. O. Box 231
Wilmington, DE 19899

Duquesne Light Company
Steven J. Del Cotto
411 Seventh Avenue, 16-006
P. O. Box 1930
Pittsburgh, PA 15239

Beehive Telephone Company, Inc.
Russell D. Lukas
Lukas, McGowan, Nace
& Gutierrez, Chartered
1111 19th Street, N.W.
Twelfth Floor
Washington, D.C. 20036

People of the State of California
Peter Arth, Jr.
Edward W. O'Neill
Mary Mack Adu
505 Van Ness Avenue
San Francisco, CA 94102

Paul Glist
Cole, Raywid & Braverman
1919 Pennsylvania Avenue, N.W.
Suite 200
Washington, D.C. 20006

Celpage, Inc.
Frederick M. Joyce
Elaine D. Critides
Joyce & Jacobs, Att6ys. at Law
1019 19th Street, N.W.
14th Floor, PH-2
Washington, D.C. 20036

Consolidated Edison Company of New York, Inc.
John D. McMahon
Mary L. Krayeske
4 Irving Place - Room 1815S
New York, NY 10003

Delmarva Power & Light Company, New Mexico PSC
John H. O'Neill, Jr.
Robert E. Conn
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037-1128

Florida Power
Jeffrey A. Froeschle
3201 Thirty-Fourth Street South
P.O. Box 14042
St. Petersburg, FL 33733-4042

Infrastructure Owners (Electric Companies)
Shirley S. Fujimoto
McDermott, Will & Emery
1850 K Street, N.W.
Suite 500
Washington, D.C. 20006

Kansas City Power & Light Company
Michael A. Rump
1201 Walnut
Kansas City, Missouri 64141-9679

OPASTCO
Lisa M. Zaina
Ken Johnson
21 Dupont Circle, N.W., Suite 700
Washington, DC 20036

Lower Colorado River Authority
Thomas J. Keller
Kathy D. Smith
Verner, Liipfert, Bernhard, McPherson & Hand
901 15th Street, N.W.
Suite 700
Washington, D.C. 20005

State of Colorado
Anthony Marquez
First Assistant Attorney General
1580 Logan Street, OL2
Denver, CO 80203

Rand McNally & Company
Daniel S. Goldberg
Goldberg, Godles, Wiener & Wright
1229 Nineteenth Street, N.W.
Washington, D.C. 20036

Kalida Telephone Company, Inc.
Ralph Miller, General Manager
121 E. Main Street, Box 267
Kalida, OH 45853

Consolidated Communications Telecom Services Inc.
Ellyn Crutcher
121 South 17th Street
Mattoon, IL 61938