

RECEIVED

DEC 4 - 1996

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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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

DOCKET FILE COPY ORIGINAL

**REPLY OF SBC COMMUNICATIONS, INC.**

SBC Communications, Inc. (SBC) files this Reply in response to various Oppositions filed to Petitions for Reconsideration (PFRs) of the Captioned matter.

I. **DIALING PARITY AND NUMBER ADMINISTRATION COST RECOVERY SHOULD BE COMPETITIVELY NEUTRAL.**

The Second Report and Order (Order)<sup>1</sup> concludes that cost recovery for numbering administration and dialing parity should: (1) not give one service provider an appreciable, incremental cost advantage over another service provider, when competing for a specific subscriber;

<sup>1</sup> FCC No. 96-333 (Aug. 8, 1996).

No. of Copies rec'd  
List A B C D E

048

and (2) not have a disparate effect on the ability of competing service providers to earn a normal return.<sup>2</sup>

SBC opposes arguments by several parties, including AT&T, MCI, MFS, Sprint, TRA and NCTA, that cost recovery should not be borne by all telecommunications carriers on a competitively neutral basis.<sup>3</sup> Nor does SBC agree that the Order's "gross telecommunications revenues less payments to other carriers" formula represents a competitively neutral means of recovering numbering administration and dialing parity costs. Reducing revenues by charges to other carriers results in disproportionate burdens on incumbent local exchange carriers (ILECs). Resellers, for example, under this formula, are almost completely exempt from bearing any costs. IXC's also shoulder a reduced burden, because the formula eliminates assessments on access charges which interexchange carriers (IXCs) pay to local exchange carriers (LECs).

Number administration and dialing parity costs should be allocated to all telecommunications carriers on the basis proposed by SBC, elemental access lines (EALs). Under this approach, access lines would be counted by "element," indicative of their use in three different types of services: (1) local exchange service, (2) intraLATA toll service, and (3) interLATA toll service. The total number of EALs would include the sum of (1) local exchange access lines (including both wireline and wireless), (2) intraLATA toll presubscribed access lines, and (3) interLATA toll presubscribed access lines. SBC's proposed EAL method meets the Commission's definition of competitive neutrality and does not disadvantage new entrants, IXCs or ILECs due to disproportionate

---

<sup>2</sup> Order at para. 94.

<sup>3</sup> AT&T Opposition at 15; MCI Opposition at 7; MFS Response at 8; Sprint Comments at 8; TRA Reply at 5-6; NCTA at 6.

distribution of costs, customers or EALs. The Commission should abandon its approach of gross revenues minus charges paid to other carriers and adopt SBC's EAL approach.

II. FULL NUMBER PORTABILITY SHOULD NOT BE A CONDITION PRECEDENT TO ALL-SERVICES OVERLAYS.

SBC opposes the notion that NPA overlays should not be allowed until full number portability is in place. SBC supports the Commission's previous finding that linking overlays to permanent number portability would "effectively deny state commissions the option of implementing any all-services overlays while many area codes are facing exhaust."<sup>4</sup> Each NPA Relief effort should be evaluated on its own merits. Overlays should not be precluded by an arbitrary and misguided linkage to number portability.

SBC also supports mandatory ten-digit dialing where all-services overlays have been implemented. Ten-digit dialing for all ensures that no one obtains a dialing advantage.

III. AFTER NOTIFICATION, A CUSTOMER WHO DOES NOT SELECT AN INTRALATA CARRIER SHOULD REMAIN WITH THE LEC.

SBC's Petition for Reconsideration (PFR) sought clarification of confusing and inconsistent language about the procedure for handling existing customers who do not provide their local exchange carriers with intraLATA toll presubscription instructions. SBC requested the Commission clarify that after an appropriate customer notification education effort, an existing customer who fails to provide his LEC with a "PIC" selection shall remain presubscribed to the LEC.

Through the comment cycle on Petitions for Reconsideration, SBC's position was addressed by numerous commentors. AT&T, Sprint, MFS, Ameritech, BellSouth, Pacific Telesis Group, Bell

---

<sup>4</sup> Order at para. 290.

Atlantic and GTE all support this position.<sup>5</sup> In addition, NYNEX and USTA have also addressed the handling of existing customers, in PFR filings requesting clarification that the prohibition on the automatic assignment of intraLATA toll traffic does not apply to pre-existing customers.<sup>6</sup> BellSouth reads the prohibition against automatic assignment of toll customers as inherently applying only to new customers and believes that clarification is not required but rather only the Commission's confirmation that it never intended the inference drawn by petitions or the hardship on existing consumers that would result from applying this prohibition to them.<sup>7</sup>

There is thus overwhelming support for SWBT's position that absent an affirmative response that the existing customer wants to change carriers, the customer should remain presubscribed to the existing intraLATA toll carrier.

IV. WHEN LATAS CROSS STATE BOUNDARIES, INTRALATA TOLL DIALING PARITY MUST BE DICTATED BY THE LAWS OF THE STATE IN WHICH THE SERVING SWITCH IS LOCATED.

SBC's PFR requested clarification of paragraph 41 of the Order, which addresses LATA boundaries that encompass parts of two adjacent states, and which could be interpreted to require the serving LEC to implement the procedures which both states have approved for intraLATA toll dialing parity. SBC's interpretation of paragraph 41 is that, in such instances, the procedures to be followed should be those of the state in which "dial tone" is provided. Sprint agrees with this straight-forward interpretation.<sup>8</sup> MCI disagrees, claiming that it is pointless to distinguish between

---

<sup>5</sup> Ameritech at 2-3; AT&T at 5; Bell Atlantic at 7; BellSouth at 7-8; GTE at 6-7; MFS at 3; Pacific Telesis Group at 6; Sprint at 6.

<sup>6</sup> NYNEX at 5; USTA at 7.

<sup>7</sup> BellSouth at 7-8.

<sup>8</sup> Sprint at 5.

intrastate, intraLATA toll calls and interstate, intraLATA toll calls for the purpose of dialing parity.<sup>9</sup>

MCI misses the point, which is not to distinguish between intrastate and interstate intraLATA toll calls. This issue is technological. Once the dual PIC software is loaded and activated within a switch, it is not feasible to limit it to certain NPA/NXXs. Therefore, end user customers who reside in a state where intraLATA toll dialing parity has been approved but who receive dial tone from a switch located in another state where intraLATA toll dialing has not been made available cannot, as a technical matter, benefit from dialing parity until the state in which the switch is located approves dialing parity. Therefore, when LATAs cross state boundaries, intraLATA toll dialing parity implementation for end users must be dictated by the switch from which they are served and not by the state in which they reside.

V. THE BURDEN FALLS UPON WIRELESS CUSTOMERS TO CHANGE NUMBERS IN A GEOGRAPHIC SPLIT.

SBC agrees with The Personal Communications Industry Association,<sup>10</sup> AirTouch Communications<sup>11</sup> and Bell Atlantic NYNEX Mobile<sup>12</sup> that the Order erred in stating that “requiring approximately half of the wireless and wireline customers to change their telephone numbers in a geographic split is an equitable distribution of burdens.”<sup>13</sup> While having equal numbers of customers of different types of technology change their numbers gives an illusion of equitable treatment, much more time, effort and money are required to change a wireless number than a wireline number.

---

<sup>9</sup> MCI at 5.

<sup>10</sup> PCIA at 4.

<sup>11</sup> AirTouch at 2-3.

<sup>12</sup> Bell Atlantic NYNEX Mobile at 3-4.

<sup>13</sup> Order at para. 308.

Both wireline and wireless customers need to make stationery changes and inform their friends and acquaintances or customers of their new number after an area code change. However, when the 214/972 area code split occurred in Dallas on September 14, 1996, the 972 wireline customers awakened to a phone number with a new area code. They did not have to go anywhere to get their new area code; they did not need to contact their phone company about receiving a new code. As far as wireline customers are concerned, there is virtually no burden involved in actually getting a new area code. This is not the case for wireless phone numbers.

When a wireless customer has to change his/her phone number, the customer must physically bring the mobile phone into a wireless carrier's store and have it manually reprogrammed by a wireless carrier technician. Then the carrier must change the customer's number in its network and billing systems as well. This involves time and expense for the customer and the carrier. And, when a wireless carrier has to change thousands of its customers' phone numbers, the carrier needs to schedule customer visits to avoid excessive delays. This involves planning and notification. Thus, there is a significant burden involved in the changing of wireless customers' phone numbers.

Therefore, SBC requests the Commission to reconsider its statement that requiring approximately half of the wireless customers and wireline customers to change telephone numbers in a geographic split is an equitable distribution of burdens. At the very least, the Commission should recognize that such "equitable distribution of the burdens" should be pursued only if it contributes to the relief effort. Imposing unnecessary burdens on customers for the sole purpose of achieving an "equitable distribution" is inappropriate.

VI. STATE COMMISSIONS SHOULD BE ALLOWED TO USE VOLUNTARY WIRELESS CONVERSIONS TO LESSEN THE BURDEN OF GEOGRAPHIC SPLITS ON CONSUMERS.

The Order declined to take any action to prevent the Texas Commission from taking back some wireless numbers in the course of introducing a geographic split plan. SBC does not oppose such decision per se<sup>14</sup> but rather is concerned that language in the Order may be misconstrued as somehow preventing state commissions from using voluntary wireless conversions to lessen the burden of geographic splits on consumers. Both AirTouch<sup>15</sup> and Paging Network, Inc.<sup>16</sup> support SBC.

SBC is concerned that the statement in the Order that, in a geographic split, “roughly half of the customers in the NPA, including wireless customers, will have to change their telephone numbers” could be misconstrued as precluding voluntary wireless conversions as part of the relief plan. SBC’s concern is well taken, as evidenced by the Massachusetts Department of Public Utilities’ recent inquiry whether it could allow voluntary wireless conversions as part of a geographic split plan. The Commission treated the inquiry as a Petition for Declaratory Ruling, and Comments were filed on November 6, 1996.<sup>17</sup> As noted in Southwestern Bell Mobile Systems, Inc.’s Comments on the Petition for Declaratory Ruling, prohibiting voluntary wireless conversions

---

<sup>14</sup> The estimated exhaust dates for the resulting area codes are such that any mandatory migration from the old area code to the other would effectively hasten the exhaust of the next area code exhaust in Dallas. Thus, mandatory conversions from the old area code to the new area code would not be practical, and it seems unlikely that any party will pursue such action.

<sup>15</sup> AirTouch at 2-3.

<sup>16</sup> PageNet at 2.

<sup>17</sup> See, Public Notice, released October 23, 1996, NSD 96-15, “FCC Seeks Comment on Petition for Declaratory Ruling filed by Massachusetts Department of Public Utilities Regarding Area Code Relief Plan for Area Codes 508 and 617.”

is contrary to the best interest of the consumer, illogical, inefficient and would needlessly force consumers and the wireless industry to incur millions of dollars of cost for each NPA split.<sup>18</sup>

---

<sup>18</sup> See Comments of Southwestern Bell Mobile Systems, Inc., pp. 1-12 and affidavit of Professor Jerry A. Hausman, Cambridge Professor of Economics at the Massachusetts Institute of Technology, attached thereto as Exhibit 1, NSD 96-16, filed November 6, 1996.

VII. CONCLUSION

As a previous SBC pleading has pointed out, SBC's PFR was filed one day out of time, due to circumstances beyond the control of SBC. Should the Commission decline to consider SBC's PFR, SBC respectfully requests that the Commission consider the arguments contained herein in reaching its decision on reconsideration in this matter.

Respectfully Submitted,

SBC COMMUNICATIONS INC.

By PAUL WALTERS

James D. Ellis  
Robert M. Lynch  
David F. Brown  
175 E. Houston, Room 1254  
San Antonio, Texas 78205  
(210) 351-3478

ATTORNEYS FOR SBC  
COMMUNICATIONS INC.

Durward D. Dupre  
Mary W. Marks  
J. Paul Walters, Jr.  
One Bell Center, Room 3520  
St. Louis, Missouri 63101  
(314) 235-2507

ATTORNEYS FOR SOUTHWESTERN BELL  
TELEPHONE COMPANY

December 4, 1996

Certificate of Service

I, Elaine Temper, hereby certify that the reply of Southwestern Bell Telephone Company on Docket Nos. 96-98, 95-185, 92-237, NSD 96-8 and IAD 94-102 have been served this 4th day of December, 1996 to the Parties of Record.

A handwritten signature in cursive script that reads "Elaine Temper". The signature is written in black ink and is positioned above a solid horizontal line.

Elaine Temper

December 4, 1996

LAWRENCE G MALONE SOLICITOR  
NEW YORK STATE DEPARTMENT  
OF PUBLIC SERVICE  
THREE EMPIRE STATE PLAZA  
ALBANY NEW YORK 12223-3510

THOMAS E TAYLOR  
DOUGLAS E HART  
JACK B HARRISON  
FROST & JACOBS  
ATTORNEYS FOR CINCINNATI BELL TELEPHONE  
2500 PNC CENTER  
201 EAST FIFTH STREET  
CINCINNATI OHIO 45202

DIANE MUNNS  
GENERAL COUNSEL  
IOWA UTILITIES BOARD  
LUCAS STATE OFFICE BUILDING  
DES MOINES IOWA 50319

ALLAN KNIEP  
DEPUTY GENERAL COUNSEL  
IOWA UTILITIES BOARD  
LUCAS STATE OFFICE BUILDING  
DES MOINES IOWA 50319

MARK D ROELLIG  
DAN L POOLE  
1020 19TH STREET NW SUITE 700  
WASHINGTON DC 20036

PAUL T CAPPUCCIO  
STEVEN G BRADBURY  
PATRICK F PHILBIN  
KIRKLAND & ELLIS  
655 15TH STREET NW SUITE 1200  
WASHINGTON DC 20005

BRIAN A EDDINGTON  
LOUISIANA PUBLIC SERVICE COMMISSION  
PO BOX 91154  
BATON ROUGE LA 70821-9154

DON SCHROER, CHAIRMAN  
ALASKA PUC  
1016 WEST 6TH AVENUE SUITE 400  
ANCHORAGE AK 99501

JOHN STRAND  
MICHIGAN PSC  
6545 MERCANTILE WAY  
LANSING MI 48910

JOSEPH W WAZ JR  
COMCAST CORPORATION  
1500 MARKET STREET  
PHILADELPHIA PA 19102

DOUGLAS POVICH  
KELLY & POVICH PC  
1101 30TH STREET NW SUITE 300  
WASHINGTON DC 20007

ROBERT J HIX  
VINCENT MAJKOWSKI  
COLORADO PUBLIC UTILITIES COMMISSION  
1580 LOGAN STREET  
OFFICE LEVEL 2  
DENVER CO 80203

DAVID MCGANN  
MYRA KAREGIANES  
ILLINOIS COMMERCE COMMISSION  
160 NORTH LA SALLE STREET  
SUITE C-800  
CHICAGO ILL 60601

JONATHAN E CANIS  
REED SMITH SHAW & MCCLAY  
1301 K STREET NW  
SUITE 1100 EAST TOWER  
WASHINGTON DC 20005

CHRISTOPHER W SAVAGE  
NAVID C HAGHIGHI  
JOHN DODGE  
COLE RAYWID & BRAVERMAN LLP  
1919 PENNSYLVANIA AVE NW  
SUITE 200  
WASHINGTON DC 20006

MICHAEL S FOX  
JOHN STAURULAKIS INC  
6315 SEABROOD ROAD  
SEABROOK MD 20706

JOSEPH R REIFER  
JOHN D SEIVER  
1919 PENNSYLVANIA AVE NW  
SUITE 200  
WASHINGTON DC 20006

PAUL B JONES  
JAMIS STAHLJUT  
TIME WARNER COMMUNICATIONS HOLDING  
300 STAMFORD PLACE  
STAMFORD CT 06902

JOHN WINDHAUSER JR  
RONALD BINZ  
DEBRA BERLYN  
COMPETITION POLICY INSTITUTE 1156 15TH  
STREET NW SUITE 310  
WASHINGTON DC 20005

RICHARD G MORGAN  
RICHARD A DROM  
LANE & MIHENDORF LLP  
919 18TH STREET NW STE 800  
WASHINGTON DC 20006

ROBERT B NICHOLSON  
ROBERT J WIGGERS  
US DEPARTMENT OF JUSTICE  
ROOM 3224  
10TH & PENNSYLVANIA AVENUE NW  
WASHINGTON DC 20530

CHRISTOPHER J WRIGHT  
FEDERAL COMMUNICATIONS COMMISSION  
ROOM 614  
1919 M STREET NW  
WASHINGTON DC 20554

THEODORE V MORRISON JR  
VIRGINIA STATE CORPORATION COMMISSION  
STAFF  
1300 EAST MAIN STREET  
RICHMOND VA 23219

TERRENCY P MCGARTY  
COMAV CORP  
22ND FLOOR  
60 STATE STREET  
BOSTON MA 02109

ANTOINETTE COOK BUSH  
LINDA G MORRISON  
SKADDEN ARPS SLATE MEAGHER & FLOM  
1440 NEW YORK AVENUE NW  
WASHINGTON DC 20005

WILLIAM E KENNARD  
FEDERAL COMMUNICATIONS COMMISSION  
1919 M STREET NW ROOM 614  
WASHINGTON DC 20554

BRUCE J ENNIG  
ANTHONY C EPSTEIN  
DONALD VERRILLI  
MAUREEN F DEL DUCA  
JENNER AND BLOCK  
601 13TH STREET NW  
WASHINGTON DC 20005

SUSAN DROMBETTA  
SCHERERS COMMUNICATIONS GROUP INC  
575 SCHERERS COURT  
WORTHINGTON OH 43085

THOMAS P HESTER  
KELLY R WELSH  
JOHN T LENAHAN  
AMERITECH OPERATING COMPANIES  
30 SOUTH WACKER DRIVE  
CHICAGO IL 60606

R MICHAEL SENKOWSKI  
RICHARD E WILEY  
JEFFREY S LINDER  
WILEY REIN & FIELDING  
1776 K STREET NW  
WASHINGTON DC 20006

ENCARNITA CATALAN-MARCHAN  
MARIA PIZARRO-FIGUEROA  
TELFONICA LARGA DISTANCIA DE  
PUERTO RICO INC  
METRO OFFICE PART  
BUILDING NO 8 STREET NO 1  
GUAYNABO PR 00922

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

TIM RAVEN  
TEXAS TELEPHONE ASSOCIATION  
SUITE 1005  
400 WEST 15TH STREET  
AUSTIN TX 78701-1647

BRUCE HAGEN  
SUSAN E WEFALD  
LEO M REINBOLD  
NORTH DAKOTA PUBLIC SERVICE COMMISSION  
12TH FLOOR  
STATE CAPITOL  
BISMARCK, ND 58505-0480

WILLIAM P BARR  
WARD W. WUESTE JR  
GAIL L POLIVY  
GTE SERVICE CORPORATION  
SUITE 1200  
1850 M STREET NW  
WASHINGTON DC 20036

PHILIP L MALET  
ALFRED MAMLET  
COLLEEN A SECHREST  
STEPTOE & JOHNSON LLP  
1330 CONNECTICUT AVENUE NW  
WASHINGTON DC 20036

JIM WHITEFIELD  
GARY L MANN  
TEXAS STATEWIDE TELEPHONE ATIVE INC  
3721 EXECUTIVE CENTER DRIVE  
SUITE 200  
AUSTIN TX 78731-1639

JAMES U TROUP  
L CHARLES KELLER  
ARTER & HADDEN  
SUITE 400K  
1801 K STREET NW  
WASHINGTON DC 20006

RICHARD A FINNIGAN  
WASHINGTON INDEPENDENT TELEPHONE  
ASSOCIATION  
SUITE B-1  
2405 EVERGREEN PARK DRIVE  
SOUTHWESTERN BELL TELEPHONE COMPANY  
OLYMPIA WA 98502

STEVE HAMLEN  
UNICOM  
5450 A STREET  
ANCHORAGE AK 99518-1291

ELIZABETH R SACHS  
LUKAS MCGOWAN NACE & GUTIERREZ  
12TH FLOOR  
1111 19TH STREET NW  
WASHINGTON DC 20036

DANNY E ADAMS  
JOHN J HEITMANN  
STEVEN A AUGUSTINO  
KELLY DRYE & WARREN LLP  
SUITE 500  
1200 19TH STREET NW  
WASHINGTON DC 20036

SCOTT HARSHBARGER  
DANIEL MITCHELL  
ATTORNEY GENERALS OFFICE OF THE  
COMMONWEALTH OF MASSACHUSETTS  
4TH FLOOR  
200 PORTLAND STREET  
BOSTON MA 02114

JOE D CARPENTER JR  
TELECOMMUNICATIONS INDUSTRY  
ASSOCIATION  
SUITE 315  
1201 PENNSYLVANIA AVENUE NW  
WASHINGTON DC 20044-0407

ALAN R SHARK  
AMERICAN MOBILE TELECOMMUNICATIONS  
ASSOCIATION INC  
SUITE 250  
1150 18TH STREET NW  
WASHINGTON DC 20036

WAYNE V BLACK  
C DOUGLAS JARRETT  
SUSAN M HAFELI  
KELLER & HECKMAN  
SUITE 500 WEST  
1001 G STREET NW  
WASHINGTON DC 20001

RACHAEL J ROTHSTEIN  
ANN P MORTON  
CABLE & WIRELESS INC  
8219 LEESBURG PIKE  
VIENNA VA 22182

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  
MAIN PUBLIC UTILITIES COMMISSION  
STATE HOUSE STATION NO 18  
242 STATE STREET  
AUGUSTA ME 04333-0018

LOWELL C JOHNSON  
NEBRASKA PUBLIC SERVICE COMMISSION  
300 THE ATRIUM  
1200 N STREET  
POB 94927  
LINCOLN NE 68509-4927

DAVID KAUFMAN  
NEW MEXICO STATE CORPORATION  
COMMISSION  
POB 1508  
SANTA FE NM 87504-1508

MICHAEL L GINSBERG  
ASSISTANT ATTORNEY GENERAL  
160 EAST 300 SOUTH  
POB 146751  
SALT LAKE CITY UT 84145

GEORGE E YOUNG  
VERMONT PUBLIC SERVICE BOARD  
DRAW 20  
MONTELIER VT 05620-2701

KAREN FINSTAD HAMMEL  
MONTANA PUBLIC SERVICE COMMISSION  
1701 PROSPECT AVENUE  
POB 202601  
HELENA MT 59620-2601

E BARCLAY JACKSON  
NEW HAMPSHIRE PUBLIC UTILITIES  
COMMISSION  
8 OLD SUNCOOK ROAD  
CONCORD NH 03301-7319

STEPHEN F MECHAM  
UTAH PUBLIC SERVICE COMMISSION  
160 EAST 300 SOUTH  
POB 45585  
SALT LAKE CITY UT 84145

SHELDON M KATZ  
VERMONT DEPARTMENT OF PUBLIC SERVICE  
DRAWER 20  
MONTPELIER VT 05620-2601

ROLAYNE A WIEST  
SOUTH DAKOTA PUBLIC UTILITIES  
COMMISSION  
500 EAST CAPITAL  
PIERRE SD 57501

ROBERT B MCKENNA  
US WEST INC  
51ST FL  
1801 CALIFORNIA ST  
DENVER CO 80202

PHILIP L VERVEER  
JENNIFER A DONALDSON  
ANGIE KRONENBERG  
WILLKIE FARR & GALLAGHER  
SUITE 600  
THREE LAFAYETTE CENTER  
1155 21ST STREET NW  
WASHINGTON DC 20036-3384

BRADLEY STILLMAN  
MARK N COOPER  
CONSUMER FEDERATION OF AMERICA  
SUITE 604  
1424 16TH STREET NW  
WASHINGTON DC 20036

CHRISTOPHER C KEMPLEY  
DEBORAH R SCOTT  
ARIZONA CORPORATION COMMISSION  
1200 WEST WASHINGTON STREET  
PHOENIX AZ 85007

DAVID W CARPENTER  
PETER D KEISLER  
DAVID L LAWSON  
DAVID M LEVY  
SIDLEY & AUSTIN  
ONE FIRST NATIONAL PLAZA  
CHICAGO IL 60603

MARTHA S HOGERTY  
NASUCA  
SUITE 550  
1133 15TH STREET NW  
WASHINGTON DC 20005

MICHAEL F ALTSCHUL  
RANDALL S COLEMAN  
CELLULAR TELECOMMUNICATIONS INDUSTRY  
ASSOCIATION  
SUITE 200  
1250 CONNECTICUT AVENUE NW  
WASHINGTON DC 20036

ANN KUTTER  
DOUGLAS ELFNER  
NEW YORK STATE CONSUMER PROTECTION  
BOARD  
99 WASHINGTON AVENUE  
ALBANY NY 12210

ROY E HOFFINGER  
MARK C ROSENBLUM  
RICHARD H RUBIN  
AT&T CORP  
ROOM 324511  
295 NORTH MAPLE AVENUE  
BASKING RIDGE NJ 07920

MARGARET E GARBER  
PACIFIC TELESIS GROUP  
4TH FLOOR  
1275 PENNSYLVANIA AVENUE NW  
WASHINGTON DC 20004

MARLIN D ARD  
RANDALL E CAPE  
JOHN W BOGY  
PACIFIC TELESIS GROUP  
ROOM 1530A  
140 NEW MONTGOMERY STREET  
SAN FRANCISCO CA 94105

SAUL FISHER  
WILLIAM J BALCERSKI  
NYNEX CORPORATION  
1111 WESTCHESTER AVENUE  
WHITE PLAINS NY 10604

MORTON POSNER  
ANDREW D LIPMAN  
RUSSELL M BLAU  
ERIC J BRANFMAN  
DANA FRIX  
MARY C ALBERT  
SWIDLER & BERLIN CHARTERED  
3000 K STREET NW SUITE 300  
WASHINGTON DC 20007

RILEY M MURPHY  
CHARLES KALLENBACK  
AMERICAN COMMUNICATIONS SERVICES INC  
SUITE 100  
131 NATIONAL BUSINESS PARKWAY  
ANNAPOLIS JUNCTION MD 20701

DAVID N PORTER  
MFS COMMUNICATIONS COMPANY INC  
SUITE 300  
3000 K STREET NW  
WASHINGTON DC 20007

AGRIS PAVLOVSKIS  
MICHIGAN EXCHANGE CARRIERS  
ASSOCIATION  
1400 MICHIGAN NATIONAL TOWER  
LANSING MI 48901-0025

MAUREEN O HELMER  
PUBLIC SERVICE COMMISSION OF THE STATE  
OF NEW YORK  
THREE EMPIRE STATE PLAZE  
ALBANY NY 12223

J MANNING LEE  
TERESA MARRERO  
TELEPORT COMMUNICATIONS GROUP INC  
SUITE 300  
TWO TELEPORT DRIVE  
STATEN ISLAND NY 10311

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

BRAD E MUTSCHELKNAUS  
STEVE A AUGUSTINO  
MARIEANN ZOCHOWSKI  
KELLEY DRYE & WATTEN LLP  
SUITE 500  
1200 19TH STREET NW  
WASHINGTON DC 20036

GLEN A SCHMIEGE  
MARK J BURZYCH  
FOSTER SWIFT COLLINS & SMITH PC  
303 SOUTH WASHINGTON SQUARE  
LANSING MI 48933

AARON I FLEISCHMAN  
RICHARD RUBIN  
MITCHELL F BRECHER  
STEVEN N TEPLITZ  
FLEISCHMAN AND WALSH  
SUITE 600  
1400 16TH STREET NW  
WASHINGTON DC 20036

ANNE K BINGAMAN  
DONALD J RUSSELL  
LUIN FITCH  
US DEPARTMENT OF JUSTICE  
ROOM 8104  
555 4TH STREET NW  
WASHINGTON DC 20001

BETTY D MONTGOMERY  
STEVEN T NOURSE  
PUBLIC UTILITIES COMMISSION OF OHIO  
180 EAST BROAD STREET  
COLUMBUS OH 43266-0573

JEFFREY L SHELDON  
SEAN A STOKES  
UTILITIES TELECOMMUNICATIONS COUNCIL  
SUITE 1140  
140 CONNECTICUT AVENUE NW  
WASHINGTON DC 20036

REGINALD J SMITH  
CONNECTICUT DEPARTMENT OF PUBLIC  
UTILITY CONTROL  
10 FRANKLIN SQUARE  
NEW BRITAIN CT 06051

ROBERT S FOOSANER  
NEXTEL COMMUNICATIONS INC  
SUITE 1001  
800 CONNECTICUT AVENUE NW  
WASHINGTON DC 20006

PETER A BATACAN  
RICHARD S DENNING  
RAYMOND G BENDER JR  
WERNER K HARTENBERGER  
DOW LOHNES & ALBERTSON LLC  
SUITE 800  
1200 NEW HAMPSHIRE AVENUE NW  
WASHINGTON DC 20036

ROBERT S TONGREN  
OHIO CONSUMERS COUNCIL  
15TH FLOOR  
77 SOUTH HIGH STREET  
COLUMBUS OHIO 43266-0550

TIMOTHY R GRAHAM  
ROBERT M BERGER  
JOSEPH M SANDRI JR  
WINSTAR COMMUNICATIONS INC  
1146 19TH STREET NW  
WASHINGTON DC 20036

CHARLES C HUNTER  
HUNTER & MOW PC  
SUITE 701  
1620 I STREET NW  
WASHINGTON DC 20006

CINDY SCHONHAUT  
INTELCOM GROUP (USA) INC  
9605 EAST MAROON CIRCLE  
ENGLEWOOD CO 80112

MAUREEN A SCOTT  
VERONICA A SMITH  
JOHN F POVALAITIS  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
POB 3265  
HARRISBURG PA 17105-3265

PETER A ROHRBACH  
LINDA L OLIVER  
KYLE D DIXON  
HOGAN & HARTSON LLP  
555 13TH STREET NW  
WASHINGTON DC 20004

STEVE ELLENBECKER  
KRISTIN H LEE  
WYOMING PUBLIC SERVICE COMMISSION  
700 WEST 21ST STREET  
CHEYENNE WY 82002

ALBERT H KRAMER  
ROBERT F ALDRICH  
DICKSTEIN SHAPIRO & MORIN LLP  
SUITE 800  
2101 L STREET NW  
WASHINGTON DC 20037-1526

JERE W GLOVER  
DAVID W ZESIGER  
UNITED STATES SMALL BUSINESS  
ADMINISTRATION  
SUITE 7800  
409 3RD STREET SOUTHWESTERN BELL  
TELEPHONE COMPANY  
WASHINGTON DC 20416

STEPHEN L GOODMAN  
HALPRIN TEMPLE, GOODMAN & SUGRUE  
SUITE 650 - EAST TOWER  
1100 NEW YORK AVENUE NW  
WASHINGTON DC 20005

JOHN G LAMB JR  
NORTHERN TELECOM INC  
2100 LAKEWIDE BOULEVARD  
RICHARDSON TX 75081-1599

ERIC E BREISACH  
CHRISTOPHER C CINNAMON  
JAMES H GEARY  
HOWARD & HOWARD  
SUITE 400  
107 WEST MICHIGAN AVENUE  
KALAMAZOO MI 49007

RODNEY L JOYCE  
J THOMAS NOLAN  
HENRY M RIVERA  
GINSBURG FELDMAN AND BRESS  
8TH FLOOR  
1250 CONNECTICUT AVENUE NW  
WASHINGTON DC 20036

JAMES EIBEL  
NETWORK RELIABILITY COUNCIL II  
SECRETARIAT  
7613 WILLIAM PENN PLACE  
INDIANAPOLIS IN 46256

ROBERT J AAMOTH J  
JUDITH ST LEDGER-ROTY  
REED SMITH SHAW & MCCLAY  
SUITE 1100-EAST TOWER  
1301 K STREET NW  
WASHINGTON DC 20005-3317

MARK GOLDEN  
PERSONAL COMMUNICATIONS INDUSTRY  
ASSOCIATION  
SUITE 700  
500 MONTGOMERY STREET  
ALEXANDRIA VA 22314-1561

MADLYN DEMATTEO  
ALFRED J BRUNETTI  
MAURA C BOLLINGER  
SOUTHERN NEW ENGLAND TELEPHONE  
COMPANY  
227 CHURCH STREET  
NEW HAVEN CT 06510-1806

STEPHEN R ROSEN  
THEODORE M WEITZ  
LUCENT TECHNOLOGIES INC  
475 SOUTH STREET  
MORRISTOWN NJ 07962-1976

LEON M KESTENBAUM  
JAY C KEITHLEY  
H RICHARD JUHNKE  
SPRINT COMMUNICATIONS COMPANY INC  
SUITE 1100  
1850 M STREET NW  
WASHINGTON DC 20036

GENEVIEVE MORELLI  
COMPETITIVE TELECOMMUNICATIONS  
ASSOCIATION  
SUITE 220  
1140 CONNECTICUT AVENUE NW  
WASHINGTON DC 20036

CYNTHIA MILLER  
FLORIDA PUBLIC SERVICE COMMISSION  
2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE FL 32399-0850

EMILY C HEWITT  
VINCENT L CRIVELLA  
MICHAEL J ETTNER  
GENERAL SERVICES ADMINISTRATION  
ROOM 4002  
18TH AND F STREETS NW  
WASHINGTON DC 20405

WILLIAM H SMITH JR  
ALLAN KNIEP  
IOWA UTILITIES BOARD  
LUCAS STATE OFFICE BUILDING  
DES MOINES IA 50319

VERONICA M AHERN  
MIXON HARTGROVE DEVANS & DOYLE  
SUITE 800  
ONE THOMAS CIRCLE NW  
WASHINGTON DC 20005

DAVID A GROSS  
KATHLEEN Q ABERNATHY  
AIRTOUCH COMMUNICATIONS INC  
SUITE 800  
1818 N STREET NW  
WASHINGTON DC 20036

ROBERT KITTEL  
CECIL O SIMPSON JR  
OFFICE OF THE JUDGE ADVOCATE GENERAL  
SUITE 713  
901 NORTH STUART STREET  
ARLINGTON VA 22203-1837

SNAVELY KING MAJOROS O'CONNOR & LEE  
INC  
1220 L STREET NW  
WASHINGTON DC 20005

PAMELA RILEY  
AIRTOUCH COMMUNICATIONS INC.  
ONE CALIFORNIA STREET  
SAN FRANCISCO CA 94111

ANNE P SCHELLE  
AMERICAN PERSONAL COMMUNICATIONS  
SUITE 600  
ONE DEMOCRACY CENTER  
6901 ROCKLEDGE DRIVE  
BETHESDA MD 20817

ROBERT A LONG JR  
KURT A WIMMER  
MARTIN WALD  
JONATHAN D BLAKE  
COVINGTON & BURLING  
1201 PENNSYLVANIA AVENUE NW  
POB 7566  
WASHINGTON DC 20044-7566

MARK J PALCHICK  
STEPHEN M HOWARD  
VORYS, SATER, SEYMOUR & PEASE  
SUITE 1111  
1828 L STREET NW  
WASHINGTON DC 20036

ROBERT A HART IV  
HART ENGINEERS  
POB 66436  
BATON ROUGE LA 70896

MARY E NEWMAYER  
JOHN GARNER  
ALABAMA PSC  
100 NORTH UNION STREET  
POB 991  
MONTGOMERY AL 36101

JAMES BALLER  
LANA MELLER  
THE BALLER LAW GROUP  
SUITE 200  
1820 JEFFERSON PLACE, NW  
WASHINGTON DC 20036

JOHN T SCOTT III  
CORWELL & MORING  
1001 PENNSYLVANIA AVENUE NW  
WASHINGTON DC 2004

NICHOLAS ECONOMIDES  
STERN SCHOOL OF BUSINESS  
NEW YORK UNIVERSITY NY 10012

RICHARD N KOCH  
10 LILAC STREET  
SHARON MA 02067

HAROLD CRUMPTON  
MISSOURI PSC  
POB 360  
JEFFERSON CITY MO 65102

DAVID JATLOW  
YOUNG & JATLOW  
SUITE 600  
2300 N STREET NW  
WASHINGTON DC 20037

MARC A STONE  
FRED WILLIAMSON & ASSOCIATES INC.  
SUITE 200  
2921 EAST 91ST STREET  
TULSA OK 74137-3300

MICHAEL SHORTLEY III  
FRONTIER CORPORATION  
180 SOUTH CLINTON AVENUE  
ROCHESTER NY 14646

ROY L MORRIS  
FRONTIER COMMUNICATIONS SERVICES INC  
SUITE 500  
1990 M STREET NW  
WASHINGTON DC 20036

BB KNOWLES  
DAVE BAKER  
GEORGIA PSC  
244 WASHINGTON STREET SOUTHWESTERN  
BELL TELEPHONE COMPANY  
ATLANTA GA 30334-5701

KATHY L SHOBERT  
GENERAL COMMUNICATION INC.  
SUITE 900  
901 15TH STREET NW  
WASHINGTON DC 20005

AMY DOUGHERTY  
PSC OF KENTUCKY  
730 SCHENKEL LANE  
POB 615  
FRANKFORT KY 40602

LEE M WEINER  
DOUGLAS W KINKOPH  
LCI INTERNATIONAL TELECOMMUNICATIONS  
CORPORATION  
SUITE 800  
8180 GREENSBORO DRIVE  
MCLEAN VA 22102

ROBERT A MAZER  
ALBERT SHULDINER  
MARY PAPE  
VINSON & ELKINS  
1455 PENNSYLVANIA AVENUE NW  
WASHINGTON DC 20004-1008

GREG BERBERICH  
MATANUSKA TELEPHONE ASSOC INC  
1740 SOUTH CHUGACH STREET  
PALMER AK 99645

BRYAN G MOORHOUSE  
SUSAN STEVENS MILLER  
MARYLAND PSC  
6 ST PAUL STREET  
BALTIMORE MD 21202

RICHARD TETTELBAUM  
CITIZENS UTILITIES COMPANY  
SUITE 500  
1400 16TH STREET NW  
WASHINGTON DC 20036

KEVIN C GALLAGHER  
360 COMMUNICATIONS COMPANY  
8725 WEST HIGGINS ROAD  
CHICAGO IL 60631

BARBARA OCONNOR  
MARY GARDINER JONES  
HENRY GELLER  
ALLIANCE FOR PUBLIC TECHNOLOGY  
SUITE 230  
901 15TH STREET NW  
WASHINGTON DC 20005

CURTIS T WHITE  
ALLIED ASSOCIATED PARTNERS LP AND  
GELD INFORMATION SYSTEMS  
SUITE 402  
4201 CONNECTICUT AVENUE NW  
WASHINGTON DC 20008-1158

CAROLYN C HILL  
ALLTEL TELEPHONE SERVICES CORP  
SUITE 220  
655 15TH STREET NW  
WASHINGTON DC 20005

BETTYE GARDNER  
THE ASSOCIATION FOR THE STUDY OF AFRO-  
AMERICAN LIFE AND HISTORY INC  
1407 14TH STREET NW  
WASHINGTON DC 20005-3704

EARL PACE  
BDPA  
SUITE 610  
1250 CONNECTICUT AVENUE NW  
WASHINGTON DC 20036

TIMOTHY E WELCH  
HILL AND WELCH  
SUITE 113  
1330 NEW HAMPSHIRE AVENUE NW  
WASHINGTON DC 20036

WINSTON PITTMAN  
CHRYSLER MINORITY DEALERS ASSOCIATION  
SUITE 1105  
27777 FRANKLIN ROAD  
SOUTHFIELD MI 48034

GERALD M ZUCKERMAN  
EDWARD B MYERS  
COMMUNICATIONS AND ENERGY DISPUTE  
RESOLUTION ASSOCIATES  
SUITE 400  
INTERNATIONAL SQUARE  
1825 I STREET NW  
WASHINGTON DC 20006

J CHRISTOPHER DANCE  
KERRY TASSOPOULOS  
EXCEL TELECOMMUNICATIONS INC.  
SUITE 1220  
9330 LBJ FREEWAY  
DALLAS TX 75243

THOMAS K CROWE  
MICHAEL B ADAMS JR  
LAW OFFICES OF THOMAS K CROWE PC  
SUITE 800  
2300 M STREET NW  
WASHINGTON DC 20037

MAUDINE R COOPER  
GREATER WASHINGTON URBAN LEAGUE INC  
3501 14TH STREET NW  
WASHINGTON DC 20010

DAVID HEINEMANN  
EVA POWERS  
STEPHEN H KUKTA  
JULIE THOMAS BOWLES  
KANSAS CORPORATION COMMISSION  
1500 S W ARROWHEAD ROAD  
TOPEKA KS 66604

GENE P BELARDI  
MOBILEMEDIA COMMUNICATIONS INC  
SUITE 935  
2101 WILSON BOULEVARD  
ARLINGTON VA 22201