

Bell Atlantic Network Services, Inc.  
1133 20th Street, N.W.  
Suite 800  
Washington, DC 20036  
202 392-6980  
FAX 202 392-1687

**Patricia E. Koch**  
Assistant Vice President  
Federal External Affairs and Regulatory Relations

December 19, 1996

**EX PARTE OR LATE FILED**

**EX PARTE**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW - Room 222  
Washington, D.C. 20554

**RECEIVED**  
**DEC 19 1996**  
FEDERAL COMMUNICATIONS COMMISSIO  
OFFICE OF SECRETARY

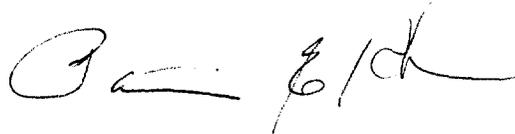
**Re: CC Docket No. 96-149**

Dear Mr. Caton:

On December 19, 1996 the attached documents were provided to Chairman Hundt, Commissioner Chong, Commissioner Ness, Commissioner Quello, Richard Metzger, Deputy Chief of the Common Carrier Bureau and Chris Wright of the Office of General Counsel.

Please enter this letter into the record as appropriate.

Sincerely,



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*CHZ*

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Assistant Vice President  
Federal External Affairs and Regulatory Relations

December 19, 1996

Christopher Wright  
Deputy General Counsel, Office of General Counsel  
Federal Communications Commission  
1919 M Street, N.W. - Room 500  
Washington, D.C. 20554

**Re: CC Docket No. 96-149**

Dear Mr. Wright:

The Commission is in the process of finalizing its Long Distance Safeguards order which will implement Section 272 of the Telecommunications Act and establish rules under which Bell Atlantic will provide in-region long distance service.

As you deliberate the final order, we ask that you vote against any rule that would make a Section 272 affiliate which acts as a reseller of local service an ILEC. Such a rule would be inconsistent with Section 251 of the Act.

Also, we ask that you uphold the IXC restriction in Section 271(e)(1) from joint marketing both local and long distance if they are providing local service through resell.

To aid you in your deliberations, we have provided several papers which speak to the issues.

Please contact me at 202 392-6980 if you have any questions or require additional information.

Sincerely,



Enclosure

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**Patricia E. Koch**  
Assistant Vice President  
Federal External Affairs and Regulatory Relations

December 19, 1996

Richard Metzger  
Deputy Chief, Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W. - Room 500  
Washington, D.C. 20554

**Re: CC Docket No. 96-149**

Dear Mr. Metzger:

The Commission is in the process of finalizing its Long Distance Safeguards order which will implement Section 272 of the Telecommunications Act and establish rules under which Bell Atlantic will provide in-region long distance service.

As you deliberate the final order, we ask that you vote against any rule that would make a Section 272 affiliate which acts as a reseller of local service an ILEC. Such a rule would be inconsistent with Section 251 of the Act.

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**Patricia E. Koch**  
Assistant Vice President  
Federal External Affairs and Regulatory Relations

December 19, 1996

The Honorable Reed E. Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, N.W. - Room 814  
Washington, D.C. 20554

**Re: CC Docket No. 96-149**

Dear Chairman Hundt:

The Commission is in the process of finalizing its Long Distance Safeguards order which will implement Section 272 of the Telecommunications Act and establish rules under which Bell Atlantic will provide in-region long distance service.

As you deliberate the final order, we ask that you vote against any rule that would make a Section 272 affiliate which acts as a reseller of local service an ILEC. Such a rule would be inconsistent with Section 251 of the Act.

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**Patricia E. Koch**  
Assistant Vice President  
Federal External Affairs and Regulatory Relations

December 19, 1996

Commissioner Rachelle B. Chong  
Federal Communications Commission  
1919 M Street, N.W. - Room 844  
Washington, D.C. 20554

**Re: CC Docket No. 96-149**

Dear Commissioner Chong:

The Commission is in the process of finalizing its Long Distance Safeguards order which will implement Section 272 of the Telecommunications Act and establish rules under which Bell Atlantic will provide in-region long distance service.

As you deliberate the final order, we ask that you vote against any rule that would make a Section 272 affiliate which acts as a reseller of local service an ILEC. Such a rule would be inconsistent with Section 251 of the Act.

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**Patricia E. Koch**  
Assistant Vice President  
Federal External Affairs and Regulatory Relations

December 19, 1996

Commissioner Susan Ness  
Federal Communications Commission  
1919 M Street, N.W. - Room 832  
Washington, D.C. 20554

**Re: CC Docket No. 96-149**

Dear Commissioner Ness:

The Commission is in the process of finalizing its Long Distance Safeguards order which will implement Section 272 of the Telecommunications Act and establish rules under which Bell Atlantic will provide in-region long distance service.

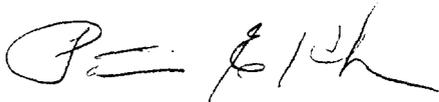
As you deliberate the final order, we ask that you vote against any rule that would make a Section 272 affiliate which acts as a reseller of local service an ILEC. Such a rule would be inconsistent with Section 251 of the Act.

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**Patricia E. Koch**  
Assistant Vice President  
Federal External Affairs and Regulatory Relations

December 19, 1996

Commissioner James H. Quello  
Federal Communications Commission  
1919 M Street, N.W. - Room 802  
Washington, D.C. 20554

**Re: CC Docket No. 96-149**

Dear Commissioner Quello:

The Commission is in the process of finalizing its Long Distance Safeguards order which will implement Section 272 of the Telecommunications Act and establish rules under which Bell Atlantic will provide in-region long distance service.

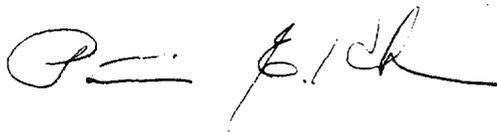
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