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

In the Matter of	)	
	)	
Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996	)	CC Docket No. 96-128
	)	CC Docket No. 91-35

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Federal Communications Commission
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AT&T'S COMMENTS ON BELL ATLANTIC'S
COMPARABLY EFFICIENT INTERCONNECTION PLAN

Pursuant to the Commission's Public Notice released January 8, 1997,[1] AT&T Corp. ("AT&T") hereby submits these comments on the Bell Atlantic telephone companies' ("Bell Atlantic's") comparably efficient interconnection ("CEI") plan for payphone service providers.[2]

In its CEI plan, Bell Atlantic states generally that it will purchase and use the same tariffed services that are available to other providers of payphone services. Bell Atlantic further states that it will satisfy the

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[1] Pleading Cycle Established for Comments on Comparably Efficient Interconnection Plans for Payphone Service Providers, Public Notice, CC Docket No. 96-128, DA 97-31, released January 8, 1997.

[2] The Commission required the Bell Operating Companies ("BOCs") to file CEI plans in Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Report and Order, FCC 96-388, released September 20, 1996("Payphone Order"); and Order on Reconsideration, FCC 96-349, released November 8, 1996 ("Reconsideration Order").

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Commission's additional requirement that the BOCs meet the nonstructural safeguards standards adopted for their enhanced service offerings in Computer Inquiry III.[3] In these comments, AT&T seeks clarification of certain aspects of Bell Atlantic's service that are not specifically addressed in the CEI plan.

First, Bell Atlantic's CEI plan fails to address the Commission's requirement that LECs ensure transmission of codes that enable interexchange carriers to track payphone calls. Pursuant to the Reconsideration Order (para. 94), Bell Atlantic is required to offer services "that provide a discrete code to identify payphones that are maintained by non-LEC providers." Accordingly, Bell Atlantic should provide, in its CEI plan, detail on the types of codes it will use to identify Bell Atlantic payphones and the payphones of non-affiliated providers. Whatever codes Bell Atlantic chooses to use, those codes should be transmitted for both NCL and Customer-Provided Coin-Operated Telephone Service, in order to prevent discrimination between users of the different services.[4]

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[3] See Amendment of Section 64.702 of the Commission's Rules and Regulations (Computer Inquiry III), Report and Order, 104 F.C.C.2d 958 (1986).

[4] The Southwestern Bell Telephone Company ("SWBT") has addressed this issue in its CEI plan by stating that "[a]s required by paragraph 64 of the Reconsideration Order, at the time per-call compensation becomes effective, [SWBT's Customer Owned Pay Telephone Service]

(footnote continued on following page)

Bell Atlantic's CEI plan also does not address Bell Atlantic's proposed treatment of uncollectibles due to fraud. To the extent that Bell Atlantic establishes a policy of foregoing uncollectibles due to fraud for its payphone service affiliates, the same treatment must be accorded to non-affiliates, regardless of whether such practice appears in Bell Atlantic's tariffs. In order to ensure such nondiscriminatory treatment, Bell Atlantic should be required to modify its CEI plan to address this issue directly.

Finally, Bell Atlantic's CEI plan does not address how Bell Atlantic will ensure that the primary interexchange carrier ("PIC") selection process for payphones will be performed in a non-discriminatory manner. As Bell Atlantic becomes both a provider of interexchange services and the administrator of the PIC selection process, it is imperative that its CEI plan describe adequate and appropriate safeguards to ensure fairness in that process.

(footnote continued from previous page)

lines will transmit coding digits which will specifically identify them as payphone lines." See SWBT CEI plan, Exhibit B, page 1 of 4, filed December 30, 1996. Bell Atlantic similarly should explicitly state its intention to provide the required screening information.

For the reasons stated above, before Bell Atlantic's CEI plan is approved, Bell Atlantic should clarify its plan consistent with AT&T's comments.

Respectfully submitted,

AT&T CORP.

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February 7, 1997

CERTIFICATE OF SERVICE

I, Rena Martens, do hereby certify that on this 7th day of February, 1997, a copy of the foregoing "AT&T's Comments on Bell Atlantic's Comparably Efficient Interconnection Plan" was mailed by U.S. first class mail, postage prepaid, to the parties listed below.

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