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February 14, 1997

FEB 14 1997

HAND DELIVERY

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Reply Comments of the Commercial Internet eXchange Association
Access Charge Proceeding, CC Dkt. No. 96-262, et al.

Dear Mr. Caton:

Attached please find an original and 16 copies of the Reply Comments of the Commercial Internet eXchange for submission in the above-captioned proceeding. Also attached is a diskette containing the Reply Comments.

Should you have any questions, please contact the undersigned.

Sincerely,

Mark J. O'Connor

/mjo
Enclosures

No. of Copies rec'd 0+14
List ABCDE

FEB 14 1997

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

In the Matter of	)	
	)	
Access Charge Reform	)	CC Docket No. 96-262
	)	
Price Cap Performance Review for Local Exchange Carriers	))	CC Docket No. 94-1
	)	
Transport Rate Structure and Pricing	))	CC Docket No. 92-213
	)	
Usage of the Public Switched Network by Information Service and Internet Access Providers	)))	CC Docket No. 96-263

REPLY COMMENTS OF THE COMMERCIAL INTERNET EXCHANGE ASSOCIATION

Robert D. Collet
Chairman of the Board
Commercial Internet eXchange Association

Barbara A. Dooley
Executive Director
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February 14, 1997

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Summary

CIX agrees with the Commission's tentative conclusion and the vast majority of commenters that the current non-cost-based access charges should not apply to Internet providers. The record demonstrates that Internet providers and their customers pay for many LEC services that were simply not taken into account when some RBOCs raised the issue of Internet compensation for PSTN usage. Moreover, Internet providers do not receive some discriminatory benefit when they use local services. Rather, incumbent LECs should invest in their networks to meet increased demand for their services.

Moreover, CIX urges the Commission not to adopt a SLC regime that is antithetical to data users. Specifically, the proposals to eliminate the SLC cap, and even allow LECs to charge SLCs that exceed costs, will deter customers from initiating and maintaining advanced services in their homes, as well as increase the costs for Internet providers. Finally, CIX agrees with the widespread industry conclusion that SLCs should not be assessed on each virtual ISDN channel; the Commission should adopt a SLC per-facilities approach.

Before The
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REPLY COMMENTS OF THE COMMERCIAL INTERNET EXCHANGE ASSOCIATION

The Commercial Internet eXchange Association ("CIX"), by its attorneys, hereby replies to the comments filed in response to the Notice of Proposed Rulemaking[1] ("NPRM") in the above-captioned dockets.[2] The record demonstrates that the Commission's tentative conclusion not to impose IXC access charges on Internet and enhanced service providers is sound. Further, SLC charge increases for data lines -- second lines to residential and multi-line business

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1 Notice of Proposed Rulemaking, Third Report and Order, and Notice of Inquiry, CC Dkt. Nos. 96-262, 94-1, 91-213, 96-263 (rel. Dec. 24, 1996). CIX will later file separate comments in response to the issues raised by the Commission's Notice of Inquiry ("NOI").

2 These reply comments represent the views of CIX as a trade organization and are not necessarily those of individual CIX members.

subscribers -- would only serve to frustrate regulatory efforts to improve accessibility of all Americans to the Internet and data networks generally.

I. Access Charges Should Not Apply to Internet Service Providers

The record of comments supporting the Commission's tentative conclusion not to apply access charges to Internet providers and other information service providers is overwhelming. Members of the educational community urge the Commission not to impose Internet access charges because such charges would raise their costs of providing services to students and educators to unaffordable levels. Comments of Ozark Technical Community College (any increase such as usage-sensitive access charges would be "catastrophic" for educational users); see also Comments of American Library Ass'n, at 1 (assessing non-cost-based access charges would add to cost of Internet service to libraries, reduce the number of competitive offerings, reduce affordability of service). Internet end users strongly object; as several public interest groups argue/note, access charges would impinge on citizens' ability to engage in on-line discourse. Comments of Media Access Project, Center for Democracy and Technology, Electronic Frontier Foundation, and the Benton Foundation at 2. Federal access charges could also cripple communication for users in remote areas. Comments of Northern Mariana Islands at 12-13 (Northern Mariana Islands depends on low-cost information services; any increase in price will mean that some citizens are disenfranchised).

Even incumbent LECs concede that federal access charges are not appropriate. BellSouth, for example, urges the Commission to study appropriate jurisdictional issues and creative ways to encourage development of the packet switched network before even beginning to examine access charges for ISPs because "changing the ESP exemption might only achieve disrupting the marketplace rather than making it more efficient. Comments of BellSouth at 87;

see also Comments of SNET, 55-56 (Internet traffic is intrastate, not interstate).[3] Virtually all parties answer the question posed by the NPRM by agreeing that the current non-cost-based access charge regime should not be applied to the Internet. Comments of ACTA at 24; Comments of AT&T at 72; Comments of Bell Atlantic & NYNEX at 62; Comments of Telecommunications Resellers Assoc. at 40.

Some commenters, however, do argue that access charges should be applied to Internet providers. Most seek imposition of access charges only after they are reformed;[4] a few seek imposition even before reform. As discussed below, these arguments misconstrue the nature of the Internet and fail to give proper consideration of the ways in which ISPs and Internet users currently support of the PSTN.

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3 We also note that the incumbent LECs do not approach the issue of Internet access charges uniformly. While Pacific Bell, U.S. West, Bell Atlantic and NYNEX all complain about Internet network congestion stemming from the lack of federal IXC access charges, BellSouth disagrees with this approach. Ameritech and GTE, by contrast, are silent on the issue. Taken collectively, the congestion problem appears to be far less critical than some RBOCs characterize it.

4 We note that the issue of applying the reformed access charge to ISPs was not raised by the NPRM, which seeks comment on the tentative conclusion that ISPs should not "pay interstate access charges as currently constituted." NPRM at ¶ 288. Given that reform of access charges, and especially the carrier common line charge, may take any one of many proposed forms or some compromise, it is speculative at best to debate the merits of applying future reformed access charges to ISPs. Moreover, issues of promoting efficient PSTN usage, jurisdictional separations of Internet traffic, and other issues are specifically set for the NOI. The bulk of commenters' proposals for reformed access charges for ISPs are, therefore, improperly asking the Commission to address in the forthcoming access charge order the issues that have been designated for the NOI.

A. Internet Generates More Than Enough Revenue To Cover Its Costs to the PSTN

Several parties argue that use of the PSTN by enhanced service end users, especially Internet providers and their customers, does not cover the costs of that use to the PSTN.[5] As CIX and others have already pointed out, those arguments start from a faulty premise that ISPs simply receive terminating traffic and, because those calls are "sent paid" and do trigger additional payments for each termination, there is no compensation for the PSTN. That view is fundamentally blind to a more comprehensive assessment of the issue. As described in detail by the Internet Access Coalition, "The Effect of Internet Use on the Nation's Telephone Network," by Lee Selwyn and Joseph Laszlo (Jan. 22, 1997) (the "IAC Report"), LEC recovery of Internet usage must begin with an analysis of: (1) revenues and efficiencies derived from second lines sold to residences and businesses for Internet access that exceed the cost of those lines; (2) other LEC services sold along with those second lines and business lines, such as BRI ISDN; (3) revenues derived from services sold to the ISPs, such as multiple business lines,[6] PRI ISDN, direct inward dialing, multiline hunt group services;[7] and (4) efficiencies that result from Internet

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5 Comments of Communications Workers of America at 6-7; Comments of US West at 83.

6 While most businesses strive for increased sales, NYNEX apparently views them as evil: "NYNEX's current data show that the number of businesses and lines using this configuration is *increasing about 10% per month.*" Letter from Kenneth Rust, NYNEX, to James Schlichting, FCC, at 1 (July 10, 1996) (emphasis in original).

7 According to Bell Atlantic, "ISPs decide to purchase either Business Dial Tone Line, Engineered CENTREX or CustoFLEX 2100 from the hub central office," or ISDN PRI which, in Virginia, it purchases for $455.00 per month. "Report of Bell Atlantic on Internet Traffic," at 2-3 (June 28, 1996). Bell Atlantic's Report completely fails to take these revenues into account. Id. at 14 (cost analysis looks only to single average $17/month rate). Bell Atlantic's charges for its ISDN BRI and PRI are multiples more than $17/month rate. See Exhibit 1 (Bell Atlantic's business and residential ISDN price list).

usage patterns of PSTN capacity during off-peak voice telephone hours.[8] Moreover, ISPs lease from the incumbent LECs a host of private line services (e.g., T1 and T3 lines) which contribute to the incumbent LECs' overall and consistent historical profits.

When these factors are taken into account, the IAC Report demonstrates that Internet providers and their customers generate significant revenues and efficiencies that exceed the cost of the services purchased.

Finally, we note that only a monopolist would complain, as some incumbent LECs do now, that they have too much local business.[9] The Commission should consider carefully whether that complaint is worth addressing. Certainly incumbent LECs recognize that they have a problem: the Commission is trimming IXC access charge prices and promoting local competitive entry (thereby reducing the demand for LEC access service). It is, therefore, in the incumbent LECs' interest to secure new sources of access payors, such as ISPs and their customers, in order to maintain total access revenues. However, because Internet usage costs are already covered (regardless of the niceties of regulatory separations), the fundamental issue is whether additional prices mandated by regulatory fiat (i.e., federal access charges) would promote local competition and cost-based advanced services for the American public. CIX submits that raising the cost of access to the Internet through mandated regulatory prices is certainly not in the public interest. To the contrary, non-cost-based access charges can only lead

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8 As the IAC Report (at 24) demonstrated, second line Internet usage occurs during hours that are off-peak to voice traffic, and so contributes to a reduction in the overall cost-per-minute of providing local service. See, NYNEX study (July 10, 1996) (Internet hold times highest between 12 AM and 6 AM); US West study, Attachment #2 (ISP usage highest between 6 PM and 12 AM); Pacific Bell ESP Impact Study at 2 (July 2, 1996) (Internet access peak hour at 10 PM).

9 See, note 6, above.

to short-term incumbent monopoly profits and, as one or more competitors enter the market, a tendency for access to be priced higher than cost. These results are incompatible with the Commission's mandate to promote a competitive local market, and its ongoing efforts to ensure greater access for all Americans to the burgeoning fruits of the Information Age. See also, Comments of the National Cable Television Association at 5 ("Internet access appears . . . to be developing in a manner consistent with a competitive market model. . . . At this early stage of Internet development, the last thing the government should do is take actions that effectively create new costs of entry and new entry barriers.").

B. Internet Service Providers Do Not Receive a Discriminatory Benefit

Some commenters argue that because voice interexchange carriers pay federal interstate access charges, so too should all information service providers. These commenters broadly allege that the differences in payment mechanisms mean that IXCs are discriminated against, and that information service providers are the beneficiaries of an implicit subsidy contrary to Section 254(b)(5). Comments of ACTA at 25-27; Comments of US West at 83-84; Comments of USTA at 82. Of course, *alleging* discrimination is different than *showing* it, which requires an analysis of what each group pays the RBOC, as well as what each group gets for what it pays. No commenter has or can *show* discrimination.

Specifically, as discussed above, both Internet users and Internet providers pay the incumbent LEC for use of the local network in ways that the interexchange carrier does not. To CIX's knowledge, no commenter offers an analysis of whether IXCs pay more or less than Internet users and ISPs pay. IXCs also use different aspects of the local exchange network that ISPs and their Internet customers do not use (such as outdialing, 911 service, and directory services),[10] so it may be appropriate for each class of user to pay for different elements. Moreover, an interexchange carrier has more rights and privileges in interconnecting with the local exchange than does an ISP. For example, as a telecommunications carrier, an IXC enjoys the following rights to the PSTN: network unbundling (47 U.S.C. § 251(c)(3)); wholesale resale of local exchange services (id. at § 251(c)(4)); collocation (id., at § 251(c)(6)); and interconnection (id. at § 251(c)(2)).[11] According to the Commission, information providers do not share these same rights.[12] Thus, none of the commenters alleging discrimination have shown discrimination or, for that matter, have even attempted to compare "apples to apples."

Finally, CIX notes that there is no discrimination simply because ISPs do not pay the incumbent LEC in the same manner that IXCs pay. It is a truism that IXCs and information providers pay in different ways because *all* users of the PSTN pay in different ways, including large corporate end-users, and even small business end-users and residential users. This difference does not advance the argument that ISPs should pay in the same manner as IXCs because presumably no party wants the Commission to apply access charges to all users of the PSTN, changing the PSTN into a rigid per-minute network priced in a manner analogous to today's pay telephones. For the reasons stated by the comments of CIX, AOL, IAC, the

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10 See, e.g., US West Communications, ESP Network Study at 2 (June 28, 1996) ("trunking networks ordered by the IXCs differ from the local services purchased by the ESPs . . . ").

11 Comptel has argued before the Eighth Circuit that IXCs should have the same rights to Section 251(c)(2) interconnection as other telecommunications carriers, even though the Commission's initial order decided against such a reading of the statute. Comptel v. FCC, Case No. 96-3604 (8th Cir.).

12 First Report and Order, CC Dkt. Nos. 96-98, 95-185, FCC 96-325, at ¶ 992 (rel. Aug. 8, 1996); First Report and Order and Further Notice of Proposed Rule Making, CC Dkt. No. 96-149, FCC 96-489, at ¶ 220 (rel. Dec. 24, 1996).

education community, and many others, there are sound public policy reasons why the IXC access charge regime should not be applied to Internet providers.

C. The Proponents of Internet Access Charges Offer No Proposed Rule or Plausible Plan For Implementation

As CIX highlighted in its initial comments, the current access charge regime and reform proposals are based on the PSTN model. The Part 69 rules are based on a paradigm of a voice circuit-switched network conforming to telephone exchange boundaries and communications that are geographically directed according to the telephone number. However, the Internet is not an overlay of the voice telephony network. It does not recognize telephone exchange boundaries and it is not configured along state lines. Internet communications are not routed according to a telephone number, but through the transmission of packets with network, and not geographic, addresses. Moreover, the packets originating from the same Internet communication are not necessarily circuit-switched and may use a variety of networks in disparate locations to reach the same terminating network address.

Neither the NPRM nor the record of comments in this proceeding have even suggested how the Commission could rationally reform the voice telephony access charge regime to apply to Internet communication.[13] Contrary to the basic requirements of administrative procedure, neither CIX nor any other party has had any opportunity to review or comment on the "terms or substance of the proposed rule"[14] from those that advocate an ISP access charge.[15] Rather, the

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13 Similarly, NYNEX's and Bell Atlantic's plan (at 62-64) for a discounted ISP access charge fails to address these issues. Further, the discount approach implicitly recognizes the inequity of imposing ISP access charges at all.

14 5 U.S.C. § 553(b).

fundamental issues surrounding an ISP access charge are appropriately raised in the NOI, and the Commission cannot legitimately promulgate an ISP access charge rule in the forthcoming Access Charge order.

II. SLC Charges Should Be Kept to Levels That Encourage Consumer Demand For Data Services And Efficient Transport

A. The Commission Should Not Increase the SLC On Second Line Residences and Multi-Line Businesses

CIX opposes the Commission's proposal to target SLC cap increases at residential second lines and multi-line businesses. NPRM at ¶ 65. As explained in CIX's opening comments (at 13-14), this proposal would have a clear disparate impact upon Internet service providers and Internet users, significantly increasing the cost of connectivity to the Internet and reducing the number of Americans with access to the Internet. Internet service providers, who as a group are large purchasers of multiple business lines, would be squarely hit by this proposal. These costs would in turn be passed along to Internet users, many of whom already purchase second residential lines, and thus would be taxed twice for their use of the Internet. This outcome would contradict Congress' policy choice in the Telecommunications Act of 1996 "to promote the continued development of the Internet and other interactive computer services . . . ." 47 U.S.C. § 230(b)(1).

As the comments of rural LECs indicate, increasing the SLC cap would have a particularly deleterious effect on Internet connectivity in rural areas served by price cap LECs

(Footnote continued from previous page)

15 Likewise, because the comments advocating an ISP access charge fail to recognize the jurisdictional and implementation issues involved, adoption of such a rule would not a "logical outgrowth" of the NPRM. See, Public Service Com'n v. FCC, 906 F.2d 713, 717-18 (D.C. Cir. 1990).

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(and all rural areas, if the proposal were extended to rate of return LECs), a major concern of the authors of the Telecommunications Act of 1996.[16] It is already considerably more expensive to provide Internet service to rural areas, due to the smaller number of people that can be served by an ISP network access point. With the NPRM's proposed increase in the SLC to capture all the common line costs associated with service to residential second line and multi-line business users, Internet service would likely become prohibitively expensive in many rural areas.

Increasing the SLC cap to multi-line business users would also deliver a set back to the President's and the Chairman's goal of providing Internet access to schools and libraries generally, and to rural schools and libraries in particular. In the context of telecommunications service to schools and libraries under Section 254(h), the Commission would in effect be taking away with one hand what it is giving with another, while increasing the overall cost of the Section 254(h) subsidy.

Increasing the SLC cap for residential second lines -- in addition to increasing incentives for user fraud to conceal second lines[17] -- risks producing a net decrease in LEC cost recovery from Internet users. It would create a disincentive for residential Internet users to subscribe to additional residential lines, currently a significant source of increased ILEC revenue.

The NPRM and many commenters who address this issue are of course correct that non-traffic sensitive costs of the local loop should no longer be recovered through the traffic sensitive CCL. However, in answering this question, the NPRM begs the separate question of why the

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16 H.R. Conf. Rep. No. 458, 104th Cong., 2d Sess. at 132 (Section 254(h) universal service goals include "open[ing] new worlds of knowledge, learning and education to all Americans -- rich and poor, rural and urban.").

17 See Comments of Alaska Telephone Association at 8 (removal of the SLC cap would result in a SLC charge of $80 per month).

non-traffic sensitive common line costs currently recovered through the CCL for residential second lines and multi-line businesses must be recovered by increasing the SLC for these lines. See Comments of MCI at 79 ("if loop costs are determined by economic costs, as they should be, the Commission's proposed increases in the EUCL cap will be moot, as the economic costs of the loop is well below the current cap."). Because both end users/subscribers and IXCs derive benefit from the common line, they both should share its costs. Indeed, this approach would be more consistent with recovering these users' common line costs "in a manner consistent with the way costs are incurred" than the approach proposed in the NPRM. See id. at ¶ 65. Accordingly, the Commission should adopt or blend options set forth in ¶¶ 60 and 61 of the NPRM in lieu of increasing the SLC for residential second lines and multi-line businesses.

The NPRM's "alternative" proposal to eliminate the SLC cap entirely for these users and allow SLC charges that "exceed[] the per-line loop costs assigned to the interstate jurisdiction" where the incumbent LEC has made some showing of "actual or potential local exchange competition," NPRM at ¶ 65, is even more misguided. The Commission is well aware of the slow pace with which "potential local competition" has become reality. This proposal would be nothing more than a license for incumbent LECs to exploit monopoly control over the local loop by imposing prices in excess of cost. To the extent that the proposal would be an attempt to raise additional funds for USF, it would likely run afoul of Section 254(d)'s requirement that contributions to USF be made "on an equitable and nondiscriminatory basis" and be "specific, [and] predictable."

For all these reasons, CIX urges the Commission to reject all proposals in ¶ 65 of the NPRM to increase the SLC for residential second line and multi-line business users, and to bring common line charges assessed against IXCs to cost without raising the costs of Internet service and discouraging connectivity to the Internet.

B. SLCs Should Be Charged On A Per-Facilities Basis; Each Virtual Channels Should Not Be Separately Taxed

Much like the public response to the initial ISDN SLC NPRM,[18] the commenters from a broad cross-section of the communications industry have once again overwhelmingly opposed the application of a separate SLC for each virtual channel resulting from the use of ISDN BRI or PRI services. See Comments of ACTA at 7; Comments of Ameritech at 13; Comments of Bell Atlantic and NYNEX at 34-35; Comments of BellSouth at 70; Comments of Comptel at 29-30; Comments of Microsoft at 6; Comments of Sprint at 18. These parties agree that applying a SLC to each virtual channel overtaxes the introduction of efficient digital and data services. At a time when the Commission strives to increase bandwidth and digital service to the end user, a SLC imposed on each virtual channel is simply a decision in the wrong direction.

To CIX's knowledge, the only commenter that supported a SLC for each virtual channel was the State Consumer Advocates, which contends that it is discriminatory to charge one subscriber one SLC for a single voice channel and yet charge the same SLC for subscribers receiving multiple voice channels. Comments of State Consumer Advocates at 64-66. However, each subscriber pays a SLC for a single common line. If the subscriber then orders ISDN service, thus increasing the capacity of the line (but not changing the line itself), it then pays the LEC price for that ISDN service. The non-ISDN customers are not forced to subsidize the ISDN service in any way, and it makes little sense to force that subscriber to pay additional SLCs, as if it had additional physical lines. Therefore, there is no discriminatory pricing. To the contrary, it could be argued that a SLC for each virtual channel discriminates against the ISDN subscriber

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18 End User Common Line Charges, CC Dkt. No. 95-72, Notice of Proposed Rulemaking, 10 FCC Rcd. 8565 (1995) ("ISDN SLC NPRM")

because that subscriber would then pay for more than its share of the interstate costs associated with the common line.

V. **Conclusion**

CIX urges the Commission not to impose access charges on ISPs. The time for federally mandated monopoly charges has passed, and the Internet will continue to flourish only if the Commission respects that. Further, the Commission should work to reduce IXC access charges to costs, and thereby avoid the need for selective increases in the SLC cap or the assessment of SLCs on virtual channels.

Respectfully submitted,

Robert D. Collet
Chairman of the Board
Commercial Internet eXchange
Association

Barbara A. Dooley
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EXHIBIT 1

ISDN IntelliLinQ -- BRI Pricing Individual Line Business Service

IntellilinQ - BRI is an optional service enhancement for use with existing business line service. Dial access from the customer's premises is over the same two-wire cable pair that is used to provide voice business services today. For more information, call the Bell Atlantic ISDN Sales & Technology Center on **1-800-570-ISDN (4736)**, your local Account Executive, or Bell Atlantic Dealer Representative.

State	Monthly	Installation
Delaware		
ISDN-BRI (2B+D) service*	$19.49	$80.42
Business Line**	$25.90 - $28.40	$61.00
Total	$45.39 - $47.89	$141.42
District of Columbia		
ISDN-BRI (2B+D) service*	$19.50	$37.00
Business Line**	$14.66	$83.25
Total	$34.16	$120.25
Maryland		
ISDN-BRI (2B+D) service*	$19.50	$34.00
Business Line**	$16.84 - $21.25	$98.50
Total	$36.34 - $40.75	$132.50
New Jersey		
ISDN-BRI (2B+D) service*	$19.50	$43.75
Business Line**	$15.99 - $18.28	$79.50
Total	$35.49 - $37.78	$123.25
Pennsylvania		
ISDN-BRI (2B+D) service*	$19.50	$94.75
Business Line**	$11.83 - $19.50	$75.00
Total	$31.33 - $39.00	$169.75
Virginia		
ISDN-BRI (2B+D) service*	$19.50	$36.00
Business Line**	$14.50 - $18.93	$64.00
Total	$34.00 - $38.43	$100.00
West Virginia		
ISDN-BRI (2B+D) service*	$19.50	$39.00
Business Line**	$28.00 - $30.50	$96.90
Total	$47.50 - $50.00	$135.90

Notes

* * ISDN-BRI usage rates are $.02/min for local circuit switched data calls or prevailing business line rates for local voice calls. Both voice and data toll calls on ISDN-BRI service will be billed at prevailing business line rates for voice toll calls. Usage rates are charged for originating calls only. All charges are per B channel in use.

* ** Business Line Rates may vary depending upon location within state, usage options, selected and addtional features ordered. Rates include FCC subscriber line charges. Installation Charge is only applicable if a new business line is ordered.

Back to How Do I Get It Menu

Bell Atlantic ISDN IntelliLinQ -- PRI Tariff Pricing

"Primary Rate Interface" (PRI) tariffs are undergoing changes. For more information, call the Bell

Atlantic ISDN Sales & Technology Center on **1-800-570-ISDN (4736)**, your local Account Executive, or Bell Atlantic Dealer

	Installation Charges for All States Except Delaware*	**Monthly Charges for...**						
		PA	DE	NJ	DC	VA	WV	MD
PRI Access Facility								
Mo to mo	$700	$150	Note 1	$150	$150	$150	$150	$150
3 Years	$700	$145	Note 1	$145	$145	$145	$145	$145
5 Years	$700	$135	Note 1	$135	$135	$135	$135	$135
23B+D								
Mo to mo	$700	$350	$449.55	$300	$300	$300	$650	$350
3 Years	$700	$335	$435.00	$285	$285	$285	$620	$335
5 Years	$700	$315	$415.00	$270	$270	$270	$585	$315
24B								
Mo to mo	$700	$350	$449.55	$300	$300	$300	$650	$350
3 Years	$700	$335	$435.00	$285	$285	$285	$620	$335
5 Years	$700	$315	$415.00	$270	$270	$270	$585	$315
23B+B U/D								
Mo to mo	$700	$400	$499.50	$350	$350	$350	$700	$400
3 Years	$700	$380	$480.00	$335	$335	$335	$665	$380
5 Years	$700	$360	$460.00	$315	$315	$315	$630	$360
Call by Call								
Mo to mo	$100	$75	$74.92	$75	$75	$75	$75	$75
3 Years	$100	$73	$73.00	$73	$73	$73	$73	$73
5 Years	$100	$71	$71.00	$71	$71	$71	$71	$71
Caller ID								
Mo to mo	$100	$100	$99.90	$100	$100	$100	$100	$100
3 Years	$100	$95	$95.00	$95	$95	$95	$95	$95
5 Years	$100	$90	$90.00	$90	$90	$90	$90	$90
Feature Pkg.								
Mo to mo	$100	$150	$149.85	$150	$150	$150	$150	$150
3 Years	$100	$145	$145.00	$145	$145	$145	$145	$145
5 Years	$100	$135	$135.00	$135	$135	$135	$135	$135
Individual Additional Tel. Number	$25	$3	$3	$3	$3	$3	$3	$3

* For Delaware, the installation charges are as follows:

+ $699.30 each for PRI Access Facility, 23B+D, 24B, and 23B+B/U D
+ $ 99.00 each for Call By Call, Caller ID, and Feature Pkg.

Note 1 : Rates are as specified for 1.544 Mbps High Capacity Service in P.S.C.-Del.- No. 36, Section 6.6.

PRI consists of the access facility plus a choice of either 23B + D, 24B, or 23B + Backup D configuration. Optional features available are Call by Call selection, Caller ID, or a discount Feature Package consisting of Call by Call and Caller ID.

ISDN PRI service is available on a month-to-month basis as well as 3-year and 5-year contract terms. The prices above reflect the monthly charges for each option.