DOCKET FILE COPY ORIGINAL

RECEIVED
MAR 17 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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

In the Matter	)	
	)	
BellSouth Petition for Forbearance	)	CC Docket No. 96-149
from Application of Section 272 of the	)	
Communications Act of 1934, as Amended,	)	
to Previously Authorized Services	)	

REPLY COMMENTS OF AT&T CORP.

Pursuant to the Public Notice issued on February 14, 1997, AT&T respectfully submits its Reply to the Comments filed in response to BellSouth's petition for forbearance, under Section 10 of the Communications Act of 1934, as amended, from the application of the requirements of Section 272 of the Act to BellSouth's "reverse directory" and E911 services.[1]

First, the Comments confirm that BellSouth has failed to address -- let alone meet -- the Section 10(b) requirement that "forbearance will enhance competition among providers of telecommunications services."[2] Absent such a showing, BellSouth cannot satisfy the public interest standard of Section 10(a)(3) of the Act.

To the contrary, the Comments of MCI and Sprint suggest that the continued provision of traditional and reverse directory services on an integrated basis by BellSouth will frustrate, not promote, local exchange competition -- a critical showing

---

1 Comments were filed by Ameritech, AT&T, Bell Atlantic, MCI and Sprint.

2 See MCI at 8-10; Sprint at 4-6.

No. of Copies rec'd 029
List A B C D E

under Section 10 on which BellSouth has been completely silent. For example, MCI describes in detail in its Comments (pp. 4-11) its inability to obtain directory assistance information from BellSouth which includes subscriber listings of third party LECs, notwithstanding that BellSouth makes use of that information for its own directory services. In light of the fact that CLECs such as MCI do intend to offer competing directory services and "nondiscriminatory access to BellSouth's directory database is absolutely necessary for competing providers like MCI,"[3] the purported actions of BellSouth underscore the anticompetitive and discriminatory implications of its petition.[4] These Comments thus compel denial of BellSouth's request that the Commission forbear from enforcing the very safeguards that were established to protect competition.

BellSouth's petition is also an inappropriate vehicle for the Commission to grant blanket forbearance for all Bell Operating Companies, as Bell Atlantic requests (pp. 1-5). First, the Commission did not broaden its inquiry, as established in its Public Notice, to whether it should forbear from application of Section 272 to any carrier or class of carriers beyond BellSouth. Thus this proceeding is an improper forum to address such a request. In any event, as confirmed by the Comments of MCI, Sprint and AT&T, the petition fails to address -- let alone meet -- the critical standards of Section 10 as to the

---

[3] MCI at 9.

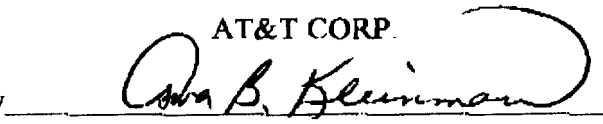
[4] Similarly, Sprint (pp. 4-6) raises concerns that BellSouth's provision of directory services on an integrated basis "gives rise to possible harm to competing providers of reverse directory service," "also may harm local exchange competition," and "will make it more difficult to detect or prevent improper cost allocations and other discriminatory activity." Sprint also questions (pp. 2-4) whether BellSouth's on-line reverse directory service was "previously authorized."

specific services provided by BellSouth. It clearly offers an insufficient record to warrant the blanket forbearance authorization that Bell Atlantic seeks.[5]

WHEREFORE, BellSouth's petition for forbearance must be denied.

Respectfully submitted,

AT&T CORP.

By 

Mark C. Rosenblum
Leonard J. Cali
Ava B. Kleinman

Its Attorneys

295 North Maple Avenue
Room 3252J1
Basking Ridge, New Jersey 07920
(908) 221-8312

March 17, 1997

[5] Bell Atlantic's Comments are strikingly similar to BellSouth's petition in that Bell Atlantic is silent as to the impact of forbearance on competition in the local exchange market.

CERTIFICATE OF SERVICE

I, Rena Martens, do hereby certify that on this 17th day of March, 1997, a copy of the foregoing "Reply Comments of AT&T Corp." was mailed by U.S. first class mail, postage prepaid, to the parties listed below:

Richard L. Hetke
Ameritech Corporation
30 South Wacker Drive
Chicago, IL 60606

Edward Shakin
Edward D. Young, III
Michael E. Glover
Bell Atlantic Telephone Companies
and Bell Atlantic Communications, Inc.
1320 North Court House Road
Eighth Floor
Arlington, VA 22201

M. Robert Sutherland
A. Kirven Gilbert III
BellSouth Corporation
Suite 1700
1155 Peachtree St., N.E.
Atlanta, GA 30309-3610

Frank W. Krogh
Mary L. Brown
MCI Telecommunications Corp.
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Leon M. Kestenbaum
Norina T. Moy
Sprint Communications Company, L.P.
1850 M Street, N.W., Suite 1110
Washington, D.C. 20036

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

Janice Myles*
Common Carrier Bureau
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, D.C. 20554

International Transcription Service, Inc.*
2100 M Street, N.W.
Washington, D.C. 20037

Rena Martens

Rena Martens

* By hand delivery