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EX PARTE OR LATE FILED



Anthony M. Alessi
Director
Federal Relations

March 19, 1997

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

RECEIVED

MAR 19 1997

Fed. Comm. Comm.

RE: **Ex Parte Statement**
CC Docket No. 96-262

Dear Mr. Caton:

On March 19, 1997, Mr. Kenneth Gordon of National Economic Research Associates, Ms. Kris Shulman of Ameritech, and I met with Mr. James Casserly, Legal Advisor to Commissioner Ness, to discuss Ameritech's position in the above referenced proceeding. The attached material was used as part of our discussion.

Sincerely,

A handwritten signature in cursive script that reads "Anthony M. Alessi".

Attachment

cc: J. Casserly

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**Ameritech
Access Reform**

Let the markets work

- The market based approach provides the proper incentive for continuing infrastructure investment
- The market based approach will result in significant downward pressure on access rates because of the availability of unbundled network elements and competition
- The prescriptive approach is equivalent to a restoration of cost-based regulation
- The prescriptive approach will stifle and distort the development of efficient competition

Non-traffic sensitive costs must be removed from traffic sensitive rates and recovered via non-traffic sensitive charges

- Modify the existing switched access rate structure
 1. Recover loop and line port costs thru a flat per PIC'ed line charge assessed to Interexchange Carriers
 2. Eliminate the TIC recovery of tandem switching costs and recover the remainder of the TIC thru a flat per PIC'ed line charge assessed to Interexchange Carriers
 3. Phase out the TIC over a five year period, but ONLY if coupled with additional pricing flexibility and the flexibility to target mandatory price cap reductions to the TIC

Pricing flexibility must be granted commensurate with market conditions

The Market Based Approach:

Phase 1 - Potential Competition

When all triggers are met:

Unbundled network elements at rates approved by the states

Wholesale prices for retail services are based on reasonably avoidable costs

Transport and Termination at cost based rates

The relief granted:

Geographic deaveraging

Contract/RFP pricing

Volume and Term Discounts

**Ameritech
Access Reform**

Phase 1 - Potential Competition (Continued)

Network elements and services are capable of being provisioned rapidly and consistent with a significant level of demand; CLECs must provide demand forecasts

Price deregulation of technically new services

Growth discounts

Reduction of the X factor from 5.3 to 4.0 for the no sharing option

Phase 2 - Actual Competition

When all triggers are met:

The relief granted:

Presence of competition

Simplification of price cap bands and baskets

End of mandatory Part 69 rate structure

Ability to price differentiate between classes of customers

Reduction of the X factor from 4.0 to 0.0

Competitive Access Services should be removed from price regulation

- Demonstration of substantial competition or when an ILEC cannot dictate price movement
- Removal on a service by service basis, LATA by LATA basis
- Services currently facing substantial competition - Directory Assistance, HiCap Transport in certain LATAs and Interstate IntraLATA (IX)