

1401 H Street, N.W.  
Suite 1020  
Washington, D.C. 20005  
Office 202/326-3822



**Anthony M. Alessi**  
Director  
Federal Relations

April 9, 1997

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

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APR - 9 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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

Dear Mr. Caton:

On April 8, 1997, Mr. Gary Lytle, Ms. Karen Vessely, Ms. Kris Shulman, Mr. Paul Osland and I met with Ms. Regina Keeney, Chief, Common Carrier Bureau and Mr. Aaron Goldschmidt to discuss Ameritech's position in the above referenced proceeding. The attached material was used as part of our discussion.

Sincerely,

Attachment

cc: R. Keeney  
A. Goldschmidt

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**Ameritech  
Access Reform**

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**Let the markets work**

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- 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:

The relief granted:

Unbundled network elements at rates approved by the states

Geographic deaveraging

Wholesale prices for retail services are based on reasonably avoidable costs

Contract/RFP pricing

Transport and Termination at cost based rates

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)