

Bell Atlantic Network Services, Inc.
1133 Twentieth Street, N.W.
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202 392-6990

Marie T. Breslin
Director
FCC Relations

EX PARTE OR LATE FILED

April 11, 1997

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Federal Communications Commission
Office of Secretary

Ex Parte

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

Re: CC Docket No. 96-128, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996 and Bell Atlantic's Plan to Offer Comparably Efficient Interconnection to Payphone Service Providers

Please be advised that the attached letter in support of the Bell Atlantic CEI plan captioned above is being submitted today to Brent Olson of the Policy and Program Planning Division.

Please enter this letter and attached material into the record as appropriate. Please do not hesitate to contact me if you have any questions.

Sincerely,

Marie Breslin (f.m)

Attachment

cc: B. Olson

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Ex Parte

Mr. Brent Olson
Policy and Program Planning Division
Federal Communications Commission
1919 M Street, N.W. Rm. 544
Washington, D.C. 20554

Re: CC Docket No. 96-128, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996 and Bell Atlantic's Plan to Offer Comparably Efficient Interconnection to Payphone Service Providers

Dear Mr. Olson:

Bell Atlantic files this ex parte letter to clarify and confirm that, as part of its Plan to offer Comparably Efficient Interconnection to Payphone Service Providers, Bell Atlantic will include and comply with the following requirements:

- 1) All Network Controlled Line (NCL) services will be made available to unaffiliated payphone service providers in all central offices where such services are provided by Bell Atlantic to its own payphone operations. NCL services will be provided to both affiliated and unaffiliated payphone service providers under the same nondiscriminatory terms and conditions.
- 2) Bell Atlantic will modify its quarterly Installation and Maintenance Nondiscrimination Reports filed pursuant to ONA requirements to include performance data for the basic network services provided to unaffiliated and affiliated payphone service providers. Bell Atlantic will also include payphone related information in its annual filing of the ONA Nondiscrimination Maintenance Report (Annual Affidavit).

In addition, Bell Atlantic reaffirms that its RDP (rate demarcation policy) will apply equally to affiliated and unaffiliated payphone service providers as stated in Bell Atlantic's Reply Comments (p. 11). The demarcation point between regulated network facilities and deregulated premises wiring and equipment shall be at the minimum point of entry of the premises (MPOE) in compliance with the Commission's MPOE standards.

When providing network lines for newly installed payphones, Bell Atlantic will physically install a network interface device (NID) conforming to Part 68 rules as the demarcation point. When network technicians perform maintenance or repair work for Bell Atlantic's existing payphones that have been grandfathered from Part 68 requirements, the technicians will still identify the point at which a NID would have been placed for a new installation of an affiliated or unaffiliated payphone. Only the work performed up to that point shall be treated as regulated network services. This point has been referred to as the "virtual" NID because no NID hardware may physically be present. Bell Atlantic technicians have received training on these demarcation policies.

Please do not hesitate to contact me should you have any questions regarding this material.

Sincerely,

Marie Breslin
(j m)