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

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APR 2 4 1997

Federal Communications Commission
Office of Secretary

In the Matter of	)	
	)	
Expedited Reconsideration of	)	
	)	
Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended	)	CC Docket No. 96-149
	)	

FURTHER REPLY COMMENTS OF WORLDCOM

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April 24, 1997

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SUMMARY

WorldCom demonstrates that the RBOCs offer no compelling textual, legislative, or logical support for their position that Section 272(e)(4) of the 1996 Act grants them independent authority to provide in-region interLATA telecommunications services and facilities directly to their long distance affiliates. Instead, Section 272(e)(4) can only be read to prohibit the RBOCs from engaging in discrimination where the RBOC is already permitted to provide interLATA services and facilities (such as incidental, out-of-region, and previously authorized interLATA services) without an affiliate, but chooses to use an affiliate anyway. Unlike the RBOCs' view, which is built largely on a rote use of semantics and a forced juxtaposition of text, this interpretation best comports with the language, structure, and intent of the statute.

The RBOCs' convoluted "origination equals retail service" argument -- which the Commission already has considered and firmly rejected in the First Report and Order -- simply has no basis in the statutory language, the legislative history, ordinary industry parlance, or even plain common sense. The RBOCs' claim that origination actually carries two entirely separate meanings in the Act is nonsensical and contrary to a supposedly "plain language" view of statutory interpretation.

WorldCom notes that, despite the RBOCs' claims that the so-called "plain language" view is the only "unequivocal," "unambiguous," and "conclusive" reading of the statute, this argument never found its way into any of the RBOCs' original comments in this proceeding. In WorldCom's view, the "plain reading" argument does not survive a plain reading of the statute. The RBOCs' argument hinges on overly-expansive and untenable interpretations of several discrete words and phrases in Section 272(e)(4). Further, the RBOCs' assertion that the separation and cross-subsidy requirements of the 1996 Act will not be compromised under

an expansive view of Section 272(e)(4) is belied by the RBOCs' own statements on their intended uses of their official services networks. US West's separate argument that the 1996 Act allows the RBOCs to provide "interLATA services" to their affiliates is directly contradicted by the express terms of the statute, and by the Commission's correct finding that the definition of "interLATA services" encompasses telecommunications and information services.

Thus, WorldCom urges the Commission to promptly rule on reconsideration that Section 272(e)(4) is not a separate grant of authority to the RBOCs, and does not allow the RBOCs to provide in-region interLATA facilities and services directly to their long distance affiliates.

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FURTHER REPLY COMMENTS OF WORLDCOM

WorldCom, Inc. ("WorldCom"), by its attorneys, hereby files its further reply comments in response to the further comments submitted concerning the Public Notice, DA 97-666, issued by the Commission on April 3, 1997 in the above-referenced proceeding.

I. INTRODUCTION

In its initial comments, WorldCom urged the Commission to reject the unsupported attempts of the Regional Bell Operating Companies ("RBOCs") to avoid the express prohibitions and restrictions of Section 271 and Section 272 of the 1996 Act by rewriting Section 272(e)(4) to give them independent authority to provide in-region interLATA facilities and services directly to their long distance affiliates.[1] WorldCom demonstrated that the RBOCs' purported distinction between originating a "retail" service via Section 272(a), and providing a "wholesale" service via Section 272(e)(4), is contrary to the text of the Act, finds no support in the legislative history, and cannot be reconciled with recognized telecommunications industry terminology. WorldCom then showed that the RBOCs' primary claim that Section 272(e)(4)

[1] Further Comments of WorldCom, CC Docket No. 96-149, filed April 17, 1997 ("WorldCom Further Comments").

allows the RBOCs to provide in-region interLATA services directly to their own affiliates also lacks credible support in the words and intent of the Act, makes no logical sense, and would create serious discrimination and cost allocation problems. WorldCom explained that Section 272(e)(4) actually prohibits the RBOCs from engaging in discrimination where the RBOC is permitted to provide interLATA facilities directly, but chooses instead to use an affiliate.

Five of the six RBOCs filed joint comments,[2] with US West filing its own comments separately.[3] For purposes of this reply, WorldCom will not reiterate the strong opposition to the RBOCs' position from commenters AT&T, MCI, Sprint, CompTel, Telecommunications Resellers Association, Teleport, and the Public Utilities Commission of Ohio. Instead, WorldCom will focus exclusively on the arguments mustered by the RBOCs in their concerted attempt to evade their statutory obligations under the 1996 Act.

II. THE RBOCs' VARIED ARGUMENTS FAIL TO TRANSFORM SECTION 272(e)(4) INTO A LOOPHOLE TO THE BLANKET PROHIBITION OF SECTION 272(a)

A. The RBOCs Agree That Policy Questions Are Not Germane To Issues Of Statutory Interpretation

In its initial comments, WorldCom stated that the policy questions raised in the Public Notice concerning a supposed wholesale/retail dichotomy are inappropriate and should

[2] Bell Company Comments on Expedited Reconsideration of Interpretation of Section 272(e)(4), CC Docket No. 96-149, filed April 17, 1997 ("RBOC Joint Comments").

[3] Comments of US West, Inc., CC Docket No. 96-149, filed April 17, 1997 ("US West Comments").

not even be reached in this reconsideration proceeding, given the lack of any evidence that Congress actually intended such a distinction. The RBOCs agree with WorldCom that the Commission should not consider policy issues on this point. The Joint RBOCs state that the policy questions in the Public Notice "are ultimately beside the point,"[4] while US West finds the questions to be "fundamentally irrelevant."[5] Despite offering this assessment of the issue, however, the RBOCs proffer an affidavit, two declarations, and three pages of text in their comments discussing the policy reasons why the Commission should adopt their interpretation of Section 272(e)(4). WorldCom will take the RBOCs' sage advice -- and urges the Commission to do the same -- by ignoring the RBOCs' policy arguments and focusing instead on the crux of the issue at hand: the proper statutory interpretation of Section 272(e)(4). Even if the Commission does decide to reach the policy issues it has raised, however, Congress has already addressed and decided those very same issues within the four corners of the text of the statute.

B. The RBOCs' So-Called "Plain Language" Interpretation Of Section 272(e)(4) Must Be Rejected As Contrary To A Plain Reading Of The Act

WorldCom must note the irony of the RBOCs castigating the Commission for "declin[ing] to defend its ruling" in the First Report and Order to the D.C. Circuit, and for failing to "adequately consider" the RBOCs' so-called "plain language" argument.[6] In fact,

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[4] RBOC Joint Comments at 2.

[5] US West Comments at 7.

[6] RBOC Joint Comments at 1, 4.

none of the RBOCs raised this particular argument in either their initial or reply comments in this proceeding, and only one did so briefly in an ex parte filing that was submitted well after the formal pleading cycle had ended.[7] Given their obvious failings to present all their arguments to the Commission in a clear and timely fashion, the RBOCs' repeated asides about the Commission's failure to consider this argument are obviously not well taken. More to the point, however, WorldCom is puzzled how a reading of the Act that the RBOCs claim is so self-evidently "unequivocal," "unambiguous," "conclusive," and in the "plainest possible language,"[8] never even managed to find its way into any of the RBOCs' comments in this proceeding.[9] As will be shown below, there is a very good reason why the RBOCs did not forcefully advocate their "plain reading" view in their initial and reply comments: it doesn't survive a plain reading of the statute.

Rather than lay out a detailed and well-supported legal case for their "plain language" interpretation of Section 272(e)(4), the RBOCs' joint comments raise a number of points in its defense. WorldCom will respond to these points in the approximate order in which they are raised.

The RBOCs first present the "origination equals retail service" argument that the

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[7] See Bell Atlantic v. FCC, No. 97-1067, Motion of the Federal Communications Commission for Remand to Consider Issues (D.C. Cir. filed February 25, 1997) at 1, 3.

[8] RBOC Joint Comments at 1, 1, 3, 2.

[9] Indeed, given the RBOCs' apparent last-minute, post hoc embrace of the "plain language" argument, WorldCom believes that the RBOCs should have been foreclosed from essentially seeking a rehearing of the FCC's order on this issue.

Commission already has considered and firmly rejected in the First Report and Order.[10] This argument posits that, when an RBOC provides interLATA services to its affiliate under subsection (e)(4), it is the affiliate, not the RBOC, that actually "originates" interLATA services.[11] As WorldCom discusses in some detail in its comments, however, this "origination equals retail service" simply has no basis in the statutory language, the legislative history, ordinary industry parlance, or even plain common sense.[12] When confronted with the sticky reality that Congress never uses the terms "originate" or "origination" to signify retail service, the RBOCs try to twist out of the statutory language by insisting that origination actually carries two entirely separate meanings in the Act. In Section 271(b), the RBOCs claim, the term identifies the geographic location where interLATA services begin, while in Section 272(b), the term refers to "the specific activity of providing interLATA services to the customers who initiate interLATA calls."[13] In other words, Congress actually wrote two different definitions of origination into the 1996 Act, and apparently just forgot to tell anybody about it. Of course, US West does not further the RBOC cause by insisting that the complete absence of any mention of origination anywhere in Section 272(e)(4) "probably has no significance."[14] So much for

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[10] See Order at paras. 262-265.

[11] RBOC Joint Comments at 5.

[12] WorldCom Further Comments at 6-10.

[13] RBOC Joint Comments at 5 n.3.

[14] US West Comments at 5 n.10.

"plain language" view of statutory interpretation.

Having done their obligatory bit to defend their "origination equals retail service" argument, the RBOCs abruptly abandon it and turn to the crux of their so-called "plain language" argument. This argument necessarily hinges on a very tight focus on several words and phrases in Section 272(e)(4) which the RBOCs claim provide the basis for their expansive view of the provision. First, the RBOCs argue that Section 272(e)(4) cannot be interpreted to constrain their authority because, unlike the "shall" and "shall not" language of subsections (e)(1) through (e)(3), subsection (e)(4) was drafted as "may provide." This, the RBOCs acclaim, is a "crucial difference in statutory terminology."[15] Even a cursory review of the provision, however, finds no such crucial difference to support the RBOCs' argument. Subsections (a) through (c) are phrased as "shall [act]," "shall not [act]... unless....," and "shall [act]," respectively, while subsection (d) is phrased as "may [act]... if,... and so long as...." From this comparison, it is obvious that the conditional language of subsection (d) mirrors the "shall not [act]... unless" language of subsection (b). Congress selected the "may" language for a good reason; unlike the specific mandates imposed by subsections (a) through (c), the RBOCs are not <u>required</u> to provide previously authorized interLATA and intraLATA facilities and services to their interLATA affiliate. Instead, the RBOCs are <u>permitted</u> to provide these facilities and services, but only if subject to several conditions. The RBOCs' concerted focus on the word "may" ignores the actual meaning and placement of the provision in Section 272(e).

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[15] RBOC Joint Comments at 7.

The RBOCs also insist that there is nothing unusual about Congress inserting Section 272(e)(4) into the text of the Act to provide an "added dose of clarity" that the RBOCs are permitted to provide intraLATA facilities and services to their long distance affiliates.[16] WorldCom strongly disagrees. It is extremely unusual for Congress, under the RBOCs' interpretation of Section 272(e)(4), to grant the RBOCs authority over intraLATA facilities and services that the RBOCs already possess, and which Congress thus has no direct power to grant. As WorldCom pointed out in its comments, the inclusion of intraLATA facilities and services in Section 272(e)(4) makes absolutely no sense under the RBOCs' interpretation of that provision.[17]

The RBOCs next focus on the word "any" in the phrase "any interLATA or intraLATA facilities or services...." The RBOCs argue that the plain meaning of "any" covers every possible interLATA and intraLATA service,[18] and that (in a related argument) Section 272(e)(4) is the specific rule that trumps the more general Section 271 and Section 272.[19] What the RBOCs conveniently ignore in their exegesis, however, is the blanket language of Section 271 and Section 272. In particular, Section 271(a) states that neither an RBOC nor its affiliate

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[16] RBOC Joint Comments at 3.

[17] WorldCom Further Comments at 12.

[18] RBOC Joint Comments at 7.

[19] RBOC Joint Comments at 4-6.

may provide interLATA services "except as provided in this section."[20] Because Section 272 is not contained in Section 271, the RBOCs and their affiliates are statutorily barred from receiving any alleged independent grant of authority from any provision in Section 272. In addition, Section 272(a)(1)(B) itself states in the plainest English that an RBOC "may not provide" in-region interLATA service "unless it provides that service through one or more affiliates that meet the [structural separation] requirements of subsection (b)."[21] Because the RBOCs do not recognize the applicability of Section 272(b) to their affiliates under Section 272(e)(4), their interpretation falls afoul of the absolute language of Section 272(a).

In the RBOCs' final piece of textual analysis, they claim that Section 272(e)(4) does not suggest any need for a public auction of the RBOCs' official services networks if the RBOCs merely "provide" such facilities to their affiliates.[22] If the RBOCs were required to actually sell the facilities, they explain, the cost allocation requirement of Section 272(e)(4) "would have no point...."[23] To the contrary, WorldCom believes that the cost allocation language is a key aspect of Section 272(e)(4) because it recognizes that the costs of building and maintaining local ratepayer-funded facilities must be properly accounted for when those same facilities are converted to other uses and sold to the RBOC affiliate or other carriers. Without

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[20] 47 U.S.C. § 271(a).

[21] 47 U.S.C. § 272(a)(1)(B).

[22] RBOC Joint Comments at 7.

[23] Id. at 8.

the cost allocation provision, local ratepayers would not be compensated for their non-voluntary financing of those network facilities, and the affiliate would receive an unjust and anticompetitive windfall. Rather than support the RBOCs' case, the cost allocation language actually demonstrates Congress' policy decision not to allow the RBOCs to sell local facilities for long distance purposes except at arms length and with a full allocation of all pertinent costs.

Finally, the RBOCs claim that the separation and cross-subsidy requirements of the 1996 Act will remain in place under their view of Section 272(e)(4) and are not "in any way compromised."[24] However, the RBOCs' own statements to the D.C. Circuit belie the accuracy of that statement. Section 272(b)(1) requires the separate affiliate to "operate independently" from the RBOC, while Section 272(b)(5) requires an RBOC to conduct "all transactions" with its affiliate on an "arm's length basis."[25] Bell Atlantic told the court, however, that it "own[s] some facilities, equipment and related support systems that can be used to provide both local and long distance service," and that it "intends to place the construction, ownership and operation of its long distance network in its operating companies."[26] Section 272(b)(3) also requires the RBOC affiliate to have separate employees from the RBOC.[27] Yet Bell Atlantic has indicated

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[24] RBOC Joint Comments at 9-10.

[25] 47 U.S.C. § 272(b)(1), (b)(5).

[26] RBOC Joint Comments, attaching Declaration of James G. Cullen, Vice Chairman, Bell Atlantic Corporation, at 2 ("Cullen Declaration").

[27] 47 U.S.C. § 272(b)(3).

that it intends to use the same employees to manage both its local and long distance facilities.[28] The RBOCs' own stated plans are in direct violation of the separation and nondiscrimination requirements of the Act.

Similarly, as mentioned above, the RBOCs' proposed use of their official services networks to provide interLATA services directly to their affiliates would evade the statutory requirement that the costs of deploying and maintaining the official services networks must be "appropriately allocated."[29] Although these local networks have been built and maintained over the years from local ratepayer funds, Bell Atlantic intends to use those same "facilities, equipment and related support systems... to provide both local and long distance service."[30] The Act simply does not permit the RBOCs to convert local exchange facilities, paid for by local ratepayers, to long distance use without a proper allocation of costs.

US West's separate comments also fail to persuade. After admitting that "[t]he trick here is to reconcile Section 272(e)(4) with Section 272(a)(2)(B) without doing violence to either of them,"[31] US West then proceeds to eviscerate the rest of Section 272. US West tries to draw a distinction between Congress' use of the phrase "interLATA telecommunication services" in Section 272(a) (which the RBOCs cannot provide to their affiliates) and "interLATA

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[28] Cullen Declaration at 2.

[29] 47 U.S.C. § 272(e)(4).

[30] Cullen Declaration at 2.

[31] US West Comments at 3.

services" in Sections 271(a) and 272(e)(4) (which US West claims the RBOCs can provide to their affiliates).[32] US West explains that the absence of the word "telecommunications" in Section 272(e)(4) is very significant because otherwise "Congress would not have used different terms."[33]

Although there is a straightforward distinction between the two phrases identified by US West, it is not the distinction that US West proffers. The Commission has already decided in this proceeding that the term "interLATA services" includes both "interLATA telecommunications services" and "interLATA information services," because information services are provided via interLATA telecommunications transmissions.[34] As a result, Section 271 dictates that the RBOCs cannot provide in-region interLATA telecommunications services or interLATA information services until they have obtained Section 271 authorization.[35] Because Section 272(e)(4) uses the more inclusive phrase "interLATA services," the RBOCs are prohibited from discriminating in their provision of telecommunications services and information services.

In contrast, US West's argument that the RBOCs are free to provide "interLATA services" (but not "interLATA telecommunications services") to their affiliates stretches

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[32] US West Comments at 3.

[33] US West Comments at 3.

[34] See Order at paras. 55-57.

[35] Further, Section 272 establishes specific separation requirements for the RBOCs to provide these services after they have received Section 271 authorization.

credibility to the breaking point. For starters, it is a practical impossibility for a facility or service to be deemed interLATA in Section 271 and Section 272 without also being a telecommunications service or facility. The very act of a service moving from one LATA to another necessarily must take place in the context of telecommunications. Moreover, the 1996 Act explicitly defines "interLATA service" as "telecommunications between a point located in a local access transport area and a point located outside such area."[36] Thus, Congress' use of the phrase "interLATA service" in Section 272(e)(4) necessarily includes the very "interLATA telecommunications services" that US West admits the RBOCs are prohibited from providing to their affiliates. US West's argument makes much ado about absolutely nothing.

US West's other point is directed at parties such as WorldCom which point out Section 272(e)(4) cannot be a separate grant of authority to the RBOCs because it includes "all intraLATA services," which the RBOCs already can provide without new congressional authority.[37] US West goes a step further and claims that the RBOCs "likewise need no authority... to provide interLATA services and facilities" as well.[38] In other words, US West asserts, Congress meant for Section 272(e)(4) to be a "general grant of authority" for the RBOCs to provide all telecommunications services and facilities to their affiliates.[39] Of course, if the

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[36] 47 U.S.C. § 153(21) (emphasis added).

[37] See WorldCom Further Comments at 12.

[38] US West Comments at 6.

[39] Id.

RBOCs have no need for Section 272(e)(4) to justify providing whatever services and facilities they desire to their affiliates, one must ask why the provision is there in the first place. The obvious answer is that Section 272(e)(4) is not in the 1996 Act to allow the RBOCs to avoid most of the provisions that precede it; rather, as the title of Section 272 signals, the provision is one of several safeguards intended to prevent the RBOCs and their affiliates from doing just that.

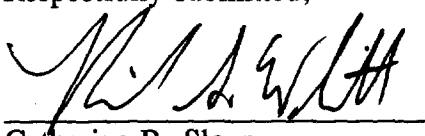
As WorldCom explained in its comments, Section 272(e)(4) -- like subsections (e)(1), (e)(2), and (e)(3) -- serves as a limitation on what the RBOCs can do. In this case, the provision prohibits the RBOCs' from engaging in discrimination where the RBOC is already permitted to provide interLATA services and facilities (such as incidental, out-of-region, and previously authorized interLATA services) without an affiliate, but chooses to use an affiliate anyway. The provision would continue to apply to the RBOCs after the separate affiliate requirement sunsets as a general nondiscrimination requirement governing the RBOCs' provision of all interLATA and intraLATA facilities and services. Unlike the RBOCs' view, this interpretation best comports with the language, structure, and intent of the statute.

Thus, the RBOCs' best efforts to dislodge the separation and nondiscrimination requirements of Sections 271 and 272 fall far short of their desired objective. The Commission should promptly rule on reconsideration that Section 272(e)(4) is not a separate grant of authority to the RBOCs, and does not allow the RBOCs to provide in-region interLATA facilities and services to their long distance affiliates.

III. CONCLUSION

The Commission should act in accordance with the recommendations proposed above, and in WorldCom's further comments in this proceeding.

Respectfully submitted,



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April 24, 1997

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I, Cecelia Y. Johnson, hereby certify that I have this 24th day of April, 1997, sent a copy of the foregoing "Reply Comments of WorldCom" by hand delivery, or first class mail, postage prepaid, to the following:

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