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June 10, 1997

BY MESSENGER

William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20037

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JUN 10 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket No. 96-61; Ex Parte

Dear Mr. Caton:

The Commonwealth of the Northern Mariana Islands ("Commonwealth")¹ hereby opposes the request of GTE Service Corporation ("GTE") for an extension of the applicable tariff filing deadlines by which carriers must submit tariffs containing integrated rates.² As demonstrated below, such an extension is unwarranted and would disrupt the implementation of rate integration in the Commonwealth.

In its recent letter to the Commission, GTE requests that the Commission issue a decision on the merits of GTE's pending Petition for Reconsideration and Clarification ("Petition") no later than June 13, 1997.³ The Petition challenges whether parent companies such as GTE must integrate the rates charged for interexchange services by their affiliates.⁴ In the alternative, GTE

¹ This letter is submitted by the Office of the Governor of the Commonwealth.

² The Commission's Report and Order in this docket requires "providers of interexchange services to integrate services offered to subscribers in Guam and the Northern Marianas with services offered in other states no later than August 1, 1997." See In re Policy and Rules Concerning the Interstate, Interexchange Marketplace; Implementation of Section 254(g), Report and Order, CC Dkt. No. 96-61, FCC 96-331, ¶ 68 (Aug. 7, 1996) ("Report and Order"). As GTE points out, the GTE subsidiary which operates in the Commonwealth, Micronesian Telecommunications Corporation ("MTC"), will need to file this tariff no later than July 15, 1997 in order to allow for a fifteen-day notice period to run before the August 1 implementation deadline. See 47 C.F.R. § 61.58.

³ See Letter from R. Michael Senkowski to Regina Keeney, Chief, FCC Common Carrier Bureau, of May 30, 1997, at 1 ("GTE Letter").

⁴ See GTE Petition for Reconsideration and Clarification in CC Dkt. No. 96-61, at 2-5 (Sept. 16, 1996).

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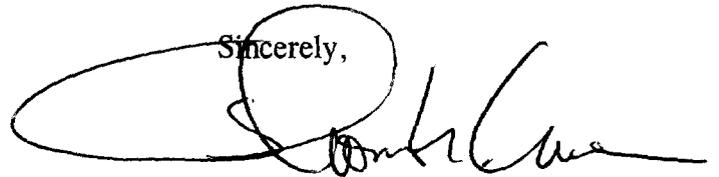
requests that "as a minimum" the Commission should "waive or extend" the July 15, 1997 deadline by which GTE's subsidiary, Micronesian Telecommunications Corporation ("MTC"), must submit a tariff complying with the rate integration requirements.⁵ GTE further asks that such a waiver or extension last "until such time as the Commission can act on (GTE's) petition."⁶

GTE is trying to force a delay. It is clear that granting any such a "waiver" or "extension" to GTE will potentially push back the August 1, 1997 deadline, effectively stalling the implementation of rate integration. Such a delay would harm the Commonwealth's ratepayers by depriving them of the long-awaited benefits of integrated rates and by throwing the implementation process into disarray. The telecommunications industry has long been aware of the August 1, 1997 deadline, and GTE has had ample notice and opportunity to develop an integrated rate plan and tariff. To delay rate integration now, at the eleventh hour, would be unfair both to consumers and to those carriers which have so far complied with the Report and Order. As a result, the Commonwealth strongly recommends that the Commission reject GTE's extension request.

In addition, the Commonwealth requests that the Commission resist granting GTE any "waiver" of its tariff rules which would shorten the notice period. For example, if the Commission was to allow GTE to file its tariff later than July 15, 1997, yet still allow this tariff to become effective by the August 1, 1997 deadline, it would compromise the Commonwealth's tariff review rights. Neither the Commission nor the Commonwealth will have sufficient time to evaluate whether GTE's tariff truly integrates its rates on a nationwide basis.

Please direct any questions to the undersigned.

Sincerely,



Thomas K. Crowe,
Michael B. Adams, Jr.
Counsel for the Commonwealth of the
Northern Mariana Islands

cc: William Kennard
Patrick Donovan
Neil Fried
Parties of Record

⁵ GTE Letter at 2.

⁶ Id.