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June 16, 1997

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Federal Communications Commission  
Office of Secretary

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222/Stop Code 20554  
Washington, DC 20554

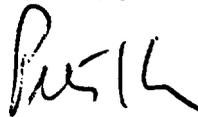
Re: In the Matter of Application by Ameritech Michigan for Authorization Under Section 271 of the Communications Act to Provide In-Region InterLATA Service in the State of Michigan, CC Docket No. 97-137

Dear Mr. Caton:

On Tuesday, June 10, AT&T filed Comments in Opposition to Ameritech Michigan's Section 271 Application for Michigan. It has come to our attention that page 33 of the Affidavit of Robert F. Falcone and Maureen E. Gerson was inadvertently omitted. We are enclosing six copies of the missing page. The electronic version of the affidavit did not contain the error.

Please date stamp the extra copy of this letter and return it to the individual delivering this package. We apologize for any inconvenience this may cause and thank you for your assistance. If you have any questions regarding these materials, please do not hesitate to call me.

Very truly yours,

  
Peter D. Keisler

Enclosures

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42. Ameritech's "access revenue settlement" proposal is plainly deficient.

Ameritech is simply refusing to accept its legal obligation, creating a pretext to retain access revenues to which it is not lawfully entitled, through the specter of future litigation in which it hopes to convince someone that it is right and everyone else has been wrong all along. Once again, the "true up" is running the wrong direction. Further, as with shared transport, the period of time during which Ameritech proposes that it be excused from complying with the law is indeterminate, because it will not "true up" until there exists a "final approved price for the network elements used to complete such calls," Kocher Aff., ¶77, *i.e.*, a price that is no longer subject to any further regulatory or judicial proceedings, that Ameritech, in its discretion, might pursue. Finally, Ameritech's "access revenue settlement" proposal has a particularly pernicious anticompetitive effect: IXC's would be "locked in" and captive to Ameritech's access service charges, until such time as the Commission enters an order rejecting Ameritech's arguments about who is entitled to collect access revenues. During this time, IXC's and their customers would be deprived of the access rate competition which the Act and the Access Reform Order were intended to foster. Indeed, under Ameritech's proposal, the CLEC is specifically prohibited from "assessing its access charges to the IXC and compensating Ameritech for the common transport furnished to the CLEC" as a result of an "access revenue settlement." Ameritech's proposal will thus forestall the development of access service competition for as long as possible.