





262, FCC 97-159 (released May 21, 1997) ("Price Cap Order"), and the *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 97-157 (released May 8, 1997) ("Universal Service Order").

3. As previously explained in proceedings before the Commission, including CC Docket No. 96-262, many of SWBT's interstate access services are already subject to growing competitive pressures that constrain the prices that can be charged for those services. High-capacity special access services already face competition from competitive access providers, interexchange carriers, cable companies, utility companies and private networks, and are particularly susceptible to these pressures. These competitors also provide an expanding array of competing telephone services, and new entrants such as wireless personal communications services and so-called "competitive local exchange carriers" are beginning operation. The scope and intensity of interstate access competition is increasing, and will continue to grow especially as a result of the Telecommunications Act of 1996.

4. My understanding is that SWBT is only permitted to recover its contributions to the Federal universal support fund for education, libraries, and health care providers from its interstate charges, which would include access charges. More particularly, based upon an internal analysis, SWBT's recovery of its contributions to a \$2.65 billion annual fund will increase SWBT's PICC charges and originating switched access rates.

5. Under the aforementioned market conditions, the implicit subsidies already in SWBT's interstate access rates and any increase in those rates make its services less attractive to existing customers and potential customers, and SWBT's competitors services more attractive. The effect of that basic economic principle is exacerbated by the Commission's determination in the Access

Charge Order that interstate access rates cannot be applied to unbundled network elements (“UNEs”), thereby making SWBT’s interstate access services less competitive with purchasers of SWBT’s UNEs. Moreover, because of the substantial difference in price between SWBT’s access services and their UNE counterparts, UNE purchasers will be able to offer local and long distance service at a substantial price advantage to any similar offerings purchased through an incumbent LEC like SWBT and a long distance carrier of the customer’s choosing.

6. Based upon past experience with customer losses to SWBT’s access competitors, I am of the opinion that the continued presence of implicit support in SWBT’s interstate access rates and any increase in those rates attendant with the Federal universal service fund will result in SWBT losing customers, traffic, and revenue that would not otherwise occur. I expect that more customers than otherwise will change to other switched access providers or to special access providers, and more traffic than otherwise will be diverted from SWBT’s network and access services.

7. SWBT’s ability to regain any access customer lost to a competitor is not assured, especially since special access services are often offered on a term basis consisting of more than one year.

8. With reference to the “Declaration of Gary L. Dolle,” to the extent that SWBT might be able secure a later grant of permission from the Commission to increase interstate prices in an effort to recovery any stranded investment resulting from a successful appeal, such permission could be an ineffective remedy. In order to recoup those amounts, SWBT prices would have to be increased significantly thereby creating an even greater incentive for customers to seek services from other carriers. Absent a stay, the Commission can provide no assurance that either the

marketplace would permit price increases to recover that investment, or that the remedy available would not result in more harm to SWBT.

9. These same issues affect Pacific Bell and Nevada Bell, which are both subsidiaries of SBC Communications Inc.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on June 30, 1997.

  
James L. Jones, Jr.

COUNTY OF OKLAHOMA        )  
  ) ss:  
STATE OF OKLAHOMA        )

SUBSCRIBED AND SWORN to before me this 30th day of June, 1997.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:

August 28, 2000



BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of )  
 )  
Federal-State Joint Board on ) CC Docket No. 96-45  
Universal Service )

**DECLARATION OF JAMES F. RILEY**

I, James F. Riley, declare the following:

1. I am the Director of Regulatory Affairs for Nevada Bell. My responsibilities encompass overall management of the regulatory affairs of Nevada Bell. In this capacity, I am knowledgeable about Nevada Bell's Lifeline assistance program.
2. Nevada Bell has a tariff approved by the Public Service Commission of Nevada ("PSCN") which governs Nevada Bell's Lifeline Service program.
3. Nevada Bell's Universal Lifeline Service ("ULS") has several requirements which must be met by an applicant. Any Nevada Bell residential customer can assert eligibility for ULS. Nevada Bell residential customers need only state their eligibility as meeting all of the requirements and return a

signed certified eligibility form with proof of age and/or income eligibility to qualify for Lifeline assistance.

4. The PSCN currently allows Nevada Bell to disconnect ULS customers for non-payment of charges, including toll charges where toll charges have not been disputed. The PSCN also permits Nevada Bell to require a deposit from a ULS customer due to past unpaid charges before initiation of local service.
5. Without the ability to deny service for non-payment of toll charges, Nevada Bell will be subject to increased fraud, uncollectibles and net bad debt expense, administrative and collections expenses.
6. The current Nevada Bell collection system does not distinguish between toll and non-toll charges. The collections system would need to be modified to accommodate the new policy.

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on June 30, 1997.

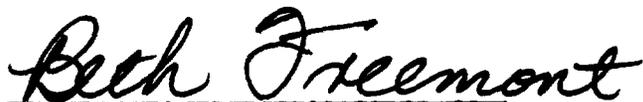
State of Nevada

County of Washoe

  
James F. Riley  
Directory of Regulatory Affairs

Subscribed and sworn to  
before me this 30th day  
of June 1997.





Notary Public



Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
 )  
Federal-State Joint Board on ) CC Docket No. 96-45  
Universal Service )

DECLARATION OF PAUL L. TURNER

I, Paul L. Turner, declare the following:

1. I am the Universal Lifeline Telephone Service (ULTS) Product Manager for Pacific Bell. My responsibilities encompass overall product management of the ULTS program for Pacific Bell including facilitation of sales, support system, regulatory and legal requirements. The position also requires participation in regulatory and consumer group forums.
2. In this capacity, I am familiar with the Lifeline program established by the Federal Communication Commission, and implementation of that program in California, including by Pacific Bell.
3. The California Public Utilities Commission (CPUC) adopted a self-certification program by which any residential customer can assert eligibility for ULTS. A California resident need only state their eligibility and return a signed eligibility form to qualify for Lifeline assistance.
4. The Report and Order in the Federal-State Joint Board on Universal Service, CC 96-45, FCC 97-157, at para. 359 n. 903 states that "approximately 4.4 million consumers participate in Lifeline." Based on this figure and Pacific Bell's current Lifeline subscribership, more than 50% of all US Lifeline customers are served by Pacific Bell.
5. More than 23% of Pacific Bell's residential customers have self-certified as eligible for Lifeline assistance and are participating in the program.
6. The CPUC currently permits Pacific Bell and other local exchange carriers to disconnect ULTS customers for non-payment of charges, including toll charges.

Requiring a deposit from a ULTS customer due to past unpaid charges before initiation of local service is also permitted by the CPUC.

7. Pacific Bell does not have the authority under State regulation to block involuntarily toll services to a customer, including Lifeline customers. Without the ability to deny service for non-payment of toll charges, Pacific Bell would be providing unlimited access to toll. Pacific Bell will be subject to a dramatic increase in fraud, uncollectibles and net bad debt expense, administrative and collections expenses.
8. In order to accommodate the FCC's no disconnect/deposit rule, Pacific Bell would be required to overhaul the current billing and collections system. Within the current system, toll charges are not distinguishable from the total billed revenue. New fields within the collections system would need to be added to store the additional details of the toll charges. This would then enable the collections system to strip off the toll charges from Lifeline customers in order to treat the balance of the bill. Business rules would then need to be modified to reflect the change in treatment of Lifeline customers. The cost and development time required to make this change is now being evaluated.

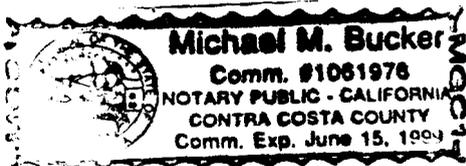
I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on June 30, 1997.

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 30 DAY OF JUN 1997

Michael M. Bucker  
NOTARY PUBLIC

Michael M. Bucker

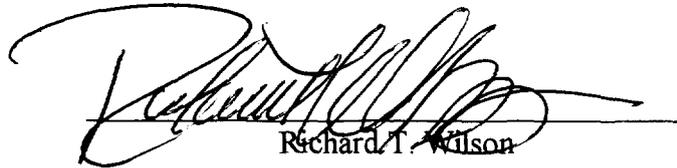






charges. The collections system would need to be modified to accommodate the proposed policy.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on June 30, 1997.

  
Richard T. Wilson

Subscribed and sworn to before me this 30th day of June, 1997.

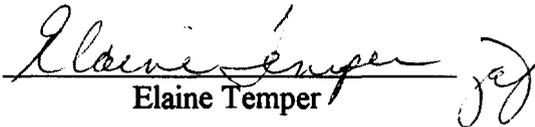
  
Notary Public

My term expires:

**MARY ELLEN KALAPINSKI**  
**NOTARY PUBLIC STATE OF MISSOURI**  
**ST. LOUIS CITY**  
**MY COMMISSION EXP JULY 24, 1997**

**CERTIFICATE OF SERVICE**

I, Elaine Temper, hereby certify that the Joint Petition for a Stay Pending Judicial Review of Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell in CC 96-45 has been served this 3rd day of July, 1997 to the Parties of Record.

  
Elaine Temper

July 3, 1997

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