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

Federal-State Joint Board on Universal Service	CC Docket No. 96-45
Access Charge Reform	CC Docket No. 96-262
Price Cap Performance Review for Local Exchange Carriers	CC Docket No. 94-1
Transport Rate Structure and Pricing	CC Docket No. 91-213
End User Common Line Charges	CC Docket No. 95-72

PETITION FOR RECONSIDERATION AND CLARIFICATION OF AT&T CORP.

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SUMMARY

In this petition, AT&T asks the Commission to reconsider and clarify certain rulings in its May 1997 Universal Service and Access Reform Orders.

As AT&T shows in Part I, the Commission should change the mechanism for universal service support recovery to a competitively neutral mandatory end user surcharge on all interstate retail telecommunications service revenues. The recovery mechanism adopted in the Universal Service Order and implemented in the Access Reform Order is not competitively neutral because interexchange carriers ("IXCs") are forced to bear through "wholesale" access charges all of the incumbent local exchange carriers'("ILECs") "retail" universal service fund ("USF") assessment assigned to the Common Line basket. Most fundamentally, unlike ILECs, carriers entering the local market through total service resale will have no ability to deflect USF recovery through access charges, placing them at a serious competitive disadvantage *vis-à-vis* the incumbent.

In Part II, AT&T demonstrates that the subscriber line charge ("SLC") cap on multiline business lines and non-primary residential lines should be raised to allow for full recovery of all ILEC retail marketing expenses from end users. This would be consistent with the Commission's finding in the Access Reform Order that IXCs should not be required to bear ILEC retail marketing expenses and with its prior determination in the Local Competition Order that *other* ILEC

retail expenses are not to be recovered from wholesale services, such as access.

In Part III, AT&T shows that the Commission should clarify its Access Reform Order to ensure that the transport interconnection charge ("TIC") is no longer assessed on switched access minutes of competitive access providers ("CAPs") as of July 1, 1997. There is no reason to delay implementation of this holding -- which appropriately recognizes that CAPs who do not use the ILECs' transport services should not be required to pay this subsidy element.

In Part IV, AT&T demonstrates that the Commission should clarify that the new flat-rated trunk port rate element established in the Access Charge Order should be reduced proportionally to the extent that the trunk port is used to originate or terminate long distance calls to an end user customer who is served by a competitive local exchange carrier ("CLEC") using unbundled network elements ("UNEs"). This will ensure that the trunk port charge is applied in a manner consistent with the Commission's holding that purchasers of UNEs are not required to pay access charges.

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PETITION FOR RECONSIDERATION AND CLARIFICATION OF AT&T CORP.

Pursuant to Section 1.429 of the Commission's Rules, 47 C.F.R. § 1.429, AT&T Corp. ("AT&T") petitions the Commission for reconsideration and clarification of certain rulings in the May 8, 1997 Universal Service Order[1] and the May 16, 1997 Access Reform Order.[2]

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1 Federal-State Joint Board on Universal Service Reform, CC Docket No. 96-45, Report and Order, FCC 97-157, released May 8, 1997, and published in the Federal Register on June 17, 1997 (62 Fed. Reg. 32862) ("Universal Service Order").

2 Access Charge Reform, CC Docket Nos. 96-262, 94-1, 91-213, 95-72, First Report and Order, FCC 97-158, released May 16, 1997, and published in the Federal Register on June 11, 1997 (62 Fed. Reg. 31868) ("Access Reform Order").

I. THE COMMISSION SHOULD ADOPT A MANDATORY END USER SURCHARGE ON ALL INTERSTATE RETAIL TELECOMMUNICATIONS REVENUES AS THE RECOVERY MECHANISM FOR UNIVERSAL SERVICE SUPPORT.

Section 254(b)(4) of the Telecommunications Act of 1996 requires that all telecommunications service providers make an equitable and nondiscriminatory contribution to universal service support. The Commission's current USF recovery mechanism does not comply with this directive and should be reconsidered because it inappropriately transfers the ILECs' USF obligation to other carriers and, most fundamentally, it has an acute discriminatory impact on carriers who enter the local service market through total service resale ("TSR") and who have no ability to deflect their USF obligations to wholesale customers through access charges. Accordingly, the USF recovery scheme adopted by the Commission is not competitively neutral and it should be replaced with a mandatory end user surcharge on all interstate retail telecommunications revenues.

Although the Commission requires that USF support be *assessed* in a competitively neutral manner, *i.e.*, based on an interstate carrier's retail end user telecommunications service revenues,[3] the *recovery* of this assessment is not competitively

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[3] See Universal Service Order, paras. 833, 844. The revenue assessment base for the federal USF varies depending on the program supported. For the high cost/low-income support programs interstate revenues are assessed, whereas for the schools, libraries and rural health care programs both interstate and intrastate revenues are assessed. For both sets of programs, the international revenues of interstate telecommunications carriers are also assessed. See

(footnote continued on following page)

neutral. For example, of the $4.65 billion in USF funding requirements the Commission anticipates will be required in 1998,[4] $1.35 billion will be assessed on ILECs based on their relative retail end user telecommunications service revenues.[5]

However, in order to recover their obligation, the ILECs are allowed to assign their USF support obligation as an exogenous cost-causative adjustment to those price cap baskets containing interstate end user telecommunications service revenues, namely, Common Line, Trunking (special access sold to end users) and Interexchange (end user) based on the relative proportion of end user revenues in each basket. Universal Service Order, paras. 829-830. Thus, of the $1.35 billion ILEC USF assessment, roughly 85%, or $1.17 billion, would be allowed to be recovered as an exogenous adjustment to the Common Line basket.

This recovery mechanism violates competitive neutrality because of how costs are recovered in the Common Line basket. Specifically, the SLC formula does not allow any USF support to be recovered from the SLC (the only

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Universal Service Order, paras. 772-773, 779, 807-809, 818, 824, 831, 837.

[4] The $4.65 billion consists of $2.65 billion for schools, libraries and rural health care programs and $2 billion for high cost/low-income programs.

[5] In addition, IXCs would be assessed $2.55 billion and other interstate service providers (cellular, resellers, etc.) would be assessed $.75 billion.

end user rate element in that basket) and, even if the formula allowed it, the SLC caps prescribed in the Access Reform Order would not, in any event, allow for significant USF recovery. Accordingly, of the $1.17 billion of ILEC USF obligations that flow to the Common Line basket, the entire amount will be recovered from access charges paid by IXCs (through the flat-rated presubscribed interexchange carrier charge ("PICC") and the usage-sensitive Carrier Common Line Charge ("CCLC")). In essence, this $1.17 billion of assessment on *retail* revenues has been transferred to *wholesale* services. Thus, the *effective* USF support obligation on the ILECs' retail services is only $.18 billion ($1.35 billion less $1.17 billion), whereas the IXCs' retail services would have to recover $3.72 billion ($2.55 billion of IXC retail revenue assessment plus $1.17 billion of ILEC retail revenue assessment). This is a clear violation of Section 254(b)(4) of the Act which requires that "all providers of telecommunications services should make an equitable and nondiscriminatory contribution to the preservation and advancement of universal service."

Moreover, this recovery mechanism creates a barrier to entry because although the ILEC will be able to recover its USF support obligation from its access customers, a CLEC that enters the local service market through total service resale will not be able to recover any of its USF obligations through

access charges paid by IXCs.[6] Accordingly, it will have to recover its USF obligation solely from end user services, forcing its end user rate to be higher than that of the ILEC. Because customers are not likely to shift service from an ILEC to a CLEC with higher rates, the Commission's structure for USF recovery creates a barrier to local entry, contrary to the fundamental objectives of the 1996 Telecommunications Act.[7]

Accordingly, the Commission should reconsider the mechanism for recovering USF support and should adopt an explicit, mandatory end user surcharge on all interstate retail telecommunications service revenues. This is, in fact, the recovery mechanism which in the Universal Service proceeding received broad support among the industry as the most

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[6] For example, if 30 percent of ILEC retail revenues are in the future lost to CLECs providing TSR, the ILECs' $1.35 billion USF obligation would be reduced by 30 percent to $945 million of which ILECs could recover $803 million through access charges, leaving only $142 million as an ILEC obligation to be recovered from ILEC retail services. The CLECs using TSR, on the other hand, will be assuming 30 percent of the original ILEC USF obligation, or $405 million. Because CLECs providing TSR do not provide access to IXCs (rather, IXCs continue to purchase access from the ILEC to originate or terminate calls to the CLEC's end user customers), CLECs will have no choice but to recover the entire $405 million from their end user customers through higher end user rates.

[7] In order to remain competitive with the ILEC's local service rates, a CLEC would be forced to mirror the current ILEC/IXC rate structure by recovering its USF obligation from its toll customers, similar to the way that IXCs recover their obligation. But even here the CLEC operates at a competitive disadvantage. Its toll rates have to be sufficient to recover not only its USF obligation, but also the ILEC USF obligation that is embedded in the ILEC's access charges.

competitively neutral recovery mechanism.[8] The mandatory end user surcharge should be assessed against all interstate retail revenues (including the SLC, long distance, special access sold to end users, interexchange, cellular, paging, and noncommon carrier telecommunications services such as satellite).[9]

With a mandatory end user surcharge, the competitive neutrality problem would not arise because the *assessment* and *recovery* for USF support would focus on retail end user revenues.[10] Under a mandatory end user surcharge, there would be no possibility whatsoever that access customers would bear the burden of the ILECs' USF obligation (whereas CLECs

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[8] See e.g., *CC Docket 96-45 Comments*: ALLTEL at 7-8; Ameritech at 30-31; AT&T at 8; BellSouth at 15-16; California Department of Consumer Affairs at 38-40; GTE at 36; LCI at 14; MFS at 12-13; NYNEX at 23-24; PacTel at 20-22; PageNet at 16; SBC at 11-13; TDS at 6-8; U S WEST at 45-46; USTA at 22-23; WorldCom at 40-41; *CC Docket 96-45 Reply Comments*: ACTA at 6; AirTouch at 20-21; ALTS at 5-8; Bell Atlantic/NYNEX at 2-3; California SBA at 4-5; KMC at 4; SBC at 2-3.

[9] The Commission should make explicit that because, unlike customers of other services, wireless customers pay for both placing and receiving calls, the surcharge on bills to wireless customers should apply only to basic service and revenues associated with originating calls. This will ensure parity between landline and wireless customers.

[10] This does not suggest that the portion of USF support for schools, libraries and rural health care providers that is assessed on intrastate end user retail revenues should also be recovered by an end user surcharge on intrastate services. The Commission decided to forego preempting state ratemaking authority by recovering all USF obligations, including that which is assessed on intrastate services, from interstate end user services. Universal Service Order, paras. 772-773, 807-809, 837. Recovering this entire obligation from an end user surcharge on interstate services does not violate the competitive neutrality requirement.

providing service through TSR would have no ability to deflect their USF obligation through access charges) because each carrier's USF obligation would be directly transferred to its end user customers. With no additional costs incurred by the carriers, there would be no opportunity for carriers to "game" the process.[11] Accordingly, USF recovery as between ILECs and CLECs entering the local service market through TSR would be competitively neutral.[12]

The Commission's sole basis for rejecting a mandatory end user surcharge was that it would "eliminate carriers' pricing flexibility to the detriment of consumers." Universal Service Order, para. 853. To the contrary, as shown above, because a mandatory end user surcharge is the most competitively neutral recovery mechanism, it will ensure that each consumer pays his or her fair share of universal service support.

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[11] Carriers would remit their surcharge receipts to the USF administrator, who would disburse the appropriate USF support funds to the eligible telecommunications service providers.

[12] If the Commission does not adopt a mandatory end user surcharge for USF recovery in the Universal Service proceeding, it should, at a minimum in the Access Reform proceeding, allow the ILEC flow-back that is assigned to the Common Line basket to be recovered from end users via the SLC to the extent that actual SLC rates in a study area are below the SLC caps. See Access Reform Order, para. 174.

II. THE COMMISSION SHOULD INCREASE THE SUBSCRIBER LINE CHARGE CEILING FOR MULTILINE BUSINESS LINES AND NON-PRIMARY RESIDENTIAL LINES TO ALLOW FOR FULL RECOVERY OF ALL ILEC RETAIL EXPENSES FROM END USERS.

In the Access Reform Order (para. 319), the Commission concluded that the "LECs' marketing costs that are not related to the sale or advertising of interstate switched access services are not appropriately recovered from IXCs through per-minute interstate access charges" and directed "LECs to recover marketing expenses allocated to the interstate jurisdiction from end users on a per-line basis." Effective January 1, 1998, the Commission directed the LECs to remove Account 6610 marketing expenses from per-minute switched access charges via downward exogenous adjustments to the price cap indices ("PCIs") of the Common Line, Traffic Sensitive and Trunking baskets, and to recover these costs by increasing the SLCs for multiline business and non-primary residential lines. To the extent the SLC ceilings prevent full recovery of these amounts, LECs may increase their multiline business and non-primary residential PICCs. Access Reform Order, para. 324.

The Commission should reconsider and modify its holding in three respects. First, although the Commission correctly concluded that, consistent with principles of cost-causation, retail *marketing* expenses (Account 6610) aimed at selling retail services to end users should not be recovered from access charges (para. 320), it did not go far enough. As

AT&T showed in the Access Reform proceeding,[13] principles of cost-causation also require the removal of *other* inappropriate retail expenses currently recovered through carrier switched access charges. These other retail costs that support end user services consist of approximately $154 million of direct retail customer service expense (Account 6623) and $264 million of indirect retail expenses (for example, general support expenses (Accounts 6121-6124), corporate operations expenses (Accounts 6711, 6712, 6721-6728), and telecommunications uncollectibles (Account 5301)). As the Commission recognized in the Local Competition Order (paras. 917-918), *all* of these expenses are avoidable retail costs that should not be recovered from wholesale services, such as access.[14]

Second, the removal of ILEC retail marketing costs from interstate access should not be delayed any further. Ten years have passed since the Joint Board's 1987 recommendation that interstate access revenues be excluded from the allocation factor used to apportion marketing expenses between the state and interstate jurisdictions. The exclusion of marketing expenses (and other retail expenses identified above) from

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[13] See AT&T Access Reform Comments, filed January 29, 1997, CC Docket No. 96-262, pp. 66-67 and Appendix D, and AT&T Ex Parte, CC Docket Nos. 96-262 and 94-1, filed February 19, 1997.

[14] Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, First Report and Order, 11 FCC Rcd. 15499, 15958, paras. 917-918 (1996) ("Local Competition Order").

access charges should thus be implemented immediately, rather than on January 1, 1998.

Third, although the Commission acknowledged (*id.*, para. 319) that the ILECs' retail marketing expenses should *not* be paid by IXCs, because of ceilings on the SLCs, IXCs will in fact continue to pay a portion of ILEC marketing expenses via PICCs and/or CCLCs, in contravention of the Commission's conclusion that these costs should *not* be recovered from carriers. To remedy this defect, the Commission should modify its rules governing SLCs to ensure that these costs are recovered from end users rather than IXCs. Specifically, the Commission should raise the SLC cap on multiline business lines and non-primary residential lines to allow for full recovery of all retail expenses identified above from end users. Stated another way, the Commission can achieve full end user recovery of retail marketing and other retail expenses by excluding the portion of SLCs that recovers these costs (which the ILECs should be required to identify and place in a separate price cap basket) from the existing SLC ceilings.[15]

III. THE COMMISSION SHOULD CLARIFY THAT COMPETITIVE ACCESS PROVIDERS ARE NO LONGER REQUIRED TO PAY THE TRANSPORT INTERCONNECTION CHARGE EFFECTIVE JULY 1, 1997.

In the Access Reform Order (para. 192), the Commission modified its rule "to prohibit incumbent LECs from

[15] The Access Reform Order (para. 324) already requires the price cap LECs to place retail marketing expenses in a separate basket. On reconsideration, the Commission should

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assessing any per-minute residual TIC charge on any switched minutes of CAPs that interconnect with the incumbent LEC switched access network at the end office." The Commission also stressed that "[b]eginning in July 1997, price cap reductions will be targeted to the per-minute residual TIC . . . [which] shall be assessed only on incumbent LEC transport customers, and therefore shall no longer be assessed on . . . CAPs that interconnect with the LEC switched network at the end office." (*id.*, para. 64).

The Commission's Access Reform *Errata* (para. 4), released June 4, 1997, adopts a January 1, 1998 effective date for Rule 69.155 which, at subsection (c), mentions that the residual per-minute TIC may only be assessed on minutes using the LEC's local transport services. As a result of the *Errata* confusion exists as to the effective date of the CAP exemption from the TIC.

Because the TIC is an obvious subsidy element that should never have been imposed on the ILECs' CAP competitors who do not use the ILECs' local transport services, and only the structural changes (such as the bifurcation of the residual TIC between originating and terminating minutes) need to take effect simultaneously with other structural changes on January 1, 1998, the Commission should clarify that CAPs are

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direct that all retail expenses be identified and placed in this basket.

immediately exempted from paying their competitors' "costs" via the TIC.

IV. THE COMMISSION SHOULD CLARIFY THAT CHARGES TO IXCS FOR FLAT-RATED TRUNK PORTS SHOULD BE REDUCED PROPORTIONALLY WHEN TRUNK PORTS ARE USED TO ORIGINATE OR TERMINATE TRAFFIC TO CUSTOMERS SERVED BY CLECS USING UNBUNDLED NETWORK ELEMENTS.

In the Access Reform Order (para. 6), the Commission undertook to "reduce usage-sensitive interstate access charges by phasing out local loop and other non-traffic-sensitive (NTS) costs from those charges and directing incumbent local exchange carriers (LECs) to recover those NTS costs through more economically efficient, flat-rated charges." As part of this initiative the Commission established a new trunk port charge to recover the non-traffic-sensitive costs of the local switch associated with the trunk port (*id.*, para. 127).[16]

The interstate access trunk port structure is inconsistent with the Commission's UNE local switching rate structure, which permits, but does not require, ILECs to have a separate UNE trunk port charge.[17] In view of the permissive nature of the UNE local switching rate structure, virtually all price cap ILECs have a UNE local switching element that covers the full cost of local switching functionality, including the

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[16] The Commission also created a flat-rated line port charge to recover the non-traffic-sensitive costs of the local switch associated with the loop-side customer. Access Reform Order, paras. 125-126.

[17] See 47 C.F.R. Section 51.509(b), and Local Competition Order, 11 FCC Rcd. at 15905, para. 810.

"trunk port," which for access purposes is now a separate interstate rate element. Because of this inconsistency, absent clarification, ILECs would be able to recover a portion of local switching costs via the access trunk port charge, while, at the same time, *fully* recovering *all* local switching costs (including the trunk port function of the switch) through the UNE local switching rate element for minutes associated with long distance traffic of end user customers served by a CLEC using the UNE local switch.

To avoid such impermissible double recovery by the ILEC (and consistent with the Commission's ruling that an ILEC may not impose access charges on CLECs purchasing UNEs[18]), the Commission should require that whenever trunk ports are used for both traditional long distance traffic *and* long distance traffic associated with end user customers served by the UNE switch, the access trunk port charges should be proportionally reduced. For example, if the ILEC were billing 20 percent of the usage on 100 trunk ports connected to transport facilities terminating at a particular IXC's POP to a CLEC at UNE rates and the ILEC had a flat-rated access trunk port rate of $10 per month, the ILEC's trunk port charges to the IXC would be $800 ($10 x 100 x .80), a reduction of 20 percent relative to the $1000 charge for 100 trunk ports at $10 each. Even in those instances where the ILEC has a separate flat-rated UNE

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[18] Access Reform Order, para. 337, and Local Competition Order, 11 FCC Rcd. at 15864, paras. 721-722.

rate element for trunk ports, the ILEC would charge for its trunk ports in this manner; *i.e.*, assuming the same usage pattern as described above, the ILEC would bill the IXC for 80 percent of the trunk ports at the tariff rate and would bill the CLEC for 20 percent of the trunk ports at the UNE rate. This will ensure that the IXC and CLEC are each charged appropriately for their use of the ILEC's access trunk port services and UNEs, respectively.

CONCLUSION

To the extent and for the reasons stated above, the Commission should reconsider and clarify its Universal Service Order and Access Reform Order.

Respectfully submitted,

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July 11, 1997

CERTIFICATE OF SERVICE

I, Viola J. Carlone, do hereby certify that on this 11th day of July, 1997, a copy of the foregoing Petition for Reconsideration and Clarification of AT&T Corp. was served by U.S. first class mail, postage prepaid, to the parties listed on the attached Service List.

/s/ Viola J. Carlone
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