

RECEIVED

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

JUL 11 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
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

Teleport Communications Group Inc. ("TCG") hereby requests that the Commission reconsider its Access Charge Reform Order¹ in two respects. First, the Commission should make the exemption from the imposition of residual transport charges for users of alternative transport facilities effective immediately. The Order as originally written appeared to require this, but a June 4 Errata filing subsequently substituted a January 1, 1998 effective date.² Second, the Commission should couple its requirement of a waiver of non-recurring charges for network rearrangements with a "fresh look" opportunity so that switched access customers have a true choice of providers. Absent a fresh look requirement,

¹ Access Charge Reform Order, CC Docket No. 96-262, FCC 97-158 (rel. May 16, 1997).

² Access Charge Reform Order, Errata, CC Docket No. 96-262 (Com. Car. Bur. rel. June 4, 1997).

substantial termination liabilities on existing arrangements may deny customers the opportunity to consider alternative sources of supply. TCG requests that the Commission promptly reconsider its Order as explained hereinafter, so that the pro-competitive benefits of the changes requested will not be delayed.

I. THE COMMISSION'S DECISION ON IMPOSITION OF RESIDUAL TRANSPORT CHARGES SHOULD BE EFFECTIVE IMMEDIATELY

In its original Order, the Commission noted that, "if the incumbent LEC's transport rates are kept artificially low and the difference is recovered through the TIC, competitors of the incumbent LEC pay some of the incumbent LEC's transport costs."³ After noting that the Colorado Commission had determined that US West should not be allowed to impose the TIC on CLEC-provided access, the Commission made the following findings:

We find that our current policy, which requires competitive entrants to pay the TIC even in cases where it provides its own transport, is inconsistent with the procompetitive goals of the 1996 Act. We therefore modify our rules to permit incumbent LECs to assess any per-minute residual TIC charge only on minutes that utilize incumbent LEC transport facilities, and not on any switched minutes of CAPs that interconnect with the incumbent LEC switched access network at the end office.⁴

Elsewhere, in summarizing the changes made in its Access Charge Reform

³ Access Charge Reform Order at ¶ 240.

⁴ Id.

Order, the Commission said that "[r]esidual per-minute TICs shall be assessed only on incumbent LEC transport customers, and therefore shall no longer be assessed on competitive access providers (CAPs) that interconnect with the LEC switched network at the end office."⁵

At no point in the original text of the Order did the Commission suggest that this provision would not be effective immediately, and the clear language of the Order -- that these charges "shall no longer" be collected -- suggests an immediate application of this requirement. However, in an Errata filing released June 4, 1997, the Commission inserted new paragraph 461, which for the first time indicated that this provision would not be effective until January 1, 1998.⁶

The Commission should reconsider and modify this provision. Having found that the imposition of residual transport costs on CLECs to be "inconsistent with the pro-competitive goals of the 1996 Act," there is no legal basis on which to continue the imposition of such charges during the remainder of 1997. Nor did the Commission enunciate any reasons to continue such charges for an interim period -- and in fact, there are none. Indeed, the Commission has already delayed too long in correcting the competitively harmful effects of its residual interconnection charge policies, which the Court of Appeals recognized over a year ago would

⁵ Id. at ¶ 64 (emphasis added).

⁶ The Errata stated that Section 69.155 of the Commission's rules, subsection (c) of which incorporates the exemption for users of competitive transport facilities, would not be effective until January 1, 1998.

discourage the development of local competitive alternatives and must be changed.⁷ Accordingly, TCG requests that the Commission reconsider or otherwise clarify its Access Charge Reform Order to make clear that the residual transport cost exemption takes effect immediately.

II. THE COMMISSION SHOULD INSTITUTE A "FRESH LOOK" FOR LOCAL TRANSPORT REARRANGEMENTS TO ENSURE THAT CARRIERS HAVE COMPETITIVE ALTERNATIVES

The Commission recognizes that access customers will likely wish to rearrange and reconfigure their local transport arrangements in light of the upcoming changes in the pricing and rate structure for access services. The Commission states that "in order to encourage transport customers to increase the efficiency of their transport networks quickly, we will require incumbent LECs to waive certain non-recurring charges until six months after the three-part rate structure becomes mandatory."⁸

TCG requests that the Commission reconsider its Order and also implement a "fresh look" requirement for transport customers. The Commission has previously implemented fresh look requirements to promote flexibility and competitive choice in LEC access arrangements. For example, the Commission

⁷ Competitive Telecommunications Association v. F.C.C., 87 F.3d 522, 529 (D.C. Cir. 1996) ("Rates for tandem switching that do not reflect the full cost of providing that service will discourage competitors with more efficient transport alternatives from entering the market.").

⁸ Access Charge Reform Order at ¶ 176.

found that "certain long-term LEC access arrangements raise potential concerns because they tend to lock up the access market, preventing customers from obtaining the benefits of the new, more competitive interstate access environment."⁹ Implementation of a fresh look opportunity in this instance will ensure that access customers have a true competitive choice in access providers.

It is TCG's understanding that a large number of transport arrangements are subject to long term contracts, and indeed a review of ILEC tariffs quickly shows that the scale of discounts offered to customers who commit to long term arrangements is extremely generous. Under such circumstances, ILECs have been able to entice their access customers to commit to long term arrangements. Given that the Commission's prior transport pricing policies have permitted the ILECs to offer below cost, subsidized tandem transport and tandem switching services, the ILECs have had an unfair advantage in competing for the transport business of these customers. In addition, failure to provide a "fresh look" opportunity for customers would "deprive customers of the benefits of competition"¹⁰ that are intended by the reform of access charges. Accordingly, TCG recommends that the

⁹ Expanded Interconnection with Local Telephone Company Facilities, 8 FCC Rcd 123, 125 (1992) (rejecting of the Expanded Interconnection Order; see also Expanded Interconnection with Local Telephone Company Facilities, 7 FCC Red. 7369, 7463-65 (1992), recon., 8 FCC Red. 7341, 7342-59 (1993), vacated on other grounds and remanded sub nom. Bell Atlantic Tel. Cos. v. FCC, 24 F.3d 1441 (1994).

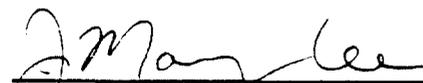
¹⁰ Expanded Interconnection with Local Telephone Company Facilities, 8 FCC Rcd 7341, 7347-48 (1995) (finding that denying customers benefits of changes to terminating charges would be an unjust and unreasonable violation of the Communications Act).

Commission provide a fresh look opportunity for any ILEC tandem transport customer who is eligible for the waiver of non-recurring charges.

For these reasons, TCG requests that the Commission reconsider and modify its order to effectuate immediately the exemption from the imposition of residual transport charges for eligible users and to permit switched access customers a "fresh look" in the context of waiver requirements for non-recurring charges assessed upon network rearrangements.

Respectfully submitted,

TELEPORT COMMUNICATIONS GROUP INC.



J. Manning Lee
Vice President, Regulatory Affairs
Two Teleport Drive
Staten Island, N.Y. 10311
(718) 355-2671

Its Attorney

Dated: July 11, 1997

CERTIFICATE OF SERVICE

I, Dottie E. Holman, do hereby certify that a copy of the foregoing Petition for Reconsideration was sent by hand-delivery and first-class mail this 11th day of July, 1997, to the following:

William F. Caton*
Secretary
Federal Communications
Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Chief*
Competitive Pricing Division
Federal Communications
Commission
1919 M Street, N.W., Rm. 544
Washington, D.C. 20554

ITS*
1231 20th St., N.W., Room 102
Washington, DC 20037

Public Service Commission
of the District of Columbia
Lawrence D. Crocker, III
Acting General Counsel
717 14th Street, N.W.
Washington, D.C. 20005

Northern Arkansas Telephone
Company, Inc.
Steven G. Sanders, President
301 E. Main Street
Flippin, AR 72634

American Library Association
Carol C. Henderson, Ex. Dir.
Ala Washington Office
1301 Penn. Ave., NW, Ste. 403
Washington, D.C. 20004

Allied Associated Partners LP
Allied Communications Group
Geld Information Systems
Curtis T. White
4201 Conn. Ave., NW, Ste. 402
Washington, D.C. 20008-1158

Edward Hayes, Jr., Esq.
1155 Conn. Ave., N.W., 3rd Fl.
Washington, D.C. 20036

Ronald Dunn, President
Information Industry Assn.
1625 Mass. Ave., NW, Ste. 700
Washington, D.C. 20036

Daniel J. Weitzner
Alan B. Davidson
Center for Democracy & Tech.
1634 Eye St., N.W., Ste. 1100
Washington, D.C. 20006

Joseph S. Paykel
Andrew Jay Schwartzman
Gigi S. Sohn
Media Access Project
1707 L St., N.W., Ste. 400
Washington, D.C. 20036

Gary M. Epstein
James H. Barker
Latham & Watkins
Counsel for Bellsouth Corp. &
Bellsouth Telecomm. Inc.
1001 Penn. Ave., NW, Ste. 1300
Washington, D.C. 20004-2505

Citizens Utilities Company
Richard M. Tettelbaum
Associate General Counsel
1400 16th St., NW, Ste. 500
Washington, D.C. 20036

Jack Krumholtz
Law and Corporate Affairs
Microsoft Corporation
5335 Wisc. Ave., NW, Ste. 600
Washington, D.C. 20015

National Cable Television
Association, Inc.
Daniel L. Brenner
David L. Nicoll
1724 Mass. Ave., N.W.
Washington, D.C. 20036

Excel Telecommunications, Inc.
Thomas K. Crowe
Michael B. Adams
2300 M St., N.W., Suite 800
Washington, D.C. 20037

Cable & Wireless, Inc.
Rachel J. Rothstein
8219 Leesburg Pike
Vienna, VA 22182

Danny E. Adams
Edward A. Yorkgitis, Jr.
Kelley Drye & Warren, LLP
1200 19th St., N.W., Ste. 500
Washington, D.C. 20036

Timothy R. Graham
Robert G. Berger
Joseph Sandri
Winstar Communications, Inc.
1146 19th Street, N.W.
Washington, D.C. 20036

Dana Frix
Mark Sievers
Swidler & Berlin Chartered
Winstar Communications, Inc.
3000 K St., N.W., Suite 300
Washington, D.C. 20007

Dana Frix
Tamar Haverty
Swidler & Berlin Chartered
Telco Comm. Group, Inc.
3000 K St., N.W., Suite 300
Washington, D.C. 20007

William Burrington
Jill Lesser
Counsel for America Online, Inc.
1101 Conn. Ave., NW, Ste. 400
Washington, D.C. 20036

Counsel for America On Line
Mintz Levin Cohn Ferris
Glovsky and Pofeo, P.C.
701 Penn. Ave., N.W., Ste. 900
Washington, D.C. 20004

Michael J. Shortley, III
Attorney for Frontier
Corporation
180 South Clinton Avenue
Rochester, NY 14646

Michael S. Fox
Director Regulatory Affairs
John Staurulakis, Inc.
6315 Seabrook Road
Seabrook, MD 20706

Robert S. Tongren
Consumers' Counsel
Ohio Consumers' Counsel
77 South High St., 15th Floor
Columbus, OH 43266-0550

National Exchange Carrier
Association, Inc.
Joanne Salvatore Bochis
Perry S. Goldschein
100 South Jefferson Road
Whippany, NJ 07981

Ozarks Tech. Community College
P.O. Box 5958
Springfield, MO 65801

Charles D. Gray
James Bradford Ramsay
Nat. Assn. of Regulatory Utility
Commission
1201 Constitution Avenue
Suite 1102
P.O. Box 684
Washington, D.C. 20044

Michael S. Pabian
Larry A. Peck
Counsel for Ameritech
Room 4H82
2000 W. Ameritech Center Drive
Hoffman Estates, IL 60195

TCA, Inc.
Telecommunications Consultants
F. Stephen Lamb, Manger
3617 Betty Drive, Suite 1
Colorado Springs, CO 80917

Scott L. Smith
Vice President of Alaska
Telephone Association
4341 B Street, Suite 304
Anchorage, AK 99503

Wayne Leighton, Ph.D.
Senior Economist
Citizens for A Sound Economy
Foundation
1250 H St., N.W., Suite 700
Washington, D.C. 20005

Betty D. Montgomery
Steven T. Nourse
Public Utilities Section
180 E. Broad Street
Columbus, OH 43215-3793

ICG Telecom Group, Inc.
Cindy Z. Schonhaut
9605 E. Maroon Circle
Englewood, CO 80112

Albert H. Kramer
Dickstein Shapiro Morin &
Oshinsky, LLP
Attorney for ICG Telecom
Group, Inc.
2101 L Street, N.W.
Washington, D.C. 20037-1526

Ronald J. Binz, President
Debra R. Berlyn, Ex. Dir.
John Windhausen, Jr., GC
Competition Policy Institute
1156 15th St., N.W., Suite 310
Washington, D.C. 20005

General Communications, Inc.
Kathy L. Shobert, Director
Federal Affairs
901 15th S., N.W., Suite 900
Washington, D.C. 20005

MCI Telecommunications Corp.
Bradley C. Stillman
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Sprint Corporation
Leon M. Kestenbaum
Jay D. Keighley
H. Richard Juhnke
1850 M St., N.W., 11th Floor
Washington, D.C. 20036

Worldcom, Inc.
Catherine R. Sloan
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036-3902

Worldcom, Inc.
Richard J. Heitmann
515 E. Amite
Jackson, MS 39201-2702

Alex J. Harris
Worldcom, Inc.
33 Whitehall St., 15th Floor
New York, NY 10004

Peter A. Rohrbach
David L. Siebadzki
E. William Lebeau
Hogan & Hartson, LLP
555 13th St. NW, Ste. 500 West
Washington, D.C. 20004-1109

Ad Hoc Telecommunications
Users Committee
Levine Blaszak Block & Boothey
1300 Conn. Ave., NW, Ste. 500
Washington, D.C. 20036

Competitive Telecomm. Assoc.
Genevieve Morelli
Executive Vice President
1900 M St., N.W., Suite 800
Washington, D.C. 200036

Robert J Aamoth
Jonathan E. Canis
Reed Smith Shaw & McClay
Attorneys for CTA
1301 K Street, N.W.
Suite 1100-East Tower
Washington, D.C. 20005

Charles C. Hunter
Catherine M. Hannan
Hunter & Mow, P.C.
Telecomm. Resellers Assoc.
1620 I St., N.W., Suite 701
Washington, D.C. 20006

Bell Atlantic Telephone Co.
Edward Shakin
1320 N. Courthouse Rd.
8th Fl.
Arlington, VA 22201

Nynex Telephone Companies Joseph
Dibella
1300 I St., NW, Suite 400 West
Washington, D.C. 20005

U.S. Telephone Association
Mary McDermott
Linda Kent
Keith Townsend
Hance Haney
1401 H St., N.W., Suite 600
Washington, D.C. 20036

ACC Long Distance Corporation
Dana Frix
Tamar Haverty
Swidler & Berlin Chartered
3000 K St., N.W., Suite 300
Washington, D.C. 20007

IXC Long Distance, Inc.
Gary L. Mann
98 San Jacinto, Suite 700
Austin, TX 78701

AT&T Corp.
Mark C. Rosenblum
Peter H. Jacoby
Judy Sello
295 N. Maple Ave., Rm. 3245G1
Basking Ridge, NJ 07920

AT&T Corporation
Gene C. Schaerr
David L. Lawson
Scott M. Bohannon
1722 Eye Street, N.W.
Washington, D.C. 20006

Robert M. McDowell
Brian A. Cute
Helen & Associates, P.C.
Counsel for Telecomm. Assoc.
8180 Greensboro Dr., Suite 700
McLean, VA 22102

Telecon, LLC
Fay E. Harris
Kieran T. Mays
America's Carriers Telecomm.
Assoc.
8180 Greensboro Dr., Suite 700
McLean, VA 22102

Anne U. Macclintock, V. P.
Reg. Affairs and Public Policy
The Southern New England
Telephone Company
227 Church Street, N.W.
New Haven, CT 06510

Thomas E. Taylor
Christopher J. Wilson
Attorneys for Cincinnati Bell
Telephone Company
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45402

Robert B. McKenna
Richard A. Karre
Colleen Megan Helmreich
Attorneys for U.S. West
1020 19th St., NW, Suite 700
Washington, D.C. 20036

Pacific Telesis Group
Marlin D. Ard
Nancy C. Woolf
140 New Montgomery Street
San Francisco, CA 94105

Pacific Telesis Group
Margaret E. Garber
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

GSA
Emily C. Hewitt, GC
18th & F S., N.W., Room 4002
Washington, D.C. 20405

Office of the Judge Advocate
General
U.S. Army Litigation Center
901 N. Stuart Street, Ste. 712
Arlington, VA 22202-18374
John Rother, Esq.
Dir. Legis. and Public Policy
AARP
601 E Street, N.W.
Washington, D.C. 20049

Mary Rofuleau
Dr. Mark N. Cooper
Consumers Union
1666 Connecticut Avenue, N.W.
Washington, D.C. 20036

James Love, Director
Consumer Project on Technology
P.O. Box 19367
Washington, D.C. 20036

Int'l. Comm. Assoc.
Brian R. Moir
Moir & Hardman
2000 L St. N.W., Suite 512
Washington, D.C. 20036-4907

Alliance for Public Technology
Dr. Barbara O'Connor, Chair
Gerald Dep, President
901 15th Street, N.W.
Washington, D.C. 20005

David J. Newburger
Newburger & Vossmeier
One Metropolitan Square
Suite 2400
St. Louis, MO 63102

Martha S. Hogerty
Office of the Public Counsel
P.O. Box 7899
Jefferson City, MO 65102

Jack Shreve
Office of the Public Counsel
111 W. Madison St., Suite 812
Tallahassee, FL 32399-1400

Mike Travieso
Office of People's Counsel
6th St. Paul St., Suite 2102
Baltimore, MD 21202

Irwin A. Popowsky
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Blossom Peretz
Division of Ratepayer Advocate
P.O. Box 46005
Newark, NJ 06101

James Maret
Office of Consumer Advocate
Lucas State Office. Bldg.
4th Floor
Des Moines, IA 50319

Elizabeth A. Noel
Office of the People's Counsel 1133
15th St. N.W., Suite 500
Washington, D.C. 20005

Rob Manifold
Assistant Attorney General
9800 4th Ave., Suite 2000
Seattle, WA 98164

Regina Costa
Toward Utility Rate
Normalization
625 Polk Street, Suite 4503
San Francisco, CA 94102

Eric Swanson
Office of Attorney General
445 Minnesota Street
WCL Tower, Suite 1200
St. Paul, MN 55101-2130

Anne Becker
Ofc. of Utility Consumer
Counselor
100 N. Senate Ave., Room 501
Indianapolis, IN 46204-2208

Peter Arth, Jr.
Lionel & Wilson
Mary Mack Adu
505 Van Ness Avenue
San Francisco, CA 94102

Alabama Pub. Serv. Comm.
Mary Newmeyer
Federal Affairs Adviser
P.O. Box 991
Montgomery, AL 36101

Counsel for the Commonwealth
of the Northern Mariana
Islands
Law Ofc. of Thomas K. Crow, PC
2300 M Street, N.W., Suite 800
Washington, D.C. 20037

Maureen O. Helmer
NY State Dept. of Pub. Serv.
Three Empire Plaza
Albany, NY 12223-1350

Ofc. of Public Utility Counsel
Laurie Pappas
Deputy Public Counsel
1701 N. Congress Avenue, 9-180
P.O. Box 12397
Austin, TX 78711-2397

James A. Burg
Pam Nelson
SD Public Utilities Commission
Sate Capitol
Pierre, SD 57504-5070

R. Michael Senkowski
Jeffrey S. Linder
Gregory J. Vogt
Wiley Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

GTE Service Corporation
Ward W. Wueste
Gail L. Polivy
1850 M St. N.W., Suite 1200
Washington, D.C. 20036

Richard Hemstad
William R. Gillis
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive
P.O. Box 47250
Olympia, WA 98504-7250

Michael T. Skrivan
Harris Skrivan & Associates,
LLC
8801 S. Yale, Suite 220
Tulsa, OK 74137

Airtouch Communications, Inc.
Kathleen Q. Abernathy
David A. Gross
1818 N Street, N.W.
Washington, D.C. 200036

Pamela J. Riley
Airtouch Communications, Inc.,
One California St., 9th Floor
San Francisco, CA 94111

Personal Communications
Industry Association
Mark J. Golden
Robert J. Hoggarth
Mary Madigan
500 Montgomery St., Suite 700
Alexandria, VA 22314-1561

Centennial Cellular Corp.
Christopher W. Savage
Cole Raywid & Braverman, LLP
1919 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Association for Local
Telecommunications Services
Richard J. Metzger
Emily M. Williams
1200 19th St., N.W. Suite 560
Washington, D.C. 20036

Teleport Commun. Group, Inc.
Teresa Marrero
Senior Regulatory Counsel
Two Teleport Drive
Staten Island, NY 10311

Spectranet International, Inc.
Glenn B. Manishin
Christine A. Mailloux
Blumenfeld & Cohen
Technology Law Group
1615 M Street N.W., Suite 700
Washington, D.C. 20036

Brian Conboy
Thomas Jones
Gunnar Halley
Willkie Farr & Gallagher
Three Lafayette Center
1155 21st Street, N.W.
Washington, D.C. 20036

Tele-Communications, Inc.
Randall B. Lowe
Piper & Marbury, LLP
1200 19th Street N.W.
Washington, D.C. 20036

Rural Telephone Finance Coop.
John J. List, Sr. V. P.
2201 Cooperative Way
Herndon, VA 20170

Western Alliance
Benjamin H. Dicken, Jr.
Gerald J. Duffy
Blooston Mordkofsky Jackson &
Dickens
2120 L Street N.W., Suite 300
Washington, D.C. 20037

TDS Telecomm. Corporation
Margot Smiley Humphrey
Kotten & Naftalin, LLP
1150 Conn. Ave., NW, Ste. 1000
Washington, D.C. 20036

ITC
David A. Irwin
Tara S. Becht
Irwin, Campbell & Tannenwals
1739 Rhode Island Ave., N.W.,
Suite 200
Washington, D.C. 20036-3101

Independent Telephone
Telecommunications Alliance
Diane Smith
655 15th St. N.W., Suite 220
Washington, D.C. 20005-5701

Kent Larsten
Cathey Hutton and Associates
2711 LBJ Freeway, Suite 560
Dallas, TX 75234

Alltel Telephone Serv. Corp.
Carolyn C. Hill
655 15th St. N.W., Suite 220
Washington, D.C. 20005

Frederick & Warinner, LLC
Clink Frederick
10901 W. 84th Terr., Suite 101
Lenexa, KS 66214-1631

Rosevill Telephone Company
George Petrutsas
Paul J. Feldman
Fletcher Heald & Hildreth PLC
1300 N. 17th St., 11th Floor
Rosslyn, VA 22209

Minn. Independent Coalition
Richard J. Johnson
Michael J. Bradley
Moss & Barnett
4800 Norwest Center
90 South Seventh Street
Minneapolis, MN 55402-4129

NRTA
Margot Smiley Humphrey
Koteen & Naftalin, LLP
1150 Conn. Ave., NW, Ste. 100
Washington, D.C. 20036

NTCA
David Cosson
L. Marie Gullory
2626 Pennsylvania Ave., N.W.
Washington, D.C. 20037

Aliant Communications Company
Robert A. Mazer
Albert Shuldiner
Vinson & Elkins
1455 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-1007

Compuserve, Inc. & Prodigy
Services Corporation
Randolph J. Mayu
Bonding Yee
1275 Pennsylvania Ave., N.W.
Washington, D.C. 20004-2404

Illuminet
Stephen G. Kraskin
Slyvia Lesse
Thomas J. Moorman
Kraskin & Lesse
2120 L St., N.W., Suite 530
Washington, D.C. 20037

The Interactive Serv. Assoc.
Edward N. Lavergne
J. Thomas Nolan
Ginsburg Feldman & Bress
1250 Connecticut Avenue, N.W.
Washington, D.C. 20036

Microsoft Corporation
Jack Krumholtz
Law & Corporate Affairs Dept.
5335 Wisc. Ave., NW, Suite 600
Washington, D.C. 20015

Microsoft Corporation
Stanley M. Gorinson
William H. Davenport
Preston Gates Ellis & Rouvelas
Meeds
1735 New York Ave., N.W.
Washington, D.C. 20006

Commercial Internet Exchange
Association
Robert D. Collet
Barbara A. Dooley
Piper & Marbury, LLP
1200 19th St. N.W., Suite 700
Washington, D.C. 20036

Bankers Clearing House Mastercard
Intl., Inc.
and Visa USA, Inc.
Henry D. Levine
Laura R.H. McDonald
1300 Conn. Ave., NW, Suite 500
Washington, D.C. 20036

LCI International Corp., Inc.
Gregory M. Casey
Douglas W. Kinkoph
8180 Greensboro Dr., Suite 800
McLean, VA 22102

Terry Michael Banks
ICG Telecom Group
1303 Sawbridge Way
Reston, VA 22094

The Rural Telephone Coalition
Margo Smiley Humphrey
Caption & Naftalin, LLP
1150 Conn. Ave., NW, Suite 100
Washington, D.C. 20036

The Rural Telephone Coalition
David Cosson
L. Marie Guillory
2626 Pennsylvania Ave., N.W.
Washington, D.C. 20037

The Rural Telephone Coalition
Lisa M. Zaina
Kenneth Johnson
21 DuPont Circle, NW, Ste. 700
Washington, D.C. 20036

Tennessee Regulatory Authority
Christopher Klein, Chief
Utility Rate Division
460 James Robertson Parkway
Nashville, TN 37243-0505

David J. Brown
E. Molly Leahy
Newspaper Assoc. of America
529 14th St., N.W., Suite 440
Washington, D.C. 20045

Lesla Lehtonen
Attorney for California Cable
Television Association
4341 Piedmont Avenue
Oakland, CA 94611

Nysernet, Inc.
James Brennan
Assoc. Dir. of Gov. Services
Rensselaer Technology Park
Troy, NY 12180-7698

Cynthia B. Miller
Senior Attorney
Florida Public Service Comm.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Sonetech, Inc.
W. Fred Seigneur, President
2109 Kale Avenue
Sterling, VA 20164

David J. Newburger
Newburger & Vossmeier
Counsel for American
Association for Adult and
Continuing Education
One Metropolitan Sq. Ste. 2400
St. Louis, MO 63102

Catherine R. Sloan
David Porter
Richard L. Fruchterman, II
Worldcom, Inc.
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036-3902

Richard J. Heitmann
Worldcom, Inc.
15 E. Amite
Jackson, MS 39201-2702

Alex J. Harris
Worldcom, Inc.
33 Whitehall St., 15th Floor
New York, NY 10004

Attys. for Worldcom, Inc.
Peter A. Rohrbach
David L. Sieradzki
F. William Lebeau
Hogan & Hartson, LLP
555 13th Street, N.W.
Washington, D.C. 20004-1109

Comm. Workers of America
Morton Bahr, President
501 3rd Street, N.W.
Washington, D.C. 20001

Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Industry Analysis Division*
Common Carrier Bureau
1919 M St., N.W., Room 534
Washington, D.C. 20554

James Schlichting*
Chief Tariff Division
FCC
1919 M St., N.W., Room 519
Washington, D.C. 20554

John C. Smith
General Counsel
Aeronautical Radio, Inc.
2551 Riva Road
Annapolis, MD 21401

W. Theodore Pierson, Jr.
Richard J. Metzger
Douglas J. Minster
Attorneys for Association for
Local Telecom Services
1200 19th St., NW, Suite 607
Washington, D.C. 20036

M. Robert Sutherland
Counsel for Bellsouth
Telecommunications, Inc.
1155 Peach St., NE, Suite 1700
Atlanta, GA 30309-3610

California Cable Television Association
Donna N. Lampert
Christopher J. Harvie
James J. Valentino
Glovsky and Popeo, P.C.
702 Penn. Ave., NW, Suite 900
Washington, D.C. 20004

Walter G. Bolter, Ph.D.
Bethesda Research Institute,
Ltd.
P.O. Box 4044
St. Augustine, FL 32085

Allan J. Arlow
President and CEO
Computer Y Communications
Industry Association
666 11 Street, N.W.
Washington, D.C. 20001

Charles A. Zielinski
Rogers & Wells
Attorneys for Computer
& Comm. Industry Association
607 14th Street, N.W.
Washington, D.C. 20005

Henry Mrivera
Attorney for the Council of
Chief
1250 Connecticut Avenue, N.W.
Washington, D.C. 20036

James E. Keith, President
AMBOX Incorporated
6040 Telephone Road
Houston, TX 77087

Barry Gorsun, President
Summa Four, Inc.
25 Sun Dial Avenue
Manchester, NH 03103

Charles W. Trippe
Chairman and CEO
AMPRO Corporation
525 John Rodes Blvd.
Melbourne, FL 32934

Joseph J. Lahoud, President
LC Technologies, Inc.
9455 Silver King Court
Fairfax, VA 22031

Paul Pandian, President
Axes Technologies, Inc.
3333 Earhart
Carrollton, TX 3220

Fred Van Veen, Vice President
Teradyne, Inc.
321 Harrison Avenue
Boston, MA 02118

James B. Wood, President
Inovonics, Inc.
1304 Sair Avenue
Santa Cruz, CA 95060

Frank Tripi, Vice President
Perception Technology Corp.
40 Shawnut Road
Canton, MA 02021

L. Paul Knoerzer
Vice President
OK Champion Corporation
P.O. Box 585
Hammond, IN 46320

John E. Lingo, Jr.
President
Lingo, Inc.
P.O. Box 1237
Camden, NJ 08105

William H. Combs, III, President
Tamaqua Cable Products Corp.
P.O. Box 347
300 Willow Street
Schuylkill Haven, PA 17972

J.R. Panholzer, Vice President
Rhetorex, Inc.
200 E. Hacienda Avenue
Campbell, CA 95008

George Sollman
President and CEO
Centigram Comm. Corporation
91 E. Tasman Drive
San Jose, CA 95134

Stephen B. Kaufman
President and CEO
Healthtech Services Corp.
255 Revere Drive, Suite 101
Northbrook, IL 60062

David L. Deming, President
Senecom Vocie Processing
Systems
6 Blossomwood Court
St. Louis, MO 63033-5202

Lucile M. Moore, Chairman
Intelect, Inc.
1100 Exeuctive Drive
Richardson, TX 75081

Tenley A. Carp
Personal Property Division
GSA
18th & F Sts., NW, Room 40002
Washington, D.C. 20405

Vincent L. Crivella
Personal Property Division
GSA
18th & F Sts., NW, Room 40002
Washington, D.C. 20405

Michael J. Ettner
Personal Property Division
GSA
18th & F Sts., NW, Room 40002
Washington, D.C. 20405

Richard McKenna, Esq.
GTE Service Corporation
HQE03136
P.O. Box 152092
Irving, TX 75015-2092

Jonathan E. Canis
Swidler & Berlin Chartered
Counsel for Intermedia Comm.
of Florida, Inc.
3000 K Street N.W., Suite 300
Washington, D.C. 20007

Robert A. Mazer
Nixon Hargrave Devans & Doyle
Counsel for the Lincoln
Telephone & Telegraph Co.
One Thomas Cir., NW, Ste. 800
Washington, D.C. 20005

Andrew D. Lipman
Russell M. Blau
Attorneys for MFS Comm. Co.
Inc.
3000 K Street, N.W.
Washington, D.C. 20007

Margot Smiley Humphrey
Koteen & Naftalin
Attorneys for National Rural
Telecom Association
1150 Conn. Ave., NW, Ste. 1000
Washington, D.C. 20036

David C. Bergmann
Yvonne T. Ranft
Associate Consumers' Counsel
Ofc. of the Consumers' Counsel
State of Ohio
77 S. High Street, 15th Floor
Columbus, OH 43266-0550

James P. Tuthill
John W. Bogy
Attorneys for Pacific Bell and
Nevada Bell
140 New Montgomery Street
Room 1530-A
San Francisco, CA 94105

James L. Wurtz
Margaret E. Garber
Attorneys for Pacific Bell and
Nevada Bell
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Lucille M. Mates
Sarah Rubenstein
Attorney for Pacific Bell and
Nevada Bell
140 New Montgomery Street
Room 1522A
San Francisco, CA 94105

Paul B. Jones
Janis A. Stahlhut
Regulatory Affairs
Time Warner Communications
300 First Stamford Place
Stamford, CT 06902-6732

Lawrence P. Keller
Cathey Hutton & Assoc., Inc.
Counsel for USTA
3300 Holcomb Bridge Road
Suite 286
Norcross, GA 30092

Peter A. Rohrback
Linda L. Oliver
Attorney for Wiltel, Inc.
Hogan & Hartson
555 13th Street, N.W.
Washington, D.C. 20004-1109

Dr. Jerome R. Ellig
Center for Market Processes
4084 University Dr., Suite 208
Fairfax, VA 22030

Danny E. Adams
Jeffrey S. Linder
Wiley Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Janet Reno
U.S. Attorney General
Department of Justice
10th & Constitution Ave., NW
Room 4400
Washington, D.C. 20530

Janice Myles*
Policy & Program Planning Div.
Common Carrier Bureau
1919 M St., N.W. Room 544
Washington, D.C. 20554

Comcast Cable Comm. Inc.
Cox Enterprises, Inc.
Leonard J. Kennedy
Laura H. Phillips
Steven Morris
1255 23rd St., NW, Suite 500
Washington, D.C. 20037

Jody B. Burton
Personal Property Division
GSA
18th & F Sts., N.W. Washington,
D.C. 20405

Philip L. Verveer
Thomas Jones
Attorneys for National Cable
Television
Willkie Farr & Gallagher
1155 21st Street, N.W.
Washington, D.C. 20036

Daniel Kelley
Economic and Technology
Consultants
National Cable Television
Association, Inc.
757 29th Street, Suite 200
Boulder, CO 80303

Maureen O. Helmer
General Counsel
NY Dept. of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Information Technology and
Telecomm. Association
R. Michael Seneowski
Wiley Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006


Dottie E. Holman

*By Hand Delivery