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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	DOCKET FILE COPY ORIGINAL
	)	
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
	)	

REPLY COMMENTS OF AMERITECH

Ameritech<sup>1</sup> submits this reply to comments on the Commission's further notice of proposed rulemaking in the above captioned proceeding.<sup>2</sup> With respect to the potential assessment of a presubscribed interexchange carrier charge ("PICC") on special access lines, the comments of others were largely consistent with Ameritech's position -- *i.e.*, there should be no required charge on special access services to recoup a carrier's own common line related costs. Therefore, in this reply, Ameritech will limit its comments to the issue of the reallocation of

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<sup>1</sup> Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

<sup>2</sup> *In the Matter of Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure and Pricing, End User Common Line Charges*, CC Docket Nos. 96-262, 94-1, 91-213, 95-72, First Report and Order and Further Notice Of Proposed Rulemaking, FCC 97-158 (released May 16, 1997) ("FNPRM").

general support facility (“GSF”) investment and expense to the Other Billing and Collection (“OB&C”) category.

In that regard, Ameritech agrees with the comments of Southwestern Bell/Pacific Bell (“SBC”), Cincinnati Bell, BellSouth, and USTA.<sup>3</sup> Any changes in allocation should be considered, if at all, as part of the Commission’s upcoming comprehensive review of separations. Such a comprehensive review would ensure that all the implications of any changes are identified and considered before those changes are implemented.

If the Commission believes that it is necessary to make a change at this time, a variant of the Commission’s proposed “Part 69” option, would be appropriate. Since only general purpose computer investment is at issue, applying an allocator to the entire GSF account would grossly overallocate investment to OB&C.<sup>4</sup> Therefore, Ameritech and US West<sup>5</sup> have proposed identical modifications which would involve the initial application of the allocator to investment account 2124 (general purpose computers) only. Once the investment is driven to OB&C, a secondary allocation of expenses would drive an appropriate share of GSF related expenses to that category. USTA and Bell Atlantic have proposed a similar modification which would handle the allocation appropriately.<sup>6</sup>

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<sup>3</sup> SBC at 6, Cincinnati Bell at 2, BellSouth at 5, and USTA at 4.

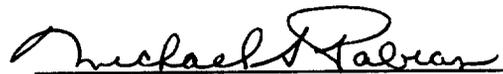
<sup>4</sup> See, Sprint at 4.

<sup>5</sup> US West at 6.

<sup>6</sup> USTA at 5, BA/NYNEX at 7-8.

As noted in Ameritech's initial comments, there should be no required adjustments to price cap indexes as a result of any allocation change.<sup>7</sup>

Respectfully submitted,



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Dated: July 11, 1997

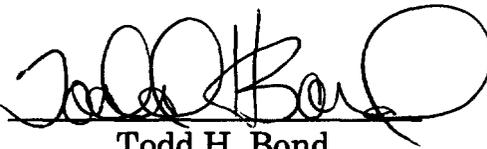
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<sup>7</sup> See, Ameritech comments at 4-5.

CERTIFICATE OF SERVICE

I, Todd H. Bond, do hereby certify that a copy of the foregoing Reply Comments of Ameritech has been served on all parties listed on the attached service list, via first class mail, postage prepaid, on this 11th day of July, 1997.

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