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FEDERAL COMMUNICATIONS COMMISSION  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of  
  
Access Charge Reform

CC Docket No. 96-262

**PETITION FOR STAY PENDING JUDICIAL REVIEW  
ERRATA**

The NYNEX Telephone Companies<sup>1</sup> ("NYNEX") request that the Commission accept the attached errata pages regarding the above-referenced petition.

Respectfully submitted,

The NYNEX Telephone Companies

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Dated: July 24, 1997

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<sup>1</sup> The NYNEX Telephone Companies are New York Telephone Company and New England Telephone and Telegraph Company.

are not related to the LECs' transport services. The only part of the per-minute residual TIC that is clearly related to LEC transport costs after July 1, 1998 is the portion that recovers tandem switch service-related costs. Therefore, there is an inadequate basis in the record to justify a total exemption from the per-minute residual TIC for traffic that is carried on CAP transport. At the very least, the Commission should stay the portion of its rule that prohibits the LECs from recovering the non-service-related portion of the per-minute residual TIC from traffic that is routed to CAP transport.

The Commission adopted the per-minute residual TIC rule without adequate notice or opportunity for comment. The rule was not described in the *Access Charge Reform Notice of Proposed Rulemaking*, and the Commission relied on an *ex parte* filing that was made after the close of formal comments, and just three weeks before the Commission adopted its order. Because of this inadequate notice, the record is inadequate concerning the impact of this rule on the LECs. The Commission should stay the rule pending further opportunity for comment by the industry.

A stay is necessary to avoid irreparable harm to NYNEX. NYNEX's per-minute residual TIC will be several times larger than the effective rate per-minute for NYNEX's transport services. This will cause customers to shift their transport traffic from NYNEX to the CAPs even where NYNEX's transport services are more efficient. NYNEX's loss of per-minute residual TIC revenues

industry, as well as a large number of central offices with physical collocation, would have reacted vigorously to such a proposal. In adopting this rule, the Commission relied on an *ex parte* filing made by CompTel and Teleport after the comment period had ended and three weeks before the *Access Charge Reform Order* was adopted.<sup>41</sup> The Commission never asked the industry to submit the data that was needed to adequately assess the effects of the CompTel/Teleport proposal.

If the Commission had properly noticed this issue, the LECs would have had the opportunity to provide the information discussed above, which would have given the Commission a basis in the record for deciding this issue. There is nothing in the record to show that the Commission considered or quantified the impact of this rule on the LECs. Having heard only one side of the story, the Commission failed to reach a reasoned decision on the merits. For this reason alone, the Commission should stay its rule pending further opportunity for notice and comment.

#### **IV. NYNEX Will Suffer Irreparable Harm Absent A Stay**

NYNEX will suffer irreparable harm absent a stay. First, a simple rate comparison shows that the rule will have a devastating impact on NYNEX's revenues, making it impossible for NYNEX to recover the bulk of residual TIC revenues. Second, it will provide an irresistible and uneconomic incentive for

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<sup>41</sup> See *id.* at para. 179, n. 242.

## CERTIFICATE OF SERVICE

I hereby certify that copies of this pleading were mailed this date, first class postage prepaid, upon the persons listed on the attached service list.

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