ORIGINAL

DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

LORETTA J. GARCIA
DIRECT DIAL 202-776-2973
ljgarcia@dlalaw.com

WASHINGTON, D.C.
1200 NEW HAMPSHIRE AVENUE, N.W. · SUITE 800 · WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 · FACSIMILE 202-776-2222

ONE RAVINIA DRIVE · SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

DOCKET FILE COPY ORIGINAL

July 30, 1997

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington DC 20554

Dear Mr. Caton:

Enclosed herewith for filing are an original and eleven copies of the Reply Comments of Midcom Communications, Inc.

If you have any questions regarding the enclosed filing, please contact the undersigned.

Sincerely,

Loretta J. Garcia

LJG/crd

Enclosures

0+11

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

DOCKET FILE COPY ORIGINAL

In the Matter of	)	
	)	
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	
Petition for Expedited Rule Making To Establish Reporting Requirements and Performance and Technical Standards for Operations Support Systems	)	RM 9101

REPLY COMMENTS OF MIDCOM COMMUNICATIONS INC.

Steven P. Goldman
Vice President & General Counsel

MIDCOM COMMUNICATIONS, INC.
1111 Third Avenue, Suite 1600
Seattle, WA 98101

Of Counsel

Leonard J. Kennedy
Laura H. Phillips
Loretta J. Garcia
DOW, LOHNES & ALBERTSON, PLLC
1200 New Hampshire Avenue, Suite 800
Washington, D.C. 20036-6802
(202) 776- 2000

July 30, 1997

TABLE OF CONTENTS

Page

SUMMARY i

I. THE COMMISSION SHOULD ADOPT FEDERAL GUIDELINES FOR TECHNICAL CRITERIA 2

II. THE COMMISSION SHOULD ALSO ADOPT MINIMUM SERVICE QUALITY MEASUREMENTS 5

III. THE COMMISSION SHOULD ADOPT FEDERAL GUIDELINES FOR ELECTRONIC INTERFACES 8

IV. THE COMMISSION SHOULD REQUIRE ILEC REPORTING 9

V. THE COMMISSION SHOULD ENFORCE COMPLIANCE WITH THE MINIMUM OSS STANDARDS 10

VI. CONCLUSION 12

SUMMARY

MIDCOM generally supports the Petition in the captioned proceeding. As a mid-tier interexchange carrier deeply involved in becoming a competitive local exchange carrier, MIDCOM agrees that OSS is a critical competition matter deserving of expeditious action. MIDCOM's experience suggests the need for the development and reporting of incumbent LEC performance criteria as well as more uniform, national OSS implementation standards.

MIDCOM agrees that the Commission could promote the development of competition by adopting minimum performance and reporting standards under which the ILECs would provide access to their OSS functions. These standards should apply across the board to all ILECs. Standards adopted only by an industry group are less desirable than Commission-approved standards because, with industry-adopted standards, each ILEC would remain free to interpret and implement the standards in its own way. Under such a framework, uniformity is rarely achieved, despite good intentions. Nevertheless, among the possible industry standards discussed by commenters, MIDCOM could support the performance standards achieved by the Local Competition Users' Group. The LCUG standards measure such performance indicators as installation intervals, billing intervals, blocking, outages and post-dial delay. The LCUG criteria also elicit important information regarding parity of treatment.

MIDCOM's experience in gaining access to Ameritech's OSS demonstrates that it is essential to have uniform performance measurement standards by which to gauge the effectiveness of OSS functions provided by all ILECs. A uniform, national approach to OSS provisioning would substantially advance the prospects for successful local competition and

would ease some of the difficulties ILECs apparently are experiencing as they try and discard a seemingly endless series of OSS provisioning approaches.

MIDCOM also supports the request that the Commission require ILECs to adopt industry-agreed standards on electronic data interfaces, in a timely manner and with little or no deviation. Without standardized EDI, a CLEC with national operations can work intensively with one ILEC to establish interface parameters, only to find that another ILEC has developed a divergent, inconsistent interface. CLECs truly need consistent interface parameters regardless of the identity of the ILEC.

Furthermore, MIDCOM supports commenters who request reporting of information regarding the ILECs' performance standards and those commenters who ask the Commission to require the ILECs to file periodic public reports regarding their compliance with OSS obligations. Finally, MIDCOM concurs that the Commission should impose enforcement measures on ILECs who fail to comply with the minimum national requirements, including the application of credits for deficiencies. The FCC has the authority to and should take these steps expeditiously.

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

In the Matter of	)	
	)	
Implementation of the Local Competition Provisions	)	
in the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	
Petition for Expedited Rule Making To Establish	)	
Reporting Requirements and Performance and	)	RM 9101
Technical Standards for Operations Support Systems	)	

REPLY COMMENTS OF MIDCOM COMMUNICATIONS INC.

MIDCOM Communications Inc. ("MIDCOM") hereby submits its Reply Comments on the Petition for Expedited Rule Making jointly filed by LCI International Telecom Corp. ("LCI") and Competitive Telecommunications Association ("CompTel") (collectively "Petitioners") on May 30, 1997.[1/] The petition sought FCC establishment of certain standards under which the incumbent local exchange carriers ("ILECs") would provide parity of access to their operations support systems ("OSS"). As a mid-tier interexchange carrier deeply involved in the process to becoming a CLEC over many incumbent LEC regions, MIDCOM agrees that OSS is a critical competition matter deserving of the FCC's attention and expeditious action. As described below, MIDCOM's own experience with OSS access, while presently limited to a single BOC, strongly suggests the need for the development and reporting of ILEC performance criteria as well as more uniform OSS implementation standards. The FCC could substantially aid the development of competition by adopting an OSS template that ILECs could put into place.

1/ Public Notice DA No. 97-1211, released June 10, 1997. *See also* Order, DA 97-1526, released July 18, 1997 (extended deadline for reply comments to July 30, 1997).

I. THE COMMISSION SHOULD ADOPT FEDERAL GUIDELINES FOR TECHNICAL CRITERIA

While there may be a few isolated new local service entrants that intend to operate solely in a single ILEC market, MIDCOM believes that the vast majority of carriers stepping up to the challenge of providing local competition have plans to launch local service in markets throughout the nation. As the ILECs well recognize, efforts on this scale can be made immensely more difficult by interposing a bewildering array of OSS requirements and technical criteria on new entrants and by making OSS requirements a constantly moving target. Quite obviously, new entrants that also lack the most basic information on ILEC performance capabilities will be operating at a significant disadvantage.

The Commission has already acknowledged these difficulties by setting minimum criteria in related areas of interconnection and other unbundled elements, and should take the important step here of adopting minimum performance and reporting standards under which the ILECs would provide access to their OSS functions.[2/] Federal minimum standards would expedite access to OSS and facilitate competition among service providers. Having determined in its *Local Competition Order* that access to efficient and functional OSS is critical to competition,[3/]

2/ In its *Local Competition Order*, the Commission noted that, depending on the progress made by the industry in arriving at OSS standards, the FCC would determine whether its obligations under the 1996 Act "require us to issue a separate notice of proposed rulemaking or take other actions" to achieve OSS standards. *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, 11 FCC Rcd 15499, 15763-68 (1996), *rev'd on other grounds sub nom. Iowa Util. Bd. v. FCC* (consolidated), Nos. 96-3321, et al. (8th Cir. July 18, 1997). *See also* Comments of Association for Local Telecomm. Services at 4-5, Competitive Telecomm. Ass'n at 3-4 and Worldcom, Inc. at 10-11.

3/ *Local Competition Order*, 11 FCC Rcd at 15768.

the FCC should not leave OSS implementation and the question of parity, which could make or break the local competitive process, to the whims and competitive incentives of each ILEC.[4/]

It is important that the Commission apply a set of minimum federal standards across the board to all ILECs. Worldcom suggests that a default set of technical standards should apply only when an ILEC fails to measure and report its OSS performance.[5/] While MIDCOM agrees that the ILECs should report their performance criteria and technical measurements, MIDCOM believes it will be more efficient and predictable for interconnectors if the FCC itself establishes federal minimum standards to which all ILECs must adhere.

Commenters asserted that industry groups are examining the question of OSS technical standards. For example, Bell Atlantic/NYNEX observe that groups sponsored by the Alliance for Telecommunications Solutions ("ATIS") and the American National Standards Institute ("ANSI") are deliberating on technical standards.[6/] However, standards achieved by an industry group are less desirable than minimum federal standards or an OSS template established by the Commission. The recurring and persistent problem with standards adopted by industry groups is that not all segments of the industry can or do participate in formulating the standards, and certainly industry segments are not represented on any proportional basis. Typically, smaller

---

4/ It is worth noting that National Association of Regulatory Utilities Commissioners and state commissions supported adoption of federal guidelines and encouraged the FCC to cooperate with state regulators in developing national standards or rules. *See* Comments of NARUC at 3, California Pub. Util. Comm'n at 7-9 and Pub. Serv. Comm'n of Wisconsin at 3-4.

5/ Comments of Worldcom at 11.

6/ Comments of Bell Atlantic/NYNEX at 2-3. *See also* Comments of PSC Wisconsin at 1 and United States Tel. Ass'n at 4-5.

carriers, like MIDCOM, do not have sufficient resources to participate in all, or perhaps any, of the existing industry forums. It is difficult to know even whether participation would make much difference in the outcome of important standards decisions, because adoption of items proceeds by "consensus" of the parties present. Typically, only the ILECs have sufficient resources to create or block consensus. This is true of ATIS, and its predecessor, the Exchange Carrier Standards Association, in which "industry" consensus frequently meant that the LECs had arrived at an agreement and were able to push it through despite substantial opposition. Thus, MIDCOM opposes FCC adoption of any standards arrived at by ATIS. Another critical problem with the industry standards process occurs after the industry group adopts particular standards. Each LEC remains entirely free to interpret and implement adopted standards in its own way. Under this framework uniformity is rarely achieved despite good intentions and great effort.

Among the other possible industry standards discussed by commenters, MIDCOM could support the performance standards achieved by the Local Competition Users' Group ("LCUG").[7/] The LCUG standards measure such performance indicators as installation intervals, billing intervals, blocking, outages and post-dial delay.[8/] The LCUG criteria also elicit important information regarding parity of treatment.

7/ Petitioners and others stated that the LCUG has put forward a set of critical OSS functions that the Commission should require the ILECs to measure and report. Petition at Appendices A and B; *see also* comments of AT&T at 11-21, MCI at 4-8, Sprint at 7-9, and Worldcom at 8.

8/ The primary advantage of adopting a set of standards arrived at by the LCUG would be to expedite the timetable under which standardization could be achieved.

Some commenters seek flexibility in any federal standards that are adopted.[9/] Having flexible OSS performance standards at this very early stage in the development of local service arrangements, however, would not be much of an improvement over having no standards at all. Any federal standards adopted should be established as minimum technical performance parameters with carriers and state commissions free to adopt more stringent guidelines.[10/] Certainly the FCC can and should indicate that standards will be revised as experience is gained with OSS issues.

Therefore, MIDCOM urges the Commission to adopt minimum technical performance guidelines for the ILECs to meet in complying with their obligations to provide nondiscriminatory access to their OSS functions. If the Commission is inclined to adopt standards achieved by an industry group, MIDCOM recommends that the Commission seriously consider the LCUG standards.

II. THE COMMISSION SHOULD ALSO ADOPT MINIMUM SERVICE QUALITY MEASUREMENTS

MIDCOM's local service program, and its experience with access to OSS functions is most advanced with Ameritech. Although Ameritech has in place a quality assurance program for OSS, its actual processes to date do not reflect attention to high quality operations. For

---

9/ Comments of Worldcom at 10, and Teleport Comm. Group Inc. at 2-6.

10/ Indeed, as Worldcom observed, a competitive carrier could measure the OSS performance it is receiving from a particular ILEC to determine whether that performance meets the federal minimum standards. Comments of Worldcom at 8.

example, Ameritech's tracking of applications is faulty and has resulted in substantial delays to MIDCOM's local service launch.

This problem is illustrated by the processing of MIDCOM's "certification" questionnaire. Before Ameritech will set up a CLEC account for OSS purposes, it requires completion of a questionnaire to establish information such as contact names, routing codes, billing intervals, and related information that allows Ameritech to certify the CLEC. MIDCOM completed this questionnaire and submitted it to Ameritech to begin the certification process. Although Ameritech was aware the questionnaire had been sent, it apparently was misrouted within Ameritech. Ameritech never notified MIDCOM that the questionnaire had been misrouted or otherwise lost. Approximately two months later, when MIDCOM made inquiries about the progress of the certification, Ameritech was unable to locate MIDCOM's certification application. After MIDCOM resubmitted the document, it took another 45 days of "expedited" processing for Ameritech to establish MIDCOM's account information in Ameritech's OSS system. While this sort of example seems mundane, it is the sort of roadblock that has real-world ramifications. Because Ameritech will not process any customer orders from MIDCOM until certification is completed, MIDCOM was substantially delayed even in beginning a testing process for OSS ordering and service provisioning. Actual provision of local service was also substantially delayed.

These inadvertent errors and processing delays on wholesale accounts are aggravated by insufficient staffing and the lack of a program manager to troubleshoot on CLEC resale issues.[11/]

11/ It is not obvious to MIDCOM why Ameritech's wholesale operations do not have comparable levels of service support as Ameritech's resale operations. One area where

Although MIDCOM has good relationships with the Ameritech employees directly responsible for MIDCOM's OSS arrangements, these people are stretched very thinly over too many CLECs for it to be humanly possible to properly service them all.[12/] Also, Ameritech's staff struggles with technical issues related to the purchase of wholesale services. Even relatively routine requests must be elevated to higher levels or to a small number of people with specialized technical training to resolve, often resulting in major delays. Another problem with Ameritech's staffing is a high rate of turnover among those that provide CLEC account servicing.

Perhaps one of the largest and most persistent problems MIDCOM has experienced is that Ameritech has no comprehensive, coherent and correct set of information regarding wholesale products with appropriate USOC descriptions and rates. This results in the frustrating situation of receiving several different lists of wholesale services available for resale in a particular state and receiving different, supposedly "correct" information in each with each response.[13/]

Furthermore, Ameritech supports its certification process with a manual rather than an automated system. Manual processing is slower and more prone to errors than an electronic processing system. This is borne out by the fact that MIDCOM experienced a delay of two to

---

additional support is critical is via a help desk function.

12/ On more than one occasion MIDCOM certification and other processing suspended dead in its tracks because the only person within Ameritech's regional organization charged with solving a particular issue was on vacation.

13/ The serious practical problem this creates is that MIDCOM service orders are rejected by Ameritech because MIDCOM, relying upon material supplied by Ameritech, has used the "wrong" USOC ordering code. Any rejection results in additional substantial delays as the order is kicked back and forth for clarification and correction.

three weeks in receiving certification because Ameritech incorrectly set up MIDCOM's service test parameters. It remains to be seen how well in practice Ameritech's manual OSS will function.

While MIDCOM's more recent contacts with Ameritech demonstrate a willingness to work to resolve these and other problems, it is nevertheless essential that there be uniform national standards as well as measurements by which to gauge the effectiveness of OSS functions provided by all ILECs.[14/] A uniform, national approach to OSS provisioning would substantially advance the prospects for successful local competition.[15/] It could also ease some of the difficulties ILECs are experiencing as they try and reject a seemingly endless series of OSS provisioning approaches.[16/]

III. THE COMMISSION SHOULD ADOPT FEDERAL GUIDELINES FOR ELECTRONIC INTERFACES

MIDCOM supports the request that the Commission require ILECs to adopt industry agreed standards on electronic data interfaces ("EDI"), in a timely manner and with little or no deviation.[17/] Without standardized electronic interfaces, a CLEC with national operations can

---

14/ *See* comments of CompTel at 4-6 and MCI at 9-10. *See also* comments of ALTS at 4-5 (asking the Commission to apply performance measurements to all Class A ILECs).

15/ Comments of American Comm. Serv., Inc. at 7-8.

16/ Working to implement OSS with just Ameritech, MIDCOM has frequently been informed of OSS changes that impact functionality with little or no advance notification. Working with eight or ten ILECs on OSS simultaneously becomes a nearly impossible proposition if ILECs continually change basic OSS functionalities at will.

17/ Comments of Worldcom at 15. The United States Telephone Association confirmed that there are no industry standards for EDI. Comments of USTA at 14.

work intensively with one ILEC to establish interface parameters, only to find that another ILEC has developed a divergent, inconsistent interface. CLECs with national operations truly need consistent interface parameters regardless of the identity of the ILEC.

In the Ameritech region, MIDCOM has noted that processes using the EDI do not function smoothly. MIDCOM has designed its EDI to meet industry standards developed through the ANSI, but MIDCOM's parameters differ from Ameritech's, causing substantial problems. Whether Ameritech's EDI does not comply with ANSI standards, or is simply set at a different level in a range of acceptable standards, is unclear. What is plain enough is that this mismatch of EDIs causes errors to occur in the transmission of data, which impedes the accurate and timely processing of information, all to the detriment of MIDCOM, its customers, and the competitive goals of the Commission.

IV. THE COMMISSION SHOULD REQUIRE ILEC REPORTING

MIDCOM supports the commenters who request reporting of information regarding the ILECs' performance standards,[18/] and those commenters who ask the Commission to require the ILECs to file periodic reports regarding their compliance with OSS obligations.[19/] An essential piece of information that should be reported is the ILEC's performance with respect to provisioning its own service. Reporting that neglects this critical parity assessment will allow

---

18/ Comments of AT&T at 7-11, MCI at 4-9, Telco at 6-9, Telecom Resellers Ass'n at 4-7, WinStar Comm. at 3-4, Sprint Corp. at 9-12, Excel at 7-11, GST at 9-10, Worldcom at 6-9, PSC of Wisconsin at 1, General Serv. Admin. at 8-9, Competition Policy Institute at 3-4 and US West at 8-9.

19/ Comments of CompTel at 5-6, , Excel at 11-12, Sprint at 9-10, and MCI at 7-8.

perpetuation of second class status on non-ILEC local competitors.[20] MIDCOM also concurs with Telecommunications Resellers Association that the Commission should require the ILECs to provide updated electronic information concerning services available for resale, along with their USOC descriptions.[21] As stated above, this information is difficult, if not impossible to obtain, yet it is necessary for effective resale of the ILECs' services.

V. THE COMMISSION SHOULD ENFORCE COMPLIANCE WITH THE MINIMUM OSS STANDARDS

Once technical and performance guidelines are established, the FCC will be in a position to take corrective action for any failure to comply. For example, Worldcom's comments proposed that when an ILEC's performance falls short of the standard, there would be a presumption that it is providing OSS that is not equal in quality to the OSS that it is providing to itself.[22] Further, if an ILEC's service quality appears substantially below the levels reported by similarly situated ILECs, such a result may merit an inquiry by the Commission or state commission to determine whether the quality level is sufficient to serve the needs of competitors and consumers. Finally, when an ILEC is not able to provide OSS access that meets the

---

20/ MIDCOM notes that Bell Atlantic/NYNEX on July 19 filed with the FCC their offer of performance standards and service intervals these carriers were willing to support as a condition of FCC approval of their pending merger application. Without getting into the specifics of how the proposal is insufficient, it is outrageous that Bell Atlantic/NYNEX are only willing to provide OSS information of their choosing for a period of four years. While MIDCOM acknowledges that OSS provisioning issues will be most unsettled in the earliest stages of local competition, the FCC should not condone any ILEC attempt to time limit OSS reporting requirements.

21/ Comments of TRA at 4-5.

22/ Comments of Worldcom at 10-11.

minimum federal standards, the Commission should direct that RBOC to provide OSS access at a discounted rate. Such an approach was used when interexchange equal access was introduced. For example, when a local telephone company was not able to provide Feature Group D access, it was required to charge "non-premium" rates for inferior access provided via other technologies.[23/] These enforcement measures would ensure that the ILECs devote adequate attention to their obligation to provide nondiscriminatory access to their OSS functions.

MIDCOM supports the comments of other parties that favor tough enforcement measures.[24/] MIDCOM agrees that the Commission should prohibit any ILEC that fails to provide parity in access to its OSS from signing up and serving new long distance customers.[25/] In addition, the Commission should make it clear that noncompliance with the federal OSS standards will be taken into consideration in any future proceedings undertaken to evaluate an RBOC's entry into the in-region interLATA market under Section 271 of the Act.

In light of the recent Eighth Circuit decision in *Iowa Utilities Board,* MIDCOM anticipates that there may be ILECs that will argue to the FCC that it lacks jurisdiction to take any of the actions advocated in the Petition or the comments of CLECs.[26/] Such a

---

23/ *See e.g., Contel Serv. Corp., et al.*, 6 FCC Rcd 3760 (1991) (requiring Contel to charge less-than-premium rates for interstate switched access service provided by means other than the preferred Feature Group D technology).

24/ Comments of ACSI at 8, ALTS at 16-17, CompTel at 6-7, MCI at 10-12 and Worldcom at 12-13. In fact, MIDCOM supports having enforceable performance standards and system access that pertain to both parties.

25/ Comments of CompTel at 6, MCI at 11 and Worldcom at 13.

26/ Indeed, Ameritech, BellSouth, SBC and USTA, commenting prior to release of the court's decision, argued that the FCC would unlawfully exceed its authority if it adopted federal standards. Comments of Ameritech at 6-7, 10-13; BellSouth at 14-16, 19-21; and SBC at 7-11.

characterization is incorrect. As an initial matter, the court confirmed that OSS is an unbundled network element. Under the court's statutory and jurisdictional analysis, it concluded that the FCC is the regulatory body with the authority to regulate and enforce compliance with the statutory OSS obligation.[27/] Thus, even under the Eighth Circuit's narrow view of federal jurisdiction, the FCC has the requisite authority to fashion OSS performance and reporting standards.

VI. CONCLUSION

MIDCOM respectfully requests that the FCC establish federal minimum technical and performance criteria for the ILECs to comply with when providing access to their OSS functions.

Other ILECs favored having negotiations under state auspices to determine the method for compliance with their OSS obligations. Comments of Bell Atlantic/NYNEX at 3-4, GTE at 3-4, SNET at 8-10, US West at 13-16, and USTA at 5-7.

27/ *Iowa Util. Bd. v. FCC* (consolidated), Nos. 96-3321, *et al.* (8th Cir. July 18, 1997). It is important to note that while the court indicated its belief that the FCC was not a proper forum for the resolution of enforcement actions stemming from state-approved interconnection agreements, the court did not question the FCC's ability or duty to enforce provisions of the 1996 Act expressly entrusted to the FCC, such as identification of unbundled elements, including OSS.

The Commission should adopt enforcement measures that will ensure ILEC compliance with the obligation to provide nondiscriminatory access to their OSS functions and assist in the effective development of local competition.

Respectfully submitted,

Steven P. Goldman
Vice President & General Counsel

MIDCOM COMMUNICATIONS, INC.
1111 Third Avenue, Suite 1600
Seattle, WA 98101

Of Counsel

Leonard J. Kennedy
Laura H. Phillips
Loretta J. Garcia
DOW, LOHNES & ALBERTSON, PLLC
1200 New Hampshire Avenue, Suite 800
Washington, D.C. 20036
(202) 776- 2000

July 30, 1997

CERTIFICATE OF SERVICE

I, Cornelia R. DeBose, hereby certify that a copy of the foregoing "*Reply Comments of Midcom Communications Inc.*" was sent this 30th day of July, 1997 via United States first-class mail, postage prepaid, to the following:

Robert J. Aamoth
Edward A. Yorkgitis, Jr.
Kelley, Drye & Warren, LLP
1200 - 19th Street, N.W., Suite 500
Washington DC 20036

Genevieve Morelli
Executive Vice President
and General Counsel
COMPTEL
1900 M Street, N.W., Suite 800
Washington DC 20036

Anne K. Bingaman
Douglas W. Kinkoph
LCI International Telecom Corp.
8180 Greensboro Drive, Suite 800
McLean VA 22102

Eugene D. Cohen
Bailey Campbell PLC
649 North Second Avenue
Phoenix AZ 85003

Rocky Unruh
Morgenstein & Jubelirer
Spear Street Tower
San Francisco CA 94105

David Alan Nall
Squire, Sanders & Dempsey, LLP
1201 Pennsylvania Avenue, N.W.
Washington DC 20044-0407

Catherine R. Sloan
Richard L. Fruchterman
Richard S. Whitt
WorldCom, Inc.
1120 Connecticut Avenue, N.W.
Suite 400
Washington DC 20036

Richard J. Metzger
Association for Local
Telecommunications Services
1200 - 19th Street, N.W., Suite 560
Washington DC 20036

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

Eric J. Branfman
Robert V. Zener
Anthony R. Petrilla
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington DC 20007-5116

Brad E. Mutschelknaus
Kelley, Drye & Warren, LLP
1200 - 19th Street, N.W., Suite 500
Washington DC 20036

James C. Falvey
Vice President
American Communications Services, Inc.
131 National Business Parkway
Suite 100
Annapolis Junction MD 20701

J. Christopher Dance
Robbin Johnson
Excel Communications, Inc.
8750 North Central Expressway
Dallas TX 75231

Dana Frix
C. Joël Van Over
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington DC 20007-5116

Kathy L. Shobert
Director, Federal Affairs
General Communications, Inc.
901 - 15th Street, N.W., Suite 900
Washington DC 20005

Robert V. Zener
Tamar E. Haverty
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington DC 20007-5116

Roy L. Morris
Vice President
Government Affairs and Revenue
Development
US ONE Communications Corporation
1320 Old Chain Bridge Road, Suite 350
McLean VA 22101

Ronald W. Gavillet
Executive Vice President
USN Communications, Inc.
101 S. Riverside Plaza, Suite 401
Chicago IL 60606

Brian Conboy
Thomas Jones
Willkie, Farr & Gallagher
Three Lafayette Centre
1155 - 21st Street, N.W.
Washington DC 20036

Richard M. Rindler
Morton J. Posner
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington DC 20007-5116

Timothy R. Graham
Robert G. Berger
Joseph Sandri
WinStar Communications, Inc.
1146 - 19th Street, N.W.
Washington DC 20036

Mary McDermott
Linda Kent
Keith Townsend
Hance Haney
United States Telephone Association
1401 H Street, N.W., Suite 600
Washington DC 20005

Michael J. Karson
Attorney for Ameritech
2000 West Ameritech Center Drive
Room 4H88
Hoffman Estates IL 60196-1025

Leslie A. Vial
Attorney for Bell Atlantic
1320 North Court House Road, 8th Floor
Arlington VA 22201

Jack M. Farris
Attorney for NYNEX
1095 Avenue of the Americas, 38th Floor
New York NY 10036

Robert A. Mazer
Albert Shuldiner
Vinson & Elkins, L.L.P.
1455 Pennsylvania Avenue, N.W.
Washington DC 20004-1008

William B. Barfield
Jim O. Llewellyn
1155 Peachtree Street, N.E., Suite 1800
Atlanta GA 30309-3610

Michael K. Kellogg
Austin C. Schlick
Kevin J. Cameron
Kellogg, Huber, Hansen, Todd
& Evans, P.L.L.C.
1301 K Street, N.W., Suite 1000 West
Washington DC 20005

R. Michael Senkowski
Suzanne Yelen
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington DC 20006

David W. Zesiger
Independent Telephone &
Telecommunications Alliance
1300 Connecticut Avenue, N.W.
Washington DC 20036

Gregory J. Vogt
Robert J. Butler
Scott D. Delacourt
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington DC 20006

Robert W. Lynch
Durward D. Dupre
Michael J. Zpevak
One Bell Center
Room 3518
St. Louis MO 63101

Marlin D. Ard
John W. Bogy
140 New Montgomery Street
Room 1530A
San Francisco C A 94105

Wendy S. Bluemling
Director - Regulatory Affairs
The Southern New England
Telephone Company
227 Church Street
New Haven CT 06510

James T. Hannon
Kathryn Marie Krause
1020 - 19th Street, N.W., Suite 700
Washington DC 20036

Cheryl L. Parrino
Daniel J. Eastman
Joseph P. Mettner
Public Service Commission of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, Wisconsin 53707-7854

Emily C. Hewitt
George N. Barclay
Michael J. Ettner
General Services Administration
1800 F Street, N.W., Room 4002
Washington DC 20405

Charles D. Gray
James Bradford Ramsay
National Association of Regulatory
Utility Commissioners
1100 Pennsylvania Avenue, N.W.
Suite 603
P. O. Box 684
Washington DC 20044

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

Ronald J. Binz
Debra R. Berlyn
John Windhausen, Jr.
Competition Policy Institute
1156 - 15th Street, N.W., Suite 310
Washington DC 20005

Mark C. Rosenblum
Roy E. Hoffinger
Leonard J. Cali
Richard H. Rubin
AT&T Corp.
295 North Maple Avenue, Room 3252I3
Basking Ridge NJ 07920

Charles C. Hunter
Catherine M. Hannan
Hunter Communications Law Group
1620 I Street, N.W., Suite 701
Washington DC 20006

Bryan Rachlin
Telco Communications Group, Inc.
4219 Lafayette Center Drive
Chantilly VA 20151

C. Joël Van Over
Michael R. Romano
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington DC 20007-5116

Jerome L. Epstein
Jodie L. Kelley
Jenner & Block
601 - 13th Street, N.W., 12th Floor
Washington DC 20005

Lisa B. Smith
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, N.W.
Washington DC 20006

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
1850 M Street, N.W., 11th Floor
Washington DC 20036

J. Jeffrey Mayhook
General Counsel
GST Telecom
4317 N.E. Thurston Way
Vancouver WA 98662

Chairman Reed Hundt[*/]
Federal Communications Commission
1919 M Street, N.W.
Washington DC 20554

Commissioner Susan Ness[*/]
Federal Communications Commission
1919 M Street, N.W.
Washington DC 20554

Commissioner Rachell Chong[*/]
Federal Communications Commission
1919 M Street, N.W.
Washington DC 20554

[*/] Delivered by hand.

Commissioner James Quello*/
Federal Communications Commission
1919 M Street, N.W.
Washington DC 20554

Ms. Regina Keeney*/
Federal Communications Commission
Common Carrier Bureau
1919 M Street, N.W., Room 500
Washington DC 20554

Ms. Janice Myles*/
Federal Communications Commission
Common Carrier Bureau
1919 M Street, N.W., Room 500
Washington DC 20554

International Transcription Service*/
Federal Communications Commission
1919 M Street, N.W.
Room 246
Washington, D.C. 20036

Cornelia R. DeBose