

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

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

CC Docket No. 93-162

In the Matter of )  
)  
Local Exchange Carriers )  
Rates, Terms, and Conditions )  
for Expanded Interconnection )  
Through Physical Collocation )  
for Special Access and Switched Transport )

AMERITECH'S REPLY TO OPPOSITION  
TO PETITION FOR PARTIAL RECONSIDERATION

Ameritech<sup>1</sup> submits this reply to MCI's opposition to Ameritech's petition for partial reconsideration.

In its petition, Ameritech asked the Commission to reconsider that part of its recent order<sup>2</sup> which finds that the "overhead loading factors" reflected in Ameritech's 1994 rates for physical collocation services are unjust and unreasonable and requires Ameritech to refund a corresponding portion of the rates charged for physical collocation service between December 15, 1994, and December 31, 1994. Ameritech pointed out that the ruling was based on pre-price cap cost data concerning comparable DS1 and DS3 services given to the

<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 Local Exchange Carriers' Rates, Terms, and Conditions for Expanded Interconnection through Physical Collocation for Special Access and Switched Transport*, CC Docket No. 93-162, Second Report and Order, FCC 97-208 (released June 13, 1997) ("Order").

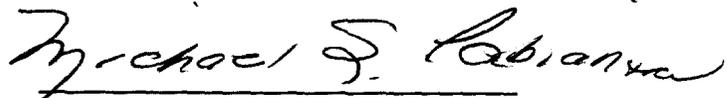
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Commission at its request in early 1994. However, in November, 1994, in response to a specific Commission request for updated information in connection with its investigation for rates for virtual collocation services, Ameritech submitted new cost information with respect to comparable DS1 and DS3 services. That revised information demonstrated that the overhead loading factor included in Ameritech's virtual collocation rates -- the same 1.58 overhead loading factor included in Ameritech's physical collocation rates -- complied with the Commission's overhead cost standard.

In its opposition, MCI argues that the Commission's decision in the Order was correct because it was based on cost information on comparable DS1 and DS3 services filed in this particular docket. Ameritech, however, is simply asking the Commission to revisit its decision by taking "judicial notice" of more current information the cost of comparable DS1 and DS3 services that it already had in a parallel docket dealing with exactly the same issue. That information provides the Commission with a more accurate picture of the "margin" built into the rates for comparable DS1 and DS3 services than does pre-price cap cost information. MCI asks the Commission to ignore the facts. Ameritech's petition simply asks the Commission not to.

In light of the foregoing, the Commission should grant Ameritech's petition for partial reconsideration.

Respectfully submitted,



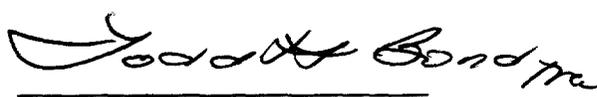
Michael S. Pabian  
Counsel for Ameritech  
Room 4H82  
2000 West Ameritech Center Drive  
Hoffman Estates, IL 60196-1025  
(847) 248-6044

Dated: August 4, 1997

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**CERTIFICATE OF SERVICE**

I, Todd H. Bond, do hereby certify that a copy of the foregoing Ameritech's Reply to Opposition to Petition for Partial Reconsideration has been served on the party listed below, via first class mail, postage prepaid, on this 4th day of August, 1997.

By:   
Todd H. Bond

Don Sussman  
Regulatory Analyst  
MCI Telecommunications Corp.  
1801 Pennsylvania Ave., NW  
Washington, D.C. 20006