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EX PARTE PRESENTATION

August 7, 1997

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Mail Stop Code 1170
Washington, D.C. 20544

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

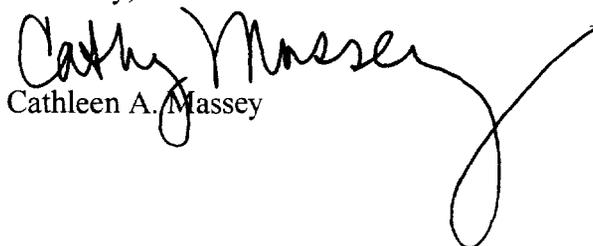
RE: Ex Parte Presentation
CS Docket No. 95-184 -- Inside Wiring

Dear Mr. Caton:

Pursuant to the requirements of Sections 1.1200 et seq. of the Commission's Rules, you are hereby notified that Howard Symons of Mintz, Levin, Glovsky, Ferris & Popeo and I met on August 6, 1997 with Rick Chessen, Barbara Esbin, John Logan and JoAnn Lucanik. The issues discussed in the meeting are summarized in the attached handouts.

Should there be any questions regarding this matter, please contact the undersigned.

Sincerely,


Cathleen A. Massey

cc: Meeting Participants

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List ABCDE

**EX PARTE PRESENTATION OF AT&T WIRELESS SERVICES, INC.
CS DOCKET NO. 95-184 - INSIDE WIRING**

**WITH THE CONSENT OF THE END USER, A CLEC SHOULD HAVE THE SAME
RIGHTS AS THE END USER TO UTILIZE THE INSIDE WIRING
IN SINGLE-FAMILY HOMES**

In the Local Competition Order, the Commission identified the network interface device (NID) as the point at which competitors “obtain[] access to the inside wiring of [a] building.”^{1/} This device is typically located on the outside of the customer’s premises. A competitor is entitled to connect its loops, via its own NID, to the incumbent local exchange carrier’s NID.^{2/} Under the Commission’s inside wiring rules, however, the demarcation point between the inside wiring in a single-unit installation and the network is “a point within 12 inches of the protector or, where there is no protector, within 12 inches of where the telephone wire enters the customer premises.”^{3/} This point can be inside the premises.

To avoid any confusion between the inside wiring rules and the Local Competition Order, the Commission should make clear that a competitor may access the wiring inside a single-family home at the NID, notwithstanding the definition of demarcation point. The Commission should also state that, with the customer’s consent, a competitor may exercise any and all of the customer’s rights over the wiring inside the premises in order to connect that wiring to the competitor’s network. This may include removing the wiring inside the customer’s premises from the ILEC’s NID and connecting it directly to the competitor’s NID, so long as the incumbent’s loop facilities are not disconnected from the ILEC NID.

Dcdocs: 108213.1

^{1/} Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, FCC 96-325 (rel. Aug. 8, 1996) (“Local Competition Order”), at ¶ 396.

^{2/} Id. at ¶ 392.

^{3/} 47 C.F.R. § 68.3.

Repair Service

Calls answered 24 hours a day

Residence Service

611 (local call)

Business Service

954-2222 (local call)

Public (coin) Telephone Service

954-6060 (local call)

Reparaciones

954-6700 (llamadas locales)

District of Columbia/Federal Government

954-2424 (local call)

Text Telephone (TTY/TDD) Users
(hearing or speech impaired ONLY)
residence & business

1-800-564-0999 (toll-free)

Monday - Friday

(9 A.M. to 4:30 P.M., except holidays)

855-1234

(4:30 P.M. to 9 A.M.)



If your telephone is not working, please check to see if the problem is in the telephone, the outside wiring or the inside wiring (see pages 7 & 8). By finding the source of the problem, you will know whom to call to have it repaired.

- Bell Atlantic does not fix telephones or related equipment. If you call us to come to your residence or business and the problem is in the telephone or related equipment, you will be charged for the service call and we cannot make any repairs. Avoid unnecessary service call charges by determining where the problem is before you call Bell Atlantic Repair Service. (If you have the Bell Atlantic® Guardian® Plan you will not have to pay for a service call and we will make a loaner set available to you while you repair or replace your telephone.)
- If you have trouble only on long distance calls, call your long distance company.
- In most cases if the problem is in the wiring outside your home, Bell Atlantic will fix it promptly at no cost to you.
- If the problem is in the wiring or jacks inside your home, you may:
 - a) Make your own repairs;
 - b) Have an electrician, contractor or someone else make your repairs;
 - c) Call Bell Atlantic to make the repairs for a fee based on the amount of time and cost of materials needed to do the work.

Inside wire maintenance may not be your responsibility if you live in an apartment, dorm, condo, co-op, nursing

home or other group living facility. Contact your landlord or manager to determine responsibility. Bell Atlantic does not provide for the repair or replacement of telephone and related equipment.

Bell Atlantic inside wiring or jack repair charges:

If you choose Bell Atlantic to repair your inside wiring or jacks and you do not have a Maintenance Plan, charges will vary depending on the amount of time and cost of materials needed to do the work. The following charges apply during normal business hours:

Service call charge

This \$42.00 charge is billed when a Bell Atlantic Representative visits your home or business to do inside wiring work.

Labor and material charge

In addition to the Service Call Charge, a charge of \$16.00 applies for every 15 minutes required to complete work. Additional material charges will apply for telephone jacks depending on the type required. Repair service can be arranged for times outside of normal business hours—call our Business Office for information on rates.

All service, labor and material charges will be billed on your next monthly phone bill.

Bell Atlantic has optional maintenance services available for customers who prefer to have repair diagnosis done by Bell Atlantic. These plans include repairs to the wiring or jacks inside your home or office and are available for an additional monthly fee. These plans are: Optional Wire Maintenance Plan and Bell Atlantic® Guardian® Plan (residence). For more information see page 8 or call our Business Office.

Bell Atlantic repair commitments and policies

Bell Atlantic is committed to the swift repair of our lines. If you are unable to use your Bell Atlantic service for 24 hours or more because of a problem in the Bell Atlantic network, you will be given an adjustment on your local service bill. The 24-hour period begins when you report the problem to Bell Atlantic Repair.

Emergency restoration service

For residence customers with medical conditions that put them at risk when the phone is out of order, we offer emergency restoration service. Call our Business Office for information on how to apply.

Diagnosing repair problems**Problem in One Phone**

1) If only one of your phones does not work, unplug it and plug a working phone into its jack. If that phone works, you know the problem is in the non-working phone. Check your warranty or contact the place where you bought the phone.

continued on next page

Repair Service

Diagnosing repair problems (continued)**Problem In One Phone:**

2) If you have only one phone, borrow a working phone and plug it into the jack of your non-working phone. If the borrowed phone works, the problem is in your non-working phone. Check your warranty or contact the place where you bought the phone.

3) If you have a Network Interface Device (the gray box where Bell Atlantic's outside line attaches to your house or building), you can plug a working phone into the Network Interface Device (see detailed, easy to follow instructions below). If there is no dial tone at the Network Interface Device, the problem is probably in the outside line.

4) If you have a normal dial tone at the Network Interface Device, the problem is not in Bell Atlantic's outside line. The trouble is either in the wiring or jack inside your house or building or in your telephone equipment.

Problem in More Than One Phone:

If you have any of the following problems on all your phones: no dial tone, cannot call in or out, cannot hear or be heard, noise or static, be aware that one faulty piece of telephone equipment can cause a problem on all your phones.

1) See Step 3 above.

2) See Step 4 above.

3) Unplug every piece of telephone equipment including cordless phones, answering machines, computers, modems, burglar alarms, etc., then plug in a phone that you know is a working phone.

a) If that phone works, you can assume that at least one piece of your equipment is faulty. You can determine what was causing the problem by adding each piece in turn to the line until the problem recurs.

b) If that phone does not work, but you have dial tone at the Network Interface, the trouble is in your inside wiring or jacks. If you have no Network Interface, call Bell Atlantic Repair Service to check the outside line.

Cordless phones and answering machines

Sometimes during or after a storm you may experience no dial tone—try unplugging equipment for 15 minutes and then reconnect. If you still have no dial tone, call Bell Atlantic Repair.

Troubleshooting at the Network Interface Device (NID)

The Network Interface Device (NID) is the gray box where Bell Atlantic's outside lines enter your house or building, usually near the electric meter (see sample figure to the right).

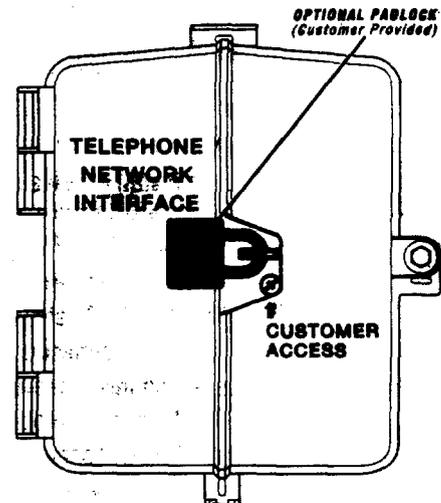
What does this device do?

If you should have a problem with your telephone service, this device lets you test to determine if the problem is in your wiring, equipment, or in Bell Atlantic's lines. Advance testing by you may prevent

any unnecessary repair visit charges from Bell Atlantic. This device also allows you (or someone you authorize) to install or replace your inside wiring safely. See the device lid for more information.

CAUTIONS!

- Do not work on your telephone at all if you wear a pacemaker.
- Telephone lines carry electrical current. To avoid contact with electrical current:
 - * Use a screwdriver or other tools with insulated handles.
 - * Do not touch screw terminals or bare conductors with your hands.
 - * Do not work on your telephone wiring while a thunderstorm is in the vicinity.
 - * Be sure that your modular plug is not connected to the test jack while you are working on your telephone wiring.
 - * Do not place telephone wiring or connections in any conduit, outlet or junction box containing electrical wiring.
 - * Protectors and grounding wire placed by Bell Atlantic must not be connected to, removed, or modified.
 - * You may want to secure the device with a padlock.

**Testing your telephone wiring**

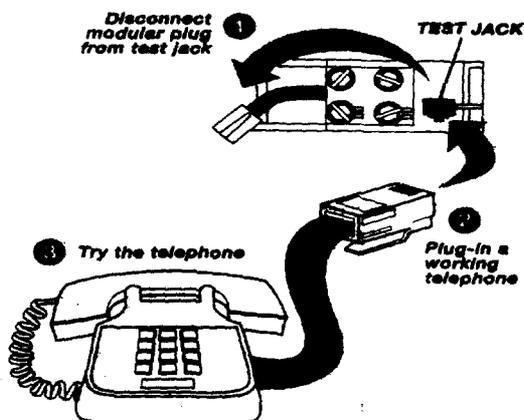
This procedure will tell you if a problem is in Bell Atlantic's line or in your inside wiring - Unscrew the Network Interface cover at the Customer Access point with a screwdriver and open (see figures on this page and on page 8).

- 1) Disconnect modular plug from test jack. This disconnects your inside wiring from Bell Atlantic's lines.
- 2) Wait one (1) minute, then insert plug from a telephone set you know is working. You are now plugged directly into the Bell Atlantic line.

Repair Service

Diagnosing repair problems (continued)

- 3) Try the telephone.
 - If problem still exists, it is in Bell Atlantic's lines. Contact Bell Atlantic Repair Service.
 - If problem is gone, you have trouble on your inside wiring, equipment, jacks or remaining telephone sets. Contact either Bell Atlantic Repair Service, an electrician, contractor or someone else, or make the repairs yourself.
- 4) Once you have finished your test, disconnect your testing telephone and securely re-insert the original modular plug. Close the cover and screw the fastener down until the cover is snug and tight.



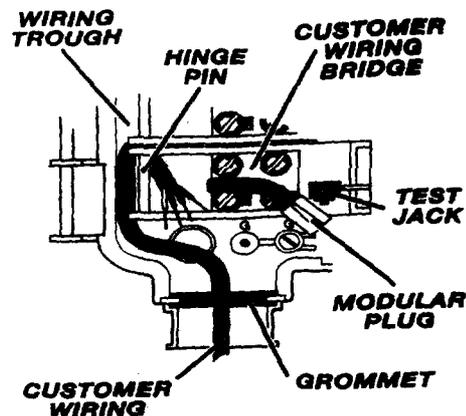
To install or replace your inside wiring at the Network Interface Device

Warning! Telephone wires carry electricity!

Caution must be used to avoid electrical shock—read CAUTION steps on page 7 before you start!

Network Interface cover must be open (see figures on previous page and above).

- 1) Disconnect modular plug from test jack.
This disconnects your inside wiring from Bell Atlantic's lines.
- 2) Using a pen or pencil, punch a hole through the grommet and pass the wire through the hole in the grommet (punch one hole for each wire). Pass the wire behind the hinge pin as shown in figure in the next column.
- 3) Loosen the terminal screws on the customer wiring bridge one full turn.
- 4) Strip off one half inch of insulation from each wire and connect them to color the corresponding terminals, wrapping each clockwise between the washers on the screw. Tuck excess wire in wiring trough. Tighten screws securely.
- 5) Re-insert modular plug into test jack. Close the cover and screw the fastener down until the cover is snug and tight.



Residence Maintenance Plans from Bell Atlantic

Optional Wire Maintenance Plan (see page 29 for rates) provides diagnosis and repair of customer-owned standard inside phone wire and jacks with no additional charges for the service call or for time and materials. However, if you call Bell Atlantic about a problem with your service and it is determined that the problem is in your telephone or related equipment, you will be billed the service call charge.

Bell Atlantic® Guardian® Enhanced Maintenance Service includes the features provided by the Optional Wire Maintenance Plan plus the following:

(See page 29 for rates.)

- No service call charge, even if the problem is in your telephone or related equipment;
 - A loaned standard desk/wall phone, if the trouble is in your phone, for up to 60 days while you arrange to have your phone repaired or replaced;
 - Conversion of one phone jack to modular at no charge if you have a permanently wired phone without a standard modular phone jack and need to use a loaned phone.
- Certain restrictions apply. Please call our Business Office (the number is on page 4) for more information.

The charges for these services are not regulated, approved or controlled by your state or federal regulatory agency and are subject to change.

If you do not have a Maintenance Plan, you may:

- Make your own repairs;
- Have an electrician, contractor or someone else make the repairs;
- Call Bell Atlantic repair to have us fix your inside phone wire or jacks for a fee based on the amount of time and cost of materials needed to do the work.

Inside wire maintenance may not be your responsibility if you live in an apartment, dorm, condo, co-op, nursing home or other group living facility. Contact your landlord or manager to determine responsibility.

Bell Atlantic does not provide for the repair or replacement of telephone and related equipment.