

looking economic cost of serving the customer exceeds the nationwide revenue benchmark, it is the UNE purchaser that bears the shortfall and thus is entitled to the subsidy. By contrast, total service resale is another means by which a new entrant can provide the supported service to the subscriber. But with total service resale, the reseller gets the benefit of the USF subsidy that flows to the underlying carrier by purchasing the service at a discount off the retail rate (paras. 161-163, 179).

USTA (at 15) suggests that the Commission should require an eligible carrier to offer the supported service on a stand-alone basis at the affordable rate established by the state or combined with other services so that new entrants cannot cherry pick high volume, high revenue customers. AT&T agrees that an eligible carrier should offer the core supported service on a stand-alone basis so as to ensure that it will be available to all consumers desiring the service. AT&T also concurs with RTC (at 23) that the Commission should abandon continued examination of competitive bidding as a means of selecting an eligible carrier given the lack of significant support for this approach and its previously identified shortcomings.¹⁹

¹⁹ See AT&T Further Comments, CC Docket No. 96-45, filed August 2, 1996, at 36-40; *id.*, AT&T Reply Comments, filed January 10, 1997, at 8-10.

V. THE COMMISSION'S DECISION TO REQUIRE PAGING COMPANIES AND PRIVATE PROVIDERS OF INTERSTATE TELECOMMUNICATIONS SERVICES TO CONTRIBUTE TO UNIVERSAL SERVICE SUPPORT PROPERLY ENSURES A BROAD CONTRIBUTION BASE.

The Commission correctly determined that under Section 254(d) all interstate telecommunications service providers offering service for a fee directly to the public on a common carrier basis are mandatory contributors to the federal USF (paras. 777-791). Various paging firms contend, however, that they should not be required to contribute because, as providers of one-way messaging services, they will not be entitled to USF support because they do not offer the core set of supported services. Ozark at 4; PCIA at 2, 6; ProNet at 4; TLI at 1. These claims should be rejected.

In mandating that all telecommunications carriers shall contribute to the USF, Congress recognized that a broad contribution base is necessary to support universal service. Whether any carrier will be a recipient of universal service support will depend on whether that carrier offers the supported services and is certified as an eligible carrier. Thus, for example, an interexchange carrier that chooses not to enter the local service market would not be a direct recipient of USF support, although, as with paging providers, it would be a net contributor. There is nothing unfair about this result.

The Commission also correctly determined that the public interest requires that private service providers that offer interstate telecommunications services to others for a fee must contribute under Section 254(d)'s permissive authority

(paras. 793-796). Absent this construction, telecommunications service providers could readily circumvent USF obligations by providing service to their largest business customers on a private carriage basis, thereby seriously eroding the foundation for universal service support. The Commission wisely concluded that:

"[w]hether a business decides to sell telecommunications services to others on a common carrier or private contractual basis or through a separate corporate entity should not determine contribution obligations, because in either event the entity offers telecommunications to others for a fee. In addition, we do not want contribution obligations to shape business decisions, and we do not want to discourage carriers from continuing to offer their common carrier services." (para. 795).

Contrary to Ad Hoc's (at 11-16) and ITAA's (at 3) assertions, and consistent with the Commission's well-reasoned logic, systems integrators who provide large business customers telecommunications service and equipment on a bundled basis should be required to contribute based on their telecommunications revenues, otherwise the Commission will have created a tremendous loophole.²⁰

²⁰ Similarly, and contrary to ICN's assertion (at 7-8), the Commission should not exempt non-profit entities that provide telecommunications services for a fee to others. For one, whether or not an entity makes a profit should not determine contribution status because contributions are assessed on retail revenues not profits. As the Commission correctly noted (paras. 784, 800), if an agency purchases telecommunications services in bulk on behalf of state networks for schools and libraries, it would not be required to contribute because it would not be a "provider of telecommunications service" but rather would be serving its internal needs. However, if, as with ICN, the agency owns and operates its own network and receives payments for

Similarly, various satellite service providers' contentions that providing a stand-alone transponder does not constitute a telecommunications service is frivolous. GE Americom at 2-4, 9-11; Columbia at 1-2, 6. Large business customers often purchase satellite capacity on a long term lease basis, alternatively under tariff or on a noncommon carrier contractual basis. Indeed, the Commission only recently accorded domestic satellite operators the discretion to elect to operate on a noncommon carrier basis without the need for prior Commission approval.²¹ Thus, there is no substance to the contention that these noncommon carrier offerings do not constitute telecommunications service.

VI. THE COMMISSION SHOULD REVISE AND CLARIFY A NUMBER OF ISSUES REGARDING THE LIFELINE PROGRAM.

Kansas (at 2-3) expresses concern about the burdens on state commissions if they had to certify resale carriers in order for such carriers to be able to obtain Lifeline support on behalf of Lifeline eligible customers. Pure resellers, who provide service through total service resale of the incumbent's services, need not be certified by the state in order to be

(footnote continued from previous page)

service from others, then it is a network operator and would be required to contribute to the universal service fund.

²¹ Amendment of the Commission's Regulatory Policies Governing Domestic Fixed Satellites and Separate International Satellite Systems, IB Docket No. 95-41, Report and Order, FCC 96-14, released January 22, 1996, paras. 45-50 ("DISCO I Order").

able to obtain Lifeline support in the following circumstance. If the incumbent offers a tariffed Lifeline service, the reseller would be able to purchase a discounted version of that service and thereby provide a Lifeline rate to an eligible end user. In this instance, the Lifeline subsidy would flow to the underlying carrier (the carrier eligible to receive Lifeline support from the USF) and the reseller would get the benefit of the subsidy by purchasing the service at a discount off the retail rate. In contrast, in those jurisdictions where the incumbent does not offer a tariffed Lifeline service and the reseller sells basic local exchange service to a Lifeline eligible subscriber as a Lifeline service, the reseller should be eligible to receive the subsidy on behalf of the subscriber, but, as Kansas correctly notes, it appears that in this case the reseller would need to be certified by the state commission to receive Lifeline support from the USF. Because the Section 214(e) certification process is primarily for carriers providing facilities-based (including UNE-based) service, the Commission should consider exempting from rule 54.201(a)(1) resale carriers providing Lifeline service by reselling basic local service.

AT&T agrees with U S WEST (at 20-21) and USTA (at 4-7) that carriers should be permitted to offer either toll blocking or toll control to a Lifeline customer. As these parties correctly point out, toll control creates enormous and unnecessary burdens on carriers, is dependent on billing software modifications implemented only by a few of the largest

ILECs and, in all events, would require hourly information from long distance carriers. Despite all these burdens, it does not prevent excessive toll charges through collect or third number billed calls.²² Given the limitations of the effectiveness of current methods of toll control, requiring eligible carriers to offer toll control in order to receive universal service support is unreasonable.

AT&T also suggests that carriers not be required to pay a presubscribed interexchange carrier charge ("PICC") for a Lifeline customer who has elected toll blocking. This is appropriate because the customer has indicated that it will not be placing long distance calls. AT&T has no objection to USCC's suggestion (at 5) that the PICCs for Lifeline customers who do not presubscribe to an interexchange carrier be waived, because recovery of the PICC from the Lifeline customer could provide incentives for customers not to elect toll blocking.

CONCLUSION

To the extent and for the reasons stated above, the Commission should reconsider and clarify its Universal Service

²² Because even toll blocking does not preclude collect or third party billed calls, the Commission should allow collection of a service deposit to maintain Lifeline service if a customer has violated toll blocking restrictions.

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Order to achieve a competitively neutral regime that will sustain the new universal service program.

Respectfully submitted,

AT&T CORP.

By 1/s/ *Judy Sello*
Mark C. Rosenblum
Peter H. Jacoby
Judy Sello

Room 3245I1
295 North Maple Avenue
Basking Ridge, New Jersey 07920
(908) 221-8984

Its Attorneys

August 18, 1997

**UNIVERSAL SERVICE
PETITIONS FOR RECONSIDERATION
CC DOCKET 96-45**

Ad Hoc Telecommunications Users Committee ("Ad Hoc")
AirTouch Communications, Inc. ("AirTouch")
Alaska Public Utilities Commission ("Alaska")
Alaska Telephone Association ("ATA")
Alliance for Public Technology, et al. ("Alliance")
ALLTEL Telephone Services Corporation ("ALLTEL")
American Association of Educational Service Agencies
("AAESA")
American Petroleum Institute ("API")
American Public Communications Council ("APCC")
AMSC Subsidiary Corporation ("AMC")
Arkansas Public Service Commission ("Arkansas")
AT&T Corp. ("AT&T")
Benton Foundation and Edgemont Neighborhood Coalition
("Benton")
Cellular Telecommunications Industry Association ("CTIA")
Columbia Communications Corporation ("Columbia")
Comcast Cellular Communications, Inc. and Vanguard Cellular
Systems, Inc. ("Comcast/Vanguard")
Fidelity Telephone Company ("Fidelity")
Florida Department of Education ("FLDOE")
Florida Department of Management Services ("FLDMS")
Florida Public Service Commission ("Florida")
GE American Communications, Inc. ("GE Americom")

General Communications, Inc. ("GCI")

Georgia Department of Administrative Services-Information
Technology ("GA DOAS-IT")

GVNW Inc./Management ("GVNW")

Information Technology Association of America ("ITAA")

Iowa Telecommunications and Technology Commission ("ICN")

ITCS, Inc. ("ITCS")

Kansas Corporation Commission ("Kansas")

MCI Telecommunications Corporation ("MCI")

National Association of State Telecommunications Directors
("NASTD")

National Exchange Carrier Association, Inc. ("NECA")

New Jersey Division of the Ratepayer Advocate ("NJ Ratepayer
Advocate")

New York Library Association ("NYLA")

Nextel Communications, Inc. ("Nextel")

Ozark Telecom, Inc. ("Ozark")

Pennsylvania Public Utility Commission ("Pennsylvania")

Personal Communications Industry Association ("PCIA")

ProNet Inc. ("ProNet")

Puerto Rico Telephone Companies ("PRTC")

Rural Telephone Coalition ("RTC")

Rural Telephone Company ("Rural Tel")

Sandwich Isles Communications, Inc. ("Sandwich")

Sprint Corp. ("Sprint")

Sprint Spectrum L.P. d/b/a Sprint PCS ("Sprint PCS")

Teletouch Licenses, Inc. ("TLI")

TelHawaii ("TelHawaii")

Texas Public Utility Commission ("Texas")

Time Warner Communications Holdings, Inc. ("TW Comm")

United States Catholic Conference, et al. ("USCC")

United States Telephone Association ("USTA")

United Utilities, Inc. ("United")

U S WEST, Inc. ("U S WEST")

Vermont Public Service Board and Vermont Department of
Public Service ("Vermont")

Washington State Department of Information Services
("WADIS")

Western Alliance

Wyoming Public Service Commission ("Wyoming")

CERTIFICATE OF SERVICE

I, Viola J. Carlone, do hereby certify that on this 18th day of August, a copy of the foregoing AT&T Opposition to Petitions for Reconsideration was served by U.S. first class mail, postage prepaid, to the parties listed on the attached Service List.


Viola J. Carlone

SERVICE LIST
(CC Docket 96-45)

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M St., NW -- Rm. 814
Washington, DC 20554

Lisa Boehley
Federal Communications Commission
2100 M St., NW, Room 8605
Washington, DC 20554

The Honorable Rachelle B. Chong, Commissioner
Federal Communications Commission
1919 M St., NW -- Rm. 844
Washington, DC 20554

Charles Bolle
South Dakota Public Utilities Commission
State Capitol, 500 E. Capitol St.
Pierre, SD 57501-5070

The Honorable Susan Ness, Commissioner
Federal Communications Commission
1919 M St., NW -- Rm. 832
Washington, DC 20554

Deonne Bruning
Nebraska Public Utilities Commission
300 The Atrium
1200 N St.
P.O. Box 94927
Lincoln, NE 68509-4927

The Honorable Julia Johnson, Commissioner
Florida Public Service Commission
Gerald Gunter Bldg.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

James Casserly
Federal Communications Commission
Office of Commissioner Ness
1919 M St., Rm. 832
Washington, DC 20554

The Honorable Sharon L. Nelson, Chairman
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Bryan Clopton
Federal Communications Commission
2100 M St., NW, Rm. 8615
Washington, DC 20554

The Honorable Laska Schoenfelder, Commissioner
South Dakota Public Utilities Commission
State Capitol, 500 E. Capitol St.
Pierre, SD 57501-5070

Rowland L. Curry
Texas Public Utility Commission
1701 N. Congress Avenue
Austin, TX 78701

Martha S. Hogerty
Public Counsel for the State of Missouri
P.O. Box 7800
Jefferson City, MO 65102

Irene Flannery
Federal Communications Commission
2100 M St., NW, Rm. 8922
Washington, DC 20554

Paul E. Pederson, State Staff Chair
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Kathleen Franco
Federal Communications Commission
Office of Commissioner Chong
1919 M St., NW, Rm. 844
Washington, DC 20554

Tom Boasberg
Federal Communications Commission
Office of Chairman
1919 M St., NW, Rm. 814
Washington, DC 20554

Emily Hoffnar
Federal Communications Commission
2100 M St., NW, Rm. 8623
Washington, DC 20554

L. Charles Keller
Federal Communications Commission
2100 M St., NW, Rm. 8918
Washington, DC 20554

Lori Kenyon
Alaska Public Utilities Commission
1016 W. Sixth Ave., Suite 400
Anchorage, AK 99501

Debra M. Kriete
Pennsylvania Public Utilities Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Diane Law
Federal Communications Commission
2100 M St., NW, Room 8920
Washington, DC 20554

Mark Long
Florida Public Service Commission
Gerald Gunter Bldg.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Robert Loube
Federal Communications Commission
2100 M St., NW, Rm. 8914
Washington, DC 20554

Sandra Makeeff
Iowa Utilities Board
Lucas State Office Bldg.
Des Moines, IA 50319

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Michael A. McRae
D.C. Office of the People's Counsel
1133 15th St., NW -- Suite 500
Washington, DC 20005

Tejal Mehta
Federal Communications Commission
2100 M St, NW, Rm. 8625
Washington, DC 20554

Mark Nadel
Federal Communications Commission
2100 M St., NW, Rm. 8916
Washington, DC 20554

Lee Palagyi
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Dr., SW
Olympia, WA 98504

Kimberly Parker
Federal Communications Commission
2100 M St., NW, Rm. 8609
Washington, DC 20554

Barry Payne
Indiana Office of the Consumer Counsel
100 N. Senate Ave., Rm. N501
Indianapolis, IN 46204-2208

Jeanine Poltronieri
Federal Communications Commission
2100 M St., NW, Rm. 8924
Washington, DC 20554

James Bradford Ramsay
National Assn. of Regulatory Utility Commissioners
P.O. Box 684
Washington, DC 20044-0684

Brian Roberts
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Gary Seigel
Federal Communications Commission
2000 L St., NW, Suite 812
Washington, DC 20554

Richard Smith
Federal Communications Commission
2100 M St., Rm. 8605
Washington, DC 20554

Lori Wright
Federal Communications Commission
2100 M St., NW, Rm. 8603
Washington, DC 20554

James S. Blaszak
Kevin S. DiLallo
Janine F. Goodman
Levine, Blaszak, Block &
Boothby, LLP
Suite 500
1300 Connecticut Ave., NW
Washington, DC 20036
Attorneys for
Ad Hoc
Telecommunications
Users Committee

Kathleen Q. Abernathy
David A. Gross
AirTouch Communications,
Inc.
1818 N Street, NW
Washington, DC 20036

Charles D. Cosson
Lynn Van Housen
AirTouch Communications,
Inc.
29th Floor
One California Street,
San Francisco, CA 94111

Alyce A. Hanley
Alaska Public Utilities
Commission
Suite 300
1016 W. Sixth Ave.
Anchorage, Alaska 99501

Barbara O'Connor
Donald Vial
Allen S. Hammond
Alliance for Public
Technology
Suite 230
901 15th St., NW
Washington, DC 20005

Carolyn C. Hill
ALLTEL Telephone Services
Corporation
Suite 220
655 15th Street, NW
Washington, DC 20005

R. Bruce Hunter
American Association of
Educational Service
Agencies
1801 North Moore Street
Arlington, VA 22209

Wayne V. Black
C. Douglas Jarrett
Susan M. Hafeli
Keller & Heckman LLP
Suite 500 West
1001 G Street, NW
Washington, DC 20037
Attorneys for
American Petroleum
Institute

Albert H. Kramer
Robert F. Aldrich
Dickstein Shapiro Morin
& Oshinsky LLP
2101 L Street, NW
Washington, DC 20037
Attorneys for American
Public Communications
Council

Bruce D. Jacobs
Glenn S. Richards
Stephen J. Berman
Fisher Wayland Cooper
Leader & Zaragoza LLP
Suite 400
2001 Pennsylvania Ave. NW
Washington, DC 20006
Attorneys for
AMSC Subsidiary Corp.

Lon C. Levin
AMSC Subsidiary Corp.
10802 Parkridge Blvd.
Reston, VA 22091

Arthur H. Stuenkel
Arkansas Public Service
Commission
1000 Center Street
P.O. Box 400
Little Rock, AR 72203

Kevin Taglang
Benton Foundation
1634 Eye St., NW
Washington, DC 20006
Ellis Jacobs
Council for the
Edgemont Neighborhood
Coalition

Legal Aid Society of Dayton
Suite 500
333 West First St.
Dayton, OH 45402

Michael F. Altschul
Randall S. Coleman
Cellular Telecommunications
Industry Association
Suite 200
1250 Connecticut Ave., NW
Washington, DC 20036

Raul R. Rodriguez
David S. Keir
Leventhal, Senter &
Lerman P.L.L.C.
Suite 600
Washington, DC 20554
Attorneys for
Columbia Communications
Corporation

Leonard J. Kennedy
Laura H. Phillips
Christopher D. Libertelli
Dow, Lohnes & Albertson,
PLLC
Suite 800
1200 New Hampshire Ave., NW
Washington, DC 20036
Attorneys for
Comcast Cellular
Communications, Inc.

Raymond G. Bender, Jr.
J. G. Harrington
Dow, Lohnes & Albertson,
PPLC
Suite 800
1200 New Hampshire Ave., NW
Washington, DC 20036
Attorneys for
Vanguard Cellular
Systems, Inc.

Paul J. Berman
Alane C. Weixel
Covington & Burling
1201 Pennsylvania Ave., NW
Washington, DC 20044
Attorneys for
Fidelity Telephone Co.

Michael H. Olenick
Margaret O'Sullivan Parker
Florida Department of
Education
The Capitol, Suite 1701
325 W. Gaines Street
Tallahassee, Florida 32399

Linda Nelson
Florida Department of
Management Services
4050 Esplanade Way
Tallahassee, FL 32099

Cynthia B. Miller
Florida Public Service
Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Peter A. Rohrback
David L. Sieradzki
Hogan & Hartson, L.L.P.
555 Thirteenth St., NW
Washington, DC 20004
Attorneys for
GE American
Communications, Inc.

Kathy L. Shobert
General Communications,
Inc.
Suite 900
901 15th Street, NW
Washington, DC 20005

Paul Mason
Georgia Department of
Administrative Services
Suite 1402, West Tower
200 Piedmont Avenue
Atlanta, Georgia 30334

Kenneth T. Burchett
GVNW Inc./Management
Suite 100
7125 SW Hampton Street
Tigard, OR 97223

Jonathan Jacob Nadler
Squire, Sanders & Dempsey,
L.L.P.
1201 Pennsylvania, Ave., NW
Box 407
Washington, DC 20044
Attorneys for Information
Technology Association of
America

Kenneth D. Salomon
J. G. Harrington
Dow, Lohnes & Albertson,
PPLC
Suite 800
1200 New Hampshire Ave., NW
Washington, DC 20036
Attorneys for
Iowa Telecommunications
and Technology
Commission

David A. Irwin
Tara S. Becht
Irwin, Campbell &
Tannenwald, P.C.
Suite 200
1730 Rhode Island Ave., NW
Washington, DC 20036
Attorneys for ITCs, Inc.

Timothy E. McKee
Susan M. Seltsam
John Wine
Marianne Deagle
Kansas Corporation
Commission
1500 SW Arrowhead Road
Topeka, KS 66604

Mary J. Sisak
Mary L. Brown
MCI Telecommunications
Corporation
1801 Pennsylvania Ave., NW
Washington, DC 20006

Jim Gay
National Association of
State Telecommunications
Directors
c/o The Council of State
Governments
Iron Works Pike
P.O. Box 11910
Lexington, KY 40578

Blossom A. Peretz
Heikki Leesment
Lawanda R. Gilbert
New Jersey Division of the
Ratepayer Advocate
31 Clinton Street
P.O. Box 46005
Newark, NJ 07101

Susan Lehman Keitel
New York Library
Association
252 Hudson Avenue
Albany, NY 12210

Leonard J. Kennedy
Charles M. Oliver
Dow, Lohnes & Albertson,
P.L.L.C.
1200 New Hampshire Ave., NW
Washington, DC 20036
Attorneys for
Nextel Communications,
Inc.

Frederick M. Joyce
Ronald E. Quirk, Jr.
Joyce & Jacobs, L.L.P.
1019 19th Street, PH-2
Washington, DC 20036
Attorneys for
Ozark Telecom, Inc.

Maureen A. Scott
Frank B. Wilmarth
John F. Povilaitis
Pennsylvania Public
Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

Robert L. Hoggarth
Angela E. Giancarlo
Personal Communications
Industry Association
Suite 700
500 Montgomery Street
Alexandria, VA 22314

Jerome K. Blask
Daniel E. Smith
Gurman, Blask & Freedman
Suite 500
1400 16th Street, NW
Washington, DC 20036
Attorneys for ProNet,
Inc.

Joe D. Edge
Tina M. Pidgeon
Drinker, Biddle &
Reath, LLP
Suite 900
901 15th Street, NW
Washington, DC 20005
Attorneys for
Puerto Rico Telephone
Company

Margot Smiley Humphrey
Koteen & Naffalin, LLP
Suite 1000
1150 Connecticut Ave. NW
Washington, DC 20036
Attorneys for The Rural
Telephone Coalition (NRTA)

David Cosson
L. Marie Guillory
Pamela Fusting
Scott Reiter
2626 Pennsylvania Ave., NW
Washington, DC 20037
Attorneys for The Rural
Telephone Coalition (NTCA)

Lisa M. Zaina
Stuart Polikoff
Suite 700
21 Dupont Circle, NW
Washington, DC 20036
Attorneys for The Rural
Telephone Coalition (OPASTCO)

Sandra-Ann Y.H. Wong
Sandwich Isles
Communications, Inc.
Pauahi Tower, Suite 2750
1001 Bishop Street
Honolulu, Hawaii 96813

Leon M. Kestenbaum
Jay C. Keithley
Norina T. Moy
Sprint Corporation
Suite 1110
1850 M St., NW
Washington, DC 20036

Cheryl A. Tritt
Charles H. Kennedy
Morrison & Foerster, LLP
Suite 5500
2000 Pennsylvania Ave., NW
Washington, DC 20006
Attorneys for
Sprint Spectrum L.P.

David Higginbotham
Teletouch Licenses, Inc.
P.O. Box 7370
Tyler, TX 75711

Pat Wood, III
Robert W. Gee
Judy Walsh
Public Utility Commission
of Texas
1701 N. Congress Ave.
P.O. Box 13326
Austin, Texas 78711

David R. Poe
Catherine P. McCarthy
LeBoeuf, Lamb, Greene &
MacRae, LLP
Suite 1200
1875 Connecticut Ave., NW
Washington, DC 20009
Attorneys for Time Warner
Communications Holdings, Inc.

Lori Anne Dolqueist
Angela J. Campbell
Institute for Public
Representation
Georgetown University
Law Center
600 New Jersey Ave., NW
Washington, DC 20001

Catherine Grincewich
United States Catholic
Conference
3211 4th Street, NW
Washington, DC 20017

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

*Steve Hamlen
United Utilities, Inc.

Robert B. McKenna
John L. Traylor
US WEST, Inc.
Suite 700
1020 19th St. NW
Washington, DC 20036

Elisabeth H. Ross
Birch, Horton, Bittner and
Cherot
Suite 1200
1155 Connecticut Ave., NW
Washington, DC 20036
Attorneys for
The Vermont Public
Service Board and
The Vermont Department
of Public Service

David W. Danner
Washington State Department
of Information Services
P.O. Box 42445
Olympia, WA 98504

Benjamin H. Dickens, Jr.
Gerard J. Duffy
Blooston, Mordkofsky,
Jackson & Dickens
2120 L Street, NW
Washington, DC 20037
Attorneys for
Western Alliance

Carol S. Verosky
Wyoming Public Service
Commission
Capitol Building
Cheyenne, Wyoming 82002

*Unable to serve.