

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of
Access Reform Tariff Filings

REPLY OF CENTURY TELEPHONE OF WISCONSIN, INC.

Century Telephone of Wisconsin, Inc. (Century) hereby replies to the December 23, 1997, AT&T Corp. ("AT&T") petition, in the above captioned matter.¹ AT&T has not demonstrated that Century's tariff filing should be suspended.² Accordingly, the Commission should dismiss the AT&T petition and permit Century's Tariff to become effective on January 1, 1998 as filed.

AT&T incorrectly alleges that Century relied upon incorrect cost data to justify its tariff filing.³ Contrary to AT&T's claim, no new cost of service study was required

¹ See In the Matter of Access Reform Tariff Filings, Petition of AT&T Corp. on Rate-of-Return LEC Tariff Filings, filed December 23, 1997 ("AT&T Petition"). This reply is filed pursuant to the directives of the Federal Communications Commission ("Commission"). See In the Matter of Support Material For Carriers to File to Implement Access Charge Reform Effective January 1, 1998, Order, DA 97-2358, released November 7, 1997, Attachment 3.

² See Century Telephone of Wisconsin, Inc., Transmittal No. 9, filed December 17, 1997.

³ AT&T Petition at 6-7.

since the Tariff filing was a compliance filing to reallocate the costs that support Century's existing Interstate access rates.

As indicated in its Description and Justification, included with its Tariff, Century appropriately relied upon the cost of service study which supported the establishment of its existing Interstate access rates.⁴ In a manner consistent with the Commission's access charge restructure decisions, i.e., the Commission's First Report and Order, Order on Reconsideration, and Second Order on Reconsideration and Memorandum Opinion and Order issued in its Access Charge Reform proceeding (CC Docket Nos. 96-262, 94-1, 91-213 and 95-72), Century made its compliance filing by reallocating costs among the various access rate elements. The rate making methodology utilized by Century was fully explained in, and all necessary data was provided with, the Century Tariff filing. This information fully justified the Tariff and the revised rates contained therein.

⁴ In accordance with Section 69.3(a) of the Commission's Rules, which states that a tariff for access service shall be filed for a two-year period, Century exercised its option regarding a biennial period access tariff filing and chose not to make an annual access filing for 1997.

CONCLUSION

AT&T has failed to make any showing to justify the suspension and investigation of Century's Tariff filing. Accordingly, Century respectfully requests that the Commission dismiss the AT&T Petition and permit Century's Tariff to become effective on January 1, 1998 as filed.

Respectfully submitted,

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December 29, 1997

CERTIFICATE OF SERVICE

I, Colleen von Hollen, do hereby certify that on this 29th day of December, 1997, a copy of the foregoing Reply of Century Telephone of Wisconsin, Inc. was hand-delivered to the following parties:

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