DOCKET FILE COPY ORIGINAL

RECEIVED

DEC 29 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

In the Matter of	ALLTEL Telephone System Tariff
Access Reform Tariff Filings	F.C.C. No. 1, Transmittal Nos. 58 and 59.

97-249
97-250

ALLTEL TELEPHONE SERVICES CORPORATION'S
REPLY TO AT&T'S PETITION TO SUSPEND

ALLTEL Telephone Services Corporation, on behalf of the ALLTEL telephone companies identified in Transmittals 58 and 59[1] filed on December 17, 1997 and December 24, 1997, respectively (hereinafter referred to as "ALLTEL" or the "ALLTEL companies") submits this reply to the petition of AT&T.

AT&T's petition on the rate-of-return companies' access reform tariff filings was apparently submitted to the FCC on December 23, 1997, but it was not served on the ALLTEL companies at that time. ALLTEL only discovered that the petition had been filed after contacting the Commission's staff. With respect to the petition itself, while there was a request in the body of the petition that ALLTEL's filing should be suspended, the transmittal number (number 58) was not cited either in the text or on the list of parties served. On the afternoon of December 24th, ALLTEL received service of the pleading via facsimile. Based on this, ALLTEL believes that AT&T's petition was procedurally defective. Out of an abundance of caution, however, ALLTEL is responding to the issues raised in AT&T's petition so that there is not any misunderstanding as to ALLTEL's position that it has complied with the Commission's requirements regarding its access reform tariff filings.

[1] Transmittal 59 reflected final Universal Service Fund contribution factors which involve only Carrier Common Line rate development for the ALLTEL Georgia Communications Corp., and Georgia ALLTEL Telecom, Inc. companies.

can demonstrate in a more efficient and complete manner the reasonableness of the methods and results of cost studies." ALLTEL believes it has identified the impacts of the various changes ordered by the Commission in its D&J Section. AT&T has not questioned any of the charts included in the D&J orally or in a written request to ALLTEL. AT&T's main argument is not whether the changes made by ALLTEL were in accordance with the Commission's changes nor whether the changes made by ALLTEL appear incorrect. AT&T's primary intent appears to be an attempt to raise issues unrelated to this filing.

ALLTEL submits, based on the aforesaid, that AT&T's petition, as it relates to the ALLTEL companies, should be denied.

Respectfully submitted,

ALLTEL Telephone Services Corporation on behalf of the ALLTEL Telephone Companies:

Carolyn C. Hill

Carolyn C. Hill
655 15th Street Northwest, Suite 220
Washington, D.C. 20005
its Attorney

December 29, 1997

Certificate of Service

I, Carolyn C. Hill, hereby certify that copies of this reply have been served on December 29, 1997, by United States mail, postage prepaid, or by hand where indicated, or by facsimile on the following:

Judy A. Nitsche
Chief Competitive Pricing Branch
1919 M Street NW
Room 518
Washington, D.C. (via Hand)

Carl D. Wasserman
Attorney for AT&T
1722 I Street NW
Washington, D.C. 20006 (via US mail)

Yolanda Brooks
AT&T (via facsimile)

ITS
1231 20th Street NW
Washington, D.C.

Carolyn C. Hill

Carolyn C. Hill