prohibitively expensive for competitors to provide local service. One might note that local phone monopolies have sought as much as $187 to switch local service providers, while charging five dollars or less to switch a long-distance customer from one company to another.[14]

Bell Atlantic again seeks to distance itself from the rates set by state commissions and even from the rates it has proposed. However, it does not refute that these NRCs include inflated historical or embedded costs and/or costs that should appropriately be charged as recurring costs. As such, the ceiling for NRCs is often vastly inflated. Moreover, there is little reason to believe that Bell Atlantic will offer any rates lower than those it has received from the states. This fact was confirmed by Bell Atlantic in its October 9, 1997 letter to MCI in which Bell Atlantic states that it believes its recurring and non-recurring charges are based on adequate forward-looking economic costs and as such, are either approved or pending approval at the relevant state commissions. However, these charges are not based on cost nor were determined using TELRIC -- the pricing methodology the FCC has determined to be appropriate and required under the merger conditions.[15]

Bell Atlantic has proposed NRCs that would have a pernicious effect on competition. In New York, for example, Bell Atlantic proposed an NRC of $74.88 to order an unbundled network loop that is necessary to provide local service to a new customer. Bell Atlantic, however, charges a new residential customer only $55 to sign-up for local service. The $20 difference not only exploits consumers, but also give Bell Atlantic a large financial advantage over new entrants. Fortunately, on October 2, 1997, Administrative Law Judge (ALJ) Joel A. Linsider issued a Recommended Decision (ALJ Recommended Decision) in New York's cost proceeding which found Bell Atlantic's (the former Nynex's) proposed NRCs to be excessive

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[14] Pac Bell's NRC is $187 in California. In Bell Atlantic's region NRCs for switching local service range from $6.41 in Pennsylvania (for a non-premise visit) to $83.36 in Massachusetts.

[15] Letter from Jacob J. Goldberg, President, Bell Atlantic Telecom Industry Services, to Donald T. Lynch, Senior Vice President, Local Financial Operations, MCI (October 9, 1997).

and not sufficiently cost supported.[16] That decision recommended the reduction of reduced the proposed NRC for loop provisioning from $74.88 to $19.85.[17] At present, however, an interim NRC rate remains in effect until the commission can confirm the recommended decision.

Bell Atlantic also argues that, as a result of the merger conditions, it is committed to proposing an optional payment plan permitting carriers to pay for non-recurring charges in monthly recurring charges set at levels to recover the non-recurring amounts. Be that as it may, if NRCs are set well above economic cost, as they have been to date, optional payment plans that allow recovery of the non-recurring amounts will still ensure additional and undeserved revenues for the Incumbent Local Exchange Providers (ILECs). Misuse of optional payment plans does not eliminate the barriers to entry created by NRCs.

5. Access to OSS:

The Bells, including Bell Atlantic, are also engaged in a systematic effort to prevent new entrants from being able to serve their new customers well. Instead, they offer new entrants inferior ordering systems and they discriminate against consumers who are trying to switch local service providers by delaying orders and repairs, dropping features, and supplying misleading and often incorrect information. Yet, Bell Atlantic still claims that "processing orders from competitors is no sweat for Bell Atlantic's wholesale operations centers . . . ." and that "Bell Atlantic service representatives who facilitated [a recent stress test] trial already are beaming."[18]

This is cause for alarm. In fact, our experience with Bell Atlantic's OSS has been one of purposeful delay or incompetence on the part of Bell Atlantic.[19] During the time of their purported "stress test" in which according to them orders were processed "quickly and

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[16] ALJ Recommended Decision, Case No. 95-C-0657

[17] ALJ Recommended Decision at 95. With respect to NRCs for the loop, the ALJ found that Bell Atlantic overstated the costs of physically installing an unbundled loop. Bell Atlantic assumed an all copper/analog loop architecture at the same time that its recurring rates for Unbundled Network Elements (UNEs) are based on an all fiber/digital network thus depriving competitors of the expected cost efficiencies of electronic loop provisioning. With respect to OSS NRCs, the ALJ stated that Bell Atlantic failed to "present a comprehensive view of a forward-looking system. Instead of constructing a new, forward-looking system, it simply began with its existing processes and asked its personnel how these processes might change with increased mechanization."

[18] "Bell Atlantic Wholesale Centers Handle Load and Then Some." Bell Atlantic Press Release, October 9, 1997.

[19] See, for example, Letter from Lisa B. Smith, Senior Policy Counsel, MCI, to Regina Keeney, Chief, Common Carrier Bureau, August 21, 1997.

accurately," MCI systems experienced severely degraded performance and system outages up to 18 hours. Bell Atlantic has, in fact, admitted that their stress test caused these problems and that they were stress testing in their production environment because they could not adequately simulate the effects of stress testing in their test environment, which MCI is currently using.

This is not the first time MCI has had its systems put on hold by Bell Atlantic. As we detailed in a recent letter to the FCC in August, MCI was forced to completely halt resale in New York because the former Nynex's OSS was erroneously rejecting 90% of MCI's resale orders.[20]

Moreover, Bell Atlantic has not fulfilled its legal obligations with respect to parity or automation. In New York, it takes an MCI representative using the Graphical User Interface (GUI) an average of 8-13 minutes to verify a service address and obtain a telephone number and service delivery date, versus a Nynex representative who can provide the same information within an average of three minutes. Moreover, although the Bell Atlantic Chairman and CEO has touted an "84 percent flow-through rate and quick order confirmation," this is not adequate for the commercial marketplace. The bottom line: MCI, quite reasonably, chooses not to make it -- or its customers -- reliant on service delivery mechanisms that do not do the job.[21]

The FCC required every Bell, including Bell Atlantic, to put in place by January 1, 1997 fully automated OSS, capable of handling commercial volumes of transactions. At present, despite the fact that MCI sends orders to Bell Atlantic in New York through an electronic data feed, virtually every order must be handled manually by Bell Atlantic in that region. This manual intervention increases the order processing time and greatly increases the risk of errors made to the customer's account. MCI is also forced to receive confirmation orders by fax which frequently arrive four days after the date of the order. MCI's contract in New York requires Bell Atlantic to provide and acknowledge each and every MCI service order within one hour of receipt, and to process MCI service orders (or notify MCI of an error) within four hours of receipt of a service order from MCI.[22] In both cases, Bell Atlantic is failing to meet these obligations.

In addition, in its own territory, Bell Atlantic still does not have a completed Electronic Data Interchange (EDI) specification for resale and has provided incorrect EDI specifications to MCI. Bell Atlantic has indicated that MCI must begin using LSOG version 2 within the next couple of months and it has not provided MCI with those specifications either. Bell Atlantic

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[20] Letter from Lisa B. Smith, Senior Policy Counsel, MCI, to Regina Keeney, Chief, Common Carrier Bureau, September 4, 1997.

[21] We also take issue with Bell Atlantic's description of the total number of resale orders for MCI in New York.

[22] Attachment 8, NY Contract, sections 3.5.1.2 and 3.5.1.3.

systems are not functioning properly for migration orders, causing the customer to continue to be billed by Bell Atlantic for service beyond the date that the service has actually been migrated to MCI. Bell Atlantic still has yet to provide committed dates for implementing "flow-through" order processing.

Bell Atlantic contends that MCI has lagged behind competitors in using Bell Atlantic's electronic interfaces because it faxes orders rather than using the standard it asserts Bell Atlantic must meet. This is not the case. In the former Nynex territory, MCI is conducting resale via EDI, not fax. Unbundled network element (UNE) orders in the former Nynex region are being sent via fax, however, because of Bell Atlantic's delays and inability to implement EDI for UNEs. Bell Atlantic admitted in an August 1997 meeting that it had not funded EDI for UNEs for 1997. In fact, after the Bell Atlantic-Nynex merger, Bell Atlantic indicated that it will implement EDI for UNEs at some point in October of 1997.

6. Collocation:

Bell Atlantic and the other incumbents are making it difficult and expensive for new entrants to collocate equipment to provide competitive local services. That makes Bell Atlantic's public statements about collocation simply wrong. Overall, in the former Nynex region, Bell Atlantic has continuously delayed MCI's collocation applications despite Bell Atlantic's claims that it is responding to every collocation request made by MCI throughout the combined region.

For example, on September 24, 1996, MCI initiated a major project in the former Nynex region which has resulted in a total of 85 collocation applications being submitted by January 17, 1997. Despite assurances from Bell Atlantic that collocation is part of normal business and should not require special attention, the entire project has suffered from delays and foot-dragging. Eighteen of MCI's applications have been rejected due to space issues. Bell Atlantic has, nevertheless, failed to demonstrate these space constraints to the respective states as required under the Act. For another 18 of the applications, MCI received abnormally high cost estimates to complete the physical collocation. Bell Atlantic cited an estimate average for these collocations of $400,000 per physical collocation for the former Nynex region, while the previous physical collocation figure in New York was at a costly average of $108,000.[23]

In addition, Bell Atlantic has not responded to MCI's request that the collocation licensing agreements be superseded by the section 252 interconnection contracts. The delays in collocation implementation in New York led MCI to go to the New York Public Service Commission (NYPSC) in April. It was not until after that meeting between the NYPSC and the parties that physical collocation proceeded. Still further delays occurred in August 1997 which necessitated an executive level meeting for the two companies.

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[23] The cost in Boston, by contrast, is $42,500.

Since January 30, 1997, MCI has been compelled to request a virtual collocation solution from Bell Atlantic for the former Nynex region because of alleged space constraints and unreasonably high cost estimates to complete physical collocations, as discussed above. Bell Atlantic has repeatedly missed commitment dates and responses related to this request despite high level involvement from both companies. Finally, on August 29, 1997, seven months after its original request, MCI received the requested information.

Bell Atlantic has also refused and caused subsequent delays in the former Nynex region in providing leased transport to collocations as required under the New York contract and the Act.

Other unnecessary delays in the former Nynex region stem from claims by Bell Atlantic that forms were incorrectly filled out. Bell Atlantic never followed-up on those forms, however, thus forcing MCI to make inquiries on their status, resulting in greater delay.

7. Other Critical Issues

Bell Atlantic also has made a number of assertions regarding specific issues that MCI has brought to the attention of the FCC. Taken separately, these issues in and of themselves may seem episodic and trivial. Taken together, they are indicative of the persistent and systematic efforts by Bell Atlantic to delay competition in every way, and at every turn. It is important that we set the record straight on these issues.

-- Intellectual Property:

MCI and others have argued that certain incumbent LECs are refusing to provide access to unbundled network elements under the guise of protecting third party vendors' intellectual property rights.[24] If extensions of existing licenses are necessary to provide access to elements -- a proposition which is highly doubtful -- MCI has argued that the ILEC is in the best position to negotiate those extensions. If additional cost is incurred, that cost should <u>not</u> be passed directly to the competing LEC, as Bell Atlantic suggests, but should be incorporated into the TELRIC rate of the relevant element.

-- Number Portability:

Bell Atlantic is seeking to mislead the FCC on MCI's position with respect to number portability. Let us be clear: MCI's position is and always has been that all carriers, including the

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[24] <u>In the Matter of Petition of MCI for Declaratory Ruling that New Entrants Need Not Obtain Separate License or Right-to-Use Agreements Before Purchasing Unbundled Network Elements Under Section 251(c)(3) of the Telecommunications Act of 1996</u>, CC Docket No. 96-98 (filed March 11, 1997).

ILECs, should bear their own costs of implementing Local Number Portability (LNP). This is consistent with section 251(e) of the Act which states that the costs of LNP "shall be borne by all telecommunications carriers on a competitively neutral basis." It is not MCI's position, as Bell Atlantic seeks to assert in a letter to the FCC, that "MCI claims that, because number portability imposes an "enormous financial burden' on the industry, all 'LNP costs should be borne by the incumbents.'"[25] The real issue here is Bell Atlantic's desire to see new entrants not only pay our own costs for LNP, but also be forced to pay Bell Atlantic's costs for upgrades to their own systems to accommodate LNP.

-- Billing and Collections (B&C):

Bell Atlantic must not be allowed to provide in-region long-distance services simultaneously with the ability to abuse its market power in the B&C arena. Bell Atlantic's assertion is incorrect that the Commission's detariffing order of over a decade ago proves that B&C services for non-subscribed or "casual" Interexchange Carrier (IXC) services are competitive. In that order, the Commission addressed pre-subscribed services only. Thus, the Commission's determination that B&C services are not competitive is irrelevant for purposes of MCI's petition for rule making, which deals only with non-subscribed services.

Bell Atlantic also claims that B&C for non-subscribed services has "grown more competitive." Nothing could be further from the truth. The lack of competition in the market for B&C for non-subscribed services is illustrated by the fact that the RBOCs control approximately 74% of the market, and other ILECs retain virtual dominance with respect to the remainder of the market.

-- Directory Assistance (DA):

Bell Atlantic asserts that nondiscriminatory access to DA under the Act does not require them to "turn over" and continually update their DA databases. In point of fact, the Act requires nothing less than that. Unless Bell Atlantic provides competitors with access to DA databases and with daily updates, new entrants cannot possibly provide competitive directory assistance service. Bell Atlantic's interpretation of nondiscriminatory access to DA frustrates the purpose of the Act because without these updates a competitor's DA database would be neither comprehensive nor timely.

In Virginia, MCI was awarded access to Bell Atlantic's DA database by the state commission, consistent with the Act. Bell Atlantic has, in effect, ignored that arbitration award and the law by refusing to give MCI access to the DA database in a timely manner, and has refused to provide key data in the DA database, such as unlisted entries and non-published

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[25] Letter from Thomas Tauke and Edward Young, 3rd to the Honorable Reed E. Hundt, Chairman, Federal Communications Commission, September 10, 1997.

indicators. Bell Atlantic has also attempted to create use restrictions on the databases that are inconsistent with the Virginia arbitration award and the Act itself. Additionally, Bell Atlantic has refused to provide the database until all independent LECs agree to let their data be sent to MCI, contrary to the Virginia order. MCI has not yet received the data, even after the Virginia contract with Bell Atlantic became effective and after several meetings with Bell Atlantic and the Virginia Commission.

-- Single LATA states:

On September 15, the United States District Court for the District of Delaware affirmed the Delaware state commission's authority under the Act to order Bell Atlantic to implement intraLATA toll presubscription this fall. Bell Atlantic had argued that Delaware was not a single LATA state within the meaning of section 271, and thus, the state commission could not order Bell Atlantic to implement presubscription prior to Bell Atlantic's receipt of authorization to provide in-region long-distance services to its customers. Interestingly, in reaching the conclusion that Delaware was a single LATA state, the Court relied on several documents in which Bell Atlantic itself had repeatedly taken the position before the state commission that Delaware was a single LATA state.

Attachment A

COMPARISON OF 1996 FINANCIAL RESULTS

MAJOR LECs	TOTAL REVENUE	NET INCOME	NET/ REVENUE	EBIT
NYNEX	$ 13.5 billion	$ 1.5 billion	11.1%	37.
Ameritech	$ 14.9 billion	$ 2.1 billion	14.1%	39.
SBC Communications	$ 13.9 billion	$ 2.9 billion	20.9%	30.
Pacific Telesis	$ 9.6 billion	$ 1.1 billion	11.5%	38.
Bell South	$ 19.0 billion	$ 4.8 billion	25.3%	44.
Bell Atlantic	$ 13.1 billion	$ 1.9 billion	14.5%	42.
US West	$ 10.1 billion	$ 1.2 billion	11.9%	44.
GTE	$ 21.3 billion	$ 2.8 billion	13.2%	43
TOTAL	**$115.4 billion**	**$18.3 billion**	**15.9%**	**40.**
MAJOR IXCs	**TOTAL REVENUE**	**NET INCOME**	**NET/ REVENUE**	**EBI**
MCI	$ 18.5 billion	$ 1.2 billion	6.5%	21
AT&T	$ 52.2 billion	$ 5.9 billion	11.3%	22
Sprint	$ 14.0 billion	$ 1.2 billion	8.5%	28
TOTAL	**$ 84.8 billion**	**$ 8.3 billion**	**9.8%**	**23**

COMPARISON OF RBOC VS. IXC FINANCIALS FOR FIRST HALF OF 1997

RBOC	NET INCOME	NET MARGIN	EBITDA	MARGIN
Ameritech	7,845	1,073	13.7%	39.5%
Bell/NYNEX	15,124	1,595	10.5%	39.9%
BellSouth	9,768	1,347	13.8%	46.2%
SBC/PAC	11,927	70	0.6%	28.2%
US West	5,130	671	13.1%	45.2%
GTE	10,973	1,336	12.2%	42.7%
AT&T	26,221	2,085	8.0%	20.3%
MCI	9,726	575	5.9%	21.3%
Sprint	7,268	546	7.5%	27.9%

***SBC took a one-time charge of $1.6 billion 2Q97. Normalized net income margin would be 13.5% and EBITDA margin would be 41.5%.**

COMPARISON OF ANNUAL INVESTMENT AS A PERCENTAGE OF CASHFLOW

	RBOC AVERAGE	MCI
1996		
1995	64.09%	154.42%
1994	66.82%	141.55%
1993	64.48%	111.66%
1992	69.74%	85.83%
1991	71.46%	103.77%
Average	**67.32%**	**119.45%**

Source: SEC Data

COMPARISON OF NET NEW INVESTMENT

	BELL ATLANTIC		MCI	
	CAP. EX.	NET	CAP. EX.	NET
1994	5,650	359	2,897	1,784
1995	6,269	943	2,866	1,558
1996	6,393	1,014	3,389	1,725
1H97	3,075	340	1,677	745

Source: SEC Data

COMPARISON OF BELL ATLANTIC DOMESTIC AND FOREIGN INVESTMENT

	NET NEW DOMESTIC	FOREIGN
1995	943	22
1996	1,014	633
1H97	340	519

CERTIFICATE OF SERVICE

I, Sylvia Chukwuocha, do hereby certify that the foregoing Comments were served this 27th day of March, 1998, by first-class mail, postage prepaid, on the parties listed below:

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