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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 2, 1998

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Tariffs Implementing Access Charge Reform, CC Docket No. 97-250

Dear Ms. Salas:

Pursuant to the Commission's March 25, 1998 Public Notice (DA 98-571), AT&T Corp. ("AT&T") submits this letter to comment briefly on the numerous revisions to their access charge reform tariffs that have been filed since late January by local exchange carriers ("LECs"), and which are itemized in Appendix A to the Commission's Public Notice.

As the Public Notice recognizes, the tariff filings listed by the Commission generally raise the same substantive issues of lawfulness that the Commission is already investigating in CC Docket No. 97-250.¹ Indeed, AT&T has already noted the deficiencies of some of the LECs' recent tariff revisions in its comments on the LECs' direct cases in that proceeding.² A number of the

¹ See Tariffs Implementing Access Charge Reform, 13 FCC Rcd 163 (1997) ("Access Charge Reform Suspension Order"); Tariffs Implementing Access Charge Reform, CC Docket No. 97-250, Order Designating Issues for Investigation and Order on Reconsideration, DA 98-151, released January 28, 1998 ("Access Charge Reform Tariffs Designation Order").

² See AT&T Corp. Comments on Direct Cases filed March 16, 1998 in Tariffs Implementing Access Charge Reform, CC Docket No. 97-250, pp. 19-20 & n.33 (addressing

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tariff revisions have already been briefly suspended by the Commission and incorporated into the pending investigation.³

Therefore, to the extent that it has not already done so, the Commission should incorporate the remaining tariff filings into its investigation of the LECs' implementation of their access reform obligations. The Commission should also incorporate into the record of the investigation all petitions filed with respect to the individual tariff filings itemized in Attachment A to the Public Notice.

Respectfully submitted,

Peter H. Jacoby /ha

cc: All counsel of record in CC Docket No. 97-250

(Footnote continued from preceding page)

Bell Atlantic Transmittal No. 1033, filed March 3, 1998, and NYNEX Telephone Companies Transmittal No. 488).

³ See Ameritech (Transmittal No. 1146), Memorandum Opinion and Order, DA 98-590 (Com. Car. Bur., March 31, 1998); U S WEST Communications, Inc. (Transmittal No. 900), Memorandum Opinion and Order, DA 98-567 (Com. Car. Bur., March 27, 1998); Citizens Telecommunications Companies (Transmittal No. 47), Memorandum Opinion and Order, DA 98-566 (Com. Car. Bur., March 27, 1998); Bell Atlantic Telephone Companies (Transmittal No. 1033), Memorandum Opinion and Order, DA 98-519 (Com. Car. Bur., March 17, 1998); NYNEX Telephone Companies (Transmittal No. 488), Memorandum Opinion and Order, DA 98-524 (Com. Car. Bur. March 17, 1998); BellSouth Telecommunications, Inc. (Transmittal No. 446), Memorandum Opinion and Order, DA 98-491 (Com. Car. Bur., March 13, 1998); NYNEX Telephone Companies (Transmittal No. 481), Memorandum Opinion and Order, DA 98-233 (Com. Car. Bur., February 11, 1998); The Southern New England Telephone Company (Transmittal No. 707), Memorandum Opinion and Order, DA 98-232 (Com. Car. Bur., February 9, 1998); GTE System Telephone Companies and GTE Telephone Operating Companies (Transmittal Nos. 232 and 1131), Memorandum Opinion and Order, DA 98-226 (Com. Car. Bur., February 5, 1998).