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

APR 22 1998

In the Matter of:

Petition of LCI International Telecom Corp.
for Declaratory Ruling Concerning Bell
Operating Company Entry into In-Region
Long Distance Markets

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) CC Docket No. 98-5
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TO: The Commission:

REPLY COMMENTS OF CAMPAIGN FOR TELECOMMUNICATIONS ACCESS

David J. Newburger
Newburger & Vossmeier
Counsel for Campaign for
Telecommunications Access
One Metropolitan Square, Suite 2400
St. Louis, Missouri 63102
Voice/TDD: 314/436-4300
Telecopier: 314/436-9636

April 21, 1998

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Reply Comments

As the Commission will recall, the Campaign for Telecommunications Access (the Campaign) is composed of Aging Forum, Inc., College for Living, Missouri Alliance of Area Agencies on Aging, Missouri Association for the Deaf, Missouri Council of the Blind, National Silver Haired Congress, Presidents' Club for Telecommunications Justice, and St. Louis's independent living center, Paraquad.

The participants in the Campaign are leaders and organizations that are substantially run, respectively, by older adults and people with disabilities and devoted to ensuring that older adults and people with disabilities--and all citizens for that matter--have the opportunity to live independent, productive lives and have the accommodations that allow them to be as fully integrated into the community as possible. The Campaign works to assure that new telecommunications technologies will be available to, usable by, and affordable for all citizens, regardless of where they live and regardless of what disability or other condition they may have that is a barrier to their using some kinds of equipment.

As we have said, telephones today help the Campaign's constituents live those independent and productive lives. Future telecommunications technology foretells even greater promise. Many of the problems people with disabilities and older adults face with obtaining education, transportation, jobs, health care, and other services will be assuaged or eliminated by the advanced telecommunications technologies that Congress encouraged in enacting the Act.

So, the Campaign's major goal is to ensure present and new technologies be available to everybody. As we put it in the opening comments,

the Campaign's foremost concern in the telecommunications re-regulation that has gone on over the past several years is this: Does each proposal guarantee that advanced technologies will reach, and current technologies will continue to reach, our constituents--geographically, technologically, and affordably--even though our constituents are spread all over America?

One amazing--from the Campaign's perspective--and patently obvious fact emerges when reviewing the comments: No supporter of the LCI petition makes any suggestion of how the proposal would protect the Campaign's constituents' legitimate interests. Indeed, several of the commenters would push the LCI proposal in a direction that would even further threaten the continued maintenance and investment in networks that will bring present and new telecommunications technologies to everybody.

Is it, then, legitimate to ignore the Campaign's constituents' interests? Of course not. There are indubitably legitimate interests in telecommunications competition that the Commission does and should recognize. But that does not eliminate the right of people with disabilities, older adults, and the rest of society to continue to have the vibrant networks that work today and to participate in the advanced technologies that are promised for tomorrow. The LCI proposal hinders that right.

The goals of competition and universal participation are not completely compatible. Where they conflict, the Commission should be balancing the respective interests for the overall good of society. Traditionally, that has been a fundamental role of independent regulatory agencies.

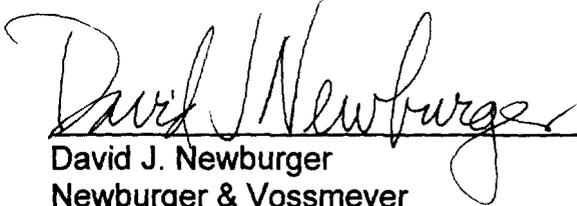
The Commission should not and must not, however, eschew the interests of a group like the Campaign's constituents in order to implement an ideology of some interest group. And most certainly it should not do so when that interest group's main motive is merely the mercenary goal of obtaining profits by growing that group's constituents' market share--the obvious goal of LCI in this petition.

As the Campaign demonstrates here and in their main comments, the Commission should reject the LCI petition for three reasons: The proposal would prohibit some opportunities for introducing advanced technologies. The proposal would add further burdens to already existing disincentives to bringing affordable and usable new technologies to people with disabilities and older adults wherever they live and would foster a decline in service using existing technologies. The proposal has the effect of being a charade that would divert Commission and state commission resources from the work already going on to reconfigure the industry.

Conclusion

For the reasons stated here and in its original comments, the Campaign suggests that it appears that the LCI proposal would work against the interests of older adults, people with disabilities, and many other Americans who do not happen to have the luxury of being richly placed in the telecommunications networks. Therefore, the Campaign respectfully suggests the Commission should reject the proposal.

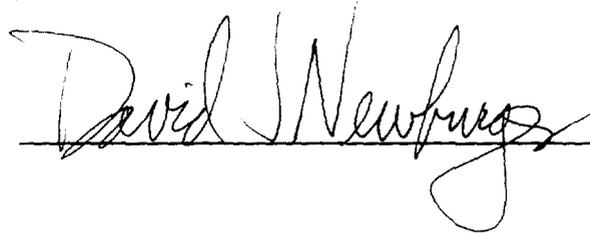
Respectfully submitted,



David J. Newburger
Newburger & Vossmeier
Counsel for Campaign for
Telecommunications Access
One Metropolitan Square, Suite 2400
St. Louis, Missouri 63102
Voice/TDD: 314/436-4300
Telecopier: 314/436-9636

Certificate of Service

I certify that I have served the Reply Comments of Campaign for Telecommunications Access by U.S. Mail, first class and postage prepaid, to the persons listed on the attached Service List this 21st day of April, 1998.



JANICE M MYLES
COMMON CARRIER BUREAU
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW, ROOM 544
WASHINGTON DC 20554

STATE OF NEW JERSEY
DIVISION OF THE RATEPAYER ADVOCATE
BLOSSOM A PERETZ
CHRISTOPHER J WHITE
31 CLINTON STREET 11TH FLOOR
NEWARK NEW JERSEY 07101

R MORRIS
FORMER VP GOVERNMENT AFFAIRS US ONE
C/O 1320 OLD CHAIN BRIDGE ROAD SUITE 350
MCLEAN VIRGINIA 22101

KEITH MAYDAK
BOX 905
RAY BROOK NY 12977

CHRISTOPHER J WHITE
DEPUTY ASSISTANT RATEPAYER ADVOCATE
31 CLINTON STREET 11TH FLOOR
NEWARK NEW JERSEY 07101

GENE W LAFITTE STAFF COUNSEL
CONSUMER ADVOCATE DIVISION OF THE
PUBLIC SERVICE COMMISSION OF WEST
VIRGINIA
700 UNION BUILDING
CHARLESTON WEST VIRGINIA

AMES S BLASZAK
EVINE BLASZAK BLOCK & BOOTHBY LLP
1001 L STREET NW
SUITE 900
WASHINGTON DC 20036

JOHN T LENAHAN
LARRY A PECK
COUNSEL FOR AMERITECH
ROOM 4H86
2000 WEST AMERITECH CENTER DRIVE
HOFFMAN ESTATES IL 60196-1025

MARK C ROSENBLUM
LEONARD J CLIFTON
RICHARD H RUBIN
ATTORNEYS AT LAW
SUITE 325213
15 NORTH MAPLE AVENUE
SPRING RIDGE NJ 07920

JAMES G PACHULSKI
1320 NORTH COURT HOUSE ROAD
EIGHTH FLOOR
ARLINGTON VIRGINIA 22201

MICHAEL K KELLOGG
AUSTIN C SCHLICK
KELLOGG HUBER HANSEN
TODD & EVANS P L L C
1301 K STREET N W
SUITE 1000 WEST
WASHINGTON D C 20005

DANNY E ADAMS
PETER A BATAKAN
KELLEY DRYE & WARREN LLP
1200 NINETEENTH STREET N W
SUITE 500
WASHINGTON D C 20036

DAVID J NEWBURGER
NEWBURGER & VOSSMEYER
COUNSEL FOR CAMPAIGN FOR
TELECOMMUNICATIONS ACCESS
ONE METROPOLITAN SQUARE SUITE 2400
ST LOUIS MISSOURI 63102

COMPETITION POLICY INSITUTE
RONALD J BINZ PRESIDENT
DEBRA BERLYN EXECUTIVE DIRECTOR
JOHN WINDHAUSEN JR GENERAL COUNSEL
1156 15TH STREET N W SUITE 310
WASHINGTON D C 20005

GENEVIEVE MORELLI
EXECUTIVE V P AND GENERAL COUNSEL
THE COMPETITIVE TELECOMMUNICATIONS
ASSOCIATION
1900 M STREET N W SUITE 800
WASHINGTON D C 20036

ROBERT J AAMOTH
STEVEN A AUGUSTINO
KELLEY DRYE & WARREN LLP
1200 NINETEENTH STREET N W SUITE 500
WASHINGTON D C 20036

OFFICE OF SECRETARY
FEDERAL COMMUNUCATIONS COMMISSION
1919 M STREET N W
WASHINGTON D C 20554

ROBERT J AAMOTH
STEVEN A AUGUSTINO
KELLEY DRYE & WARREN LLP
1200 NINETEENTH STREET N W SUITE 500
WASHINGTON D C 20036

DARA FRIX
OATHAN D DRALUCK
WIDLER & BERLIN CHARTERED
000 K STREET N W SUITE 300
VASHINGTON D C 20007

ALBERT H KRAMER
ROBERT F ALDRICH
VALERIE M FURMAN
CHRISTOPHER T MCGOWAN
& OSHINSKY LLP
2101 L STREET N W
WASHINGTON D C 20037-1526

SWILDER & BERLIN CHARTERED
3000 K STREET N W
SUITE 300
WASHINGTON D C 20007

PETER A ROHRBACH
LINDA L OLIVER
HOGAN & HARTSON L L P
COLUMBIA SQUARE
555 THIRTEENTH STREET NW
WASHINGTON DC 20004

ROCKY N UNRUH
MORGENSTEIN & JUBELIRER
ONE MARKET
SPEAR STREET TOWER 32ND FLOOR
SAN FRANCISCO CA 94105

EUGENE D COHEN
326 WEST GRANADA ROAD
PHOENIX, AZ 85003

TERRENCE J FERFUSON
SENIOR VICE PRESIDENT AND GENERAL
COUNSEL
LEVEL 3 COMMUNICATIONS INC
555 FARNAM STREET
OMAHA NEBRASKA 68131

AMY G ZIRKLE
KECIA BONEY
FRANK KROGH
LISA R YOUNGERS
LISA B SMITH
1801 PENNSYLVANIA AVENUE N W
WASHINGTON D C 20006

AMES BRADFORD RAMSAY
ASSISTANT GENERAL COUNSEL
919 M STREET ROOM 544
WASHINGTON D C 20554

ERNEST G JOHNSON
DIRECTOR
PUBLIC UTILITY DIVISION
OKLAHOMA CORPORATION COMMISSION
P O BOX 25000-2000
OKLAHOMA CITY OK 73152-2000

ERIBETH D SMAPP
DEPUTY GENERAL COUNSEL
OFFICE OF GENERAL COUNSEL
OKLAHOMA CORPORATION COMMISSION
P O BOX 25000-2000
OKLAHOMA CITY OK 73152-2000

SWIDLER & BERLIN CHARTERED
3000 K STREET N W
SUITE 300
WASHINGTON D C 20007

PHILIP F MCCLELLAND
ASSISTAN CONSUMER ADVOCATE
1425 STRAWBERRY SQUARE
HARRISBURG PA 17120

CHARLES C HUNTER
CATHERINE M HANNAN
HUNTER COMMUNICATIONS LAW GROUP
1620 I STREET N W SUITE 701
WASHINGTON D C 20006

LAURIE J BENNETT
JOHN L TRAYLOR
SUITE 700
1020 19TH STREET N W
WASHINGTON DC 20036

ANDREW D LIPMAN
MARK P SIEVERS
SWIDLER & BERLIN CHARTERD
3000 K STREET N W SUITE 300
WASHINGTON D C 20007