

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

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COMMUNICATIONS SECTION

In the Matter of)
)
Implementation of the)
Telecommunications Act of 1996:) CC Docket No. 96-115
)
Telecommunications Carriers' Use)
of Customer Proprietary Network)
Information and Other Customer)
Information)

REPLY COMMENTS OF AMERITECH

Ameritech submits these reply comments in support of the Cellular Telecommunications Industry Association's ("CTIA's") Request for Deferral and Clarification and GTE's Petition for Temporary Forbearance or, in the Alternative, Motion for Stay.

Despite substantial support for the requests, MCI is virtually alone in opposing any portion of the requests. In particular, MCI opposes GTE's request as it relates to CPE used in connection with advanced services, to the use of CPNI to expand on current service packages, and to the win-back prohibition as it applies to incumbent local exchange carriers ("ILECs").¹ MCI's objections are all based on competitive concerns. Further, MCI argues that the requested relief with respect to service packages would render the statute meaningless.

MCI's opposition, however, is clearly misplaced. It must be remembered that the primary focus of §222 is customers' privacy interests. None of the aspects of the relief requested by petitioners compromises those interests in any way. Rather, each proposal provides customers with information about products or services naturally related to the ones which they are already

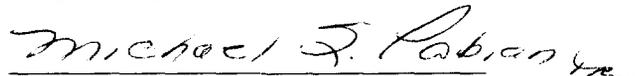
¹ On this latter point, MCI appears to have been joined by AT&T.

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obtaining from their chosen carrier. In fact, in many cases, customers would be angry or disappointed if carriers did not notify them of these related opportunities -- i.e., of the availability of specialized CPE or of enhancements to their current service packages that provide more value or functionality. Moreover, rather than "gutting" the statute, the various aspects of requested relief are merely natural variations of the Commission's logical "total service" approach. In other words, once customers have established a relationship with the carrier for certain categories of services, they would naturally expect carriers to notify them of products and services that are related to or associated with services in those categories.

In fact, as Ameritech has suggested in its comments, the Commission should simply clarify that neither the statute nor the Commission's rules prohibit the use of CPNI, without customer consent, to market a bundle or a package that includes a product or service that is outside the category of services from which CPNI derived as long as a significant portion of the bundle or package relates to the category for which there is already an established carrier-customer relationship. In these cases, the entire package or bundle should be considered part of a customer's total service relationship. Such an interpretation would be both pro-customer and pro-competitive. Carriers would be able to compete by offering the best possible combination of products and services for their customers -- with customers benefiting from the innovation that results.

Respectfully submitted,



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Dated: May 13, 1998
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CERTIFICATE OF SERVICE

I, Todd H. Bond, do hereby certify that a copy of the foregoing Reply Comments of Ameritech has been served on all parties listed on the attached service list, via first class mail, postage prepaid, on this 13th day of May, 1998.

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