

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

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of )  
)  
Petition of the Association for Local )  
Telecommunications Services (ALTS) for a )  
Declaratory Ruling Establishing Conditions )  
Necessary to Promote Deployment of )  
Advanced Telecommunications Capability )  
Under Section 706 of the Telecommunications )  
Act of 1996 )

CC Docket No. 98-78

REPLY COMMENTS OF GTE

Dated: June 25, 1998

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affiliated telecommunications  
companies

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## TABLE OF CONTENTS

	<u>PAGE</u>
I. INTRODUCTION AND SUMMARY .....	2
II. THERE IS NO NEED FOR THE COMMISSION TO TAKE IMMEDIATE ACTION WITH REGARD TO INTERCONNECTION FOR DATA SERVICES AS REQUESTED IN THE ALTS PETITION.....	3
A. Existing Interconnection is Sufficient for Competitors to Provide Advanced Telecommunications Services.....	3
B. Additional Unbundling Requirements are Unnecessary.....	5
III. NEITHER ALTS NOR ITS SUPPORTERS HAVE DEMONSTRATED THAT CURRENT COLLOCATION RULES REQUIRE A MASSIVE OVERHAUL....	6
IV. THE COMMISSION SHOULD END THE DEBATE OVER SECTION 706 BY IMMEDIATELY INITIATING THE STATUTORILY REQUIRED SECTION 706 INQUIRY. ....	10
V. THE NEGOTIATION AND ARBITRATION PROCESS IS WORKING AND THE COMMISSION SHOULD NOT TAKE ANY ACTION THAT WILL DISTURB WHAT CONGRESS HAS PUT IN PLACE.....	13
VI. CONCLUSION .....	15

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**REPLY COMMENTS OF GTE**

GTE Service Corporation and its affiliated telecommunications companies<sup>1</sup> (collectively, "GTE") respectfully submit these Reply Comments to the Association for Local Telecommunications Services ("ALTS") Petition for a Declaratory Ruling Establishing Conditions Necessary to Promote Deployment of Advanced Telecommunications Capability Under Section 706 of the Telecommunications Act of 1996, CC Docket No. 98-78, filed on May 27, 1998 (the "ALTS Petition").

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<sup>1</sup> These companies include: GTE Alaska Incorporated; GTE Arkansas Incorporated; GTE California Incorporated; GTE Florida Incorporated; GTE Hawaiian Telephone Company Incorporated; The Micronesia Telecommunications Corporation; GTE Midwest Incorporated; GTE North Incorporated; GTE Northwest Incorporated; GTE South Incorporated; GTE Southwest Incorporated; Contel of Minnesota, Inc.; and Contel of the South, Inc.; GTE Communications Corporation.

## **I. INTRODUCTION AND SUMMARY**

The ALTS Petition requests Commission action in three principle areas relating to the deployment of advanced telecommunications capability under Section 706 of the Telecommunications Act of 1996. First, ALTS seeks a declaratory ruling that the interconnection, collocation, unbundling and resale requirements of Sections 251, 252, and 271 of the 1996 Act apply fully to digital and broadband services and facilities. Second, ALTS asks the Commission to re-open CC Docket No. 91-141 and establish new rules and rates for collocation. And third, ALTS asks the Commission to make certain that any action it may take under Section 706 is consistent with interconnection rules and policies adopted by the state commissions.

As GTE will develop more fully below, and as the original comments filed in this proceeding clearly establish, the ALTS Petition is unnecessary and should be denied. ALTS and its supporters have not made a convincing showing that advanced data services in general, and ADSL service in particular, should be subjected to the obligations of Sections 251 and 252. Neither has ALTS demonstrated that the collocation rules require the massive overhaul proposed by ALTS in its Petition. With five Section 706 petitions now pending, the Commission should immediately refocus this debate by initiating the statutorily required inquiry into advanced data services.

**II. THERE IS NO NEED FOR THE COMMISSION TO TAKE IMMEDIATE ACTION WITH REGARD TO INTERCONNECTION FOR DATA SERVICES AS REQUESTED IN THE ALTS PETITION.**

Although the ALTS and its supporters suggest that Commission action is needed to assist competitors in obtaining appropriate interconnection for data services, both ALTS and the comments confirm that the market for data services is developing rapidly under the existing regulatory environment.<sup>2</sup> GTE agrees with ITTA, "[l]ess regulation, not more, is the indicated course for maintaining ... innovation."<sup>3</sup>

Competitive carriers ("CLECs") are able to provide their own competitive data offerings using already available unbundled network elements ("UNEs") and collocation. Competitive carriers are already providing such services. GTE and other Incumbent LECs have shown that the existing statutory and regulatory requirements provide the necessary structure and remedies to assure reasonable and appropriate interconnection.<sup>4</sup>

**A. Existing Interconnection is Sufficient for Competitors to Provide Advanced Telecommunications Services.**

As the comments confirm, Incumbent LECs already provide conditioned loops and collocation of equipment such as that required for a CLEC to provide its own ADSL service. ILECs, including GTE, permit collocation

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<sup>2</sup> See, e.g., ALTS Petition at ii; Independent Telephone & Telecommunications Alliance ("ITTA") at 3;

<sup>3</sup> ITTA Comments at 6.

<sup>4</sup> See, e.g., Opposition of GTE; Comments of Bell South at 5; Comments of Bell Atlantic at 7-8.

arrangements to include equipment necessary to provide ADSL service. This includes ADSL electronics such as Digital Subscriber Line Access Multiplexers ("DSLAMs") that provide more functionality than basic transmission capability.<sup>5</sup> Under these arrangements, CLECs have the incentive to become facilities-based providers of advanced services and to create innovative services to serve the public.

Competitors can combine their own ADSL equipment collocated in GTE's central office with conditioned local loops from GTE. GTE defines an Unbundled Digital Loop ("UDL") as a digital transmission facility that extends from the main distribution frame ("MDF"), or its equivalent, in a GTE central office, to an end user customer premise. UDLs will be provisioned without bridge taps or load coils.<sup>6</sup> GTE's UNE prices for local loops and conditioning are set forth in its negotiated interconnection agreements.<sup>7</sup>

GTE will provide the ADSL conditioned loop to the CLEC in its collocation cage in the same manner in which it provides any other UNE loop. The CLEC will then be able to connect that loop to its CLEC-provided ADSL equipment. GTE will allow direct access to its ADSL service at GTE's DSLAM for

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<sup>5</sup> To the extent that DSLAMs perform concentration/multiplexing capability, GTE permits this functionality to be collocated.

<sup>6</sup> When utilizing ADSL technology, the CLEC is responsible for limiting the Power Spectral Density (PSD) of the signal to the levels specified in Clause 6.13 of ANSI T1.413 ADSL Standard.

<sup>7</sup> If a request for an ADSL conditioned loop results in a field visit to remove bridge taps or load coils, GTE has a separate charge for that activity.

interconnection to a data network other than GTE's. GTE will also allow CLECs to interconnect their own DSLAMs with GTE's frame relay service or the CLEC, if it chooses, may connect to its own or some other provider's frame relay, ATM or other data network. Thus, the CLEC, working with GTE, has a choice of several options in provisioning ADSL service to its customers.<sup>8</sup>

The comments confirm that many ILECs recognize that the ability to extend ADSL service to customers served by pair gain facilities, such as digital loop concentrators ("DLCs"), will necessitate the incorporation of so-called "mid-loop" ADSL electronics at the pair gain location.<sup>9</sup> Although GTE has no experience with this configuration and does not offer it in GTE's initial introduction of ADSL service, GTE would entertain an "extended" ADSL service, complete with the mid-loop ADSL electronics, and would offer this configuration through its special access tariff at a price that incorporates the additional investment.

**B. Additional Unbundling Requirements are Unnecessary.**

Many of ALTS' supporters take the position that competitors are entitled to whatever facilities, equipment, features, functions or capabilities which are

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<sup>8</sup> For example, with regard to ADSL, a CLEC can resell end-to-end ADSL access service from GTE's interstate access tariff; purchase an ADSL-conditioned loop and connect it to CLEC-provided ADSL-enabling equipment and CLEC-provided data network; or interconnect its ADSL service to GTE's frame relay service.

<sup>9</sup> See, e.g., Comments U S West at 31-32.

created by the ILEC.<sup>10</sup> Although it is understandable that competitors would want to acquire access to the most advanced technologies without having to incur their own the capital investments, neither legal nor policy considerations support the sweeping proposals for extending the reach of Section 251(c) to include these advanced capabilities.<sup>11</sup> The statute requires access to bottleneck network elements needed to provide competitive services.<sup>12</sup> The public interest will not be served by expanding Section 251(c) requirements to include new equipment that cannot be reasonably characterized as a "bottleneck" facility.<sup>13</sup>

### **III. NEITHER ALTS NOR ITS SUPPORTERS HAVE DEMONSTRATED THAT CURRENT COLLOCATION RULES REQUIRE A MASSIVE OVERHAUL.**

ALTS calls for a re-opening of CC Docket No. 91-141,<sup>14</sup> basing its request on a recitation of a few anecdotal events. Naturally, several CLECs rushed forth with additional tales, somehow suggesting that a plethora of "war stories" would dispel the record and the facts. The Commission established an extensive

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<sup>10</sup> See, e.g., Comments of AT&T at 7; Comments of MCI at 5.

<sup>11</sup> See Opposition of GTE at 8-11.

<sup>12</sup> 47 U.S.C. 251(d)(2). See Comments of SBC at 19 ("The Commission left open the possibility it might itself revisit unbundling requirements, but decided not to require incumbent LECs to unbundle or provide interconnection to high-speed data network equipment.")

<sup>13</sup> As SBC points out, ALTS itself has recognized the distinction between bottleneck and non-bottleneck facilities. See Comments of SBC at 18, *citing*, Opposing Brief on the Merits of the Association for Local Telecommunications Services, *Association for Local Telecommunications Services v. Iowa Utilities Board*, No. 97-826 (May 18, 1998).

record supporting the current collocation regime in the very same proceeding ALTS seeks to re-open almost six years after the fact. The Commission, in the *Local Competition Order*,<sup>15</sup> re-examined its collocation rules and determined that little had changed that would necessitate changes in the collocation rules established in its *Expanded Interconnection Order*. The Commission found, "[t]hus, the standards established for physical and virtual collocation in our *Expanded Interconnection* proceeding will generally apply to collocation under section 251."<sup>16</sup>

While the chief complaint from ALTS and its supporters is a lack of available floor space, the record established in the *Expanded Interconnection Order* clearly anticipated a future exhaustion of central office space. "In certain LEC central offices, space for physical collocation could become filled to capacity."<sup>17</sup> This conclusion was reached nearly six years ago, and, to no ones surprise, space in many central offices has become exhausted.

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<sup>14</sup> *Expanded Interconnection with Local Telephone Company Facilities*, ("Expanded Interconnection Order") 7 FCC Rcd 7369 (1992).

<sup>15</sup> *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, 11 FCC Rcd 15499 (¶¶542-613) ("the Local Competition Order"), *stay granted in part sub nom. Iowa Utilities Board v. FCC*, 109 F.3d 418 (8<sup>th</sup> Cir. 1996), *motions to vacate stay denied*, 117 S.Ct. 378-79 (1996), *order vacated in part on other grounds and aff'd in part*, 120 F.3d 753 (8<sup>th</sup> Cir. 1997), *mandate enforced*, 135 F.3d 535 (8<sup>th</sup> Cir. 1998), *cert. granted sub nom. AT&T Corp. v. Iowa Utilities Board*, No. 97-826 (October Term, 1997).

<sup>16</sup> *Id.* at ¶564.

<sup>17</sup> *Expanded Interconnection Order* at ¶77.

The Commission, however, did not just leave competitors without a reasonable alternative. The Commission found that, "[p]ermitting LECs to turn away interconnectors when space for physical collocation is exhausted could prevent interested parties from collocating in offices where space is limited. Requiring LECs to provide a virtual collocation alternative will help ensure that all potential interconnectors can be accommodated, but should not prove to be onerous for the LECs."<sup>18</sup> Finally, the Commission declined to require LECs to expand their facilities or relinquish space reserved for their future use.<sup>19</sup> These rules, first established in the *Expanded Interconnection Order*, remain unchanged after the *Local Competition Order* and provide a balanced and reasonable method of accommodating collocation requests, insofar as it is possible.

Beyond the central office space limitation complaints, ALTS and others assert that ILECs have unreasonable rates, require minimum areas that are larger than is necessary and unfairly restrict space sharing and various cross-connect arrangements.<sup>20</sup> The tariffed rates for collocation were the subject of an exhaustive FCC review process in which CLECs were active participants. Also,

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<sup>18</sup> *Id.* See also, 47 C.F.R. §51.323(a) ("An incumbent LEC shall provide physical collocation and virtual collocation to requesting telecommunications carriers.")

<sup>19</sup> *Id.* at ¶79. Nonetheless, the Commission advised LECs that they would be expected to consider interconnection demand for central office space when remodeling or building new central offices, just as they are required to consider demand for other services when undertaking such projects.

<sup>20</sup> See, e.g., ALTS Petition at 21.

collocation arrangements obtained through interconnection agreements have been reviewed by state PUCs and CLECs had every opportunity to request arbitration. Further, the FCC properly decided to leave the details of central office space management to the negotiation and arbitration process in the states. This process continues to serve all parties well and is preferable to heavy-handed regulation by an agency that is far removed from the locations in dispute.

Evidence that the Commission did the right thing by allowing the negotiation and arbitration process to work abounds. Bell Atlantic has agreed to provide alternate methods of access to network elements in New York, such as assembly rooms, assembly points, shared collocation cages, and secured "cageless" collocation arrangements.<sup>21</sup> U S West offers a SPOT collocation option, which permits CLECs to aggregate unbundled network elements at a single U S West frame in the central office.<sup>22</sup> Cageless physical collocation is a new concept that U S West is introducing in response to the demands of the marketplace through the negotiation process.<sup>23</sup> The comments submitted clearly show that despite the security concerns the Commission acknowledged in its original *Expanded Interconnection Order*, the marketplace and the negotiation process have caused ILECs and CLECs to establish reasonable solutions proactively.

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<sup>21</sup> Comments of Bell Atlantic at 11.

<sup>22</sup> U S West at 32.

<sup>23</sup> *Id.*

In response to its customers' requests, GTE is also pursuing new methods to ease the burden of collocation on all parties. GTE will provide a "Common Collocation" area equipped with vertical racks which will allow multiple CLECs a collocation arrangement to be used for interconnection or for access to UNEs. Common Collocation allows a CLEC to recombine UNEs without incurring the full cost of a standard physical collocation cage environment. This optional arrangement provides interested CLECs with the lower costs of so-called cageless collocation without compromising ILEC security concerns. GTE believes that Common Collocation is a viable alternative for CLECs who do not want or require a full 100 square feet of collocation space.

Even with Common Collocation, however, GTE still has concerns about security and its relationship to cageless collocation. GTE supports the Commission's original observation that a collocation cage offers protection for both parties. However, GTE is interested in the proposals of Bell Atlantic, U S West, and others, which are intended to develop additional forms of cageless collocation. GTE will be closely watching the innovative new arrangements to see how they might fit into GTE's overall collocation approaches.

**IV. THE COMMISSION SHOULD END THE DEBATE OVER SECTION 706 BY IMMEDIATELY INITIATING THE STATUTORILY REQUIRED SECTION 706 INQUIRY.**

Beginning with the Bell Atlantic Petition, followed closely by similar petitions by Ameritech and U S West, the debate over the intent of Congress in Section 706 has fueled massive filings and counterfilings. The Alliance for Public Technology ("APT") Petition expanded the discussion beyond Sections 251, 252,

and 271. APT recognized that additional issues needed to be addressed under Section 706. For example, APT recommends phasing out the UNE/TELRIC pricing structure, eliminating certain depreciation regulation, resolving the embedded cost issue, and instituting pricing flexibility among other items. Now, the ALTS Petition brings the debate full circle by seeking a full and complete extension of the obligations of Sections 251 and 252 to include advanced data networks. The inescapable conclusion is that the Commission can only end the debate by immediately initiating its Section 706 inquiry as mandated by the 1996 Act.

GTE believes that Congress included Section 706 in the 1996 Act to establish a different regulatory approach to data networks, definitely apart from the more restrictive regime established for the traditional voice networks. Congress correctly focused attention on opening local telephone markets to competition because of the embedded "bottleneck" facilities. To suggest that Congress saw no need to force competition into networks and services that either do not exist or are being built by formidable competitors is not an unreasonable proposition.

Why would the Congress separately engage a discussion of advanced data services for all Americans? Clearly, Congress addressed a vast multitude of contingencies in the 1996 Act, each ostensibly necessary to ensure that local markets are opened to competition. Yet, Section 706 suggests that Congress intended that advanced data services and the networks upon which the services

ride are different from embedded voice networks and need different regulatory treatment.

Most of the legal debate over Section 706 concerns whether the regulatory forbearance reference in Section 706 supercedes the more general forbearance requirements found in Section 10. GTE submits that this distinction, if there is a distinction, is immaterial since Congress intended for the Commission to apply regulatory forbearance in a discriminate manner. The very existence of Section 706 means Congress had one goal of creating competition for traditional voice services in local markets and a parallel goal of restricting the growth of regulation in data markets.

If Congress had intended the old regulatory regime -- a regime which the 1996 Act seeks to reduce and eliminate from embedded voice markets -- to apply to new data networks, Section 706 would not have been necessary. The rules for regulating interconnection, collocation, unbundled network elements and resale are very specific and the Commission would have no trouble applying them to old, new, borrowed or blue networks. But, GTE submits, Section 706 has a purpose that is more than just a harmless observation about advanced data services. Congress has sent an unambiguous signal to the Commission that these networks are different. Their genesis is an open, freely competitive marketplace. Their prospectus is rapid change and growth. These are characteristics that simply cannot be applied to voice networks. These networks require a different regulatory environment.

These arguments will not be put to rest until the Commission takes the next step and initiates a comprehensive Notice of Inquiry ("NOI"). As GTE stated in its original Comments, Section 706 raises issues that should not be decided on the basis of individual petitions. Confusion and hesitation will reign if Section 706 requirements continue to be debated in the piecemeal and internally focused manner exhibited in the various petitions now pending. GTE urges the Commission to move forward and issue its NOI immediately.

**V. THE NEGOTIATION AND ARBITRATION PROCESS IS WORKING AND THE COMMISSION SHOULD NOT TAKE ANY ACTION THAT WILL DISTURB WHAT CONGRESS HAS PUT IN PLACE.**

Several commenters support ALTS' concern that the Commission take no action under Section 706 that would have a negative effect on state actions taken to implement the requirements of Sections 251 and 252. For example, e.spire requests that the Commission "should not take unilateral action under Section 706 that would diminish or destroy the effect of State actions that have provided CLECs with various combinations of UNEs that have been critical to the deployment of CLEC data services, including State decisions that have resulted in ILECs being required to provide: subloop components upon request; digital unbundled loops; non-discriminatory access to digital equipment and services."<sup>24</sup> Intermedia also supports ALTS: "Intermedia agrees with ALTS that the Commission should not take any action that would disrupt innovative and pro-

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<sup>24</sup> Comments of e.spire at 10.

competitive initiatives taken by the State regulators in implementing §§251 and 252 of the Communications Act."<sup>25</sup>

GTE submits that the surest way to retain and enhance the innovative and pro-competitive decisions rising from state negotiations and arbitration is to let the process work as intended. It is not in the best interest of competition for any parties continually to seek prescriptive solutions from the Commission. ALTS and its supporters should recognize the inherent difficulties which would be caused by micro-management by a government agency of the complex issues surrounding the opening of local markets to competition. As GTE explained in its original Comments, both sides in the local competition debate have had successes and failures through the negotiation and arbitration process. The Commission should continue to resist the temptation to intervene and allow the process to continue.

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<sup>25</sup> Comments of Intermedia at 7.

## VI. CONCLUSION

Accordingly, the Commission should deny the declaratory relief requested by ALTS. Those supporting the ALTS Petition have failed to make a convincing showing that advanced data services in general, and ADSL service in particular, should be subjected to the obligations of Sections 251 and 252, nor have they demonstrated that the collocation rules should be re-examined. Nonetheless, GTE urges the Commission immediately to initiate the inquiry mandated by Section 706 of the 1996 Act.

Dated: June 25, 1998

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### Certificate of Service

I, Ann D. Berkowitz, hereby certify that copies of the foregoing "Reply Comments of GTE" have been mailed by first class United States mail, postage prepaid, on June 25, 1998 to all parties of record on the attached list.



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