

ORIGINAL

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September 18, 1998

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SEP 18 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. - Rm. 222

Re: CC Docket 96-115

Dear Ms. Salas:

Please be advised that today, Joe LaPorta, Larry Katz, and I met with Paul Gallant, Legal Advisor to Commissioner Tristani, to discuss the above captioned proceeding. The meeting focused on electronic auditing/flagging requirements as they pertain to this proceeding.

Please enter this letter and attachment into the record as appropriate.

Sincerely,

Attachment

cc: P. Gallant

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**Bell Atlantic Ex Parte
CPNI Electronic Auditing
CC Docket 96-115**

- **The FCC should immediately stay electronic audit and flagging requirements**
 - **Costs far exceed any marginal benefit**
 - **BA's estimated costs for audit alone are \$75-100M upfront expenses with similar ongoing yearly costs**
 - **Unanimous industry support for stay and reconsideration**
 - **No record support for this requirement**
 - **Long lead time required for implementation**
 - **Could jeopardize Y2K and other critical efforts**

- **Electronic audit and flagging requirements should be removed on reconsideration**
 - **CI-II and III history shows that carriers fully comply with the CPNI rules**
 - **Streamlined complaints process provides sufficient remedy; if pattern of violations exist, Commission can re-examine rules**
 - **No party supports the requirements**
 - **Electronic auditing, already prohibitively expensive and burdensome to implement, would only prove more impractical as desktop technology evolves**
 - **Requiring carriers to file compliance plans and annually certify continuing compliance will guard against violations**