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September 25, 1998

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

Re: In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability
Docket No. 98-147

Dear Ms. Salas:

Enclosed are an original and four copies of the Comments of the New York Department of Public Service in the above-captioned cases. These comments also have been filed using the Commission's Electronic Filing System.

Sincerely,

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for Lawrence G. Malone
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Enclosure
(Original and Four Copies)

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

In the Matters of

Deployment of Wireline Services Offering Advanced Telecommunications Capability	)	CC Docket No. 98-147
Petition of Bell Atlantic Corporation For Relief from Barriers to Deployment of Advanced Telecommunications Services	)	CC Docket No. 98-11
Petition of US WEST Communications, Inc. For Relief from Barriers to Deployment of Advanced Telecommunications Services	)	CC Docket No. 98-26
Petition of Ameritech Corporation to Remove Barriers to Investment in Advanced Telecommunications Technology	)	CC Docket No. 98-32
Petition of the Alliance for Public Technology Requesting Issuance of Notice of Inquiry and Notice of Proposed Rulemaking to Implement Section 706 of the 1996 Telecommunications Act	)	CCB/CPD No. 98-15 RM 9244
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
Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell Petition for Relief from Regulation Pursuant to Section 706 of the Telecommunications Act of 1996 and 47 U.S.C. Section 160 for ADSL Infrastructure and Service	)	CC Docket NO. 98-91

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COMMENTS OF THE NEW YORK STATE
DEPARTMENT OF PUBLIC SERVICE

Introduction and Summary

The New York State Department of Public Service (NYDPS) submits these comments in response to the Commission's Memorandum Opinion and Order, and Notice of Proposed Rulemaking (NPRM) concerning the deployment of advanced telecommunication services. Six incumbent local exchange carriers (ILECs) -- Bell Atlantic, US West, Ameritech, Southwestern Bell, Pacific Bell, and Nevada Bell -- have petitioned the Commission for regulatory relief, purportedly to speed the deployment of advanced data services. The Association for Local Telecommunications Services (ALTS) also petitioned the Commission to apply all pro-competitive provisions of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (the Act), to advanced services and circuit switched voice services.

In response to these petitions, the Commission issued an Order and a Notice of Proposed Rulemaking designed to facilitate the deployment of advanced services.[2] In the order the Commission: (1) confirms that advanced services are subject to the pro-competitive provisions of the Act, including 251(a) and 251(c)(2) interconnection requirements (para. 11); (2)

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[1] The Commission refers to advanced services in this instance as wireline, broadband telecommunications services such as those that use digital subscriber line technology (xDSL) and packet switched technology (para. 3). Our comments apply this definition of advanced services as well.

[2] The Commission notes that, although the various petitioners sought relief pursuant to Section 706 of the 1996 Act, it takes action pursuant to sections 201, 202, 251, and 271 of the Act.

clarifies that facilities and equipment used to provide advanced services are network elements and are subject to unbundling requirements under 251(c)(3)(para. 11); (3) denies the ILECs' request to forbear from applying §251 and/or §271 of the Act to advanced services (para. 12); and (4) initiates a rulemaking to strengthen collocation and unbundling requirements (para 14). The NPRM requests comments on: (1) terms for allowing Bell operating companies (BOCs) to establish a separate subsidiary to provide advanced services with minimal regulation; (2) methods for strengthening collocation requirements; (3) expanding loop unbundling obligations; (4) interpreting resale obligations; and (5) developing guidelines for limited interLATA relief.

The NYDPS offers comments with respect to: (1) separate advanced services affiliates; (2) collocation requirements; and (3) local loop unbundling obligations. We believe that deployment of advanced services should be largely driven by market forces. Therefore, we agree that giving ILECs the option of providing advanced telecommunications services through separate subsidiaries, with appropriate safeguards, may enhance the ability of all carriers to respond to competitive market pressures.

With respect to additional local loop unbundling obligations and strengthening collocation requirements, we have adopted sub-loop unbundling requirements and alternative

collocation arrangements. We are also mindful of the importance of ensuring that network reliability is maintained as further unbundling is implemented. We are monitoring these developments.

Further, in addition to physical and virtual collocation arrangements other options are under consideration in New York.[3] In any event, any Commission action should not impede state flexibility.

Discussion

I. Provision of Interstate Advanced Services Through A Separate Affiliate

A. Structural Separation

The Commission concludes that interstate advanced services offered by ILECs are subject to §251(c) requirements (interconnection, unbundling, resale, and collocation) (para. 32).[4] The Commission suggests that ILECs may avoid these requirements by establishing a separate advanced services affiliate with specified structural safeguards (i.e., independent

[3] Although national rules are not necessary, any collocation and local loop unbundling requirements established by the Commission should not prescribe states from continuing to pursue over unbundling and collocation policies, pursuant to the 1996 Act.

[4] The Commission indicates that specific advanced services will be classified as telephone exchange or exchange access service on a case-by-case basis (para. 40). In requesting states to treat affiliates that provide intrastate advanced services "equivalently to any other competing carrier offering advanced services," the Commission implicitly recognizes state jurisdiction over intrastate advanced services. We acknowledge the Commission's request and are examining the appropriate treatment of intrastate advanced services.

operations, arm's length transactions, etc.), and provided that the affiliate's own facilities are used to provide advanced services (para. 83, 86, 92 and 96).[5] Any transaction between the advanced services affiliate and the ILEC must be at arm's length (para. 87).

The fundamental issues are: (1) whether the requirements imposed on ILECs, particularly resale and unbundling (section 251(c)), so reduce ILEC incentives to invest in new technologies that they will choose not to deploy advanced services "on a reasonable and timely basis"; and, conversely, (2) whether freeing the incumbents from these requirements will unreasonably impede new entrants' (CLECs) abilities to offer broadly advanced services. Although ILECs' incentives to deploy advanced services may be diminished by the Act's unbundling and resale requirements, there is a reasonable possibility that ILECs (choosing the separate advanced services affiliate option) will have an additional incentive to provide all CLECs reasonable access to their underlying basic local networks because the affiliate will also require such access. Also, although access to the incumbent's advanced services capabilities on a resale or network element basis should enhance the CLEC's abilities to offer these services, it is not clear that lack of such access

[5] The Commission identifies specific factors where the advanced services affiliate would be considered an assign of the ILEC (i.e., wholesale asset transfers).

would fatally impede this ability. In light of these considerations, we believe the ILECs may reasonably be given the option of providing advanced services through a separate affiliate, not subject to ILEC requirements.

B. Proposed Safeguards

Recognizing state commissions' experience in dealing with LEC affiliates, the Commission invites input from the states on: 1) appropriate separation requirements for the advanced services affiliate (para. 88), and 2) how particular transactions (i.e., asset transfers) between the ILEC and the advanced services affiliate should affect the regulatory status of the affiliate (para. 104).[6]

The proposed requirements for advanced services affiliates wishing to avoid ILEC regulation under section 251(c) are similar to the rules identified in section 272, which establish standards required for BOC affiliates engaging in manufacturing and certain types of interLATA activities.[7] As noted above, a separate advanced services affiliate (as described in the NPRM) could provide a viable option for deploying advanced

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[6] To the extent intrastate advanced services are provided by the separate ILEC affiliate, the Commission requests states to exercise their jurisdiction over intrastate communications in a manner that treats the affiliate as they would treat CLECs offering similar services (para. 116).

[7] Section 272 requires BOC LECs to provide these services through a separate affiliate.

services while minimizing the potential risk for anti-competitive behavior.

During the transition to a fully competitive market, federal and state examination of affiliate transactions may be necessary to ensure that technology at the ILEC is not "frozen" while the unregulated affiliate reaps the economic rewards of advanced technology -- technology that might later make the ILEC's circuit-switched network obsolete. (See, 47 C.F.R. 53.201 et seq. and New York Public Service Law §99). A shift of ILEC customers to an affiliate that provides combined voice/video/data could leave the ILEC serving only consumers who cannot afford such services, or whose facilities have not been modernized to maintain the provisioning of basic telecommunication services. Thus, we agree with the Commission (para. 117) that it should work cooperatively with the states to ensure that ILECs do not allow their existing networks to deteriorate where advanced services are offered through an affiliate

Further, we agree that the advanced services subsidiary should be subject to existing federal and state rules for similarly-situated affiliates unless it can be shown that these requirements are unnecessary. In this regard, the in-region long-distance affiliate requirements provide a close parallel of the type of additional federal protections that should be adopted. (See, 47 U.S.C. 272; 47 C.F.R. 53.201-53.213). Both

the in-region long-distance affiliate and the advanced services affiliate will provide core telecommunications services. Therefore, the Commission's tentative conclusion that the advanced services affiliate safeguards should mirror the safeguards required of long-distance affiliates appears reasonable. In addition, we recommend that the Commission, along with the states, monitor ILEC marketing practices to ensure that ILECs do not use their local loop market power to require customers to purchase services from an advanced services affiliate in order to receive favorable treatment with respect to its other ILEC services. Such practices, if allowed, would thwart structural separation policies. Consequently, the affiliated advanced services should be treated as an integrated ILEC offering and subject to §251(c).

Finally, we recommend that, during the transition, any joint marketing between the ILEC and the advanced services affiliate should be subject to the same joint marketing provisions applicable to the long distance affiliate.[8] See, 47 U.S.C. §272(g); 47 C.F.R. 53.201.

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[8] Section 272(g) prohibits a BOC affiliate from marketing its services with BOC local exchange service unless competitors offering the same or similar service are also allowed to jointly market and sell the BOC's local exchange service.

C. Asset Transfers From ILEC To Advanced Services Affiliate

The Commission tentatively concludes, subject to any de minimis exception adopted, that a wholesale transfer of ILEC assets (including local loop) used to provide advanced services would make the affiliate an "assign" of the ILEC, and, therefore, subject to 251(c) requirements.[9] The Commission seeks comment on (1) whether there should be a de minimis exception under which a limited transfer of equipment would not make an advanced services affiliate an "assign" and (2) what should be deemed a de minimis exception (para. 108). The Commission tentatively concludes that a de minimis exception should apply only to transfers of facilities used specifically to provide advanced services, such as DSLAMs and packet switches (but not other network elements, such as, loops). We agree with the Commission's tentative conclusion that, subject to any de minimis exception, a wholesale transfer of facilities would make an affiliate an "assign" of the incumbent LEC and subject to 251(c) provisions (para. 106). The NYDPS also concurs with the Commission's conclusion that a de minimis exception should apply only to ILEC transfers of

[9] Both the states and the Commission have jurisdiction over asset transfers -- the states with respect to assets used for intrastate communications (See, New York Public Service Law § 99) and the Commission with respect to interstate communications (para. 106).

facilities and equipment used specifically to provide advanced services.[10]

The Commission's tentative conclusion with respect to the types of asset transfers that should subject the affiliate to the Act's requirements as an ILEC appears reasonable. We note, however, that the asset transfers remain subject to state regulatory oversight. (See, New York Public Service Law §99). Thus, the Commission should make it clear that it does not intend to supplant state asset transfer requirements.

II. Collocation Requirements

The Commission adopted minimum national collocation requirements in the Local Competition Order (Local Competition Order para. 555-617)[11] and seeks comment on whether it should establish additional minimum national rules (para. 122-124). Comment is also sought on equipment requirements as well as space allocation and space exhaustion issues (para. 126-150). Although we do not believe that additional national requirements are necessary, any rules adopted by the Commission should not

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[10] Any transfer of local loops, as the Commission notes, would make an advanced services affiliate an "assign" with respect to those loops and subject to the provisions of section 251(c) (para. 107).

[11] In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, First Report and Order, (August 8, 1996). Physical and virtual collocation are included in the Commission's list of methods for obtaining interconnection and access to unbundled network elements. 47 C.F.R. 51 321.

interfere with additional state approved options. (See, 47 U.S.C. §251(d)(3)).

In New York, physical and virtual collocation arrangements have been adopted. Also, New York Telephone Company d/b/a Bell Atlantic-New York (BANY) offered, in its §271 Pre-filing Statement, to provide smaller cages, shared collocation, and new virtual collocation arrangements.[12] Additional collocation arrangements are under consideration in a pending NYDPS proceeding.[13] These options include:

1. Cageless Collocation,[14]
2. Identified Space Collocation,[15]

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[12] NYPSC Case 97-C-0271 Prefiling Statement of Bell Atlantic - New York (dated April 6, 1998).

[13] NYPSC Case 98-C-0690 - Proceeding on Motion of the Commission to Examine Methods by which Competitive Local Exchange Carriers Can Obtain and Combine Unbundled Network Elements.

[14] The NYPSC is currently considering a cageless collection tariff filed by BANY. This option, called Secured Collocation Open Physical Environment (SCOPE), is a physical collocation area located in a secure part of the central office, but without a cage enclosure around each individual competitive LEC's equipment. The SCOPE is isolated from the incumbent's central office equipment, which differentiates SCOPE from virtual collocation. SCOPE uses a shared point of termination. Additionally, it uses substantially less space than traditional collocation.

[15] In this configuration a collocator would install and maintain its own equipment in a defined, finite and separate space. Equipment would be intermingled with the incumbent's equipment where space is available, and separated racks and equipment would be easily identifiable. This option was developed for interconnection purposes and not for combinations of loops and ports.

3. Virtual Collocation With Robot,[16]
4. Assembly Room and Assembly Point, and[17]
5. Recent Change Capability.[18]

Regarding the Commission's tentative conclusion that ILECs should not be permitted to impede CLECs from offering advanced services by imposing unnecessary restrictions on the type of equipment CLECs may collocate, including switching functionality (para. 129), we believe that allowing collocation of switching equipment may be more efficient than requiring CLECs to install duplicative lines to make calls within the same central office. In the BANY-MCI interconnection agreement, the

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[16] This arrangement could be used by a competitive LEC to recombine loops and ports through the use of a remotely controlled cross-connect device, or robot.

[17] This option is for voice grade service only. Links and ports can be combined on a cross-connection box located on an outside wall or pad mounted on the grounds of the central office.

[18] This method is a software-based option that can combine existing loops and ports, but cannot be combined with any other unbundled elements.

NYPSC concluded that BANY had not identified a roadblock that would prevent collocation of switching equipment.[19]

III. Unbundling Obligations

Comment is sought on the extent to which the Commission should establish additional minimum national rules for local loops, pursuant to sections 201 and 251 of the Act, in order to strengthen the ability of new entrants to gain access to xDSL compatible loops (para. 151).[20] With respect to the extent of local loop unbundling, the NYDPS has approved interconnection agreements that define various levels of loop unbundling by allowing for the purchase of four sub-loop components (loop

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[19] The NYPSC's arbitration decision granted MCI the right to collocate switching equipment. On rehearing, BANY claimed that digital switching equipment required special grounding arrangements. The NYPSC denied rehearing on this issue, finding that the need to add special grounding for any central office based switching equipment is a common industry practice. Case 96-C-0787 Petition of MCI Telecommunications Corporation Pursuant to Section 252(b) of the Telecommunications Act of 1996, for Arbitration to Establish An Intercarrier Agreement Between MCI and New York Telephone Company, Opinion No. 96-33, Opinion and Order Resolving Arbitration Issues (Issued and Effective December 23, 1996); Opinion No. 97-3, Opinion and Order Granting In Part, Denying In Part, and Dismissing Petitions for Rehearing and Clarification (Issued and Effective April 11, 1997); Order Approving Interconnection Agreement, Rejecting Notions Thereof, and Granting Reconsideration (Issued and Effective October 1, 1997). MCI has challenged the NYDPS' arbitration decision and BANY has filed a cross claim challenging the legality of allowing collocation of switching equipment. The matter has been briefed and the parties are awaiting a date for oral argument. MCI v. Bell Atlantic and New York Public Service Commission (N.D.N.Y.)

[20] The Commission has determined that the local loop is a network element that ILECs must unbundle "at any technical feasible point." Local Competition Order para. 377-379.

feeder, loop concentrator/multiplexer, network interface device, and loop distribution) to the extent technically feasible in response to a specific request.[21] Additionally, BANY recently filed a tariff, which is subject to NYPSC approval, to provide Expanded Extended Loop service. This proposed service is designed to allow CLECs to reduce the need for multiple collocation sites by aggregating loops from non-collocated central offices at one collocation office. We see no need for additional national rules. (See, section 251(d)(3)).

The Commission has also requested extensive technical information relating to the provision by ILECs of local loops capable of supporting CLEC-provided xDSL services and about the feasibility of requiring ILECs to unbundle such loops to enable CLECs to provide some portions of the loops themselves. Although requiring loop unbundling might well facilitate the development of competition for advanced services, such action requires careful consideration of the potential impacts on the quality of telephone service and accountability for the service quality provided. The NYDPS supports the Commission's efforts to

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[21] See, NYPSC Case 96-C-0787 Petition of MCI Telecommunications Corporation, Pursuant to Section 252(b) of the Telecommunications Act of 1996, for Arbitration to Establish an Intercarrier Agreement Between MCI and New York Telephone Company, Opinion No. 96-33, Opinion and Order Resolving Arbitration Issues, p. 12, Order Approving Interconnection Agreement, Rejecting Portions Thereof, and Granting Reconsideration, p. 10-11 (Issued and Effective October 1, 1997).

gather additional information. At the same time, we will be monitoring service quality results to ascertain the impact of loop unbundling. Since it is difficult to predict the impact various levels of local loop unbundling will have on service quality, the states must maintain flexible policies and it is incumbent upon the Commission not to take actions that will interfere with state monitoring.

CONCLUSION

As the advanced services market develops, competing technologies and providers will offer consumers alternative services, prices, and features. The NYDPS supports regulatory policies, such as giving ILECs the option of providing advanced services through a separate affiliate, designed to enable the growth of such competition. As discussed supra, additional national unbundling and collocation rules, however, are not necessary. Yet, if additional minimum standards are established,

they should not hamper the states' ability to respond to local conditions.

Respectfully submitted,

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Dated: September 25, 1998
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CERTIFICATE OF SERVICE

I, Lucille T. Dillenbeck, hereby certify that I have served the within and foregoing New York State Department of Public Service Comments, by depositing a copy thereof, postage prepaid, in the United States mail, properly addressed upon each of the parties as reflected on the attached service list.

Lucille T. Dillenbeck

Lucille T. Dillenbeck

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