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HARRY C. MARTIN
GEORGE PETRUTSAS
LEONARD R. RAISH
JAMES P. RILEY
KATHLEEN VICTORY
HOWARD M. WEISS
* NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH, P.L.C.
ATTORNEYS AT LAW
11th FLOOR, 1300 NORTH 17th STREET
ARLINGTON, VIRGINIA 22209-3801
(703) 812-0400
TELECOPIER
(703) 812-0486
INTERNET
www.fhh-telcomlaw.com

FRANK U. FLETCHER (1939-1985)
ROBERT L. HEALD (1956-1983)
PAUL D.P. SPEARMAN (1936-1962)
FRANK ROBERSON (1936-1961)
RUSSELL ROWELL (1948-1977)
RETIRED
EDWARD F. KENEHAN
CONSULTANT FOR INTERNATIONAL AND INTERGOVERNMENTAL AFFAIRS
SHELDON J. KRYS
U. S. AMBASSADOR (ret.)
OF COUNSEL
EDWARD A. CAINE*
MITCHELL LAZARUS*
EDWARD S. O'NEILL*
JOHN JOSEPH SMITH

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November 23, 1998

WRITER'S DIRECT
703-812-0440
lazarus@fhh-telcomlaw.com

CC 98-183

HAND DELIVERED
Magalie R. Salas, Esquire
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

Re: CC Docket No. 96-61

Dear Ms. Salas:

Enclosed are the original and four copies of the Comments of the Internet Service Providers' Consortium for filing in the above-referenced docket.

Kindly date-stamp and return the extra copy of this cover letter.

If there are any questions about this filing, please call me at the number above.

Respectfully submitted,

Mitchell Lazarus

Mitchell Lazarus
Counsel for Internet Service Providers' Consortium

ML/dd
Enclosures

cc: Service List
Ms. Deb Howard, ISP/C
Ms. Roxanna Loveday, ISP/C
Mr. Charles T. Smith, Jr., ISP/C
Mr. Justin Newton, ISP/C
Chris Sandberg, Esq.
Kathryn A. Kleiman, Esq.

Before the
Federal Communications Commission
Washington DC 20554

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OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Policy and Rules Concerning the Interstate, Interexchange Marketplace	)	CC Docket No. 96-61
	)	
Implementation of Section 254(g) of the Communications Act of 1934, as amended	)	
	)	
1998 Biennial Regulatory Review — Review of Customer Premises Equipment and Enhanced Services Unbundling Rules in the Interexchange, Exchange Access and Local Exchange Markets	)	CC Docket No. 98-183

COMMENTS OF THE
INTERNET SERVICE PROVIDERS' CONSORTIUM

Mitchell Lazarus
FLETCHER, HEALD & HILDRETH, P.L.C.
1300 North 17th Street, 11th Floor
Arlington, VA 22209
703-812-0440

Of Counsel:

Kathryn A. Kleiman
INTERNET MATTERS
601 Madison Street, Suite 222
Alexandria VA 22314
703-518-5184

Counsel for
The Internet Service Providers' Consortium

November 23, 1998

SUMMARY

Most subscribers reach the Internet through an Internet Service Provider (ISP). The ISP/C is the largest trade association for small to mid-size ISPs — companies whose primary business is providing Internet services, unlike divisions of telephone companies like Pacific Bell, on-line content providers like AOL and CompuServe, or software companies like Microsoft. The ISP/C includes about 260 company members, and has emerged as the voice of independent ISPs.

The ISP/C urges the Commission to maintain its prohibitions against bundling of enhanced services with local exchange and exchange access services.

The incumbent LECs, particularly the RBOCs and GTE, not only are competitors of the independent ISPs for the same retail ISP customers, but are also essential providers to most ISPs, which depend on the RBOCs or GTE for local loops and data lines. This combination gives the RBOCs and GTE both the incentive and the opportunity to discriminate against independent ISPs.

The bundling rules were instituted to help prevent a carrier from using its facilities monopoly to unfairly advance its position in the market for enhanced services. The Commission's current proposal to relax the prohibitions makes sense only when that facilities monopoly no longer exists — when the local telephone market has become fully competitive. That day has not yet arrived.

The bundling rules serve an additional need in the case of the RBOCs and GTE, in facilitating enforcement of those carriers' Computer III obligations. To permit bundling would make Computer III abuses much harder to detect, by making it difficult, if not impossible, for an

independent ISP to determine whether an RBOC or GTE is making available to competitors the same services it offers to its own ISP operation, and at comparable rates.

Taking into account the other competitive advantages available to the incumbent LECs, particularly joint marketing to still-captive customers, to allow bundling would further distort the market for ISP services and unfairly disadvantage non-ILEC ISPs in their efforts to continue providing individualized service to local communities.

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COMMENTS OF THE
INTERNET SERVICE PROVIDERS' CONSORTIUM

The Internet Service Providers' Consortium (ISP/C) hereby submits these Comments in response to the Further Notice of Proposed Rulemaking the above-captioned proceeding.[1]

I. INDEPENDENT ISPs ARE A VITAL PATHWAY BETWEEN END USERS AND THE INTERNET.

Today most subscribers reach the Internet through Internet service providers (ISPs), which are in the business of providing retail-level access to the Internet to anyone with a computer and a phone line (or other means of connection).[2] Without the ISPs, only entities large

---

[1] Policy and Rules Concerning the Interstate, Interexchange Marketplace, CC Docket No. 96-61, Further Notice of Proposed Rulemaking, FCC 98-258 (released Oct. 9, 1998) ("Further Notice").

[2] The Commission sometimes uses the abbreviation ISP to mean "information service provider." In this pleading, ISP/C adopts a narrower meaning, "Internet service provider."

enough to maintain their own networks could have Internet access. ISPs make the Internet universal and ubiquitous.

Independent ISPs are companies whose primary business is providing Internet services. The independents are ISPs *other than* divisions of telephone companies like the RBOCs and GTE, on-line content providers like AOL and CompuServe, or software companies like Microsoft. In addition to serving consumers, independent ISPs typically work with the small businesses of their communities — companies and organizations that lack their own information services personnel and Internet expertise, and hence often demand considerable attention and resources from their ISPs. Many of these subscribers require assistance with individualized installations and employee training, and depend on web sites designed and maintained by the ISP for their presence on the Internet. Some ISPs specialize in serving particular industries (health care, for example), and are able to offer industry-specific subject-matter expertise along with conventional Internet services. Together, small-business subscribers and individuals average about 85% of an independent ISP's customers.

The independent ISPs can offer their subscribers levels of time and energy that the large providers could never muster. Reaching out to their communities, independent ISPs create classes, software, and texts to assist the elderly, youth, and other populations who tend to be late or underfunded entrants to the Internet. Many independent ISPs have long translated their concern for community affairs into Internet access for local governments, schools, and libraries. Typically the independent ISPs also provide technical support and training, sometimes through reduced-charge or free accounts. Their work has often given these community institutions their first Internet outreach. In short, the independent ISPs focus closely on their local communities

and respond to local needs.[3] A Commission official has informally (but accurately) described the independent ISPs as "mom-and-pop shops who get grandmas online."

Independent ISPs are a small-business success story in their own right. From only a handful of ISPs in 1995, the industry has grown to between 5,000 and 7,500 independent ISPs in the United States today. About 85% are themselves small businesses, with average revenues of about $375,000. Most have between one and ten employees, and are growing. Collectively, all independent ISPs account for 50 percent of the U.S. ISP market. They also create an increasing number of highly skilled technical positions in the United States and abroad.

The independent ISPs have led the expansion of the Internet into the fastest-growing communications medium in the history of civilization. Years before the telephone companies

---

[3] From one independent ISP:

> "We're the homey company with a local office who gives free classes for all the retirees and we let them bring in their computers if they don't work and we'll fix them. They can call and ask us all kinds of stupid questions . . . . They can come in and tell jokes and ask what kind of modem they should buy and they send us the neatest compliments and tell us how great we are. What great subscribers we have! The oldest is 92 and she golfs every day and uses the internet at night.
>
> "We'll go to people's homes and set them up at no charge if they are handicapped. The biggies can't touch us. We also teach other 'Interest Seminars' like how to do genealogy on the internet or how to set up your financial portfolio. We also teach how to use search engines and how to upload & download as well as how to do web pages. Once they take that class they usually hire us to do the web pages.
>
> [. . .]
>
> "No big outfit wants to come here - there just isn't enough volume. We even sell our service as the cheaper option to paying long distance charges to AOL. They can dial in to us, lower their AOL bill to $9.95 per month and our $25 makes their $X00 phone bills look like the national budget."

and other large providers showed any interest, it was the independent ISPs — some of them launched by the same people who helped to create the Internet — that risked their own assets to develop the growth market of the decade. They are still the only means of access to the Internet by a local call in most rural and small-market areas. Everywhere, the independent ISPs contribute more than their share of the vitality and diversity that enables millions of people to use the Internet daily to improve and enrich their lives.

About the Internet Service Providers' Consortium. The ISP/C is the largest trade association for small to mid-size ISPs and other members of the Internet services industry. (A list of members is attached as Appendix A.[4]) Founded in 1996, the ISP/C now includes about 260 company members, up 200 percent in the last year alone. ISP/C members provide local and backbone Internet access, online content, and hardware and software for the industry. Members of ISP/C have over 1 million subscribers in the aggregate, with headquarters in more than 42 U.S. states and 10 countries. Most members serve local or regional markets, and increasingly specialize in services for specific industries and personal attention for those who need it.[5]

The ISP/C welcomes members regardless of size and geographic location. It has emerged as the voice for independent ISPs.

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[4] Not all members listed in Appendix A have individually reviewed and approved this pleading.

[5] Additional information about the ISP/C is available at http://www.ISPC.org.

II. THE COMMISSION SHOULD NOT PERMIT INCUMBENT LECS, ESPECIALLY THE RBOCs AND GTE, TO BUNDLE ENHANCED SERVICES WITH TRANSMISSION AND SWITCHING.

The Commission asks, among other things, whether it should permit the bundling of enhanced services with local exchange and exchange access services. The answer is plain: Not yet.[6]

The incumbent LECs serving most of the American public, including all of the RBOCs and GTE, are themselves in the ISP business, and compete directly with independent ISPs for the same retail Internet customers. But, at the same time, the independent ISPs depend on these companies for the multiple local loops, and other facilities, that customers must use to reach the ISP, and for data lines that connect the ISPs to the Internet backbone. A local carrier thus has every opportunity — and every incentive — to misuse its facilities monopoly to discriminate against independent ISPs in order to build up its own ISP business.

Prior Commission decisions help to create a level playing field by requiring:

> carriers that own common carrier transmission facilities and provide enhanced services [to] unbundle basic from enhanced services and offer transmission capacity to other enhanced service providers under the same tariffed terms and conditions under which they provide such services to their own enhanced service operations.[7]

---

[6] The Commission also asks about changes to the rules that prohibit bundling of CPE by all carriers, and of enhanced services by interexchange carriers. The ISP/C takes no position on these issues. The ISP/C notes, however, that some interexchange carriers currently bundle ISP services with interexchange service in apparent violation of the Commission's Rules.

[7] Independent Data Communications Manufacturers Ass'n, 10 FCC Rcd 13717, 13719 (1995), *cited in* Further Notice at ¶ 33.

The bundling prohibitions were instituted to help prevent a carrier from using its facilities monopoly to unfairly advance its position in the market for enhanced services. **The Commission's current proposal to relax the prohibitions makes sense only when that facilities monopoly no longer exists.** That may indeed be true today of the interexchange market. In the case of local exchange and exchange access services, however, assumptions of a competitive market are plainly premature. The Commission has repeatedly held that the RBOCs do not yet have sufficient competition to justify permitting their entry into the interexchange market. There is no basis for a different conclusion in the context of the bundling rules.

Absent restraints, any carrier's exercise of rational self-interest, coupled with its facilities monopoly, will inevitably lead it to discriminate in order to hinder competition. Indeed, the carrier's duty to its shareholders requires it to maximize profit — within regulatory constraints. The Commission has long recognized that anticompetitive behavior on the part of carriers must be restrained through appropriate regulation, at least until competition becomes strong enough to exert control through market forces. Controls on bundling are required until real competition for local telephone service is established, in order for the market to function without distortions imposed by monopoly providers.

It is important to note that the bundling prohibition does not in any way disadvantage an LEC relative to its competitors. To the contrary, the bundling prohibition merely requires the carrier to compete for ISP business under the same conditions as other participants in the market, including the independent ISPs.

There is a separate and equally compelling reason to maintain the prohibition against bundling enhanced services in the case of the RBOCs and GTE. These carriers are subject to

Computer III nonstructural safeguards to prevent abuse of their facilities monopoly in the enhanced services market, including ISP services. The independent ISPs rely on the Computer III safeguards in their efforts to maintain a reasonably competitive ISP market in the presence of the RBOCs and GTE. But the independent ISPs have had continuing difficulties in enforcing their Computer III rights against the RBOCs and GTE, particularly their rights to acquire underlying telecommunications facilities under nondiscriminatory rates, terms, and conditions. Many ISPs can provide detailed accounts of RBOC and GTE behavior that an impartial observer would have to describe as intentional discrimination. To permit bundling would make these abuses much harder to detect. Bundling would make it difficult, if not impossible, for an independent ISP to determine whether an RBOC or GTE is making available to competitors the same services it offers to its own ISP operation, and at comparable rates.

Taking into account the other competitive advantages available to the incumbent LECs, particularly joint marketing to still-captive customers, to allow bundling would further distort the market for ISP services and unfairly disadvantage non-ILEC ISPs in their efforts to continue providing individualized service to local communities.

CONCLUSION

For the reasons given above, it would be premature for the Commission to relax the enhanced services bundling rules as to incumbent LECs, particularly the RBOCs and GTE.

Respectfully submitted,

Mitchell Lazarus
FLETCHER, HEALD & HILDRETH, P.L.C.
1300 North 17th Street, 11th Floor
Arlington, VA 22209
703-812-0440

Counsel for
The Internet Service Providers' Consortium

Of Counsel:
Kathryn A. Kleiman
INTERNET MATTERS
601 Madison Street, Suite 222,
Alexandria VA 22314
703-518-5184

November 23, 1998

APPENDIX A

ISP/C MEMBERS

COMPANY	LIASON, CITY, STATE, COUNTRY
@wizard.com	Daniel Jacobs, Las Vegas, NV, US
.NU Domain LTD	Bill Semich, Sherborn, MA, US
2 Cow Herd Internet Services	Deb Howard, Venice, CA, US
3Com Corporation / US Robotics	Katherine Sawyer, Mt. Prospect, IL US
AboveNet Communications	Justin Newton, San Jose, CA, US
ABSnet Internet Services, Inc.	Marc Siegel, Baltimore, MD, US
AcroNet Professional Internet Services Inc.	Chris Pappe, Kenosha, WI, US
Affordable Connections Internet Company	Tom Weems, Pt. Charlotte, FL, US
AlaNet Internet Services, Inc.	Jennifer Watts, Dothan, AL, US
Alegany.com Internet Services, Inc.	Oran Stewart, Warren, PA, US
Alpine Internet	Richard Hodges, Carson City, NV, US
Amplex	Mark Radabaugh, Tiffin, OH, US
Applied Personal Computing, Inc.	Kevin J. Sawyer, Fairview Heights, IL, US
Arisian Software	Mark Velasquez, Jupiter, FL, US
Astroarch Consulting, Inc.	Edward Haletky, Austin, TX, US
AT&T Networked Commerce Services	Neville O'Reilly, Bridgewater, NJ, US
Atlantech Online, Inc.	Edward J. Fineran, Silver Spring, MD, US
Atlas Communications	Steve Powell, Springfield, MO, US
Bay Networks	Gordon Frank, Parsippany, NJ, US
Berean Solutions, Inc.	Scott Thomas, Tupelo, MS, US
Berkeley Software Design, Inc.	Rob Kolstad, Colorado Springs, CO, US
Biz-Net Brokers, Inc.	Richard L. Varner Jr. Glendale, AZ, US
Byte Size Computers	Robert Fowler, Berryville, AR, US
CacheFlow Inc.	Tom McCafferty, Palo Alto, CA, US
Call Sciences	Robert N. Danskin, Edison, NJ, US
Canville Communications	Dan C. Rinnert, West Chester, OH, US
CapaNet, Inc.	Lee Capa, Natrona Hgts., PA, US
Caprica	Kenneth Taira, Monterey Park, CA, US
Carolina Online Inc.	Gary Merck, Anderson, SC, US
carpeNet Information Technologies GmbH	Ray Davis, Hofheim, GERMANY
ChooseYourMail.com	Ian Oxman, Chicago, IL, US
Christy Industries, Inc.	Shayne Judkins, Fraser, MI, US
Cignal Global Communications	Bryan Van Dussen, Cambridge, MA, US
Clairvoyant Software, Inc.	Gregory Hampton, Toronto, Ontario, CANADA
Clarity Connect Inc.	Joseph Lalley, Ithaca, NY, US
ClearGate Communications, Inc.	Gene Tye, Glastonbury, CT, US
Colomotion, Inc.	Peter Berns, San Francisco, CA, US
CompuBasix	David Routh, Corpus Christi, TX, US
Connections Plus Internet Services	Dan Haughton, Sumter, SC, US
ConnectLink Inc	Phil Henson, Chescpeake, OH, US
CrimsonWeb Information Systems	Jason Ingham, La Crescenta, CA, US
Critical Path Inc.	Shelley Alger, San Francisco, CA, US

Crocker Computer Consulting	Kevin Crocker, Edmonton, Alberta, CANADA
CSRlink, Inc. (Uplink)	Micah Brown, Montoursville, PA, US
CubeXS Private Limited	Aly Ramzan, Karachi Sind, PAKISTAN
Cumberland Internet, Inc.	David Glynn, Toledo, IL, US
CyberDZign	Richard Fontaine, Ottawa, Ontario, CANADA
Cyberix, Inc.	Kyoungbum Park, Warminster, PA, US
Cyberport LLC	R. David Murray, Clarmont, NH, US
CyberTeams, Inc.	Frederick Hitt, Shenandoah Junction, WV, US
Data Instruments, Inc	Stephanie Haas, Marietta, GA, US
Deepwell Internet Services	Ian Briggs, Fair Oaks, CA, US
DeMan Communications, LLC	Michael DeMan, Bellingham, WA, US
DFW Family Internet Services	William Yiu, Plano, TX, US
Didja Net Communications	Ricky RobbinsPontotoc, MS, US
Digital Internet Access Link, Inc.	Tim Hite, Springfield, MO, US
Digital Starlight Communications, Inc.	Alan DeRossett, Agoura Hills, CA, US
Dimensional Comunications, LLC	David Denney, Denver, CO, US
Direct Network Access	Dror Matalon, Berkeley, CA, US
Dream Communications, Inc.	Aaron Sawchuk, Cohasset, MA, US
dsl.net, inc.	John Jaser, West Haven, CT, US
Dundee Internet Services, Inc.	Patricia Rountree, Dundee, MI, US
E-world Internet	Charles Chang, Fullerton, CA, US
EarthReach Communications, LLC	Jeff Vogt, Appleton, WI, US
EAZNet	Eddie Fry, Safford, AZ, US
Electro Link Network, Inc.	Dan Graupman, Elburn, IL, US
Elite.net	Gilbert James Arguelles, Merced, CA, US
EnterAct, LLC	Tracy Snell, Chicago, IL, US
Enterprise Information Services, Inc.	Hasan Muhammad, Washington, DC, US
Ericsson Inc.	Mike Litherland, Richardson, TX, US
Erols Internet	Alec Peterson, Springfield, VA, US
EurekaNet	Chris Cooper, Athens, OH, US
EXP Internet Services	J. Glenn Hughes, Bridge City, TX, US
Fastransit Communications, Inc.	Scott Knapp, West Jefferson, NC, US
FinePoint	John O'Keefe, Woodcliff Lake, NJ, US
Flordia Digital Turnpike	Harald W. Kegelmann, Tallahassee, FL, US
Fort Nocs Inc.	Lance Ahern, Anchorage, AK, US
Frazier Mountain Internet Service	Scott Rosen, Pine Mountain Club, CA, US
Frontier GlobalCenter	Jason Zigmont, New York, NY, US
FullWave Networks	Richard Safran, New York, NY, US
G.R.I.N. Net	Andrew Robinson, San Francisco, CA, US
Global Computer Services, Inc.	Douglas S. Childress, Concord, NC, US
Globalnet	Jeff Ault, Philo, OH, US
Gotham Amalgamated InterNetworking Corp.	Richard Safran, New York, NY, US
Gulf South Internet Services Inc.	Richard Palmer, Metairie, LA, US
GulfAccess, Inc.	Brad Sprowls, Naples, FL, US
Harbor Communications	Scott Leonello, Painesville, OH, US
Hi-Tak International, Inc.	Mintak Ng, New York, NY, US
Highfiber Network	Holly Steinberg, Albuquerque, NM, US

Homebug	Alan Bond, Wothington, OH, US
Homenet Communications	Steve Berman, Warner Robins, GA, US
Hubris Communications	Chris Owen, Garden City, KS, US
Hypernet Communications	Douglas Bowyer, Cleburne, TX, US
iHighway.net, Inc.	John M. Brown, San Jose, CA, US
I-Land Internet Services	Chris Young, Sedalia, MO, US
Infolink Servicios, S.C.	Jose A. Gonzalez, El Paso, TX, US
InfoMine Of The Rockies, Inc.	Phillip J. Curtiss, Butte, MT, US
InLink Communications Company	Steven D. Catanzaro, Creve Couer, MO, US
InReach Internet, LLC	John Keagy, Stockton, CA, US
Insync Internet Services, Inc.	David Power, Houston, TX, US
Interactive Telecommunications Prog., NYU	Barbara Steinberg, New York, NY, US
InterComm Technologies, Inc.	Bill Warner, Otterbein, IN, US
Interconnected Associates	Jeffrey Sterling, Seattle, WA, US
Interface Computer Center L.L.C.	Jeremy Webb, Fayetteville, AR, US
InterKan.Net, Inc.	Justin Geering, Manhattan, KS,US
Intermedia Internet Services	Tony Falin, Kingsport, TN, US
International Web Broadcasting Corp.	Joanne Collins, Portland, OR, US
Internet 1st	Tim Flavin, St Louis, MO, US
Internet Alaska, Inc.	Todd Nagengast, Anchorage, AK, US
Internet of the Sandhills	Beth Morgan, Southern Pines, NC,US
Internet Texoma, Inc.	Larry Vaden, Denison, TX, US
Internet Wizards	Robert T. Smithing, Kent, WA, US
internet@vantage, inc.	Sherwood Pekelo, Honolulu, HI, US
InterSurf Online, Inc.	Gerry Boudreaux, Baton Rouge, LA, US
Iperdome, Inc.	Jay Fenello, Atlanta, GA, US
ISLC	Walter N. Gnann Jr., Beaufort, SC, US
ISP Power Corporation	Marc Rapoza, Honolulu, HI, US
ISPNews, Inc.	Michael Betts, Plymouth, MI, US
JAJAweb, LLC	Robert G. Allen, San Antonio, TX, US
JASKE Internet Solutions	Alexi Touloumis, Chicago, IL, US
Jatek	Jeff Lasman, Torrance, CA, US
John Leslie Consulting	John Leslie, Milford, NH, US
JPS Online Systems, Inc.	John Sulima, Westerly, RI, US
Klondyke's Online Services	Maria Wells, Richmond, MI, US
Landmark Netaccess	Warren G. Mattiello, North Conway, NH, US
Las Vegas Internet	Mike Butler, Las Vegas, NV, US
LGA International	Daniel Ang, Singapore, SINGAPORE
Lightning Internet Services, LLC	Reid Fischler, Mineola, NY, US
LinkAmerica Communications	Rachel Luxemburg, New York, NY, US
Linkline Internet Access	Philip Ardron, Mira Loma, CA, US
Lockridge Grindal Nauen & Holstein, P.L.L.P.	Chris K. Sandberg, Minneapolis, MN, US
Lucent Technologies RABU	Jon Mann, Pleasanton, CA, US
Lynks Network Services, Inc.	Calvin Anderson, Fayetteville, AR, US
Madison County Telephone	Jeremy Webb, Huntsville, AR, US
MagicNet, Inc.	Robert D. Thrush, Orlando, FL, US
MAP Internet Inc.	Grosvenor Heacock, Springfield, MA, US

Maui Gateway	George Fontaine, Kihei, HI, US
Maui Net, Inc.	Roger Stout, Kihei, HI, US
Maximum R&D	Mark Geisert, Los Angeles, CA, US
Meganet Communications, TCIX, Inc.	Brian Wallingford, Fall River, MA, US
Memra Software Inc.	Michael Dillon, Armstrong, BC, CANADA
Mercury Network	David Sovereen, Midland, MI, US
MGC Communications, Inc.	Scott A. Bufton, Las Vegas, NV, US
MichWeb Inc.	Matt Simerson, Cadillac, MI, US
Midcoast Internet Solutions	Jason J. Simonds, Newcastle, ME, US
Midwest Web Inc.	Mark Canfield, Painesville, OH, US
Millennia Communications, LLC	Rick Stevens, San Diego, CA, US
Mint City Internet	Barry Buchholz, Jr., St. Johns, MI, US
Moss Communication	Steven P Schalock, McMinnville, OR, US
Mountain Peak Cyber Cafe	Marc Mager, Denver, CO, US
MV Communications, Inc.	Mark Mallett, Manchester, NH, US
MVA.NET	Dave Spaulding, Haverhill, MA, US
N2 The Net	Kevin W. Paul, Cookeville,TN,US
N2H2 Corporation	Kevin Fink, Seattle, WA, US
NameSecure	Patrick Greenwell, Moraga, CA, US
NERC Online	Lynn P. Constantini, Princeton, NJ, US
Net Access Corporation	Alex Rubenstein, Newton, NJ, US
Net Carrier Inc.	Chris Peltier, Telford, PA, US
Net56+	Robert Strickler, Palatine, IL, US
Netaxs	Avi Freedman, Philadelphia, PA, US
NetCreations, Inc.	Rosalind Resnick, Brooklyn, NY, US
Netmeg Internet	Matt Magri, Monroe, CT, US
NetSpace S.A. de C.V.	Oscar Mondragon, Toluca, MEXICO
Netstarz Solutions	Harold G. Powers, Toomsboro, GA, US
Netstep Access Services	Robb Kinnin, Kingston, NY, US
Netsurfer, Inc	J. Scott Williford, Atlanta, GA, US
Netuser Communications	Greg Merrell, Cupertino, CA, US
Network Communications	Stephen Rivera, Freehold, NJ, US
Network Trend Technology	Tateishi Saigoh, Shinjuku, Tokyo, JAPAN
Newport Internet	Don Lashier, Newport, OR, US
NFO Research	Mickey Bennett, Greenwich, CT, US
Noguska	George Gibat, Fostoria, OH, US
NorthNet Internet Services	Thomas Blauvelt, Canton, NY, US
NorthPoint Communications, Inc	Matthew J. Going, San Francisco, CA, US
Nothin But Net, LLC	Len Pikulski, Mt. Laurel, NJ, US
NYCPORT Networks	John Kenney, New York, NY, US
One Church Communications, L.L.C.	Melanie I. Becnel, New Orleans, LA, US
On-Line Systems	Jay Griffiths, Palatine, IL, US
Pact Communication Group, Inc.	Camilo Pereira, Ft. Lauderdale, FL, US
Palmer Divide Communications	Joseph M. Beggs, Monument, CO US
Pampa Cyber Net	Douglas Locke, Pampa ,TX, US
Panda Communications LLC	Harry Landers, Santa Cruz, CA, US
PAXnet Communications Inc.	James J Mundy, Greenville, SC, US

PCs Made Easy, LLC	Ken Rea Tagard, OR, US
PEGLabs	Tom English, San Francisco, CA, US
Penncom Internet Company	Laura Megill, Warren, PA, US
Pennsylvania Online LTD.	George F. Peace, Harrisburg, PA, US
Pinellas Internet Services	Roxanne Loveday, Clearwater, FL, US
Plantaganet Internet Services	James Smallacombe, Doylestown, PA US
PMH Network Services, Inc.	Michael Steinhart, Emerson, NJ, US
Poulton Associates	Craig K Poulton, Salt Lake City, UT, US
PressEnter	David E. Bushard, River Falls, WI, US
Priori Networks	Robert Shearing, Redwood City, CA, US
Private I, LLC	Kevin Wenzel, Louisville, CO, US
Progressive Telecom	Ken Klosinski, Doylestown, PA, US
QDO	Suhael Ahmed, Lahore, PAKiSTAN
Rocky Mountain Internet Junction	Terry Hickey Golden, British Columbia CANADA
Rural Communications, Inc.	Christopher W. Jones, Cedar Hill, MO, US
SBBSNET	Johnathan D. Hozeska, Saginaw, MI, US
Scescape, Inc.	Joe Bonin, Aiken, SC, US
Sentient Networks, Inc.	Sunil Dhar, Milpitas, CA, US
Seren Innovations	Greg Sanderson, Minneapolis, MN, US
ShreveNet, Inc.	Brian Feeny, Shreveport, Louisiana, US
Silicon Beach	Jay Hennigan, Santa Barbara, CA, US
SkyCache, Inc.	Doug Humphrey, Laurel, MD, US
SLIP.NET	Ted Glenwright, San Francisco, CA, US
SoftAplic S/C Ltd.	Edesio Costa e Silva, Belo Horizonte, MG BRAZIL
Software Design Associates, Inc.	Jeff Lawhorn, Poway, CA, US
SONET Communications	John Gisclon, Lawton, OK, US
Sonoma Systems	John Mazzaferro, Marina del Rey, CA, US
Southern Star	John R. Souvestre, Metairie, LA, US
SouthNet Inc.	Tony Williams, Hamilton, AL, US
Southwest Cyberport	Mark Costlow, Albuquerque, NM, US
SoVerNet	Erik Leo, Bellows Falls, VT, US
SparkNET Corporation	Christopher Knight, Green Bay, WI, US
SpeedLink	Melih Oztalay, Pontiac, MI, US
SpringSips	Stephanie Reineke, Steamboat Springs, CO, US
StarNet, Inc.	Charles T. Smith, Jr., Tucker, GA, US
StarNet Inc.	Chris Parker, Palatine, IL, US
Stevens Enterprise	Kenneth M. Stevens, Beaumont, TX ,US
Surfari Internet Provider Services	Kent Crow, Grover Beach, CA, US
Sutter Yuba Internet Exchange - SYIX.COM	David Overton, Yuba City, CA, US
System Resale Solutions IV Ltd.	Rick Niesiobedzki, Guelph, Ontario, CANADA
TDI Internet, Inc.	Tom Bilan, Monroe, MI, US
Telalink Corporation	Bob Collie, Nashville, TN, US
Teleport Internet Services	James S. Deibele ,Portland, OR, US
Televolve, Inc. (San Francisco Online)	William Sommers, San Francisco, CA, US
Texas Networking, Inc.	Ron Barron Yokubaitis, Austin, TX, US
The Binary Bin	Brian Waters, West Deptford, NJ, US
The Foxberry Network Inc.	Thomas Fox, Monroe, MI, US

The UserFriendly Network
Theviod.net
Tigerden Internet Services
TrioBYTE Services, Inc.
Union Net
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Visual Link Internet
WebbSite, Inc
Web Technologies
WebMasters, Inc.
Wizvax Communications
WTS OnLine
Xcom
Yosemite Network
Zocalo

Michael Weiner, West Reading, PA, US
Dean Schinnerer, Studio City, CA, US
George Nemeyer, Dayton, OH, US
Michelle Lawrence, Tooele, UT, US
M.C. Motsko, Baltimore, MD, US
Brian Steckler, Carmel, CA, US
Scott Brew, Grand Rapids, MI, US
Raymond Schwabenbauer, Oil City, PA, US
John Foltz, Marietta, GA, US
Kitty Sue Morgan, Welland, Ontario, CANADA
Bob Rust, Camarillo, CA, US
Lynne Mullins, Livonia, MI, US
Fred R. McDavid, Jr., Dayton, VA, US
Edward Fang, Newport News, VA, US
Mark Bayliss, Winchester, VA, US
Jason Webb, Fayetteville, AR, US
Shawn P. Lemay, Amherst, NY,US
David Weiner, Horsham, PA, US
Richard Shetron, Troy, NY, US
Gerry Dalton, Dallas, TX, US
John Johnson, Cambridge, MA, US
Mike Bird, Mariposa, CA, US
Bill Woodcock, Berkeley, CA, US

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I, Delphine I. Davis, a secretary with the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that on this 23th day of November, 1998, I caused copies of the foregoing "Comments Of The Internet Service Providers' Consortium" to be delivered by hand to the following:

Mr. William Kennard
Chairman
Federal Communications Commission
1919 M Street, Room 814
Washington, DC 20554

Mr. Harold W. Furchgott-Roth
Commissioner
Federal Communications Commission
1919 M Street, Room 814
Washington, DC 20554

Mr. Michael Powell
Commissioner
Federal Communications Commission
1919 M Street, Room 814
Washington, DC 20554

Ms. Susan Ness
Commissioner
Federal Communications Commission
1919 M Street, Room 814
Washington, DC 20554

Ms. Gloria Tristani
Commissioner
Federal Communications Commission
1919 M Street, Room 814
Washington, DC 20554

Lawrence E. Strickling
Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, Room 500
Washington, DC 20554

Ms. Carol Mattey
Chief
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
2033 M Street, Room 544
Washington, DC 20554

Michael Pryor
Deputy Chief
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
2033 M Street, Room 544
Washington, DC 20554

Mr. Peyton L. Wynns
Chief
Industry Analysis Division
Common Carrier Bureau
Federal Communications Commission
2033 M Street, Room 500
Washington, DC 20554

Ms. Jane E. Jackson
Chief
Competitive Pricing Division
Common Carrier Bureau
Federal Communications Commission
2033 M Street, Room 518
Washington, DC 20554

John W. Berresford, Esquire
Senior Antitrust Attorney
Industry Analysis Division
Common Carrier Bureau
Federal Communications Commission
2033 M Street, Room 500
Washington, DC 20554

Ms. Janice Myles
(Diskette and Paper)
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
1919 M Street, Room 544
Washington, DC 20554

International Transcription Service, Inc.
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Delphine I. Davis