RECEIVED
DEC 16 1998
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the

FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| Truth-in-Billing | ) | |
| and | ) | CC Docket No. 98-170 |
| Billing Format | ) | |
| | ) | |
| | ) | |

**REPLY COMMENTS OF SBC COMMUNICATIONS, INC.**

**COMES NOW** SBC Communications, Inc., to file its Reply Comments in the Notice of Proposed Rulemaking in CC Docket No. 98-170 and, for such, would respectfully show the following:

There were well over fifty sets of Comments filed in the Truth-in-Billing Format docket. SBC was among a number of parties who argued that the Commission should not attempt to set rigid rules, but should at most adopt a set of general industry guidelines or principles. Hard and fast rules would have the effect of denying to customers one of the first very real benefits of competition: more flexibility on the part of local carriers to bill in the manner desired by its customers. All companies are currently concerned with Y2K vulnerable data and billing systems. These are the same systems that would be required to adapt to new billing rules. SBC is currently investing three thousand hours a day and $1.5 million per week in its Y2K project. Certainly, no billing changes should be required until the Y2K project is completed.

SBC Communications Inc.
December 16, 1998

No. of Copies rec'd 0+6
List ABCDE

Every work activity has an associated cost and, ultimately, that cost is borne by consumers. So there should be a cost/benefit analysis to ensure that the cost is really justified by the benefit to the consumers who will bear the cost of any system change. In that regard, allowing the carriers to respond to the demand for billing changes from their own customers will reach the desired result in a competitive marketplace, without increasing cost across the board. GTE, the Personal Communications Industry Association, the Association for Local Telecommunications Services and the Competitive Telecommunications Association, as well as SBC, all argue in one form or another that the competitive marketplace should and will drive this issue. SBC supports the proposal of U. S. West that it would be better to put aside the rulemaking and set up a task force or an industry forum as a means of developing industry guidelines or principles.

SBC, in its Comments, urged the Commission to limit its exercise of jurisdiction over the billing process to the establishment of a uniform, nationwide identification number system for carriers and BellSouth also supported some form of national registration of carriers. The combination of an absolute requirement that all transactions of a carrier contain that identifying number and the continued imposition of heavy fines on wrongdoers would target the real cause of the problem at the least cost to consumers. The continued imposition of heavy fines on companies found guilty of "cramming" will eliminate or at least place in jeopardy the extraordinary profits that fuel the "cramming" practice. Removing the incentive to "cram" by imposing such fines on the wrongdoers will be more effective in eliminating the "cramming" problem, than would burdensome rules that increase cost for the whole industry.

SBC certainly supports the efforts of the state and federal regulatory agencies to solve the consumer fraud problems that are giving the whole

telecommunications industry a black eye. However, SBC is concerned about some of the state commission comments that there should be an absolute requirement that the bill should distinguish between deniable and non-deniable charges. While SBC believes that such information should be made available to customers, categorizing the charges in such a manner on the bill could encourage customers to ignore even valid non-deniable charges. If uncollectibles increase, customers who pay their bills could incur increased cost. Information as to the types of charges that, if not paid, can cause local service to be suspended should be provided to customers, but it should be provided on information pages in the telephone directory or on periodic bill inserts. There should not be any requirement to designate charges as deniable or non-deniable on the bill.

SBC has been an active participant and supporter of the open forums to address billing issues and problems. But SBC does not believe that a rulemaking to consider extensive rules that, if adopted, would re-regulate the billing process is the answer to the problem. SBC would support a more narrowly drawn proceeding to look at the impact of a national carrier identification number program or any other proposal that does not unreasonably burden the whole industry in order to try to prevent the fraud being perpetrated by a few wrongdoers.

## I. SBC CURRENT PRACTICES

SBC has always been an advocate for its customers, not just since the Commission instituted the Truth-In-Billing proceeding. SBC's bills already provide detailed information and are formatted in a manner to make it as easy and simple as possible for consumers to read and understand their telephone bills. SBC organizes pages by provider and lists a contact number for billing

questions. SBC periodically provides information to its customers regarding the types of charges that are "non-deniable." With the onslaught of slamming, cramming, spamming, sliding,[1] and scramming,[2] SBC has taken additional steps to combat consumer fraud. Due to the massive educational programs already in place in the SBC region, the enforcement efforts of the FCC and the state PUCs, SBC is already showing a decline in the number of its slamming complaints. In addition to the existing programs, SBC has stepped up its efforts to protect its customers with the implementation of the following programs:

Slamming/Sliding:

As indicated in its Comments, Southwestern Bell Telephone Company (SWBT) has instituted a program to help combat slamming within its five-state area. Any time a change is made to a residential consumer's long distance provider SWBT sends an automated message[3] to that customer confirming the change. However, implementation of such safeguards has not been without opposition from IXCs. MCI opposed the use of the automated message in Texas

---

[1] Sliding is a new practice whereby a consumer unknowingly switches its intraLATA toll carrier when signing up with a provider for local or long distance service. The provider holds the LOA until dialing parity becomes available.

[2] Scramming is a practice whereby an IXC terminates service to a presubscribed customer for nonpayment or any other term or condition in the IXC's tariff. 5/19/98 *Memorandum and Order In the Matter of Sprint Corporation Request for Declaratory Ruling Regarding Application of PICCs.* See AFR of SBC-CCB/CPD 98-2.

[3] The text of the automated message is as follows: "Hello. This is Southwestern Bell calling to inform you that your long distance provider has been changed at your request or at the request of your new long distance company. For future reference, you can reach our office by calling 1-8xx-xxx-xxxx. To speak to a service representative now, press 'Zero'. We appreciate your business and want you to be very satisfied. Thank you." [This message is repeated twice before the system disconnects the call.]

before the Texas PUC, resulting in a Commission request for a tariff filing. SWBT has agreed to meet with appropriate Texas Commission Staff members to discuss the slamming issue.

SBC also has a program in place, "Customer Choice Protection," that allows customers to protect their carrier(s) of choice. This is known in the industry as PIC freeze and, in most instances, will prevent a change to the customer's provider of choice.[4] In addition, SBC will no longer switch a customer's provider of choice based upon a Letter of Authorization (LOA) that is over 45 days old.

Cramming:

SBC and its Billing and Collections customers have certain obligations and responsibilities that must be fulfilled in accordance with the Billing and Collections agreements entered into by both parties. SBC has exercised such contractual remedies by imposing a moratorium on Billing and Collection of incidental charges for Billing and Collection customers that have an unacceptable level of adjustments and complaints. (*See* attached Press Release) The moratorium[5] would be for a minimum of 90 days, with requirements established to meet specific service level thresholds. If the thresholds are not met within the ninety-day period, then the contracts would be subject to termination.

Scramming:

It is the policy of SBC that only the end user customer can authorize SBC to change its provider of choice. Until such time, the customer will remain pre-

---

[4] A PIC freeze may not be effective if a reseller is involved.

[5] This moratorium applies only to miscellaneous charges. SWBT would continue to bill 1+ long distance calling charges, even during the ninety-day moratorium.

subscribed to its chosen carrier in SBC's switch. SBC will also require IXCs to provide the letters sent to these customers notifying them that they will no longer be able to place 1 + calls. However, this will not prevent "scramming" which is the practice some IXCs use to rid themselves of marginal end users that make few toll calls. Many end user customers will suffer because the "choice" of presubscription is no longer theirs and they could be charged higher non-subscriber rates.[6] The Commission determined that MCI's application of its non-subscriber rates for calls placed over lines presubscribed to MCI is unreasonable and in violation of the Federal Telecommunications Act of 1996 ("the Act").

## II. COMMENTS OUTSIDE THE SCOPE OF THIS DOCKET

A number of comments filed by other parties address perceived problems that are clearly outside the scope of this docket. Some of the issues raised are just not billing problems. The Comments of Texas Citizen Action begin with consumer-oriented complaints about the actions of various types of carriers, but quickly turns into an attack on Southwestern Bell Telephone Company and SBC, particularly targeting intrastate Access Service rates and arguing against interLATA relief. The comments are particularly troubling because so little information is given about the organization, which purports to represent consumer interests, but actually appears to speak for IXCs. Further, many of the attachments are documents that have been provided to Texas legislators in an effort to secure a legislative reduction of access charges, rather than information relevant to the issues in this docket.

MCI Telecommunications Corporation wants the Commission to rule that it can insert whatever message it pleases in ILEC bills, without any editing by the

---

[6] FCC 11/10/98 *Memorandum and Order In the Matter of Halprin, Temple, Goodman & Sugrue v. MCI Telecommunications Corporation; In the Matter of Freedom Technologies, Inc. v. MCI Telecommunications Corporation.*

ILEC issuing the bill to the customer, and also wants the FCC to force ILECs to bill for its dial-around and casual calling services. For a number of years now, carriers have been able to negotiate billing and collection contracts without the assistance of regulation. It was clear at the time that the FCC de-tariffed billing and collection service, and it is even clearer today, that there is a very competitive market in billing and collection services. Indeed, MCI has already assumed the billing and collection function for some of its customers; it is just unwilling to bear the burden of billing and collection for its dial-around and casual caller customers. These "problems" are not billing problems.

The problem with dial-around and casual calling is, of course, the high rate of uncollectibles inherent in those services, rather than the billing process. Both in regard to advertising messages and billing for dial-around and casual calling services, MCI is attempting to persuade the Commission to handicap the ILECs in the contract negotiation process by predetermining important contract issues in its favor. MCI already has other advertising and billing options in the competitive marketplace; it just wants the Commission to create options by fiat that it cannot negotiate in that competitive marketplace. Further, the dial-around and casual calling matter is already before the Commission,[7] so there is certainly no need for it to be addressed in this docket.

The common thread in all of these disparate comments is that the long distance carriers and special interest groups are seeking to have the FCC require the Incumbent Local Exchange Carriers ("ILECs" or, in some cases, the "Bell" companies) to solve problems that are not billing problems. The fact that

[7] MCI filed a petition for rulemaking on 5/19/97 on the subject of LEC billing and collecting for casual calling, styled as a plea to address the threat posed by LECs to the continued delivery of interexchange services to customers with whom IXCs do not have pre-existing subscription relationships.

some carriers engage in deceptive cramming and slamming practices is not a fault of the billing process; it is the fault of the fraudulent carriers. SBC's refusal to send an advertising message, for example, is not a billing problem. Rather, it is a contract dispute arising from MCI's desire to use the billing system as a low cost advertising medium, without regard to the fact that the advertising message being conveyed may be deceptive and harmful to the image of the billing carrier. The Commission should summarily dismiss all of the comments that seek to establish more regulation to address issues clearly beyond the scope of this proceeding. Congress clearly intended the Act to result in less, not more, regulation.

All of the demands on the Commission to solve the problems of slamming/sliding, cramming and scramming through rigid billing rules should be rejected. While rules that define fraudulent conduct can be helpful in identifying and punishing wrongdoers, such rules already exist. The Federal Trade Commission's ("FTC") Pay Per Call Rules adequately define the prohibited conduct of placing charges on customer's bills without authorization, with a few exceptions where the fraudulent practices have expanded beyond the current definitions. The FTC is presently considering changes to those rules to clarify and expand the prohibited conduct. There is a danger that even those rules, which at present are fairly narrowly drawn to impose liability on wrongdoers, will be expanded to burden the industry in general and the broad base of consumers that the rules are meant to protect. While some clarification may be needed, greater effort should be directed toward enforcement of existing rules that impose liability on the wrongdoer, rather than passing new rules or expanding old rules in a manner that will burden the billing process for all carriers and consumers.

Competition already has provided, and will continue to provide, the impetus necessary to develop more user-friendly bills. As soon as the ILECs are granted interLATA relief, competition in both the local and long distance markets will expand rapidly. SBC has already made a number of efforts to improve its bills and combat telephone fraud. SBC companies are continuing to conduct trials of billing practices designed to clarify bills. The absence of regulation allows experimentation to determine real customer preferences and a quick adoption of the preferred billing practices, unhindered by regulatory lag. The Commission should resist the entreaties of those commenters that seek to burden the competitive marketplace with rules requiring uniformity and burdensome detail that add cost, but not clarity.

For all of the reasons set forth above, SBC respectfully urges the Commission to reject the comments seeking to have the Commission re-regulate the billing process and allow competition to perform the functions intended by FTA96.

Respectfully Submitted,

SBC COMMUNICATIONS INC.

By: Barbara R. Hunt

Robert M. Lynch
Roger K. Toppins
Barbara R. Hunt

One Bell Plaza, Room 3026
Dallas, Texas 75202
214-464-5170

December 16, 1998

Southwestern Bell

# News Release

For more information, contact:
Brian Kyhos, (314) 982-1721

## SOUTHWESTERN BELL CONTINUES CRAMMING CRACKDOWN WITH DEADLINE FOR PROBLEM PROVIDERS AND BILLING MORATORIUM

***Company Aims to Reduce Customer Complaints about Providers by 75 Percent in 90 Days***

**Southwestern Bell Unveils New Slamming Billing Policy, New Customer Survey Data**

ST. LOUIS, December 9, 1998 – Southwestern Bell is issuing a warning to companies that generate the most customer complaints about cramming: Cut the complaints immediately, or plan to take your billing elsewhere.

Southwestern Bell has taken the next step in its program to crack down on cramming, the practice of adding charges to telephone bills for products or services that customers never ordered and may not have received. Southwestern Bell has instituted new customer complaint ceiling levels – one-half of one percent of customers billed by the provider that month, or 400 complaints, whichever is lower – for the telecommunications-related companies that utilize its billing service. Each company already has a contractual obligation to submit through Southwestern Bell only true and correct charges authorized by the customer.

Providers that generate the vast majority of complaints are now under a 90-day deadline to get below the complaint ceiling or face termination under the terms of their billing contracts. Already this year, Southwestern Bell has stopped billing for more than 40 providers that generated excessive complaints.

In addition, all other companies that use Southwestern Bell for billing must stay below the threshold or face termination of their contracts as well.

"Our goal is to cut cramming complaints by 75 percent in 90 days, and we hope to soon eliminate it altogether. These new requirements should help us achieve that goal," said Dick Oxler, Director – Billing and Collections for Southwestern Bell.

- more -

Cramming Crackdown/Add One

In a just completed survey, nearly half of all Southwestern Bell customers said they were aware of cramming, which emerged as a significant consumer problem less than one year ago. In the five states Southwestern Bell serves, nearly 60 percent of customers surveyed said they are worried that they will become cramming victims. Each month, the Southwestern Bell helps thousand of alleged cramming victims, and for the past several months, the company also has been tracking cramming complaints.

In addition, during the 90-day cramming crackdown, Southwestern Bell also will not allow providers under the moratorium to begin billing for any new products or services. And billing "clearinghouses" – companies that contract with Southwestern Bell on behalf of many small providers – covered by the moratorium will not be able to submit charges for any new providers. Oxler said the goal of the policy is to prevent any new problems from emerging while the company addresses existing problems.

"We strongly believe that customers should not be charged for products or services they did not order. Our actions are part of a continuing effort to help ensure that," Oxler said. "At the same time, consumers and businesses should continue to protect themselves by reviewing their bills each month."

**Slamming Prevention**

Southwestern Bell also introduced a billing policy change designed to continue removing the financial incentive for a related problem, slamming, an illegal practice in which a consumer's or business' local or long-distance service provider is switched without their permission.

In the past, when serving as a customer advocate to return a customer to the long-distance provider of their choice, Southwestern Bell – under regulatory guidance and prevailing industry practice – has worked with the offending provider to reduce the charge to whatever the customer would have paid to the provider of their choice for the same service. Under the new policy, Southwestern Bell will remove the entire charge from the customer's bill and instruct the offending provider not to use Southwestern Bell's billing service to attempt to collect any money from the slamming victim.

Cramming Crackdown/Add Two

"Unfortunately, even companies caught slamming customers had the potential to profit from their action," Oxler said. "Under state or federal law, the providers may still have a right to seek payment from slamming victims, but we don't want them to use our billing system to do it."

Through the end of October, Southwestern Bell has served as customer advocate for 350,000 alleged slamming victims throughout the five states it serves.

According to the recent Southwestern Bell survey, nearly 45 percent of Southwestern Bell customers said they have been victims of slamming or know someone who had, and more than 80 percent said protection from slamming was "extremely" or "very" important.

Southwestern Bell is committed to raising customer awareness in order to stamp out telephone fraud. Through its "Hang Up On Slamming" campaign, Southwestern Bell has educated millions of customers on how to protect themselves from cramming and slamming. The company is now sending an automated message to notify residential customers any time their long-distance service provider is changed.

To provide customers with a way to help protect their choice of providers from being switched without their permission, the company also offers Customer Choice Protection, a free service that can be added or removed from an account at the direction of the customer.

For additional information and a new brochure on slamming, cramming and other forms of telephone fraud, customers can call toll-free 1-877 4-NO-SLAM (1-877-466-7526), 1-877-3-NO-CRAM (1-877-366-2726) or log onto the Internet at www.swbell.com/Slamming.

***Southwestern Bell Telephone Co.*** *provides basic and leading-edge telephone services and products to more than 14.3 million business and residential customers — a total of 16.1 million access lines — in Missouri, Texas, Oklahoma, Arkansas and Kansas. It is a company of* ***SBC Communications Inc.*** *(www.sbc.com) a global leader in the telecommunications industry, with more than 36.9 million access lines and 6.5 million wireless customers across the United States, as well as investments in telecommunications businesses in 11 countries. Under the* ***Southwestern Bell, Pacific Bell, SNET, Nevada Bell*** *and* ***Cellular One*** *brands, SBC, through its subsidiaries, offers a wide range of innovative services. SBC offers local and long-distance telephone service, wireless communications, data communications, paging, Internet access, and messaging, as well as telecommunications equipment, and directory advertising and publishing. SBC has approximately 129,000 employees and its annual revenues rank it in the top 50 among* Fortune 500 *companies.*

###

## CERTIFICATE OF SERVICE

I, Katie M. Turner, hereby certify that the foregoing, "REPLY COMMENTS OF SBC COMMUNICATIONS INC." in CC Docket No. 98-170 has been filed this 16th day of December, 1998 to the Parties of Record.

Katie M. Turner

Katie M. Turner

December 16, 1998

FCC SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
1919 M ST NW
ROOM 222
WASHINGTON DC 20554

INTERNATIONAL TRANSCRIPTION SERVICE INC
1231 20TH STREET NW
WASHINGTON DC 20037

JUDY BOLEY
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW
ROOM 234
WASHINGTON DC 20554

TIMOTHY FAIN
OMB DESK OFFICER
10236 NEOB
725 17TH STREET NW
WASHINGTON DC 20503

EDWARD H HANCOCK
QUALITY COMMUNICATIONS INC
9931 CORPORATE CAMPUS DRIVE
SUITE 1000
LOUISVILLE KY 40223

PUBLIC UTILITY COMMISSION OF TEXAS
1701 N CONGRESS AVENUE
P O BOX 13326
AUSTIN TX 78711 3326

CYNTHIA B MILLER
FLORIDA PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BOULEVARD
TALLAHASSEE FLORIDA 32399 0850

PUBLIC SERVICE COMMISSION OF WISCONSIN
P O BOX 7854
MADISON WI 53707 7854

PAMELA J RILEY
AIRTOUCH COMMUNICATIONS INC
1818 N STREET NW
SUITE 800
WASHINGTON DC 20036

DOUGLAS D LEEDS
AIRTOUCH COMMUNICATIONS INC
ONE CALIFORNIA STREET
29TH FLOOR
SAN FRANCISCO CA 94111

WILLIAM KENNARD
1919 M STREET NW
WASHINGTON DC 20554

SUSAN NESS
1919 M STREET NW
WASHINGTON DC 20554

MICHAEL POWELL
1919 M STREET NW
WASHINGTON DC 20554

GLORIA TRISTANI
1919 M STREET NW
WASHINGTON DC 20554

HAROLD FURCHTGOTT ROTH
1919 M STREET NW
WASHINGTON DC 20554

ATTORNEYS FOR THE AMERICAN PUBLIC
COMMUNICATIONS COUNCIL
DICKSTEIN SHAPIRO MORIN & OSHINSKY
2101 L STREET NW
WASHINGTON DC 20037 1526

ANITA CHENG
COMMON CARRIER BUREAU
2025 M STREET NW
6TH FLOOR
WASHINGTON DC 20554

ROBERT M MCDOWELL
AMERICA'S CARRIERS
TELECOMMUNICATIONS ASSOCIATION
8180 GREENSBORO DRIVE SUITE 700
MCLEAN VIRGINIA 22102

LARRY STRICKLING
FCC
1919 M STREET NW
ROOM 500
WASHINGTON DC 20554

FEDERAL COMMUNICATIONS COMMISSION
445 TWELFTH STREET SW
TW A325
WASHINGTON DC 20554

JUDITH L HARRIS
REED SMITH SHAW & MCCLAY
1301 K STREET NW
SUITE 1100 EAST TOWER
WASHINGTON DC 20005

EDWIN N LAVERGNE
BILLING REFORM TASK FORCE
SHOOK HARDY BACON
1850 CONNECTICUT AVE NW SUITE 900
WASHINGTON DC 20006 2244

LARRY A PECK
COUNSEL FOR AMERITECH
2000 WEST AMERITECH CENTER DRIVE
ROOM 4H86
HOFFMAN ESTATES IL 60196 1025

EMILY M WILLIAMS
ASSOC FOR LOCAL TEL SVCS
888 17TH ST NW
SUITE 900
WASHINGTON DC 20036

MARK C ROSENBLUM
AT&T
295 NORTH MAPLE AVENUE
BASKING RIDGE NJ 07920

JOHN M GOODMAN
BELL ATLANTIC TELEPHONE COMPANIES
1300 I STREET NW
WASHINGTON DC 20005

JOHN T SCOTT III
BELL ATLANTIC MOBILE INC
1001 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004

M ROBERT SUTHERLAND
BELLSOUTH CORPORATION
1155 PEACHTREE STREET NE
ATLANTA GEORGIA 30309 3390

RACHEL J ROTHSTEIN
CABLE & WIRELESS USA INC
8219 LEESBURG PIKE
VIENNA VA 22182

GRETCHEN THERESE DUMAS
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVE
SAN FRANCISCO CA 94102

MICHAEL F ALTSCHUL
CELLULAR TELE. INDUSTRY ASSOC
1250 CONNECTICUT AVENUE NW
SUITE 200
WASHINGTON DC 20036

ELIOT J GREENWALD
CENTURYTEL
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007 5116

GARY D SLAIMAN
COALITION TO ENSURE RESPONSIBLE BILLING
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007

MAGALIE ROMAN SALAS
SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW ROOM 222
WASHINGTON DC 20554

SHANNON E SMITH
WUTC STAFF
1400 S EVERGREEN PARK DR SW
P O BOX 40128
OLYMPIA WA 98504 0128

ALLEN W HILE
BUREAU OF CONSUMER PROTECTION
601 PENNSYLVANIA AVE NW
ROOM 230
WASHINGTON DC 20580

EILEEN HARRINGTON
BUREAU OF CONSUMER PROTECTION
601 PENNSYLVANIA AVE NW
ROOM 238A
WASHINGTON DC 20580

JOHN PRENDERGAST
COMMNET CELLULAR INC
2120 L STREET NW
SUITE 300
WASHINGTON DC 20037

RUSSELL M BLAU
COMMONWEALTH TELEPHONE COMPANY
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007 5116

ROBERT J AAMOTH
COMPETITIVE TELECOMMUNICATIONS ASSOC
1200 19TH STREET NW
SUITE 500
WASHINGTON DC 20036

MATTHEW C AMES
EDLINC
1150 CONNECTICUT AVE
SUITE 1000
WASHINGTON DC 20036 4306

GARRET G RASMUSSEN
ELECTRONIC COMMERCE ASSOC
2550 M STREET NW
WASHINGTON DC 20037 1350

ANDREA D PRUITT
EXCEL TELECOMMUNICATIONS INC
1200 19TH STREET NW
SUITE 500
WASHINGTON DC 20036

CYNTHIA B MILLER
FLORIDA PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BOULEVARD
TALLAHASSEE FLORIDA 32399 0850

MICHAEL J SHORTLEY III
FRONTIER CORPORATION
180 SOUTH CLINTON AVENUE
ROCHESTER NEW YORK 14646

CHARLES H HELEIN
GLOBAL TEL CONSULTANTS INC
8180 GREENSBORO
SUITE 700
MCLEAN VIRGINIA 22102

BARRY PINELES
GST TELECOM INC
4001 MAIN STREET
VANCOUVER WA 98663

JOHN F RAPOSA
GTE SERVICE CORPORATION
600 HIDDEN RIDGE HQE03J27
P O BOX 152092
IRVING TX 75015 2092

KENNETH T BURCHETT
GVNW INC
8050 S W WARM SPRINGS
TUALATIN OREGON 97062

DONN T WONNELL
INDEPENDENT TELEPHONE &
TELECOMMUNICATIONS ALLIANCE
1300 CONNECTICUT AVE NW SUITE 600
WASHINGTON DC 20036

ROBERT E LOWELL
KING COMMUNICATIONS U S A INC
5401 ALHAMBRA DRIVE
SUITE B
ORLANDO FL 32808

DAVID L NACE
LIBERTY CELLULAR INC
1111 19TH STREET NW
SUITE 1200
WASHINGTON DC 20036

THOMAS L WELCH
MAINE PUBLIC UTILITIES COMMISSION
242 STATE STREET
18 STATE HOUSE STATION
AUGUSTA MAINE 04333 0018

MARY L BROWN
MCI WORLDCOM INC
1801 PENNSYLVANIA AVE NW
WASHINGTON DC 20006

KATHRYN C BROWN
1919 M STREET NW
ROOM 844
WASHINGTON DC 20554

JANE JACKSON
1919 M STREET NW
ROOM 518
WASHINGTON DC 20554

JAMES SCHLICHTING
1919 M STREET NW
ROOM 500
WASHINGTON DC 20554

TOM POWER
1919 M STREET NW
ROOM 814
WASHINGTON DC 20554

JAMES CASSERLY
1919 M STREET NW
ROOM 832
WASHINGTON DC 20554

PAUL GALLANT
1919 M STREET NW
ROOM 826
WASHINGTON DC 20554

KYLE DIXON
1919 M STREET NW
ROOM 844
WASHINGTON DC 20554

JUDY NITSCHE
1919 M STREET NW
ROOM 518
WASHINGTON DC 20554

DOROTHY ATTWOOD
2025 M STREET NW
SIXTH FLOOR
WASHINGTON DC 20554

SHARON LEE
2025 M STREET NW
SIXTH FLOOR
WASHINGTON DC 20554

SUSAN M EID
MEDIAONE GROUP INC
1919 PENNSYLVANIA AVE NW
SUITE 610
WASHINGTON DC 20006

LIANNE KNYCH
MINNESOTA OFC OF ATTORNEY GENERAL
1200 NCL TOWER
445 MINNESOTA STREET
ST PAUL MINNESOTA 55101 2130

GEORGE M FLEMING
MISSISSIPPI PUBLIC SVC COMMISSION
POST OFFICE BOX 1174
JACKSON MISSISSIPPI 39215 1174

PENNY G BAKER
MISSOURI PUBLIC SERVICE COMMISSION
P O BOX 360
JEFFERSON CITY MO 65102

KENNETH V REIF
NASUCA
1580 LOGAN ST
SUITE 610
DENVER CO 80203

SUSAN GRANT
NATIONAL CONSUMERS LEAGUE
1701 K STREET NW
SUITE 1200
WASHINGTON DC 20006

DAVID S KONCZAL
NEVADACOM
2001 PENNSYLVANIA AVE NW
SUITE 400
WASHINGTON DC 20006

BRUCE A KUSHNICK
NEW NETWORKS INSTITUTE
826 BROADWAY
SUITE 900
NEW YORK NY 10003

TIMOTHY S CAREY
NEW YORK STATE CONSUMER PROTECTION BOARD
5 EMPIRE STATE PLAZA
SUITE 2101
ALBANY NEW YORK 12223 1556

LAWRENCE G MALONE
PUBLIC SERVICE COMMISSION
THREE EMPIRE STATE PLAZA
ALBANY NEW YORK 12223 1350

JAMES LANNI
RHODE ISLAND DIVISION
OF PUBLIC UTILITIES
100 ORANGE STREET
PROVIDENCE RI 02903

CHARLES F LARKEN
VERMONT DEPARTMENT OF
PUBLIC SERVICE
120 STATE STREET
MONTPELIER VT 05602

KEIKKI LEESMENT
NEW JERSEY BOARD OF
PUBLIC UTILITIES
2 GATEWAY CENTER
NEWARK NJ 07102

MARY J SIASAK
DISTRICT OF COLUMBIA
PUBLIC SERVICE COMMISSION
450 FIFTH ST SUITE 800
WASHINGTON DC 20001

JOEL B SHIFMAN
MAINE PUBLIC UTILITY COMMISSION
STATE HOUSE STATION 18
AUGUSTA ME 04865

RITA BARMEN
VERMONT PUBLIC SERVICE BOARD
89 MAIN STREET
MONTPELIER VT 05602

VERONICA A SMITH
PENNSYLVANIA PUBLIC UTILITY
COMMISSION
PO BOX 3265
HARRISBURG PA 17105 3265

TELECOMMUNICATIONS REPORT
1333 H STREET NW 11TH FLOOR
WEST TOWER
WASHINGTON DC 20005

BRAD RAMSAY
INTERSTATE COMMERCE
COMMISSION BLDG ROOM 1102
12TH & CONSTITUTION ST NW
WASHINGTON DC 20044

CAMILLE STONEHILL
STATE TELEPHONE REGULATION REPORT
1101 KING STREET
SUITE 444
ALEXANDRIA VA 22314

ARCHIE R HICKERSON
TENNESSEE PUBLIC SERVICE
COMMISSION
460 JAMES ROBERTSON PKY
NASHVILLE TN 37219

RONALD CHOURA
MICHIGAN PUBLIC SERVICE
COMMMISSION
6545 MERCANTILE WAY
LANSING MI 48910

GARY EVENSON
WISCONSIN PUBLIC SERVICE COMMISSION
P O BOX 7854
MADISON WI 53707

ALABAMA PUBLIC SERVICE
COMMISSION
P O BOX 304260
MONTGOMERY AL 36130 4260

SANDY IBAUGH
INDIANA UTILITY REGULATORY
COMMIKSSION
901 STATE OFFICE BLDG
INDIANAPOLIS IN 46204

MARY STREET
IOWA UTILITIES BOARD
LUCAS BUILDING
5TH FLOOR
DES MOINES IA 50316

GORDON L PERSINGER
MISSOURI PUBLIC SERVICE COMMISSION
P O BOX 360
JEFFERSON CITY MO 65102

SAM LOUDENSLAGER
ARKANSAS PUBLIC SERVICE
COMMISSION
1200 CENTER STREET P O BOX C 400
LITTLE ROCK AR 72203

MARSHA H SMITH
IDAHO PUBLIC UTILITIES COMMISSION
STATEHOUSE
BOISE ID 83720

MARY ADU
PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA
505 VAN NESS AVENUE
SAN FRNACISCO CA 94102

GLENN LBACKMON
WASHINGTON U&TC
1300 S EVERGREEN PARK DR SW
P O BOX 47250
OLYMPIA WA 98504 7250

MYRA KAREGIANES
ILLINOIS COMMERCE COMMISSION
STATE OF ILLINOIS BUIDLING
160 NO LASALLE SUITE C 800
CHICAGO IL 60601 3104

MARIBETH D SWAPP
OKLAHOMA CORP COMMISSION
400 JIM THORPE BUILDING
OKLAHOMA CITY OK 73105

EDWARD MORRISON
OREGON PUBLIC UTILITIES COMM
LABOR AND INDUSTRIES BLDG
ROOM 330
SALEM OR 97310

ROB VANDIVER
FLORIDA PUBLIC SVC COMMISSION
2540 SHUMARD OAK BLVDF
TALLAHASSEE FL 32399 0850

JANICE M MYLES
COMMON CARRIER BUREAU
1919 M STREET NW
ROOM 544
WASHINGTON DC 20554

MARGIE HENDRICKSON
PUBLIC UTILITIES DIVISION
121 7TH PLACE EAST
SUITE 350
ST PAUL MN 55101

ROBIN MCHUGH
MONTANA PSC
1701 PROSPECT AVE
P O BOX 202601
HELENA MT 59620 2601

DEONNE BRUNNING
NEBRANKA PSC
1200 N STREET
LINCOLN NE 68508

DIANE MUNNS
IOWA UTILITIES BOARD
LUCAS STATE OFFICE BUILDING
DES MOINES IA 50319

CYNTHIA NORWOOD
VIRGINIA STATE CORP COMMISSION
P O BOX 1197
RICHMOND VA 23201

WANDA HARRIS
COMMON CARRIER BUREAU
1919 M STREET NW
ROOM 518
WASHINGTON DC 20554

MARYLAND PUBLIC SERVICE COMM
6 ST PAUL STREET
16TH FLOOR
BALTIMORE MD 21202 6806

MARY LIZ HEPBURN
BELL ATLANTIC TEL CORP
1300 I STREET NW
WASHINGTON DC 20005

BILL ALLEN
BELL ATLANTIC TEL CORP
158 STATE STREET
ALBANY NY 12207

ROBERT S FOOSANER
NEXTEL COMMUNICATIONS INC
1450 G STREET NW
SUITE 425
WASHINGTON DC 20005

DAVID L NACE
NORTHWESTERN INDIANA TEL CO INC
1111 19TH STREET NW
SUITE 1200
WASHINGTON DC 20036

TERESA S WERNER
OMNIPOINT COMMUNICATIONS INC
1200 19TH STREET NW
7TH FLOOR
WASHINGTON DC 20036

STEPHEN C LECKAR
ORION COMMUNICATIONS LTD
1300 PENNSYLVANIA AVE NW
SUITE 500
WASHINGTON DC 20004

LEE J PELTZMAN
ORION COMMUNICATIONS LTDF
1901 L STREET NW
SUITE 290
WASHINGTON DC 20036

TERRENCE J BUDA
PENNSYLVANIA PUBLIC UTILITY COMM
P O BOX 3265
HARRISBURG PA 17105 3265

KATHERINE M HARRIS
PERSONAL COMM INDUSTRY ASSOC
1776 K STREET NW
WASHINGTON DC 20006

MARY MCDERMOTT
PERSONAL COMM INDUSTRY ASSOC
500 MONTGOMERY STREET
SUITE 700
ALEXANDRIA VA 22314 1561

RICHARD S MYERS
PETROLEUM COMMUNICATIONS INC
1522 K STREET NW
SUITE 1100
WASHINGTON DC 20005

WALTER STEIMEL JR
PILGRIM TELEPHONE INC
1900 K STREET NW
WASHINGTON DC 20006

WILLIAM L ROUGHTON JR
PRIMECO PERSONAL COMMUNICATIONS
601 13TH STREET NW
SUITE 320 SOUTH
WASHINGTON DC 20005

B LYNN F RATNAVALE
PROJECT MUTUAL TEL COOPERATIVE
1111 19TH STREET NW
SUITE 1200
WASHINGTON DC 20036

JODI J BAIR
OHIO PUBLIC UTILITIES COMM
180 EAST BROAD STREET
COLUMBUS OH 43215 3793

PAT WOOD III
TEXAS PUC
1701 N CONGRESS AVE
P O BOX 13326
AUSTIN TX 78711 3326

JUDY WALSH
TEXAS PUC
1701 N CONGRESS AVE
P O BOX 13326
AUSTIN TX 78711 3326

PATRICIA A CURRAN
TEXAS PUC
1701 N CONGRESS AVE
P O BOX 13326
AUSTIN TX 78711 3326

EDWARD H HANCOCK
QUALITY COMMUNICATIONS INC
9931 CORPORATE CAMPUS DR
SUITE 1000
LOUISVILLE KY 40223

TIKI GAUGLER
QWEST COMMUNICATIONS CORP
4250 NORTH FAIRFAX DR
12W002
ARLINGTON VA 22203

JOSEPH T GARRITY
QWEST COMMUNICATIONS CORP
555 17TH STREET
DENVER CO 80202

SYLVIA LESSE
RURAL CELLULAR ASSOCIATION
2120 L STREET NW
SUITE 520
WASHINGTON DC 20037

MICHAEL R BENNET
RURAL TELECOMUNICATIONS GROUP
1019 NINETEENTH STREET NW
SUITE 500
WASHINGTON DC 20036

MARGOT SMILEY HUMPHREY
RURAL TELEPHONE COALITION
1150 CONNECTICUT AVE NW
WASHINGTON DC 20036

L MARIE GUILLORY
RURAL TELEPHONE COALITION
2626 PENNSYLVANIA AVE NW
WASHINGTON DC 20037

STUART POLIKOFF
RURAL TELEPHONE COALITION
21 DUPONT CIRCLE NW
SUITE 700
WASHINGTON DC 20036

IRENE A ETZKORN
SIMPLIFIED COMMUNICATIONS
WORLDWIDE
10 ROCKEFELLER PLAZA
NEW YORK NY 10020

CARL K OSHIRO
SMALL BUSINESS ALLIANCE FOR FAIR
UTILITY REGULATION
100 FIRST ST SUITE 2540
SAN FRANCISCO CA 94105

CAROLE C HARRIS
SOUTHERN COMMUNICATIONS
SERVICES INCF
600 THIRTEENTH STREET NW
WASHINGTON DC 20005 3096

LEON M KESTENBAUM
SPRINT CORPORATION
1850 M ST NW
SUITE 1110
WASHINGTON DC 20036

JONATHAN M CHAMBERS
SPRINT CORPORATION
1801 K ST NW
SUITE M112
WASHINGTON DC 20006

CHARLES C HUNTER
TELECOMMUNICATIONS RESELLERS
1620 I STREET NW
SUITE 701
WASHINGTON DC 20006

LAURENCE E HARRIS
TELIGENT INC
8065 LEESBURG PIKE
SUITE 400
VIENNA VA 22182

PHILIP L VERVEER
TELIGENT INC
1155 21ST STREET NW
WASHINGTON DC 20036

KENAN OGELMAN
TEXAS OPUC
1701 N CONGRESS SUITE 9 180
P O BOX 12397
AUSTIN TX 78711 2397

RICK GUZMAN
TEXAS OPUC
1701 N CONGRESS SUITE 9 180
P O BOX 12397
AUSTIN TX 78711 2397

MITCHELL F BRECHER
TIME WARNER TELECOM INC
1400 SIXTEENTH STREET NW
WASHINGTON DC 20036

RANDALL B LOWE
USP&C INC
1200 NINETEENTH STREET NW
WASHINGTON DC 20036

J TODD METCALF
USP&C INC
1200 NINETEENTH STREET NW
WASHINGTON DC 20036

LAWRENCE E SARJEANT
USTA
1401 H STREET NW
SUITE 600
WASHINGTON DC 20005

KATHRYN MARIE KARUSE
U S WEST COMMUNICATIONS INC
1020 19TH STREET NW
WASHINGTON DC 20036

DAVID C FARNSWORTH
VERMONT PUBLIC SERVICE BOARD
DRAWER 20
MONTPELIER VERMONT 05620 2701

LESLIE A CADWELL
VERMONT DEPARTMENT OF PUBLIC
SERVICE
DRAWER 20
MONTPELIER VERMONT 05620 2701

CATHY SEIDEL
FCC
2025 M STREET NW
WASHINGTON DC 20554