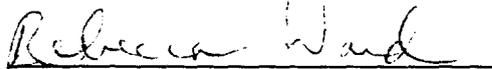


CERTIFICATE OF SERVICE

I, Rebecca Ward, do hereby certify that on this 10th day of December, 1997, I have caused a copy of the foregoing **COMMENTS OF U S WEST, INC.** to be served, via first-class United States Mail, postage prepaid upon the persons listed on the attached service list.


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Before the
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Washington, DC 20554

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OFFICE OF THE SECRETARY

In the Matter of)
)
Jurisdictional Separations Reform and) CC Docket No. 80-286
Referral to the Federal-State Joint Board)

REPLY COMMENTS OF U S WEST, INC.

U S WEST, Inc. ("U S WEST") hereby files its Reply to comments in the Federal Communications Commission's ("Commission") Separations Reform proceeding.¹

I. INTRODUCTION (NPRM § IV)

Forty-two parties filed comments in this proceeding including large local exchange carriers ("LEC"), small LECs, interexchange carriers ("IXC"), competitive local exchange carriers ("CLEC"), state public utility commissions ("State PUC"), and a few other interested parties (e.g., telecommunications consultants). It is evident from a review of the comments that most filing parties are not interested in separations "reform" -- but in separations "fine-tuning." Most parties want to preserve what they have under the current separations rules and "get a little more" through rule revisions. They do not want to take the risk that they might be worse-

¹ In the Matter of Jurisdictional Separations Reform and Referral to the Federal-State Joint Board, CC Docket No. 80-286, Notice of Proposed Rulemaking, FCC 97-354, rel. Oct. 7, 1997 ("NPRM"). Public Notice, Jurisdictional Separations Reform and Referral to the Federal-State Joint Board, DA 97-2308, rel. Oct. 31, 1997. Comments were filed Dec. 10, 1997.

off in the short-run with major separations reform than they would be with a continuation of today's separations rules. As a result, few parties, other than U S WEST and GTE Service Corporation ("GTE"), suggest anything in their comments that remotely resembles separations reform.²

As a group, IXCs favor separations changes which reduce interstate access charges.³ State PUCs favor separations rules which will stabilize local exchange rates or increase interstate cost assignments. Large LECs favor freezing separations factors at their current levels in order to stabilize interstate/intrastate cost assignments as the percent of intrastate traffic grows (*i.e.*, particularly with increasing Internet usage). Small LECs favor different separations rules for price cap and rate of return regulated companies in order to shelter small LECs from any separations changes that might be directed at reducing the interstate access charge rates of large price cap LECs.

² Sprint Corporation ("Sprint") deserves credit for recognizing that to be successful separations reform must not only deal with the assignment of a disproportionate share of LEC costs to interstate access but with below-cost pricing of local service. Needless to say, Sprint's realistic position is largely a function of its ownership of the third largest IXC and a very large LEC. However, Sprint has not proposed any major separations reforms at this time because it believes that the time is not right, politically, for a major separations overhaul. Sprint believes that a more appropriate time for separations reform would be in the year 2001 when access rates will reflect many of the Commission's recently adopted access charge reforms. See Sprint at 6.

³ For example, AT&T Corp. ("AT&T") urges the Commission to transfer all local loop costs and marketing expenses to the intrastate jurisdiction while MCI Telecommunications Corporation ("MCI") is even more direct in urging the Commission to reject any proposals which would increase interstate cost assignments. AT&T at 12-14, 15-17; MCI at i, 4. Under existing price cap rules any such separations changes would be reflected in exogenous cost adjustments to LEC price cap indices.

All of the above are incremental changes to existing separations rules -- in no way can these positions be described as separations reform.⁴ The way most commenters have laid out the alternatives, separations changes are a "zero sum" game with one group gaining something (e.g., access charge reductions) at the expense of another group (e.g., the failure of LECs to recover embedded costs). However, it does not have to be this way with separations reform if the Commission is willing to undertake dramatic reform as has been suggested by both GTE and U S WEST.⁵

U S WEST believes that significant improvements to economic efficiency can be achieved if the Commission assigns all LEC costs from the customer's premise to the IXC point of presence ("POP") to the intrastate jurisdiction.⁶ Under this

⁴ Many parties suggest that the Commission's ultimate goal should be the elimination of separations. Others agree that the Commission's separations rules should be eliminated -- but only after both interstate and intrastate markets have become fully competitive. Once one gets beyond the general long-run goals of separations reform, the positions of the parties diverge rapidly with each party advocating incremental changes which will serve its own self-interest.

⁵ Comments of U S WEST at 4-15; GTE at 4-9. U S WEST would be remiss if it did not recognize that Sprint's proposal to eliminate cost separations (i.e., cost allocations) and assign all LEC local exchange costs to the intrastate jurisdiction is very similar to U S WEST's proposal except for the recovery of historical costs. See Sprint at 9.

GTE's position differs from U S WEST's in that it has advocated use of a three-year transition period during which separations factors would be frozen. GTE at 13-17. If the Commission determines that a transition period is necessary, U S WEST believes that this period should be used to amortize unrecovered historical costs in order to give the states as much latitude as possible in establishing economically viable intrastate rates. Comments of U S WEST at 13.

⁶ As GTE notes, such an approach would also satisfy the three criteria -- competitive neutrality, administrative simplicity, and cost causation -- that the Commission established for evaluating separations reform proposals. In particular, "[g]iving

approach there will be no need to allocate the costs of commonly-used LEC facilities between jurisdictions -- all such plant will be assigned to the intrastate jurisdiction. Furthermore, artificial distinctions between intrastate and interstate access would be eliminated and access services would be subject to regulation in a single jurisdiction. As GTE points out, “[p]lacing all responsibility for these costs [of commonly-used LEC facilities] in a single jurisdiction will enable the states to develop comprehensive and coordinated programs for balancing affordable local service with rational cost recovery in a competitive environment.”⁷

II. NEITHER THE TELECOMMUNICATIONS ACT NOR SMITH v. ILLINOIS BELL PROHIBITS THE COMMISSION FROM REFORMING ITS SEPARATIONS RULES AS U S WEST HAS PROPOSED (NPRM § III)

The comments reveal that there is a significant difference of opinion as to whether the Commission has legal authority to “eliminate” separations. Some commenters argue that the separations is required by Smith v. Illinois Bell and its progeny.⁸ Other parties assert that the Commission has sufficient legal authority

states sole authority to regulate local exchange facilities would promote competitive neutrality in three ways. First, as competition in the local and access markets increases, prices will be driven toward costs, and [incumbent] LECs will be under increasing pressure to charge a single rate per minute for all traffic utilizing their exchange facilities. . . Second, giving states sole authority to regulate local exchange facilities will help avoid misallocations of costs that arise when two jurisdictions regulate the same access based on different standards. . . Third, eliminating joint jurisdiction would put all competitors on more equal regulatory footing.” GTE at 4-5.

⁷ Id. at ii.

⁸ See, e.g., AT&T at 9-11; Cox Communications, Inc. at 4-5; Public Utilities Commission of Ohio at 3-7; State of Vermont Public Service Board at 11-14; Ad Hoc Telecommunications Users Committee at 7-8; National Association of State Utility Consumer Advocates at 10-11.

under the Act's forbearance provisions and other provisions to eliminate separations.⁹ U S WEST is indifferent to the outcome of this debate.

Regardless of the outcome, it is clear that the Commission has the authority under Section 221(c) to determine what property of a carrier is considered to be used in the provision of interstate service.¹⁰ Neither Smith v. Illinois Bell nor the Act require any particular approach to separations. U S WEST is of the opinion that Smith v. Illinois Bell stands for the proposition that there must be some sort of "jurisdictional symmetry" between revenues and costs.¹¹ Otherwise it would be impossible to determine whether a rate was confiscatory or not.¹² If anything U S WEST's proposal (which would result in the assignment of all LEC costs from the customer's premise to the IXC POP to the intrastate jurisdiction) finds support in Smith v. Illinois Bell in that all costs and revenues associated with the provision of access would be assigned to a single jurisdiction.

Moreover, adoption of U S WEST's proposal would avoid the arbitrary allocation of costs of joint-use facilities between jurisdictions that has typified separations over the last 60 years. The challenges associated with the assignment of joint costs in increasingly competitive telecommunications markets are significant enough without the added burden of dealing with these costs in two different jurisdictions.

⁹ See, e.g., Bell Atlantic Telephone Companies at 5-7; Ameritech at 11-12; BellSouth Corporation and BellSouth Telecommunications Inc. at 2-4.

¹⁰ 47 U.S.C. § 221(c).

¹¹ Comments of U S WEST at 19.

III. THE KEY TO SEPARATIONS REFORM IS TO ALIGN COSTS WITH REVENUE STREAMS SO THAT STATE REGULATORY COMMISSIONS HAVE AN OPPORTUNITY TO "REBALANCE" RATES (NPRM § IV(D)(4))

IXCs are quick to support any separations changes that increase intrastate cost assignments and lead to reductions in interstate access charges.¹³ In and of themselves, most of these proposed separations changes may be defended as a step towards ensuring that costs are assigned to the appropriate jurisdiction. The problem with such a "piecemeal" approach is that interstate cost reductions are immediately reflected in price cap adjustments (via exogenous cost changes) but concurrent intrastate cost increases often are not reflected in intrastate rates until after some period of time (i.e., regulatory lag). Thus, IXCs have a great incentive to advocate reductions in interstate cost assignments while opposing the inclusion of those same costs in intrastate rates. Clearly, the IXCs may reap significant monetary gains from such separations "gamesmanship" and, therefore, have a strong incentive to engage in such behavior.

The Commission can avoid the dire consequences associated with "piecemeal" separations changes and the attendant regulatory gamesmanship by assigning all of the costs of joint-use local exchange facilities to a single jurisdiction -- the intrastate jurisdiction as U S WEST and GTE have proposed.¹⁴ The aforementioned revenue/regulatory lag problems in state jurisdictions would disappear because

¹² Smith v. Illinois Bell Telephone Co., 282 U.S. 133, 160 (1930).

¹³ See, e.g., AT&T at iii, 4-5, 12-13, 22-24; MCI at 4-5, 8-9, 12.

¹⁴ If the IXCs' words are taken at face value, one would expect them to support such a realignment in costs.

revenues would follow costs (e.g., a minute of interstate access now becomes a minute of intrastate access). While the Commission has no jurisdiction over intrastate rates, U S WEST believes that the cost transfer could be structured in such a way so that "interstate" rate levels remain in effect until state commissions have adequate time to integrate the separate interstate and intrastate access products. No party would be worse-off under such an approach and it would be a major step towards rationalizing LEC rate structures.

IV. CONCLUSION

Piecemeal changes in separations rules will create far more problems than they will resolve. As such, the Commission should decline to undertake any such revisions in this proceeding. Instead, the Commission should do what it set out to do -- reform separations. U S WEST urges the Commission to dramatically reform separations as both U S WEST and GTE have proposed by assigning all costs associated with local exchange facilities to the states. Reforming separations in this manner would give state jurisdictions both the incentive and the wherewithal to

U S WEST, INC.
January 26, 1998

resolve many of the pricing anomalies which currently exist in LEC access charge
and interconnection pricing structures.

Respectfully submitted,

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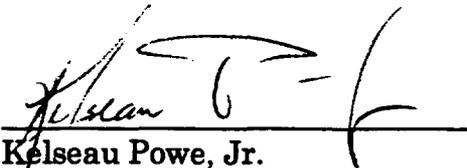
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January 26, 1998

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 26th day of January, 1998, I have caused a copy of the foregoing **REPLY COMMENTS OF U S WEST, INC.** to be served, via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.


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