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VIA HAND DELIVERY

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RECEIVED
JUN 10 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Reply Comments of Metro One Telecommunications, Inc. in CC Docket No. 96-98: In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, Second Notice of Proposed Rulemaking

Dear Ms. Salas:

On behalf of Metro One Telecommunications, Inc. ("Metro One"), we submit herewith for filing an original and twelve (12) copies of Reply Comments in the above-referenced proceeding.

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We also enclose an extra copy of this transmittal letter that is to be date-stamped and returned in the envelope provided. Should any questions arise regarding this submission, please contact Metro One's undersigned legal counsel.

Respectfully submitted,

Michelle W. Cohen

Michelle W. Cohen
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

Enclosures

cc: Janice M. Myles (FCC)
ITS

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	))	CC Docket No. 96-98

REPLY COMMENTS OF METRO ONE TELECOMMUNICATIONS, INC.

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SUMMARY

Metro One and other commenters in this proceeding have established that the Commission must retain a national list of unbundled network elements to fulfill the pro-competitive goals of the Telecommunications Act of 1996. In particular, access to ILECs' directory assistance listings and databases remains critical to permitting alternative providers a "meaningful opportunity to compete."

New entrants can only compete effectively if they have access to the tools that are prerequisites to offering the intended services. In certain instances, such "tools" still are *only* available from the ILECs. As recognized by the Commission and demonstrated by Metro One and others, the existence of an alternative network element should only begin the Commission's inquiry. The Commission must carefully review whether a substitute source is a "real" alternative to an ILEC's network element in terms of quality, pricing, and quantity.

The record establishes that there exists *no* valid alternative to the ILECs' directory assistance listings and databases. ILECs are the only source of up-to-date, complete information. Third party providers only offer a grossly inferior product, often at inflated prices. If competitive directory assistance providers cannot offer their customers accurate listings or if the costs of those listings are unreasonable, the new entrants will have short life spans in the business. Customers justifiably expect from alternative providers the same quality in directory assistance services that they have obtained for years from the ILECs. By mandating unbundled access to ILECs' directory assistance listings and databases, the Commission will allow new entrants the ability to meet those customer expectations and the opportunity to compete on an even playing field, as intended by the Telecommunications Act of 1996.

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	

REPLY COMMENTS OF METRO ONE TELECOMMUNICATIONS, INC.

Metro One Telecommunications, Inc. ("Metro One"), by its attorneys, and pursuant to Sections 1.415 and 1.419 of the Federal Communications Commission's (the "Commission") Rules, hereby respectfully submits these Reply Comments on the *Second Further Notice of Proposed Rulemaking* (the "Notice")[1/] adopted in the captioned proceeding.

I. INTRODUCTION

As Metro One and other commenters in this proceeding have demonstrated, it is imperative that the Commission establish a national, minimum list of unbundled network elements ("UNEs"). Moreover, to further one of the central goals of the Telecommunications Act of 1996 (the "1996 Act") — that alternative telecommunications providers are provided "with a meaningful opportunity to compete"[2/] — the Commission must retain directory assistance ("DA") listings and databases on the list of required UNEs. In particular, as set forth in Metro One's comments and those of other commenters, the incumbent local exchange carriers

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1/ FCC 99-70, released April 16, 1999.

2/ *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, *First Report and Order*, 11 FCC Rcd. 15499, 15660 (1996) ("*Interconnection Decision*"), *Order on Reconsideration*, 11 FCC Rcd. 13042 (1996), *vacated in part sub nom. Iowa Utils. Bd. v. FCC*, 120 F.3d 753 (8th Cir. 1997), *aff'd in part sub nom. AT&T Corp. v. Iowa Utils. Bd.*, 119 S. Ct. 721 (1999).

("ILECs") remain the only source of accurate and complete DA listings and databases. While there are some entities in the marketplace that offer DA listings and databases, these listings and databases are grossly inferior to those possessed solely by the ILECs, and used by the ILECs in their own operations. Thus, as previously found by the Commission, access to ILECs' DA as UNEs, pursuant to Section 251(c)(3) of the 1996 Act, is "*critical* to the provision of local service" and without such access, competitors would be "*significantly impaired*" in their ability to provide service.[3/]

II. DISCUSSION

A. Access to Certain ILEC Network Elements, Including Directory Assistance Listings and Databases, is Essential to Enabling New Entrants a Fair Opportunity to Compete

1. *An Alternative Network Element Must Be Sufficient in Quality, Price and Quantity to Allow New Entrants a "Meaningful Opportunity" to Compete*

In its comments, Metro One urged the Commission to find that the mere existence of an alternative to ILEC-provided UNEs (particularly with regard to DA listings and databases) does not, by itself, remove the necessity for mandating the provision of UNEs under Section 251(c)(3) of the Communications Act.[4/] Rather, the Commission must analyze whether the alternative UNE source is, at a minimum, closely equal in quality to the ILEC's element and available at a reasonable cost.[5/] Other commenters similarly advocated that a UNE alternative must be a truly valid substitute for the ILEC-provisioned UNE and not merely an inferior version of the

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3/ *Interconnection Decision* ¶ 540 (emphasis added).

4/ *See* Comments of Metro One Telecommunications, Inc., filed May 26, 1999 at 15-16 ("Metro One Comments").

5/ *See id.* at 15.

UNE.[6] Certain ILECs even acknowledged that the 1996 Act and the U.S. Supreme Court's decision in *AT&T Corp. v. Iowa Utils. Bd.*[7] require that the Commission analyze both whether a network element "is available from sources outside the ILECs' networks," *and* "whether lack of access to that element would increase competitors' costs or decrease the quality of their service sufficiently to 'impair' their ability to provide the service in question . . . ."[8] The Oregon Public Utility Commission, which was one of the state regulatory agencies at the forefront of initiating local competition, similarly has evaluated whether competitive UNE alternatives are "comparable in terms of quantity, quality and price."[9] As the record in this proceeding establishes, therefore, the fact that there may be an alternative source of an ILEC's network element only begins the inquiry. Once an alternative has been identified, the Commission must consider whether that alternative is sufficient in quality, price and quantity.

2. *There is No Sufficient Alternative to ILEC Directory Assistance Listings and Databases*

The comments of Metro One and others demonstrate that in the DA marketplace, available UNE substitutes are grossly inadequate and would only allow a new entrant to provide poor quality DA at a significant cost. As detailed in the record, third party-provided DA listings and databases are hopelessly out-of-date and, as a

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6/ *See, e.g.,* Comments of Teltrust, Inc., filed on May 26, 1999 at 6 ("Teltrust Comments") ("[k]ey to understanding whether an ILEC facility or function is 'necessary' or whether its absence will 'impair' a competitor's operations is a real-world analysis of available alternatives and reasonable substitutes.").

7/ 119 S. Ct. 721, 734 (1999).

8/ Comments of SBC Communications Inc., filed on May 26, 1999 (jointly on behalf of SBC Communications Inc., Southwestern Bell Telephone Company, Pacific Bell, Nevada Bell, and the Southern New England Telephone Company) at 2 ("SBC Comments").

9/ Submission of Oregon Public Utilities Commission, filed on May 27, 1999 at 4.

result, competitive providers have a huge handicap in competing with the ILECs.[10] The ILECs have a unique advantage because they "revise their database information continuously, thanks to the unparalleled access they have to the necessary information for the vast majority of all telephone customers."[11] Both the Commission and commenters have recognized that a lack of access to the ILECs' DA would "significantly impair" competitors' ability to provide service.[12] As MCI WorldCom aptly stated, "[a]ny provider who is unable to provide . . . accurate and complete directory assistance therefore will be impaired in its ability to offer local service competitively."[13]

Certain ILEC commenters claim that the Commission did not make "any findings regarding competitors' ability to provide directory assistance and operator

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10/ *See, e.g.*, Metro One Comments at 3-4, 15-16; Teltrust Comments at 9-10 ("printed directories are out-of-date by the time they are released."

11/ Teltrust Comments at 10; *id.* at 4 ("[t]o keep its database up-dated and to obtain information not available from other sources, Teltrust must have access to the electronic directory assistance databases of the incumbent LECs."). *See also* Metro One Comments at 3-4 (explaining that third party data is likely more than a year old by the time it is provided to new entrants; in contrast, ILECs' DA databases have "next day" new and deleted listings).

12/ *Interconnection Decision* ¶ 540. As Teltrust aptly stated:

> Customers expect to obtain full and accurate directory assistance without unreasonable delay, and they would perceive DA . . . that falls short of their expectations as deficient. Competing carriers that do not have access to ILECs' DA and operator services, or whose operator service and DA service provider does not have access to information contained solely in the ILEC databases, would find themselves at a *significant competitive disadvantage*.

Teltrust Comments at 10 (emphasis added).

13/ Comments of MCI WorldCom, Inc., filed May 26, 1999 at 71 ("MCI WorldCom Comments").

services themselves, or to acquire such services from third parties."[14] Any brief review of the record would establish that this claim is wrong. The Commission specifically found in the *Interconnection Decision* that, applying the "necessary" and "impair" standards in Section 251(d)(2), access to the ILECs' DA systems "is necessary for new entrants to provide competing local exchange service[s]."[15] The Commission concluded that, as access to DA is "critical to the provision of local service," competitors' ability to provide service "would be significantly impaired if they did not have access to incumbent LECs' operator call completion services and directory assistance."[16]

ILECs also argue that there are various alternative sources of operator services ("OS") and DA services available to competitive telecommunications providers and therefore, OS and DA facilities and functions need not be unbundled.[17] Even if an active competitive marketplace could be said to exist for OS, the same is not true for DA services. DA can be provided by an OS provider, but that is not the way that the competitive DA market is developing. DA is a specialized service that has become very important to competitive local exchange carriers ("CLECs") in the provision of their telecommunications services and is considered a means to differentiate an individual CLEC's service from other CLEC competitors and the ILECs.

14/ SBC Comments at 58.

15/ *Interconnection Decision* ¶ 539.

16/ *Id.* ¶ 540. *See also* Teltrust Comments at 7 ("[b]ecause it viewed facilities and functionalities providing operator services and DA as important to foster competition in the local exchange market, the Commission concluded that the unbundling of these facilities and functionalities was consistent with the intent of the Congress.").

17/ *See, e.g.*, SBC Comments at 59; Comments of U S WEST, Inc., filed May 26, 1999 at 75 ("U S WEST Comments").

However, as set forth in the record, ILECs continue to have the only complete, accurate DA databases and listings. As such, while a few DA competitors exist, they are forced to compete with either inferior third party information, or purchase ILEC listings at prohibitive prices, which listings are not as up-to-date as those the ILEC provides to its own customers.[18/] This competitive handicap has not been lessened since the enactment of the 1996 Act. Rather, the severe disadvantage for competitors has been exacerbated by the continuing mergers in the telecommunications industry. As ILECs acquire other ILECs, they obtain access to more comprehensive, larger DA listings and databases. As a result, upstart DA competitors — who are not seeking special treatment, but only an even playing field — have to compete with entities that are the only sources of complete, accurate listings and databases. This is a recipe for disaster. The Commission previously recognized that "customer perception can be shaped by perceived disparities in the quality of access to [DA] services provided by a competing carrier or an incumbent carrier."[19/] Customers who cannot obtain accurate and adequate listings from a competitive provider will quickly send their business to the ILEC.

Various ILECs contend in their comments that CLECs can self-provision their own DA capability because the components necessary to provide such service are readily available.[20/] This claim fails to recognize that there simply is *no reasonable*

18/ *See, e.g.*, Teltrust Comments at 8-9 ("buying DA listings as tariffed offerings from the ILECs is prohibitively expensive . . . . In addition, not all ILECs offer subscription database access, which means that even purchasing a subscription will not ensure that the competitive provider will have timely nationwide information.").

19/ *In the Matter of Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, Notice of Proposed Rulemaking,* 13 FCC Rcd. 12817, 12857 (1998).

20/ U S WEST Comments at 74; Comments of Ameritech, filed May 26, 1999, at 110-112.

alternative to the ILECs' DA listings and databases. Many competitive providers would be quite willing to bypass the ILEC by creating or obtaining their own DA listings and databases. However, as MCI WorldCom explained, a switch-based CLEC may be able to deploy its own DA platform to provide DA to its customers, "but it can provide the complete and accurate directory assistance its customers demand *only if* it has access to the ILECs' DA databases. CLECs will always need unbundled access to this critical data."[21/]

Metro One concurs in MCI WorldCom's statement. Based upon Metro One's extensive experience in the DA business, there are three basic components required for a successful DA operation. They are: 1) the DA database, 2) the DA systems platform, search engine and associated computer hardware, and 3) the individuals who operate the business. The DA systems and the individuals, while available, are only available at significant costs. More importantly, a complete and accurate DA database is *only* available from the ILEC.[22/]

The ILECs claim that DA listings may be procured from third party data providers. As explained above, it is true that third party data providers provide a form of database listings. This data is very inaccurate, incomplete and outdated. This is because the source of this third party compiled data, for the most part, is from printed ILEC telephone directories which are, in turn, sent to low labor cost countries, such as China, to be scanned. The result is the data contains only those listings included in the very much out-of-date printed directories (and not non-published and non-listed listings that are in the ILEC databases). In fact, because of the time it takes to compile and

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21/ MCI WorldCom comments at 71-72.

22/ *See, e.g.,* Teltrust Comments at 4 ("[t]o keep its database up-dated and to obtain information not available from other sources, Teltrust must have access to the electronic directory assistance databases of the incumbent LECs.").

print telephone directories, the information in the directory is from three to six months old by the time the directory is printed. Thus, by the time the directory is scanned and the data is prepared by the compilers, the data is likely more that a year old. Contrary to the claims of at least one ILEC, this data is not updated with ILEC listing changes between printed publications.

Metro One's experience with ILEC data and DA data obtained from third party data compilers has shown that the ILEC data is approximately 95% accurate while the third party data is much less than 80% accurate.[23/] Based on this experience, Metro One could expect to provide a requested listing to a DA customer less than 80% of the time using third party compiled data. Using ILEC data, Metro One can expect to find the data more than 95% of the time. This increase in accuracy can make the difference in determining whether a consumer will maintain its relationship with an alternative carrier such as Metro One or one of Metro One's customers, or whether the customer will return its DA and local telecommunications service business to the ILEC.

In particular, there are at least two practical results from using third party compiled DA listings. First and foremost, as illustrated above, is that the quality of service provided to the DA customer will be inferior. Second, the cost of providing the inferior service will be significantly higher than it would be to provide the quality of service expected by former ILEC customers using ILEC provided databases.

For a competitive DA provider, the difference between remaining viable in the business and failing is measured in seconds or in fractions of seconds in average search time. The time an operator spends searching for a listing is critical because the human component is by far the most expensive cost element. Searching for a listing

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23/ *See, e.g.*, Metro One Comments at 3 and n.4 (citing comments filed in another proceeding that estimated that "database inaccuracies due to inferior access to subscriber listing information result in approximately 40 million wrong telephone numbers per year.").

that is not in the database or is incorrect in the database will result in search times that are far greater than searching for a listing that is in the database and is correct. The average search time for a listing which is in the database should be less than 30 seconds. The average time it takes to search for and determine that the requested listing is not in the database could easily exceed 90 seconds.

For a new entrant to compete in providing DA (and local telecommunications services), the carrier must be able to compete with the ILECs in the cost and the quality of the DA service it is able to provide. As Metro One and other commenters in this proceeding have demonstrated, if consumers are unable to obtain reliable information at reasonable costs from an alternative provider, they will retreat to the one carrier who can serve their needs — the ILEC.[24/] This scenario would clearly defeat the central goal of the 1996 Act of opening telecommunications markets to full, fair competition.

This necessity to "even the playing field" has become even more obvious and more important in the last several months. The ILECs have demonstrated with their National Directory Assistance ("NDA") service using the 411 dialing code that they intend to dominate the DA business as they have the telecommunications business in the past. Without being able to obtain the DA listings of the ILECs in batch format at TELRIC prices and otherwise under the same terms and conditions upon which the ILECs provide the listings to themselves, it will be impossible for Metro One and other telecommunications providers to compete with the ILECs in the provision of DA and local telecommunications services.

24/ *See, e.g.*, Metro One Comments at 4; Teltrust Comments at 10 ("Customers expect to obtain full and accurate directory assistance without unreasonable delay, and they would perceive DA and operator services information that falls short of their expectations as deficient.").

3. *The Existence of a Few Non-ILEC Directory Assistance Providers Does Not Remove the Need for ILECs to Provide Directory Assistance Listings and Databases as UNEs. In Fact, this Requirement is Critical as Competition in the Directory Assistance Industry Remains in the Nascent Stages*

While there are several OS providers, few competitive voice DA providers operate in the telecommunications industry. The fact that there are *any* competitive DA providers is directly attributable to the 1996 Act's requirement that the ILECs unbundle and provide their DA listings to competitive providers. However, despite Section 251's network element mandate, the ILECs still refuse, after more than three years, to make their listings available under terms and conditions of the 1996 Act, including making such listings available in batch or electronic format at their cost plus a reasonable profit. In Metro One's and other commenters' experiences, if the ILECs do make their listings available they do so at prices many times greater than their costs.[25/]

Some additional background on the competitive DA industry may be helpful in understanding the critical need for DA listings and databases as UNEs. The existing competitive DA providers were able to get established because several of the ILECs recognized that the 1996 Act would eventually require them to provide their DA listings to competitive providers. The ILECs made the decision to make a retail version of their DA database available at what they claim to be market-based rates. Presumably their logic was that since they would ultimately have to make them available anyway, they might as well gain a significant profit from of the sale of the listings. Since there is no alternative source for ILEC quality DA listings, a "market based" rate is whatever the ILEC wants to charge.

25/ *See* Metro One Comments at 8-9; Teltrust Comments at 8-9 (stating that "[p]er-query tariffed offerings are priced at levels that will earn market-based retail revenues for the ILECs.").

The initial "market based" rates were many times greater than what subsequent state Public Utility Commission cost study proceedings have determined to be the ILECs' costs of providing the listings.[26] Interestingly, and to the distress of the competitive DA providers, Metro One understands that many of these ILECs have just recently announced that they are raising these market-based rates. One can only imagine what will happen to these rates if the ILECs no longer have an obligation to provide their listings at all, and at reasonable prices, as currently required by the 1996 Act and the Commission's implementing regulations. Without being able to have access to the DA listings of the ILECs under the terms and conditions of the 1996 Act, the competitive DA providers will not be able to compete in customer service or price and as a result will not be able to survive.[27]

Finally, to ensure that CLECs and other new entrants have quality choices in DA services, Metro One supports Teltrust's request in its comments that "the Commission should expressly extend the unbundling requirements to require these ILEC network elements to be made available to third parties who provide directory assistance and operator services as outsourced functions for requesting telecommunications carriers."[28] This requirement would further advance the competitive aims of the 1996 Act, by reducing the unnecessary dependence by CLECs on the ILECs with respect to the provisioning of OS and DA. As set forth in Teltrust's comments, competing telecommunications carriers offering OS and DA to their

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26/ *See, e.g.*, Teltrust Comments at 9, n.16 (contrasting PUC established rates of $0.0409 - $ 0.0419 per query with the tariffed rates for DA listings ranging from $ 0.18 to $0.21 per customer listing).

27/ *See, e.g.*, Comments of AT&T Corp., filed May 26, 1999 at 126-127, n.244 ("AT&T Comments") ("[w]ithout confirmation from the Commission that TELRIC rates are required . . . incumbent LECs would be free to charge excessive fees for access to their OS/DA services that would limit CLECs' ability to provide service.").

28/ Teltrust Comments at 2.

customers would have various options for DA/OS services, including: "(1) providing these particular services themselves; (2) providing these services through the ILEC; or (3) selecting a third party to provide the services."[29]

Third party access to network elements that are used to support requesting carriers' provision of telecommunications service is necessary to enable emerging carriers to compete effectively by providing DA and OS to their customers via the outsourcing of certain functions.[30] Many new carriers do not possess the resources to maintain in-house DA and OS services. As a result, such carriers often turn to DA and OS outsourcing firms.[31] By providing such third party access to UNEs, the Commission would further promote competition in the telecommunications marketplace.

B. The Commission Should Establish a Uniform National Rule that Directory Assistance Listings are an UNE that the ILECs Must Make Available to Competitive Providers

Metro One and other commenters have demonstrated the necessity for the Commission to maintain a national list of unbundled network elements.[32] The record establishes that without a clearly articulated national list of UNEs, competitive carriers will be "severely impaired" in their ability to compete because they likely will be

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29/ *Id.* at 3.

30/ *Id.*

31/ *See, e.g., id.* at 2, n.5 (citing to press accounts as detailing that "telecommunications companies are increasingly turning to third parties to provide support services and functions.").

32/ *See, e.g.*, MCI WorldCom Comments at 5 (establishing that national rules are contemplated by the 1996 Act, and detailing that "only national unbundled element rules can provide uniformity and predictability in the marketplace that new entrants need to formulate and execute national business plans to offer local telephone service.").

subjected to endless litigation on a case-by-case basis in multiple fora.[33] In particular, commenters articulated the critical need for a national UNE list to include ILEC DA listings and databases.[34] Even certain ILECs acknowledge that OS and DA are ripe for a national rule because they "are generally uniform in price, quality, and functionality for business and residential customers."[35]

Metro One supports the recommendation made by MCI WorldCom that UNEs, as they pertain to DA, expressly cover: (i) access to the ILEC's bulk DA database, updated as frequently as the ILEC updates the data it maintains for itself or provides to other ILECs, in readily usable format; and (ii) unbundled access to operator services and DA services and facilities where technically feasible. Moreover, as set forth in Metro One's comments, requiring access to DA listings (in readily accessible magnetic tape or electronic formats) and databases is supported by Commission precedent and by the record in this proceeding.[36]

Finally, Metro One reiterates the request in its comments that, in interpreting whether a competitive provider's ability to provide services is "impaired" by a lack of access to an ILEC's UNE, the Commission should adopt a similar definition to the one adopted in the Commission's Section 207 proceeding. Under this definition, "impair" does not mean "prevent."[37] Rather, a competing carrier's ability to provide services could be deemed to be "impaired" by an ILEC's failure to provide

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33/ *See, e.g., id.* at 6-8; Metro One Comments at 6-7.

34/ *See* Metro One Comments at 5-7 (explaining that national standards are crucial in the DA market, "where ILECs — from coast to coast — always have superior, non-replicable DA listings and databases."); Teltrust Comments at 2.

35/ SBC Comments at 59; Ameritech Comments at 108.

36/ *See* Metro One Comments at 17; AT&T Comments at 129.

37/ Metro One Comments at 11-12 (citing *Implementation of Section 207 of the Telecommunications Act of 1996*, 13 FCC Rcd. 23874 ¶ 79 (1998)).

access to network elements where: (a) the ILEC has unreasonably delayed or prevented the competing carrier from obtaining the network element; (b) the network element is only available at an unreasonable cost; or (c) the competing carrier cannot obtain a network element elsewhere of an acceptable quality.[38/] As demonstrated by the record in this proceeding, all three of these impairment criteria are present in the DA marketplace. Thus, the Commission must retain DA listings and DA databases as UNEs to ensure that the pro-competitive goals of the 1996 Act are maintained and given an opportunity to flourish.

III. CONCLUSION

WHEREFORE, for the foregoing reasons, Metro One respectfully requests that the Commission reaffirm that directory assistance and access to directory assistance databases are network elements that ILECs must provide under Section 251(c)(3) of the Communications Act, and that the Commission take such other actions as are consistent with these reply comments and with the comments submitted by Metro One in this proceeding.

38/ *See* Metro One Comments at 12.

Respectfully submitted,

METRO ONE TELECOMMUNICATIONS, INC.

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June 10, 1999

CERTIFICATE OF SERVICE

I, Kathryn J. Pettipas, do hereby certify that on this 10th day of June, 1999, I have caused a copy of the foregoing REPLY COMMENTS OF METRO ONE TELECOMMUNICATIONS, INC. to be served, via first-class United States Mail, postage pre-paid, upon the persons listed on the attached service list.

Kathryn J. Pettipas

Kathryn J. Pettipas

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