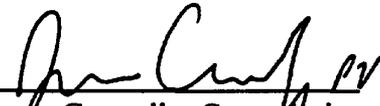


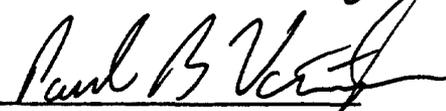
necessary compliance tariffs within 30 days of this Order; and it is

FURTHER ORDERED: That Bell Atlantic shall comply with all other directives contained herein.

By Order of the Department,


James Connelly, Commissioner


W. Robert Keating, Commissioner


Paul B. Vasington, Commissioner


Eugene J. Sullivan, Jr., Commissioner

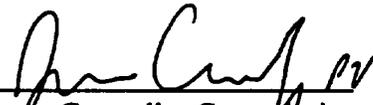
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Attest:

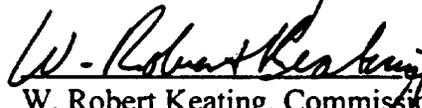

MARY L. COTTRELL
Secretary

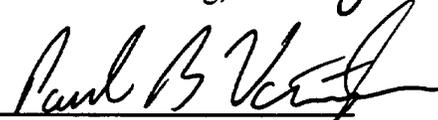
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FURTHER ORDERED: That Bell Atlantic shall comply with all other directives contained herein.

By Order of the Department,


James Connelly, Commissioner


W. Robert Keating, Commissioner


Paul B. Vasington, Commissioner


Eugene J. Sullivan, Jr., Commissioner

A true copy
Attest:


MARY L. COTTRELL
Secretary

Appeal as to matters of law from any final decision, order or ruling of the Commission may be taken to the Supreme Judicial Court by an aggrieved party in interest by the filing of a written petition praying that the Order of the Commission be modified or set aside in whole or in part.

Such petition for appeal shall be filed with the Secretary of the Commission within twenty days after the date of service of the decision, order or ruling of the Commission, or within such further time as the Commission may allow upon request filed prior to the expiration of twenty days after the date of service of said decision, order or ruling. Within ten days after such petition has been filed, the appealing party shall enter the appeal in the Supreme Judicial Court sitting in Suffolk County by filing a copy thereof with the Clerk of said Court. (Sec. 5, Chapter 25, G.L. Ter. Ed., as most recently amended by Chapter 485 of the Acts of 1971).

EXHIBIT B

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
New York on June 3, 1998

COMMISSIONERS PRESENT:

Maureen O. Helmer, Chairman
Thomas J. Dunleavy
James D. Bennett

CASE 28425 - Proceeding on Motion of the Commission as to the Impact of the Modification of the Final Judgment and the Federal Communications Commission's Docket 78-72 on the Provision of Toll Service in New York State, filed in C 28425.

CASE 92-C-0665 - Proceeding on Motion of the Commission to Investigate Performance-Based Incentive Regulatory Plans for New York Telephone Company.

CASE 95-C-0154 - Joint Complaint of AT&T Communications of New York, Inc, and MCI Telecommunications Corporation Against New York Telephone Company Concerning Establishment of a Schedule to Implement IntraLATA Presubscription in all New York Telephone Company End Offices by not Later than December 31, 1995, filed in C 28425.

CASE 95-C-0650 - Joint Complaint of MCI Telecommunications Corporation, AT&T Communications of New York, Inc., Sprint Communications Company L.P. and the Empire Association of Long Distance Telephone Companies, Pursuant to Section 97 of the Public Service Law, Against New York Telephone Company Presubscription in NYNEX Service Territories in New York State.

CASE 96-C-1041 - Ordinary Tariff Filing of New York Telephone Company to Revise its IntraLATA Presubscription (ILP) Tariff.

ORDER ADOPTING NEW YORK TELEPHONE COMPANY'S
INTRALATA FREEZE PLAN WITH MODIFICATIONS

(Issued and Effective December 23, 1998)

BY THE COMMISSION:

SUMMARY AND BACKGROUND

By order dated December 15, 1997^{1/}, the Commission denied a petition by Sprint Communications Company, L.P. (Sprint) to rehear the Order Directing Revised ILP Tariffs^{2/}, but directed an examination of the process that New York Telephone Company (NYT) utilizes to freeze and unfreeze customers' intraLATA accounts. Sprint had alleged that many intraLATA Primary Interexchange Carrier (PIC)^{3/} change orders were being improperly rejected by NYT. In the December 15 Order, the Commission concluded that the method NYT uses to process PIC changes for customer accounts with LPIC freezes merits modification and invited comments on two alternatives to the three-way conference call confirmation method:

- independent third-party verification; and/or,
- a voice mail system provided by the Local Exchange Company (LEC) that would permit a sales agent, while a prospective customer is on the telephone, to record and provide confirmation for the customers request to "unfreeze" the account so that a LPIC change may be processed. This system would be operable 24 hours a day, 7 days a week and NYT would not be permitted to reject a LPIC change request until retrieving the voice mail data.

Comments were received from AT&T Communications of New York, Inc. (AT&T), LCI International Telecom, Inc. (LCI), MCI Telecommunications Corporation (MCI), Sprint Communications

^{1/} Case Nos. 28425 et al. Order Granting in Part and Denying in Part Petition for Reconsideration (Issued December 15, 1997).

^{2/} Cases 28425, et al. Order Directing New York Telephone Company to File by Revised Tariffs Implementing IntraLATA Presubscription (Issued December 1, 1995).

^{3/} The term 'LPIC' refers to a customer's intraLATA interexchange carrier. The term 'PIC' will be used in this memorandum to refer to the customer's interLATA interexchange carrier.

Company, L.P. (Sprint), and New York Telephone Company (NYT).

NYT was directed to demonstrate that intraLATA customer accounts frozen after the implementation of intraLATA presubscription (ILP) were the result of an affirmative request. It was also directed to obtain and keep the information necessary to verify that an end-use customer requested a freeze for each service frozen. Based on our review, we conclude that NYT has kept accurate records of its LPIC customer freeze status and that its records sufficiently demonstrate that freezes have been properly implemented in the past. The Commission also adopts NYT's plan, with modifications, to administer customer freezes through an automated 800 number. This system should streamline the freeze/unfreeze system and minimize competitive concerns of carriers seeking to obtain customers.

COMMENTS

The commenters, exclusive of NYT, generally stated that NYT abuses its position as the provider of the network by unilaterally freezing customers' LPICs and that such actions are anti-competitive.

Carriers stated that numerous options should be available for customers to administer freeze options. AT&T suggested that the three-way conference call should remain available at the discretion of the interexchange carriers. It also advocated the use of a voice mail system and independent third party verification (TPV) as alternatives to the three-way conference call.

LCI proposed that a number of LPIC freeze options be available, including three-way conference calling and Realtime PIC Processing, which NYT withdrew on an interstate basis. LCI also suggested that, ultimately, a third-party clearinghouse model should be adopted to execute all PIC freeze changes. Absent such a clearinghouse, LCI recommended that the Commission require NYT to reinstate the three-way conference calls subject

to monitoring by LCI sales representatives to prevent anti-competitive activity by NYT representatives.

MCI urged that the Commission adopt a rule that all LPIC and PIC change requests handled by third party verification (TPV) should be processed by NYT, regardless of the PIC freeze status of the account. It also advocated a voice mail system as an acceptable alternative. Like LCI, it supported an independent third-party LPIC and PIC administrator.

Finally, Sprint supported independent TPV with costs initially shared between the interexchange carriers and the LEC. These costs would eventually be passed on to the end user in a charge similar to the PIC change charges. In the alternative, Sprint suggested that the voice mail system would be satisfactory, if certain conditions were fulfilled. These include an audit and control process.

NYT responded that several methods are currently available to administer LPIC freezes - customers may call or write a letter directly to NYT to request a change in their PIC freeze status. NYT suggested an alternative to those proposed by the Commission and the commenters - an automated freeze/unfreeze system accessed directly by the customer through an 800 number. This system would be used both to freeze and unfreeze LPICs and would operate as follows:

- The customer would access the system by dialing an 800 telephone number.
- The system would prompt the customer to enter his or her telephone number, along with three additional digits from the account number.
- The customer would be prompted to indicate the action requested (PIC freeze, unfreeze, LPIC freeze, unfreeze).
- The system would automatically forward the customer's request to ICRIS (Interactive Customer Record Information System) for processing.
- If any of the steps is incorrectly performed, or if the

customer presses "0" during the call, the customer would be transferred to a service representative queue or would be prompted to call the service center during business hours.

The proposed system would build upon the existing automated account information system used by NYT. Therefore, the costs of the system would be minimal. The company estimates that full implementation of this system could be accomplished within a period of nine months to a year.

NYT explained that both voice mail and the three-way conference calls are unwieldy and are inferior alternatives to the automated 800 system. It pointed out that the voice mail method is the least efficient alternative, since it would require someone to replay the tapes, transcribe the requests and then enter them into NYT's systems. It would have the drawback of having a low accuracy rate due to unintelligible messages or ambiguous requests. Moreover, it stated, the three-way conference call option is "rife with opportunities for friction between carrier personnel and NYT personnel." (NYT comments at 4). NYT argued that maintaining the system would continue to produce complaints by competitive carriers of improper actions by NYT personnel to "win back" the customer.

NYT did not support the proposed independent TPV system because it would be expensive and less efficient than the 800 system it proposed. It completely discounted MCI's proposal that if an LPIC change has been verified by an independent TPV pursuant to FCC rules, that this should override any PIC freeze in place. NYT properly stated that the PIC freeze option is specifically designed to afford customers protection against slamming and that allowing this change would defeat the purpose of the PIC freeze. NYT also found that a second TPV in addition to that required for a LPIC change would be costly and less efficient than the proposed 800 system.

DISCUSSION

Verification of Freeze Process

The current status of a customer's PIC and LPIC freezes is available from the NYNEX Subscription System (NSS) and the Interactive Customer Record Information System (ICRIS). The information is available to both NYT and interexchange carriers.^{4/} Previous freeze activities with a customer account are retained by ICRIS for six months. Afterward, this information is transferred to microfiche, and retained for six years. NYT states that this information is accurate and reliable and "demonstrates" that freezes have been properly implemented in the past.

NYT supplied staff with a description of its procedures, and representative records from the ICRIS system. This was used to demonstrate the reasonableness of the company's procedures. The records indicate that NYT retains sufficient information to verify whether a particular customer's account was handled correctly. It appears that NYT has kept accurate records of its LPIC customer freeze status and that its records sufficiently demonstrate that freezes have been properly implemented in the past. However, if competitors believe that the matter of unrequested PIC and LPIC freezes is a continuing problem, they can provide staff and NYT with information on specific accounts. NYT can then respond with the appropriate information from either NSS, ICRIS or microfiche.

LPIC Freeze Administration

Of the recommended alternatives to administer freezes (voice mail, TPV, three-way conference calls, and third-party PIC

^{4/} Contrary to AT&T's assertions, PIC and LPIC freeze information is offered by NYT to interexchange carriers. Bulk reports are offered on a monthly basis at \$0.02 per reported account, or on an ad hoc basis at \$0.03 per request.

freeze administration), the automated 800 system appears to be the most customer-friendly and cost effective method.

AT&T and MCI agree that the automated system would be acceptable, while Sprint does not, and LCI offers no opinion. Sprint believes that the requirement for customer interaction with the system, the need for a password based on the customer's account number, and the intervention of a NYT representative in case of a problem with the system weigh against its consideration.

The freeze administration method that is ultimately implemented must be secure, verifiable, and must not place unreasonable requirements on the customer. The automated 800 number system appears to most reasonably meet all of these criteria. The complaint that a NYT representative may intervene if the automated system does not work properly would be equally true for any freeze system that could be devised. The merit of NYT's proposed system is that it is likely to minimize customer contacts with NYT representatives.

We agree that the use of voice mail is problematic due to the potential for unintelligible messages that could be misconstrued by the transcriber. Three-way conference calls were the subject of many complaints by the interexchange carriers that NYT was trying to "win back" their customers. It is difficult to see how maintaining this system will be any less controversial than it has been in the past. Finally, TPV and third-party PIC administration result in additional costs which will be ultimately passed on to customers. Therefore, we will direct NYT to implement the automated 800 system for all PIC freeze administration that pertains to intrastate services subject to certain conditions that will help customers avoid unauthorized PIC changes and accomplish the goal of competitively neutral PIC administration.

In addition to the features detailed by NYT with respect to the automated system, the Commission requires:

(1) that if the system defaults to a NYT customer representative, the representative shall be prohibited from marketing NYT's service or trying to "win back" the customer; (2) that to avoid customer confusion, the system should be effective for all PIC frozen accounts affecting intrastate service; (3) that the system be substantially in operation within six months; (4) that NYT inform customers of the purpose of the system, including instructions on how to use it in a bill insert when the system is implemented; and (5) NYT must print the freeze status of all LPICs and PICs on a customer's bill at least annually and include instructions on how to use the system during the same billing cycle on an annual basis.

Emergency SAPA Adoption

This order is adopted on an emergency basis pursuant to State Administrative Procedure Act Section 202(6). The immediate adoption of this rule setting forth an efficient and competitively neutral method of PIC freeze administration is necessary to enable consumers to avoid being slammed and to promote competition. Therefore, timely approval and implementation of NYT's 800 number call-in system is essential to promote and preserve the general welfare of New York.

The Commission orders:

1. This action is taken on an emergency basis pursuant to SAPA §202(6).
2. New York Telephone Company is directed to maintain records of all PIC freezes and unfreezes affecting intrastate service for a period of 6 years.
3. New York Telephone Company is hereby prohibited from altering any customer's LPIC selection or freezing or unfreezing a PIC absent an affirmative request.
4. New York Telephone Company is ordered to implement the 800 number call-in system for PIC freeze administration for

CASE 28425, et al.

all PICs that may complete an intrastate call within 6 months.

5. New York Telephone Company customer representatives shall be prohibited from marketing or attempting to "win back" customers if a call to the 800 freeze administration number defaults to the customer service system.

6. New York Telephone Company is ordered to insert a notice detailing the purpose of the system in each customer bill along with instructions on its use in the billing cycle prior to its implementation.

7. New York Telephone Company is ordered to print the freeze status of all LPICs and PICs on a customer's bill at least annually along with instructions on how to use the system during the same billing cycle on an annual basis.

8. These proceedings are continued.

By the Commission,

(SIGNED)

JOHN C. CRARY
Secretary

Bell Atlantic - Legal Department
1095 Avenue of the Americas
New York, NY 10036
37th Floor
Tel 212 395-6509
Fax 212 768-7569



Joseph A. Post
Regulatory Counsel

May 11, 1999

Elaine Bartley, Esq.
New York State Department of Public Service
Three Empire State Plaza
Albany, New York 12223

Re: PIC/LPIC Freeze Procedures

Dear Ms. Bartley:

Pursuant to our telephone discussion last week, I have attached (a) a revised version of the "Extra" bill insert concerning VRU implementation; and (b) a detailed description of the VRU system and how it operates. Please let me know if you would like any further revisions on either of these documents.

Very truly yours,

cc: Mr. Steven Sokal
Mr. Daniel Martin
Ms. Mary Monaco
Ms. Penny Rubin

ATTACHMENT A

PROPOSED COPY FOR BILL INSERT

New Automated System Lets You "Freeze" or "Unfreeze" Your Carrier Choices

Starting _____, it will be easier for you to "freeze" or "unfreeze" the telephone company you choose to carry your regional toll and/or long distance calls. Freezing your selection means that your choice of carrier cannot be changed unless you contact us to change it. This may provide additional protection against unauthorized changes, also known as "slamming." There is no cost to freeze or unfreeze your choice of carrier.

You will be able to freeze or unfreeze your choice of regional and/or long distance carrier by dialing our new automated system, toll-free, on **1-800-305-4838** (1-800-288-4197 in Spanish). The system is available 24 hours a day, seven days a week, except for brief daily maintenance periods and the period from 7 PM on Saturday to 7 AM on Sunday. You can call from any number. When you use the system, you will be requested to enter your ten-digit telephone number and your customer code. *Your customer code is the six digit number that directly follows your telephone number on page one of your Bell Atlantic bill. This six-digit code appears only on your bill, and should not be known to anyone who does not have access to your bill. We ask you to provide the code in order to prevent anyone other than you from using the system to freeze or unfreeze your choice of carrier.*

You can separately freeze or unfreeze your choice of regional carrier and your choice of long distance carrier as often as you choose. The automated system will guide you through three basic options:

- Press 1 to freeze your current regional service provider and/or long distance provider
- Press 2 to unfreeze your current regional service provider and/or long distance provider.
- Press 0 to speak to a service representative (during business hours).

A touchtone phone is necessary to use the system (rotary phone customers must speak with a service representative). Currently, the system will freeze or unfreeze all the telephone numbers billed to the same account. If you want to freeze or unfreeze individual telephone numbers under the same account, you must speak to a service representative.

ATTACHMENT B

DESCRIPTION OF BELL ATLANTIC – NEW YORK'S PROPOSED SYSTEM FOR IMPLEMENTATION OF PIC AND LPIC FREEZES AND UNFREEZES

Pursuant to a recent order of the New York Public Service Commission¹, Bell Atlantic – New York (“BA-NY”) has been developing an automated system, commonly referred to as the “VRU”, that customers can use to freeze or unfreeze their choice of intra-LATA or interLATA carrier.² BA-NY will be able to put the VRU system “on line” in June, 1999, although, as described below, additional modifications to the system are being developed that would not be in place for a few months after the initial implementation date.

BA-NY proposed the VRU in response to the general recognition that the three-way call procedure that had previously been used to process PIC unfreeze requests was unsatisfactory. From BA-NY’s perspective, the procedure, in which a customer called a BA-NY service representative with an interexchange carrier representative on the line, was inconvenient for the customer, wasteful of service representative time, and rife with opportunities for friction between interexchange carrier personnel and BA-NY personnel. Accordingly, when the NY-PSC solicited comments on possible alternatives to three-way calls, BA-NY recommended the elimination of the “live” three-way call procedure and its

¹ Cases 28425, *et al.*, “Order Adopting New York Telephone Company’s IntraLATA Freeze Plan With Modifications” (issued and effective December 23, 1998).

² BA-NY does not currently offer a local PIC freeze option, so we do not address here the question of whether the VRU system can or should be extended to local PIC freezes, if such freezes are proposed by BA-NY and authorized by the NY-PSC.

replacement with an automated system. In effect, three-way calls could still be conducted, although BA-NY's end of the call would be handled by the automated system instead of by a live representative. Moreover, while the original three-way call procedure was only available when a customer wanted to change a carrier choice on a frozen line, the automated system is available either to impose or to lift freezes.

The key characteristics of the VRU, as it will be implemented by BA-NY, are as follows:

- ***The system is easy to access.*** A customer can access the VRU by dialing a toll-free number. The system is available 24 hours a day, seven days a week, except for a brief daily maintenance period and the period from 7 PM on Saturday to 7 AM on Sunday. Perhaps most importantly, the customer can call the system from any phone, and is not limited to calling from home.
- ***The system is easy to use.*** The VRU "script" is easy for the customer to follow. (A flow-chart of the proposed script is attached.) The system is available in both Spanish and English, on separate toll-free numbers. The customer indicates choices at each stage of the process by pressing specified touchtone keys.³
- ***The system protects the user by verifying his/her identity.*** Although the system can capture the caller's ANI, this is not used as the primary means of verifying the caller's identity, since BA-NY wanted the customer to be able to call from his or her office or from any other convenient number. Accordingly, the customer is asked to enter a six-digit code that follows the telephone number of the first page of the customer's monthly bill. Thus, only someone who has access to the customer's bill can use the system to freeze or unfreeze the customer's line.
- ***The system provides the customer with a number of choices that can be exercised independently.*** A customer can freeze his or her choice of pre-subscribed intraLATA carrier, or his or her choice of pre-subscribed inter-

³ BA-NY originally intended to use voice-response technology rather than touchtone signaling. This explains the name "VRU", for "Voice Response Unit", a designation that BA-NY has continued to use, at least internally, to describe the system.

LATA carrier, or both; or can unfreeze the intraLATA carrier, or the interLATA carrier, or both.

- ***The system allows freeze/unfreeze orders to be processed without human intervention.*** Orders entered through the VRU are automatically fed through to the ICRIS system. The customer's instructions thus will not be misunderstood, mistranscribed, or incorrectly transmitted. This is more convenient for the consumer, and avoids unnecessary disputes between BA-NY and interexchange carriers over whether a statement made by a BA-NY representative on a three-way call constituted impermissible "marketing" of BA-NY's services.
- ***The system does not require the customer to make separate calls for each telephone number included in a single billed account.*** Any freeze or unfreeze order entered through the VRU is implemented for *all* of the lines that are billed to a single number. This avoids the necessity of separate calls for each line. We recognize that some customers may want to freeze some lines but not others, although we anticipate that such situations will be relatively rare. Nevertheless, we have been developing a modification to the VRU that will enable customers who so desire to freeze or unfreeze each line separately. This modification will not be available, however, until a few months after initial VRU implementation.
- ***The system provides options for customers who are unable to use it.*** If a customer has trouble using the VRU, he or she can be transferred to a service representative queue or prompted to call the Service Center during normal hours. This can also be done if the customer wants to change the freeze status of individual lines within a billed account. (Transfer to a live representative would be unnecessary in the latter situation once the system modification described in the preceding paragraph is implemented.)
- ***The system would automatically generate an electronic "audit trail" confirming that the customer requested the change in freeze status.***

These features of the system make it one that is beneficial to consumers, interexchange carriers, regulators, and BA-NY. It eliminates or avoids the disadvantages associated with alternative freeze/unfreeze systems. BA-NY continues to urge its implementation in New York for both interstate and intrastate freeze-change requests.

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

- CASE 28425 - Proceeding on Motion of the Commission as to the Impact of the Modification of the final Judgment and the Federal Communication Commission's Docket No.78-72 on the Provision of Toll Service in New York State, filed in Case 28425.
- CASE 92-C-0665 - Proceeding on Motion of the Commission to Investigate Performance-Based Incentive Regulatory Plans for New York Telephone Company.
- CASE 95-C-0154 - Joint Complaint of AT&T Communications of New York, Inc., and MCI Telecommunications Corporation against New York Telephone Company Concerning Establishment of a Schedule to Implement IntraLATA Presubscription in all New York Telephone Company end Offices by no Later than December 31, 1995, filed in Case 28425.
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- CASE 96-C-1041 - Ordinary Tariff filing of New York Telephone Company to Revise its IntraLATA Presubscription (ILP) Tariff.

NOTICE GRANTING AN EXTENSION OF TIME

(Issued June 23, 1999)

On December 23, 1998, the Commission issued an order adopting New York Telephone Company's d/b/a Bell Atlantic-New York (BA-NY) intraLATA Plan with Modifications relating to intrastate preferred carrier (PC) freezes. Also on December 23, 1998, the Federal Communications Commission (FCC) issued an order adopting new rules with respect to PC freezes. Certain portions of the Commission's order may be inconsistent with the FCC's new rules. The Commission's order required that BA-NY implement its new PC freeze administration plan within six months, or by

June 23, 1999. On June 18, 1999, BA-NY sought a waiver from the FCC so that it may implement promptly the PC freeze administration plan consistent with the Commission's requirements.

The Commission also received three petitions for reconsideration on its order from AT&T of New York, Inc., MCI-WorldCom, and BA-NY. Specifically, BA-NY's petition requests an extension of time to implement its intraLATA freeze plan until the FCC acts on its waiver request.

Pursuant to 16 NYCRR Section 3.3(b)(1), the time for BA-NY to comply with the Commission's December 23, 1998 order will be extended by a period of 60 days so that it may receive a response to its waiver request from the FCC. This Notice does not constitute a major modification in the Commission's order, but is necessary for the fair, orderly, and efficient conduct of the proceeding. The remaining petitions for rehearing will be addressed at a later date.

DEBRA RENNER
Acting Secretary

CERTIFICATE OF SERVICE

I, Beth Marchena, do hereby certify that on this 8th day of July, 1999, copy of the foregoing "AT&T Corp. Reply to Oppositions to Reconsideration or, in the Alternative, Clarification" was served by US first class mail, postage prepaid, on the parties named on the attached service list.


Beth Marchena

July 8, 1999

SERVICE LIST
Docket No. 94-129

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