

JUL 20 1999

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

In the Matter of)
)
Truth-in-Billing)
and)
Billing Format)
)
)
)
)

DOCKET FILE COPY ORIGINAL
CC Docket No. 98-170

REPLY COMMENTS of SBC COMMUNICATIONS INC.

SBC Communications Inc.¹ ("SBC") files these Reply Comments in response to the Comments on the Further Notice of Proposed Rulemaking ("FNPRM") regarding standard labels for line-item charges relating to federal regulatory action. SBC is replying to only three issues raised by other parties in Comments on the Further Notice of Proposed Rulemaking (Comments), the length of the prescribed labels and the proposal made by MCI WorldCom on the proposed "Long Distance Access" label.

I. Length of Proposed Labels

The billing systems of many billing entities have limitations as to the number of characters that can be printed out on a bill in conjunction with a specific charge. For that reason, SBC strongly urges the Commission to keep the labels to 24 characters or less (including spaces between words) or to allow abbreviation of words to achieve that purpose. For example, the label "FCC Universal Service Fee" exceeds the 24 character limitation, while the term "Federal Universal Service" does not exceed the limit. While

¹ SBC Communications Inc. is the parent company of various subsidiaries, including telecommunications carriers. These subsidiaries include Southwestern Bell Telephone Company ("SWBT"), Pacific Bell, Nevada Bell, and The Southern New England Telephone Company ("SNET"). The abbreviation "SBC" shall be used herein to include each of these subsidiaries as appropriate in the context.

No. of Copies rec'd 041
List A B C D E

SBC Communications Inc
July 16, 1999

"Federal Universal Service Fee" probably conveys the nature of the charge equally as well as "Federal Universal Service," but it does not add to the understanding of the nature of the charge. "Fee" is assumed when the label is associated with a charge or "fee" appearing on the bill. Labeling requirements should not impose heavy economic burdens to use one label, when a shorter label will serve the same purpose equally well.

II. MCI's Labeling Proposal

MCI suggests labels that support its marketing schemes, rather than labels designed to convey information as to the nature of the charge in a clear and neutral manner. For example, MCI asserts that the proposed "Long Distance Access" label should be changed because customers might believe that the fee is for use of the long distance carrier's network. The substitutes suggested by MCI are "National Access Fee," "PICC," or "Carrier Access Charge." None of those proposed substitutes is as simple and clear as "Long Distance Access" which is, of course, a fee imposed to recover a portion of the cost of the local exchange carrier's network because that network is used to provide access to long distance service providers.

MCI's proposal to change the "Federal Universal Service" label to "Local Service Subsidy" would convert a clear and simple label to one that is actually misleading. Labeling that charge a "Local Service Subsidy" would seem to imply a general subsidy to local service providers, rather than a charge established to create a fund to promote universal service by subsidizing local service in high cost areas. Both of these MCI proposals should be rejected because the labels proposed by the Commission are shorter and clearer than the labels proposed by MCI.

III. "Number Portability" Label

The Public Utility Commission of Texas (Texas PUC) questions the use of the label "Number Portability" because it has had numerous complaints on its customer hotlines from customers that misunderstand that label. SBC would urge that no change

be made to this label because, while it may not fully explain all aspects of the charge, any new label will bring a new round of complaints until customers become educated as to the meaning of the new label. No label that will fit within the billing system character limitations can adequately explain the nature of this charge.

The complaint SBC has most frequently received about the charge has been in the nature of a protest at being required to pay for number portability costs, when the customer has not transferred their service to another carrier. There is no way to clearly explain the necessity of number portability to facilitate competition and allow the seamless transmission of calls from customers served by one company to customers of another company in twenty-four characters or less. SBC business offices have spent a considerable amount of time explaining the nature of this particular charge to customers. Through that process, those customers that read their bill have gradually become educated as to the nature of the "Number Portability" charge. Any change in that label now would cause the process to start all over again and the Texas PUC, as well as SBC, would again be flooded with complaints about a charge the customer does not understand. The label should not be changed unless and until someone is able to propose a label that would clearly explain the nature of the charge in twenty-four characters or less, which SBC believes to be an impossibility.

IV. Conclusion

For the reasons stated above, SBC respectfully requests that the Commission keep the required labels short and allow individual billing entities to use abbreviations, where necessary, in order to avoid unnecessarily requiring very expensive changes to existing billing systems. SBC also urges the Commission to reject the proposals of MCI to adopt labels that are less clear than the labels proposed by the Commission.

Respectfully Submitted,

SBC COMMUNICATIONS INC.

By: *Barbara R. Hunt*

Alfred G. Richter, Jr.

Roger K. Toppins

Barbara R. Hunt

One Bell Plaza, Room 3026

Dallas, Texas 75202

214-464-5170

Attorneys for SBC Communications Inc.
and its Subsidiaries

July 16, 1999

Certificate of Service

I, Mary Ann Morris, hereby certify that the foregoing "Reply Comments of SBC Communications, Inc." in CC Docket # 98-170 has been served on July 16, 1999 to the Parties of Record.


Mary Ann Morris

July 16, 1999

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

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

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

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

DAVID W ZESIGER
INDEPENDENT TEL & TELECOMMUNICATIONS
ALLIANCE
1300 CONNECTICUT AVE NW
SUITE 600
WASHINGTON DC 20036

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

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

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

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

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

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

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

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

DOROTHY ATTWOOD
2025 M STREET NW
SIXTH FLOOR
WASHINGTON DC 20554

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

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

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

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

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

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

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

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

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

DEONNE BRUNNING
NEBRANKA PSC
1200 N STREET
LINCOLN NE 68508

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

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

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

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

JAMES CASSERLY
1919 M STREET NW
ROOM 832
WASHINGTON DC 20554

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

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

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

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

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

KYLE DIXON
1919 M STREET NW
ROOM 844
WASHINGTON DC 20554

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

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

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

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

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

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

HAROLD FURCHTGOTT ROTH
FCC
8TH FLOOR
PORTALS II
445 12TH STREET SW
WASHINGTON DC 20554

PAUL GALLANT
1919 M STREET NW
ROOM 826
WASHINGTON DC 20554

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

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

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

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

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

L MARIE GUILLORY
RURAL TELEPHONE COALITION
4121 WILSON BOULEVARD
ARLINGTON VA 22203-1801

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

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

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

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

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

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

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

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

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

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

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

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

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

LAURA L HOLLOWAY
NEXTEL COMMUNICATIONS INC
1450 G STREET
SUITE 425
WASHINGTON DC 20005

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

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

JIM HURT
COMSUMERS' UTILITY COUNSEL DIVISION
2M L KING JR DRIVE
PLAZA LEVEL EAST
ATLANTA GEORGIA 30334

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

JANE JACKSON
1919 M STREET NW
ROOM 518
WASHINGTON DC 20554

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

WILLIAM KENNARD
FCC
8TH FLOOR
PORTALS II
445 12TH STREET SW
WASHINGTON DC 20554

DENNIS L KESCHL
MAINE PUBLIC UTILITIES COMMISSION
242 STATE STREET
18 STATE HOUSE STATION
AUGUSTA MAINE 04333 0018

LEON M KESTENBAUM
JAY C KEITHLEY
NORINA T MOY
SPRINT CORPORATION
1850 M ST NW
SUITE 1110
WASHINGTON DC 20036

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

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

KATHRYN MARIE KRAUSE
U S WEST COMMUNICATIONS INC
1020 19TH STREET NW
SUITE 700
WASHINGTON DC 20036

LAWRENCE KREVROR
NEXTEL COMMUNICATIONS INC
1450 G STREET NW
SUITE 425
WASHINGTON DC 20005

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

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

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

SHARON LEE
2025 M STREET NW
SIXTH FLOOR
WASHINGTON DC 20554

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

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

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

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

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

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

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

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

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

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

JEANETTE MELLINGER
CONSUMERS' UTILITY COUNSEL DIVISION
2 M L KING JR DRIVE
PLAZA LEVEL EAST
ATLANTA GEORGIA 30334

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

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

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

GENEVIEVE MORELLI
COMPETITIVE TELECOMMUNICATIONS ASSOC
1900 M STREET NW
SUITE 800
WASHINGTON DC 20036

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

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

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

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

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

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

SUSAN NESS
FCC
8TH FLOOR
PORTALS II
445 12TH STREET SW
WASHINGTON DC 20554

JUDY NITSCHKE
1919 M STREET NW
ROOM 518
WASHINGTON DC 20554

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

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

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

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

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

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

BARRY PINELES
GST TELECOM INC
4001 MAIN STREET
VANCOUVER WA 98663

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

MICHAEL POWELL
FCC
8TH FLOOR
PORTALS II
445 12TH STREET SW
WASHINGTON DC 20554

TOM POWER
1919 M STREET NW
ROOM 814
WASHINGTON DC 20554

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

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

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

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

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

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

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

GLENN S RICHARDS
NEVADACOM INC
2001 PENNSYLVANIA AVE NW
SUITE 400
WASHINGTON DC 20006

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

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

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

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

LAWRENCE E SARJEANT
LINDA KENT
KEITH TOWNSEND
JOHN HUNTER
JULIE E RONES
USTA
1401 H STREET NW
SUITE 600
WASHINGTON DC 20005

JAMES SCHLICHTING
1919 M STREET NW
ROOM 500
WASHINGTON DC 20554

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

FCC SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
THE PORTALS
445 TWELFTH STREET SW.
WASHINGTON DC 20554

CATHY SEIDEL
FCC
2025 M STREET NW
WASHINGTON DC 20554

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

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

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

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

JAMES M SMITH
EXCEL TELECOMMUNICATIONS INC
1133 CONNECTICUT AVE NW
SUITE 750
WASHINGTON DC 20036

MARSHA H SMITH
IDAHO PUBLIC UTILITIES COMMISSION
STATEHOUSE
BOISE ID 83720

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

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

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

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

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

LAWRENCE STRICKLING
FCC
COMMON CARRIER BUREAU
445 12TH STREET SW
WASHINGTON DC 20554

M ROBERT SUTHERLAND
BELLSOUTH CORPORATION
1155 PEACHTREE STREET NE
ATLANTA GEORGIA 30306 3610

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

GLORIA TRISTANI
FCC
8TH FLOOR
PORTALS II
445 12TH STREET SW
WASHINGTON DC 20554

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

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

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

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

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

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

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

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

JUDITH ST LEDGER ROTY
PETER A BATAKAN
PAGING NETWORK INC
KELLEY DRYE & WARREN LLP
1200 9TH STREET NW
SUITE 500
WASHINGTON DC 20036

ANNI CHUNG
TESSIE GUILLERMO
ASIAN PACIFIC ISLANDER AMERICAN CONSUMER
COALITION (APIACC)
407 SANSOME STREET
3RD FLOOR
SAN FRANCISCO CA 94111

LAURA H PHILLIPS
CECILE G NEUVENS
COMCAST CELLULAR COMMUNICATIONS INC
DOW LOHNES & ALBERTSON PLLC
1200 NEW HAMPSHIRE AVE NW
WASHINGTON DC 20036

MARY M CROSS
LEGISLATION DEPARTMENT
AMERICAN FEDERATION OF TEACHERS
555 NEW JERSEY AVE NW
WASHINGTON DC 20001

MICHAEL S WROBLEWSKI
FEDERAL TRADE COMMISSION
6TH & PENNSYLVANIA AVE NW
WASHINGTON DC 20580

SHEILA HOLBROOK WHITE
TEXAS CITIZEN ACTION
P O BOX 10231
AUSTIN, TX 10231

PETER M CONNOLLY
UNITED STATES CELLULAR CORPORATION
KOTEEN & NAFTALIN LLP
1150 CONNECTICUT AVE NW
WASHINGTON DC 20036

CHARLES CARBONE
MICHAEL SHAMES
UTILITY CONSUMERS ACTION NETWORK
1717 KETTNER BLVD
SUITE 105
SAN DIEGO CA 92101

STEPHEN G OXLEY
SECRETARY & CHIEF COUNSEL
WYOMING PUBLIC SERVICE COMMISSION
2515 WARREN AVE SUITE 300
CHEYENNE WYOMING 82002

PETER ARTH JR
LIONEL B WILSON
JONADY HOM SUN
505 VAN NESS AVE
SAN FRANCISCO CA 94102

DAVID KONUCH
COMMON CARRIER BUREAU
ENFORCEMENT DIVISION
FCC
445 12TH STREET SW
WASHINGTON DC 20554

GLENN REYNOLDS
FCC
ROOM 5A 847
PORTALS II
445 12TH STREET SW
WASHINGTON DC 20554