DOCKET FILE COPY ORIGINAL

RECEIVED
JUL 26 1999
FCC MAIL ROOM

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
JUL 27 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
	)	
Access Charge Reform	)	CC Docket No. 96-262

COMMENTS OF SBC COMMUNICATIONS INC.

SBC COMMUNICATIONS INC.

ALFRED G. RICHTER JR.
ROGER K. TOPPINS
HOPE THURROTT

One Bell Plaza, Room 3023
Dallas, Texas 75202
214-464-3620

Its Attorneys

July 23, 1999

No. of Copies rec'd 0+1
List A B C D E

TABLE OF CONTENTS

SUMMARY i

1. The Adoption of a National Benchmark Fails to Adequately and Appropriately Consider Actual Costs. 2

II. Support Levels Should Be Calculated at a Wire Center Level. 3

III. The Joint Board's Recommendation for a Fixed Indicator of a State's Ability to Support High Cost Areas Poses an Administrative Burden. 6

IV. The Commission Should Adopt a Certification Procedure to Ensure Support is Being Used for Universal Services. 7

V. A Hold-Harmless Provision is Advisable to Prevent Immediate, Substantial Reductions in Federal Support. 9

VI. The Commission Should Adjust Interstate Access Charges to Offset Universal Service Support. 10

VII. In its Implementation of the Universal Service Fund, the Commission Must Meet All Statutory Requirements. 12

1. Implicit Versus Explicit Support. 12
2. Affordability Mechanics. 13
3. Consistency in Federal and State Universal Service Support Methodologies. 14
4. Federal Funding for Intrastate Universal Service Costs. 15

VIII. Conclusion. 16

SUMMARY

SBC Communications Inc. ("SBC") remains concerned that the cost platform model adopted by the Commission fails to ensure the affordability of rates. The implementation of the cost model as proposed does nothing to alleviate these concerns. Although SBC herein provides comments on the issues raised by the Commission in its Further Notice of Proposed Rulemaking, it also furnishes to the Commission an alternative approach which meets all of the requirements for a universal service funding mechanism required by Section 254 of the Telecommunications Act.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
	)	
Access Charge Reform	)	CC Docket No. 96-262

COMMENTS OF SBC COMMUNICATIONS INC.

SBC Communications Inc., on its behalf and on behalf of its subsidiaries (collectively referred to as "SBC") welcomes this opportunity to address certain implementation issues associated with the Commission's adopted cost model platform released for comment in the Seventh Report & Order and Thirteenth Order on Reconsideration in CC Docket No. 96-45, Fourth Report & Order in CC Docket No. 96-262 and Further Notice of Proposed Rulemaking ("Notice"). Specifically, the Commission has requested input on methodology issues including the national benchmark, the area over which costs should be averaged and determining a state's ability to support high-cost areas. Comments have also been sought on the distribution and application of support, hold-harmless and portability of support and adjusting interstate access charges to account for explicit support.

In resolving these issues, the Commission must recognize that the reasonably comparable standard contained in Section 254 (b)(3) of the Telecommunications Act is a companion to Section 254 (b)(1) which provides that quality services should be available at just, reasonable and *affordable* rates. This obligation on the part of the Commission and the States is further emphasized in Section 254(i). However, while this mandate is shared, the Commission should not abdicate its obligation by simply declaring that

current rates are affordable and all remaining issues pertaining to affordability are to be left to the States. Both jurisdictions share a recovery responsibility for universal service facilities, a responsibility impacted by Section 254(i) which obligates both jurisdictions to ensure the affordability of rates. In recognition of the various competition-based factors which will erode implicit support, the Commission must adopt a standard for defining affordability that is common to state and federal jurisdictions. This standard would strike the balance Congress intended between preserving universal service and the competitive outcome of the Telecommunications Act.

As SBC has previously pointed out to the Commission, the use of forward-looking costs is wholly inappropriate in the determination of universal service support levels. The cost platform model which has been adopted fails to meet the Telecommunications Act's requirement that the universal service support mechanism must be "specific, predictable and sufficient."[1] Also of concern is that the Commission in focusing on costs for purposes of determining a benchmark seems to have disregarded the requirement that rates be affordable. The Commission's efforts in determining the appropriate level of support must also ensure that rates for universal service remain just, reasonable and affordable in order to further the "preservation and advancement of universal service."[2]

1. The Adoption of a National Benchmark Fails to Adequately and Appropriately Consider Actual Costs.

The use of a single national benchmark as recommended by the Joint Board and adopted by the Commission is inappropriate in that it fails to address the requirement of rate affordability. Additionally, a single national benchmark does not alone indicate the necessity for universal service support above that already available to support affordable service in a specific area. Any analysis regarding support must be carefully targeted to

---

[1] *Communications Act of 1934*, as amended, 47 U.S.C. § 254(b)(5).

[2] *Id.*, 47 U.S.C. § 254(b).

meet the needs of the consumers located in the relevant area. SBC below offers an approach in which the actual costs of providing universal service for a distinct geographic service area are compared to the ability of consumers to pay for those services. To the extent that the services are affordable from a consumer perspective (i.e., the actual costs are less or equal to the affordability level), there is no need for support regardless of how those costs compare to a national benchmark.

SBC's proposed method is superior to a national cost benchmark because the support provided is consumer based. It treats universal service as a household expenditure permitting an appropriate determination of affordability. A nationwide average cost benchmark can identify only which company has the highest cost relative to the average. It provides no measure of whether customers in a geographic area can afford to pay for their universal service absent subsidies.

SBC's proposal recommends a state specific universal service affordability point ("USAP") rather than a nationwide average. A state specific USAP will provide a better measure of the effect universal service prices will have on residents of individual states. A nationwide average loses this distinction. A state specific USAP also more closely reflects the area in which the universal service costs are incurred.

II. Support Levels Should Be Calculated at a Wire Center Level.

The Commission seeks input as to whether the federal support mechanism should calculate support levels by comparing the forward-looking costs of providing supported services to the benchmark at (1) the wire center level; (2) the unbundled network element (UNE) cost zone level; or (3) the study area level.[3] In addition, it requests specific comment on the impact of using study area averaged costs in a study area where UNEs are available.[4]

---

[3] Notice, ¶ 102.

[4] Notice, ¶ 106.

For non-rural incumbent local exchange carriers ("LECs") and other non-incumbent carriers, SBC recommends that costs be based upon existing incumbent LEC wire center boundaries. Use of wire center areas reflects a reasonable level of geographic deaveraging for proper high cost identification and support targeting. It is essential that high cost calculation and support targeting be performed at a level low enough to identify high cost areas and allow for support to be directed to those areas where such support is necessary for the maintenance of affordable rates. Targeting support to areas lower than wire centers would be difficult to administer. However, in contrast, the targeting of support on the basis of UNE zones or study areas would inappropriately average support over broad areas. Consequently, support would be directed to service providers operating in areas that are not high cost areas and not requiring support for the maintenance of affordable rates.

The use of UNE zone or a study area basis is ineffective and would necessitate still further breakdown in the final analysis, complicating the already complex task of accurately determining true high cost areas. Typically, there are only three to four UNE zones in SBC study areas. These zones basically reflect an urban, suburban and rural division. Low and high cost averaging over a broad geographic scope simply does not properly identify and target high cost service areas within these broad boundaries. For example, if a UNE zone were employed in an urban area, even a core inter-city area, the averaging of costs would not disclose where within these parameters there is a high cost to providing service. Therefore, there is the risk of a lack of sufficient support which would discourage other carriers from servicing these high cost neighborhoods and retard competition. At the other end of the spectrum, there are wire centers in rural areas where the costs of providing service are low. Yet, if the scope of the analysis is extended on a UNE zone basis to encompass multiple wire centers, the averaging of low and high cost areas would inappropriately assign support to the these low cost areas. The result would

be to reduce the support available for those high cost areas for which the support was intended. The adoption of UNE zones as the basis for support could also result in disparate and inequitable treatment among the states because of the differing methods employed by the states to define and establish the UNE areas.

The same problems with utilizing UNE zones as the basis for support are further magnified if an entire LEC study area is employed. In addition, the ultimate consequence of this approach would be to shift the burden of properly identifying for support purposes high cost areas will fall to the states.

The Commission also notes the inherent tension which exists between the goal of preventing the support fund from increasing significantly above current levels and the goal of ensuring that support is directly targeted to high-cost areas within study areas.[5] SBC is aware that adopting a wire center basis for support determinations, while it is the most reasonable way to identify those areas requiring support, also could increase the size of federal funding.[6] Yet, the maintenance of the fund at its current level must be secondary to ensuring that the universal service requirements of the Telecommunications Act are met. That objective can only be achieved by accurately identifying the areas in need of the support. While the utilization of a study area basis may provide enough support to achieve reasonable rate comparability among states, it does not achieve the overarching goal of ensuring universal service in all high cost areas where affordability is at risk.

At a minimum, should the Commission adopt the Joint Board's proposal to utilize a study area basis for determination of high cost support, it must still target this support amount to high cost wire center areas, based on costs produced by the model.[7] This

---

[5] Notice, ¶ 107.

[6] The use of UNE zones would also increase the size of the federal fund and complicate its administration and application, without any discernable benefit.

[7] Notice, ¶ 108.

approach would allow for the portability of support to competing carriers assuming responsibility for serving high cost areas within the study area. It will also act to restrict carriers serving low cost areas within the study area from inappropriately receiving support.

As to the second and third options proposed, there is no real difference. In both cases, support would fail to be directed where it is needed, to high cost areas located within UNE zones. To gerrymander these processes in order to determine specific areas requiring support complicates an already complicated process. Rather than add an unnecessary layer of complexity, resulting in a substantial increase in the size of the fund, the Commission should adopt the appropriate standard of a wire center.

III. The Joint Board's Recommendation for a Fixed Indicator of a State's Ability to Support High Cost Areas Poses an Administrative Burden.

The Commission has adopted the recommendation of the Joint Board that a fixed dollar amount per line is a reasonable means for assessing a state's ability to support its universal service needs.[8] However, it seeks direction as to how this amount is to be determined. Among the options presented is whether the per-line amount should be set between three and six percent of the original $31 revenue benchmark in an attempt to account for what the state could have reasonably anticipated.[9]

SBC is concerned that the adoption of a fixed dollar amount as recommended by the Joint Board will prove difficult to implement and administer, in addition to opening the process to gamesmanship in determining the fixed dollar amount.

To the extent that the Commission adopts an approach consistent with the Joint Board's recommendation, the appropriateness of a fixed dollar amount is dependent upon whether the State has adopted a High Cost Program. If the State has implemented such a program, then the fixed dollar amount could be set at no less than the statewide average

[8] Notice, ¶ 110.

[9] Notice, ¶ 111.

amount of support provided to all participants in the Program. However, this approach suffers a potential flaw. If there is no such program within the State, then a credible fixed amount will be impossible to determine because there is no reasonable assurance that the support will contribute to the preservation of affordable rates and that it still be "specific, predictable and sufficient to preserve and advance universal service."

Indeed, the approach advocated by SBC relies on a fixed indicator. However, it is one that cannot be distorted to reach a particular result nor does it result in inefficient universal service support. The Commission can maintain the balance which currently exists between interstate funding and the total amount of universal service support.

SBC believes a more appropriate approach is to determine if the actual costs of universal service exceed the ability of the customers within a state to pay for universal service. If federal and state rates for universal service components have been set at affordable levels, from a consumer-based perspective, regulators can safely assume that the potential for state funding has been maximized. Any differences resulting from costs in excess of that affordability level should be the focus of universal service funding.

It should be recognized that in some instances, the state portion of the cost excess may pose a significant burden on that state's ability to support universal service within its territory. Therefore, in those situations in which a state's potion is greater than the average state obligation, additional interstate support may be necessary.

IV. The Commission Should Adopt a Certification Procedure to Ensure Support is Being Used for Universal Services.

The Commission has concluded that carriers should be required to use support "only for the provision, maintenance and upgrading of facilities and services for which the support is intended."[10] In meeting this standard the Commission requests comments on several implementation issues. First, how is support to be applied on high cost wire

[10] Notice, ¶ 113.

center basis should the Commission decide to use average costs over an area larger than a wire center in determining support levels?[11] Second, does the characterization of federal support as carrier revenue to be considered by the state in its rate setting process meet the requirements of Section 254 of the Telecommunications Act?[12] Can all state jurisdictions properly use federal support to enable a reasonable comparability of local rates and should carriers be required to notify high-cost subscribers of this designation and the fact that federal support is being provided to the carrier to keep rates affordable? Finally, the Commission has asked what measures can be adopted to ensure that carriers utilize the federal support in a manner consistent with Section 254.[13]

The need for support is tied directly to the universal service rate level charged to customers in a given geographic area as compared to the costs of providing universal service in that same geographic area. The geographic area over which support is determined can be smaller than the area for which a price is established and the outcome still will meet statutory requirements. However, if the geographic area over which support is determined is larger than the area for which a price is established, and the universal service price is artificially low, then the structure will inherently produce implicit support. The effect in the later case results in the low cost areas and other types of services supporting the higher cost universal service prices.

The Commission also proposes that if a carrier does not receive support equal to the difference between the forward-looking cost estimate for a high-cost wire center and the threshold level for federal support, it should allocate the support among all lines on a pro rata basis, dependent upon the federal benchmark plus the state supported levels and the wire center's forward looking cost of providing service.[14]

---

[11] Notice, ¶ 113.

[12] Notice, ¶ 114.

[13] Notice, ¶ 115.

[14] Notice, ¶ 116.

SBC agrees with the Commission that a certification process should be used to ensure universal service monies are being expended for the purpose for which they were intended. Moreover, should the Commission adopt a targeted approach, such as that proposed by SBC below, consumer expenditures will determine universal support levels without the opportunity for gaming. A reporting mechanism alone will not achieve the purpose of ensuring the proper use of these funds. The States through the rate-making process can enforce the certification by carrier and proper use of the funds.

As described more fully below, exogenous treatment should be afforded to all baskets, except that attributable to Traffic Sensitive if these monies are properly considered to be new revenue. Under this scenario, the States could determine the appropriate pass-through. Various alternatives are available. For example, the current mechanism for matching costs to revenues could be used to facilitate the lowering of loop costs and ensure rates are reasonable. As an alternative the monies could be flowed through to the appropriate rate elements, or with regard to carriers subject to rate of return regulation, the flow-through could be a factor in the rate-making process. In any event, the effect should be to produce affordable local rates.

V. A Hold-Harmless Provision is Advisable to Prevent Immediate, Substantial Reductions in Federal Support.

SBC agrees with the Commission that a hold-harmless provision should be adopted whereby the amount of support is the greater of the sum generated under the proposed approach or the explicit amount currently received.[15] To ensure that universal service is advanced, a carrier should receive no less support under the Commission's new methodologies than that currently received. However, should the Commission adopt an affordability approach such as that proposed by SBC below, the interstate recovery of intrastate costs should be consistent with that methodology.

---

[15] Notice, ¶ 117.

Any hold-harmless provision should be based on a carrier-by-carrier approach. A state-by-state approach would simply add another layer of bureaucracy without achieving any discernable benefit. Moreover, there is no purpose served by distributing funds to each state and then relying upon the state to redistribute the funds based on its own determination of individual company need. Under a "block grant" approach, the current level of support could be arbitrarily redistributed based upon criteria unintended by the Commission or the Telecommunications Act.

It is more effective to distribute the service support directly to the carriers providing the service. This approach promotes portability and encourages competition. However, the Commission must bear in mind that the amount allocated to a carrier should be commensurate with that carrier's actual costs in providing the service. If the carrier is unable to produce actual costs, it may rely upon the results produced by the cost proxy model.

VI. The Commission Should Adjust Interstate Access Charges to Offset Universal Service Support.

SBC agrees with the Commission's conclusion that it is critical to implement changes in the interstate access charge system at the same time reciprocal adjustments are made with respect to universal service support.[16]

The universal service rates paid by the vast majority of residence customers are subsidized through implicit support mechanisms. The result is that these subsidized rates are kept artificially low and universal service cost recovery is accomplished through other services sold to residential customers and other types of customers. In fact, revenues generated by business services primarily provides the implicit support necessary. However, in a competitive environment, it is essential that the link between residence cost recovery and business revenues be eliminated. While this goal cannot be

[16] Notice, ¶ 128.

accomplished overnight, measures toward this end will serve public policy by minimizing the overall level of implicit support. In lessening the reliance on this implicit support, residential universal service shall not be impacted by the whims of business service competition and the competition for residential service shall benefit.

In order to accomplish this objective, the primary residence/single line business end user common line ("EUCL") charges should be increased to the non-primary residence EUCL charge level. This measure will also alleviate customer confusion over the existing EUCL structure by eliminating the distinction between primary and non-primary end user common line charges. It will further serve to minimize the level of interstate funding required by removing a significant portion of the implicit support included in interstate access charges. A transition plan should be implemented to increase the single line business EUCL charge to the multi-line business level, which in turn would simplify the customer price structure. There is no evidence that this nominal charge increase would unduly burden the single line business customer.

In this regard, the issue posed is whether carriers should make an exogenous downward adjustment to the common line basket or across all baskets which currently contain universal service fund monies. SBC believes that for the explicit Universal Service Fund subsidy, exogenous treatment should be spread across all baskets with the exception of the Traffic Sensitive. The exogenous cost reversal should be the current Universal Service Fund exogenous cost value in the price cap indices adjusted for the negative impact of the Gross Domestic Product Price Index minus the relevant Productivity factor ("GDP-X") only. The Universal Service Fund is driven by the contribution factors identified by the Commission which are based on current costs assigned by the Universal Service Administrative Corporation ("USAC"). It is not impacted by the LECs' increased efficiency or productivity, the underlying principle of the X factor. Inclusion of this real expense in access charges, especially those in the

Common Line basket, which a driven by demand for local exchange service not real access services, causes the impact of GDP-X to be larger that it would have been absent USF in the underlying rates. Neither the Commission nor USAC have lowered the LECs' Universal Service Fund contributions to reflect this additional decrease in rates.

Moreover, SBC concurs that there should be a corresponding dollar-for-dollar reduction in interstate access charges as implicit support in interstate access rates is replaced with explicit support. This approach is consistent with the Commission's previous position related to the replacement of Long Term Support ("LTS") by the Universal Service Fund. The amount of LTS currently in the Price Cap Indices ("PCI") was removed without adjustment.

VII. In its Implementation of the Universal Service Fund, the Commission Must Meet All Statutory Requirements.

The overall focus of a sound universal service policy must consider the affordability of universal service prices, the explicit support necessary to maintain these prices, portable universal service support and the shared funding obligation. None of these concepts are severable or independent. SBC believes that the starting point must be the affordability of universal service and that residential universal service rates should only be subsidized when such rates are determined to be unaffordable.

1. Implicit Versus Explicit Support.

Currently universal service rates are primarily subsidized through implicit support mechanisms, including rates for services paid by other customers. From a public policy perspective, the subsidization of telephone service must involve a careful analysis of the true needs of the marketplace, rather than an assumption regarding those needs. It is imperative that the universal service support provided is targeted to provide service

where warranted.[17] Subsidization, both implicit and explicit, requires other services and customers to support universal service. SBC proposes that a reasonable public policy outcome would be to limit subsidized service to those residence customers who reside in geographic areas in which universal service prices would be otherwise unaffordable. A federal funding mechanism based upon affordability of rates as opposed to abstract, hypothetical concepts, better achieves the goals expressed by Congress. Moreover, a consumer-based design appropriately will focus the debate on universal service prices.

2. Affordability Mechanics.

Intrastate and interstate retail universal service prices represent a household expenditure for residence customers, the same as other expenditures such as cable television charges and automobile-related expenses. With the exception of Lifeline customers, other residential customers are able to pay for their basic service. In order to ensure such rates remain affordable, the Commission should identify a USAP for residence customers and adopt a funding mechanism to assist in maintaining this level.

The first step in determining a USAP is to compare universal service expenditures with other types of household expenditures. Attachment 1A lists nationwide household expenditures and expenditure levels produced by the Bureau of Labor Statistics. Attachment 1B provides a description of the household expenditure categories. In this regard the "Telephone" expenditure category covers all telephone service expenditures, such as primary residential service, vertical services, toll service, wireless service, inside wire maintenance contracts and taxes. The estimated average residential local service rate of $19.85 from Table 1.2 in the June 1999 Reference Book[18] can be used as a

---

[17] The concept of affordability described herein does not address low income situations. These situations are best dealt with through Lifeline programs which provide support on an individual needs basis.

[18] *The Industry Analysis Division's Reference Book of Rates, Price Indices, and Household Expenditures for Telephone Service*, Industry Analysis Division, Common Carrier Bureau (June 1999).

surrogate to calculate a current nationwide universal service expenditure of .7%. Attachment 1C reflects similar calculations for the states in which the SBC telephone companies operate expressed as statewide expenditure levels. A comparison of the universal service expenditure levels to other household expenditures demonstrates that consumers are spending less for universal service than for both non-discretionary and discretionary household items. This comparison further supports the position that subscribers can afford to pay for a larger percentage of the price for universal service, rendering any higher levels of subsidy as unwarranted.

SBC recommends using a 1% expenditure level as the USAP for residential customers above which a federal funding mechanism may provide universal support (See Attachment 1D for results). This level is consistent with other types of household expenditure levels. Any increase to the universal expenditure level should be offset by corresponding decreases in the prices which were relied upon to generate implicit support. The USAP should be expressed as a statewide expenditure level to more accurately portray residential universal service expenditures versus median household income levels. Moreover, expressing this factor on a statewide level provides a better illustration of a state's ability to deal with its own funding issues.

SBC recommends a state-specific USAP rather than a nationwide average. A state-specific USAP, which is an expenditure-based threshold, recognizes that universal service prices may vary in concert with the dramatic differences in consumer income levels, as represented by state averages.

3. Consistency in Federal and State Universal Service Support Methodologies.

Despite the fact that the Act does not directly mandate states to adopt explicit universal service support, the Commission should be concerned with the significant levels of intrastate implicit support.

Fulfilling the statutory requirements of Section 254 is a joint responsibility repeatedly referenced within the Section but also due to the shared jurisdictional use of the facilities that provide universal service. As further evidence, Congress specifically assigned to the Joint Board the responsibility for crafting the rule changes needed to implement its intentions. The Joint Board and the FCC should recommend that states adopt a USAP process similar to the one described above as the basis for revising state universal service support mechanisms in a manner consistent with those adopted by the FCC.

4. Federal Funding for Intrastate Universal Service Costs.

In the May 28, 1999 Order associated with the Notice, the Commission determined that it was appropriate to provide federal funding for intrastate universal service costs. This conclusion was based on the fact that additional federal funding is believed to be necessary to assist some states in satisfying the reasonable comparability principle contained in Section 254(b)(3) of the Act. In this context, the Commission seeks comment on a replacement mechanism for the existing Part 36 high cost funding mechanism.

The SBC proposal provides just such a mechanism which would continue interstate recovery of these intrastate costs. Once the level of support has been determined by comparing actual costs and the state-specific USAP and the level of support has been appropriately allocated to the federal and state jurisdictions, the state portion of the support should be compared to an average of the total states' portions (i.e., a credible "fixed" indicator of the state's ability to support high cost areas). In those instances where a state-specific support requirement exceeds this average, additional interstate support is appropriate to ensure adequate recovery.

VIII. Conclusion.

SBC believes the goals of the Telecommunications Act are better served by an affordability approach. In any event, it is imperative that universal service support be targeted toward those persons for which such support is intended. The analysis of need on a wire center basis furthers this purpose. Moreover, in eliminating the various aspects of implicit support, the Commission must adopt an explicit methodology that permits a carrier to fully recover its costs if the advancement of universal service is to be achieved.

Respectfully submitted,

SBC COMMUNICATIONS INC.

By Hope Thurrott

Alfred G. Richter Jr.
Roger K. Toppins
Hope Thurrott
One Bell Plaza, Room 3023
Dallas, Texas 75202
214-464-3620

Attorneys for SBC Communications Inc.

July 23, 1999

Attachment 1A

Annual Household Expenditures

Household Expenditures	*United States*		*Northeast*		*Midwest*		*South*		*West*	
Non-Discretionary										
Housing	*31.4%*	*$11,272*	*32.8%*	*$12,480*	*27.9%*	*$10,532*	*30.3%*	*$9,877*	*35.0%*	*$13,255*
Food at home	*8.0%*	*$2,880*	*7.8%*	*$2,970*	*7.3%*	*$2,739*	*8.5%*	*$2,771*	*8.3%*	*$3,125*
Food away from home	*5.4%*	*$1,921*	*6.3%*	*$2,388*	*5.0%*	*$1,892*	*5.1%*	*$1,655*	*5.2%*	*$1,952*
Residential energy	*3.7%*	*$1,318*	*3.9%*	*$1,481*	*3.7%*	*$1,395*	*4.1%*	*$1,334*	*2.8%*	*$1,048*
Gasoline and motor oil	*3.1%*	*$1,098*	*2.6%*	*$979*	*2.9%*	*$1,107*	*3.4%*	*$1,112*	*3.1%*	*$1,174*
Medical services	*1.5%*	*$531*	*1.3%*	*$480*	*1.4%*	*$521*	*1.5%*	*$502*	*1.7%*	*$638*
Water and other public services	*0.8%*	*$286*	*0.6%*	*$215*	*0.7%*	*$279*	*0.9%*	*$290*	*0.9%*	*$355*
Telephone	***2.3%***	***$809***	***2.1%***	***$785***	***2.1%***	***$778***	***2.6%***	***$839***	***2.2%***	***$817***
Discretionary										
Miscellaneous Household equipment	*2.0%*	*$707*	*1.9%*	*$723*	*1.9%*	*$711*	*1.9%*	*$608*	*2.2%*	*$847*
Tobacco products and smoking supplies	*0.7%*	*$264*	*0.7%*	*$260*	*0.8%*	*$302*	*0.8%*	*$268*	*0.6%*	*$217*
Alcoholic Beverages	*0.9%*	*$309*	*1.0%*	*$379*	*0.8%*	*$306*	*0.7%*	*$229*	*1.0%*	*$377*
Entertainment fees and admissions	*1.3%*	*$471*	*1.4%*	*$528*	*1.2%*	*$468*	*1.1%*	*$358*	*1.6%*	*$604*
Television, radios, and sound equipment	*1.6%*	*$577*	*1.5%*	*$581*	*1.5%*	*$560*	*1.8%*	*$570*	*1.6%*	*$605*
Pets, toys, and playground equipment	*0.9%*	*$327*	*0.8%*	*$320*	*0.9%*	*$325*	*0.9%*	*$299*	*1.0%*	*$378*
Other entertainment supplies and equipment	*1.2%*	*$439*	*0.9%*	*$340*	*1.5%*	*$561*	*1.0%*	*$334*	*1.5%*	*$565*
Gifts of goods and services	*3.0%*	*$1,059*	*3.1%*	*$1,188*	*2.8%*	*$1,063*	*2.9%*	*$953*	*2.9%*	*$1,110*
Median Income (1997 estimate) Used to Calculate Expenditure Levels	*$35,850*		*$37,991*		*$37,705*		*$32,553*		*$37,852*	
States By Region as classified by			***Connecticut,*** *Maine, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, and Vermont.*		*Illinois, Indiana, Iowa,* ***Kansas,*** *Michigan, Minnesota,* ***Missouri,*** *Nebraska, North Dakota, Ohio, South Dakota, and Wisconsin*		*Alabama,* ***Arkansas,*** *Delaware, District of Columbia, Florida, Georgia, Kentucky, Louisiana, Maryland, Mississippi, North Carolina,* ***Oklahoma,*** *South Carolina, Tennessee,* ***Texas,*** *Virginia, and West Virginia*		*Alaska, Arizona,* ***California,*** *Colorado, Hawaii, Idaho, Montana,* ***Nevada,*** *New Mexico, Oregon, Utah, Washinton, and Wyoming*	

Source of Household Expenditures:1997 Consumer Expenditure Survey - Bureau of Labor Statistics.
Source of Median Income Data: 1995 Census Data

Glossary of Household Expenditures

Housing includes mortgage, interest and charges, property taxes, maintenance and repair, and insurance for owned dwellings. Also includes rented dwellings and other lodging.

Food at home refers to the total expenditures for food at grocery stores or other food stores and food prepared on trips.

Food away from home includes all meals (breakfast, lunch, brunch, and dinner) at restaurants, carryouts, and vending machines, including tips, plus special catered affairs such as weddings and bar mitzvahs, and meals away from home on trips.

Residential energy includes natural gas, electricity, fuel oil, wood, kerosene, coal, bottled gas.

Gasoline and motor oil includes gasoline, diesel fuel, and motor oil.

Medical services includes hospital room and services, physicians' services, service of a practitioner other than physician, eye and dental care, lab tests, X-rays, nursing, therapy services, care in convalescent or nursing home, and other medical care.

Water and Public Services includes water, garbage and trash collection, sewerage maintenance, and septic tank cleaning.

Telephone includes local service, toll service, connection charges, additional access lines, additional local service features such as call waiting, directory listing charges, information calls, inside wiring maintenance plans. Does not include unlimited local calling plans.

Miscellaneous household equipment includes typewriters, luggage, lamps and other light fixtures, window coverings, clocks, lawnmowers and gardening equipment, other hand and power tools, telephone answering devices, telephone accessories, computers and computer hardware for home use, computer software and accessories for home use, calculators, office equipment for home use, floral arrangements and house plants, rental of furniture, closet and storage items, household decorative items, infants' equipment, outdoor equipment, smoke alarms, other household appliances, and small miscellaneous furnishings.

Tobacco products and smoking supplies includes cigarettes, cigars, snuff, loose smoking tobacco, chewing tobacco, and smoking accessories such as cigarette or cigar holders, pipes, flints, lighters, pipe cleaners, and other products and accessories.

Alcoholic beverages includes beer and ale, wine, whiskey, gin, vodka, rum, and other alcoholic beverages.

Entertainment fees and admissions includes fees for participant sports; admissions to sporting events, movies, concerts, plays; health, swimming, tennis and country club memberships, and other social recreational and fraternal organizations; recreational lessons or instruction; rental of movies, and recreation expenses on trips.

Television, radio, and sound equipment includes television sets, video recorders, video cassettes, tapes, disks, disk players, video game hardware, video game cartridges, cable TV, radios, phonographs, tape recorders and players, records and tapes, and records and tapes through record clubs, musical instruments, and rental/ repair of TV and sound equipment.

Pets, toys, hobbies, and playground equipment includes pet food, pet services, veterinary expenses, toys, games, hobbies, tricycles, and playground equipment.

Other entertainment supplies and equipment includes indoor exercise equipment, athletic shoes, bicycles, trailers, campers, camping equipment, rental of campers and trailers, hunting and fishing equipment, sports equipment, boats, motors and trailers, rental of boats, landing and docking fees, rental and repair of sports equipment, photographic equipment, film and film processing, photographer fees, repair and rental of photo equipment, fireworks, pinball and electronic video games.

Gifts of goods and services includes gift expenditures for persons outside of the consumer unit: (1) clothing for females and males over 2 years of age, and infants under 2 years of age; (2) jewelry and watches; (3) small appliances and miscellaneous housewares; (4) blankets, sheets, towels, and table linens; and (5) all other gifts.

Source: 1997 Consumer Expenditure Survey, Bureau of Labor Statistics, except for the category of "Telephone" which is derived from the Common Carrier Bureau, Industry Analysis Division, "Reference Book of Rates, Price Indices and Household Expenditures for Telephone Service", March 1997.

Residence Universal Service Expenditure Data

[illegible]		[illegible]		[illegible]		[illegible]	
Annual Expenditure	*Expenditure Level*	*Annual Expenditure*	*Expenditure Level*	*Annual Expenditure*	*Expenditure Level*	*Annual Expenditure*	*Expenditure Level*
$238.20	*0.7%*	*$218.40*	*0.8%*	*$177.00*	*0.5%*	*$190.44*	*0.6%*
Median Income		***Median Income***		***Median Income***		***[illegible]***	
$35,850		*$27,896*		*$38,681*		*$33,786*	

Missouri		***Nevada***		***Oklahoma***		[illegible]	
Annual Expenditure	*Expenditure Level*	*Annual Expenditure*	*Expenditure Level*	*Annual Expenditure*	*Expenditure Level*	*Annual Expenditure*	*Expenditure Level*
$168.00	*0.5%*	*$171.00*	*0.4%*	*$198.12*	*0.7%*	*$158.64*	*0.5%*
Median Income		***Median Income***		***Median Income***		***[illegible]***	
$33,352		*$38,190*		*$27,875*		*$33,128*	

Median Income Data: 1995 Census Data Adjusted to Reflect 1997 Levels
Annual Expenditure Data is State Weighted Universal Service Rate, Touch-Tone charge, plus Primary Residence EUCL Charge

Residence Universal Service Affordability Point

[illegible]		[illegible]		[illegible]		[illegible]		[illegible]		[illegible]		[illegible]	
Expenditure Level @ 1%		*Expenditure Level @ 1%*		*Expenditure Level @ 1%*		*Expenditure Level @ 1%*		*Expenditure Level @ 1%*		*Expenditure Level @ 1%*		*Expenditure Level @ 1%*	
Annual	*Monthly*	*Annual*	*Monthly*	*Annual*	*Monthly*	*Annual*	*Monthly*	*Annual*	*Monthly*	*Annual*	*Monthly*	*Annual*	*Monthly*
$278.96	*$23.25*	*$386.81*	*$32.23*	*$337.86*	*$28.16*	*$333.52*	*$27.79*	*$381.90*	*$31.83*	*$278.75*	*$23.23*	*$331.28*	*$27.61*
Median Income		***Median Income***		***Median Income***		***Median Income***		***Median Income***		***Median Income***		[illegible]	
$27,896		*$38,681*		*$33,786*		*$33,352*		*$38,190*		*$27,875*		*$33,128*	

Median Income Data: 1995 Census Data Adjusted to Reflect 1997 Levels
Annual Expenditure Data is State Weighted Universal Service Rate, Touch-Tone charge, plus Primary Residence EUCL Charge

Certificate of Service

On this 23rd day of July, 1999, I, Mary Ann Morris, hereby certify that the Comments of SBC Communications Inc. in CC Docket 96-45 and CC Docket 96-262 have been served upon the parties listed in the Service List attached to the Comments of SBC Communications Inc.

/s/ Mary Ann Morris

July 23, 1999

MAGALIE ROMAN SALAS
OFFICE OF THE SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
THE PORTALS
445 TWELFTH STREET SW
ROOM TW-A325
WASHINGTON DC 20554

SHERYL TODD
ACCOUNTING POLICY DIVISION
FEDERAL COMMUNICATIONS COMMISSION
THE PORTALS
445 12TH STREET SW
WASHINGTON DC 20554

INTERNATIONAL TRANSCRIPTION SERVICE
1231 20TH ST NW
WASHINGTON DC 20036

THE HONORABLE SUSAN NESS CHAIR
COMMISSIONER
FEDERAL COMMUNICATION COMMISSION
THE PORTALS
445 12TH STREET SW
WASHINGTON DC 20554

THE HONORABLE HAROLD FURCHTGOTT-ROTH
COMMISSIONER
FEDERAL COMMUNICATIONS COMMISSION
THE PORTALS
445 12TH STREET SW
WASHINGTON DC 20554

THE HONORABLE WILLIAM E KENNARD, CHAIRMAN
FEDERAL COMMUNICATIONS COMMISSION
THE PORTALS
445 12TH STREET SW
WASHINGTON DC 20554

THE HONORABLE MICHAEL K POWELL COMMISSIONER
FEDERAL COMMUNICATIONS COMMISSION
THE PORTALS
445 12TH STREET SW
WASHINGTON DC 20554

THE HONORABLE GLORIA TRISTANI
COMMISSIONER
FEDERAL COMMUNICATIONS COMMISSION
THE PORTALS
445 12TH STREET SW
WASHINGTON DC 20554

THE HONORABLE JULIA JOHNSON
STATE CHAIR CHAIRMAN
FLORIDA PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BLVD
GERALD GUNTER BUILDING
TALLAHASSEE FL 32399-0850

THE HONORABLE DAVID BAKER
COMMISSIONER
GEORGIA PUBLIC SERVICE COMMISSION
244 WASHINGTON ST SW
ATLANTA GA 30334-5701

THE HONORABLE LASKA SCHOENFELDER
COMMISSIONER
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION
STATE CAPITOL 500 EAST CAPITOL STREET
PIERRE SD 57501-5070

THE HONORABLE PATRICK H WOOD III
CHAIRMAN
TEXAS PUBLIC UTILITY COMMISSION
1701 NORTH CONGRESS AVE
AUSTIN TX 78701

MARTHA S HOGERTY
MISSOURI OFFICE OF PUBLIC COUNCIL
301 WEST HIGH STREET STE 250
TRUMAN BUILDING
JEFFERSON CITY MO 65102

DEONNE BRUNING
NEBRASKA PUBLIC SERVICE COMMISSION
300 THE ATRIUM 1200 N STREET
P O BOX 94927
LINCON NE 68509-4927

CHARLES BOLLE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION
STATE CAPITOL 500 EAST CAPITOL ST
PIERRE SD 57501-5070

JAMES CASSERLY
FEDERAL COMMUNICATIONS COMMISSION
COMMISSIONER NESS'S OFFICE
THE PORTALS
445 12TH STREET SW
WASHINGTON DC 20554

ROWLAND CURRY
TEXAS PUBLIC UTILITY COMMISSION
1701 NORTH CONGRESS AVENUE
P O BOX 13326
AUSTIN TX 78701

ANN DEAN
MARYLAND SERVICE PUBLIC COMMISSION
16TH FLOOR 6 SAINT PAUL STREET
BALTIMORE MD 21202-6806

BRIDGET DUFF
STATE STAFF CHAIR
FLORIDA PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BLVD.
TALLAHASSEE FL 32399-0866

IRENE FLANNERY
FEDERAL STAFF CHAIR
FEDERAL COMMUNICATIONS COMMISSION
ACCOUNTING AND AUDITS DIVISION
UNIVERSAL SERVICE BRANCH
THE PORTALS
445 12TH STREET SW
WASHINGTON DC 20554

PAUL GALLANT
FEDERAL COMMUNICATIONS COMMISSION
COMMISSIONER TRISTANI'S OFFICE
THE PORTALS
445 12TH STREET SW
WASHINGTON DC 20554

LORI KENYON
ALASKA PUBLIC UTILITIES COMMISSION
1016 WEST SIXTH AVENUE STE 400
ANCHORAGE AK 99501

MARK LONG
FLORIDA PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BLVD.
TALLAHASSEE FL 32399-0866

SANDRA MAKEEF
IOWA UTILITIES BOARD
LUCAS STATE OFFICE BUILDING
DES MOINES IA 50319

KEVIN MARTIN
FEDERAL COMMUNICATIONS COMMISSION
COMMISSIONER FURCHTGOTT-ROTH'S OFFICE
THE PORTALS
445 12TH STREET SW
WASHINGTON DC 20554

PHILIP F MCCLELLAND
PENNSYLVANIA OFFICE OF CONSUMER
ADVOCATE
1425 STRAWBERRY SQUARE
HARRISBURG PA 17120

BARRY PAYNE
INDIANA OFFICE OF THE CONSUMER COUNSEL
100 NORTH SENATE AVE ROOM N501
INDIANAPOLIS IN 46204-2208

JAMES BRADFORD RAMSEY
NATIONAL ASSOCIATION OF REGULATORY
UTILITY COMMISSIONERS
1100 PENNSYLVANIA AVE NW
P O. BOX 684
WASHINGTON DC 20044-0684

BRIAN ROBERTS
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO CA 94102

TIANE SOMMER
GEORGIA PUBLIC SERVICE COMMISSION
244 WASHINGTON ST SW
ATLANTA GA 30334-5701

PAUL A BULLIS
CHIEF COUNSEL
MAUREEN A SCOTT
ARIZONA CORPORATION COMMISSION
1200 WEST WASHINGTON ST
PHOENIX AZ 85007

LAWRENCE W KATZ
MICHAEL E GLOVER
BELL ATLANTIC TELEPHONE COMPANIES
1320 NORTH COURT HOUSE ROAD
EIGHTH FLOOR
ARLINGTON VA 22201

JOEL B SHIFMAN, ESQ
MAINE PUBLIC UTILITIES COMMISSION
242 STATE STREET
18 STATE HOUSE STATION
AUGUSTA MAINE 04333-0018

M ROBERT SUTHERLAND
RICHARD M SBARATTA
BELLSOUTH CORPORATION
SUITE 1700
1155 PEACHTREE STREET NE
ATLANTA GA 30309-3610

KENNETH T BURCHETT
GVNW CONSULTING INC
8050 S. W. WARM SPRINGS STREET
SUITE 200
TUALATIN OREGON 97062

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

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

COMPETITIVE PRICING DIVISION
COMMON CARRIER BUREAU
THE PORTALS
445 12TH STREET SW
WASHINGTON DC 20554

GEORGIA PUBLIC SERVICE COMMISSION
ATTENTION: MR BB KNOWLES
DIRECTOR UTILITIES DIVISION
244 WASHINGTON STREET SW/SOB -- SUITE 266
ATLANTA GEORGIA 30334-5701

LYMAN C WELCH
190 S LASALLE STREET #3100
CHICAGO IL 60603

PUBLIC UTILITY COMMISSION OF OREGON
550 CAPITOL ST NE
SALEM OR 97310-1380

PUBLIC UTILITY COMMISSION OF TEXAS
1702 N CONGRESS AVE
P O BOX 13326
AUSTIN TX 78711-3326

PENNSYLVANIA INTERNET SERVICE PROVIDERS
SCOTT J RUBIN ESQ
3 LOST CREEK DRIVE
SELINSGROVE PA 17870

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA
LAWRENCE D CROCKER III
ACTING GENERAL COUNSEL
717 14TH STREET NW
WASHINGTON DC 20005

NORTHERN ARKANSAS TELEPHONE COMPANY INC
STEVEN G SANDERS - PRESIDENT
301 EAST MAIN STREET
FLIPPIN AR 72634

AMERICAN LIBRARY ASSOCIATION
CAROL C HENDERSON
EXECUTIVE DIRECTOR
ALA WASHINGTON OFFICE
1301 PENNSYLVANIA AVENUE NW SUITE 403
WASHINGTON DC 20004

ALLIED ASSOCIATED PARTNERS LP
ALLIED COMMUNICATIONS GROUP
GELD INFORMATION SYSTEMS
CURTIS T WHITE
MANAGING PARTNER
4201 CONNECTICUT AVENUE NW - #402
SUITE 402
WASHINGTON DC 20008-1158

EDWARD HAYES JR ESQ
1155 CONNECTICUT AVENUE NW
THIRD FLOOR
WASHINGTON DC 20036

RONALD DUNN
PRESIDENT
INFORMATION INDUSTRY ASSOCIATION
1625 MASSACHUSETTS AVENUE NW
SUITE 700
WASHINGTON DC 20036

DANIEL J WEITZNER
ALAN B DAVIDSON
CENTER FOR DEMOCRACY AND TECHNOLOGY
1634 EYE STREET NW
SUITE 1100
WASHINGTON DC 20006

JOSEPH S PAYKEL
ANDREW JAY SCHWARTZMAN
GIGI B SOHN
MEDIA ACCESS PROJECT
1707 L STREET NW
SUITE 400
WASHINGTON DC 20036

GARY M EPSTEIN
JAMES H BARKER
LATHAM & WATKINS
COUNSEL FOR BELLSOUTH CORPORATION &
BELLSOUTH TELECOMMUNICATIONS INC
1001 PENNYSLVANIA AVENUE NW
SUITE 1300
WASHINGTON DC 20004-2505

CITIZENS UTILITIES COMPANY
RICHARD M TETTELBAUM
ASSOCIATE GENERAL COUNSEL
SUITE 500 1400 16TH STREET NW
WASHINGTON DC 20036

JACK KRUMHOLTZ
LAW AND CORPORATE AFFAIRS DEPARTMENT
MICROSOFT CORPORATION
SUITE 600
5335 WISCONSIN AVENUE NW
WASHINGTON DC 20015

NATIONAL CABLE TELEVISION ASSOCIATION INC
DANIEL L BRENNER
DAVID L NICOLL
1724 MASSACHUSETTS AVENUE NW
WASHINGTON DC 20036

EXCEL TELECOMMUNICATIONS INC
THOMAS K CROWE
MICHAEL B ADAMS
LAW OFFICES OF THOMAS K CROWE PC
2300 M STREET NW
SUITE 800
WASHINGTON DC 20037

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

DANNY E ADAMS
EDWARD A YORKGITIS JR
KELLEY DRYE & WARREN LLP
ATTORNEYS FOR CABLE & WIRELESS INC
1200 19TH STREET NW SUITE 500
WASHINGTON DC 20036

TIMOTHY R GRAHAM
ROBERT G BERGER
JOSEPH SANDRI
WINSTAR COMMUNICATIONS INC
1146 19TH STREET NW
WASHINGTON DC 20036

DANA FRIX
MARK SIEVERS
SWIDLER & BERLIN CHTD
COUNSEL FOR WINSTAR COMMUNICATIONS INC
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

TAMAR HAVERTY
SWIDLER & BERLIN CHARTERED
COUNSEL FOR TELCO COMMUNICATIONS GROUP INC
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

AMERICA ONLINE INC
WILLIAM W BURRINGTON
JILL LESSER
COUNSEL FOR AMERICA ONLINE INC
1101 CONNECTICUT AVENUE NW
SUITE 400
WASHINGTON DC 20036

DONNA N LAMPERT
JAMES A KIRKLAND
JENNIFER A PURVIS
MINTZ LEVIN COHN FERRIS GLOVSKY
AND POPEO P C
COUNSEL FOR AMERICA ONLINE INC
701 PENNSYLVANIA AVENUE NW
SUITE 900
WASHINGTON DC 20004

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

MICHAEL S FOX
DIRECTOR REGULATORY AFFAIRS
JOHN STAURULAKIS INC
6315 SEABROOK ROAD
SEABROOK MARYLAND 20706

ROBERT S TONGREN
CONSUMERS' COUNSEL
OHIO CONSUMERS' COUNSEL
77 SOUTH HIGH STREET 15TH FLOOR
COLUMBUS OHIO 43266-0550

NATIONAL EXCHANGE CARRIER ASSOCIATION INC
JOANNE SALVATORE BOCHIS
PERRY S GOLDSCHEIN
100 SOUTH JEFFERSON ROAD
WHIPPANY NEW JERSEY 07981

OZARKS TECHNICAL COMMUNITY COLLEGE
P O BOX 5958
SPRINGFIELD MO 65801

MICHAEL S PABIAN
LARRY A PECK
COUNSEL FOR AMERITECH
ROOM 4H82
2000 WEST AMERITECH CENTER DRIVE
HOFFMAN ESTATES IL 60196-1025

TCA INC
TELECOMMUNICATIONS CONSULTANTS
F STEPHEN LAMB MAS MANAGER
1465 KELLY JOHNSON BLVD SUITE 200
COLORADO SPRINGS CO 80920-3946

SCOTT L SMITH
VICE PRESIDENT OF
ALASKA TELEPHONE ASSOCIATION
4341 B STREET SUITE 304
ANCHORAGE AK 99503

WAYNE LEIGHTON PHD
SENIOR ECONOMIST
CITIZENS FOR A SOUND ECONOMY FOUNDATION
1250 H STREET NW SUITE 700
WASHINGTON DC 20005

BETTY D MONTGOMERY
ATTORNEY GENERAL OF OHIO
STEVEN T NOURSE
ASST ATTY GENERAL
PUBLIC UTILITIES SECTION
180 EAST BROAD STREET
COLUMBUS OH 43215-3793

ICG TELECOM GROUP INC
CINDY Z SCHONHAUT
9605 EAST MAROON CIRCLE
ENGLEWOOD CO 80112

ALBERT H KRAMER
DICKSTEIN SHAPIRO MORIN & OSHINSKY LLP
ATTORNEY FOR ICG TELECOM GROUP INC
2101 L STREET NW
WASHINGTON DC 20037-1526

RONALD J BINZ -- PRESIDENT
DEBRA R BERLYN -- EXECUTIVE DIRECTOR
JOHN WINDHAUSEN JR -- GENERAL COUNSEL
COMPETITION POLICY INSTITUTE
1156 15TH STREET NW SUITE 310
WASHINGTON DC 20005

GENERAL COMMUNICATION INC
KATHY L SHOBERT
DIRECTOR FEDERAL AFFAIRS
901 15TH STREET NW
SUITE 900
WASHINGTON DC 20005

MCI TELECOMMUNICATIONS CORPORATION
BRADLEY C STILLMAN -- SENIOR COUNSEL
1801 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20006

JAY C KEITHLEY
SPRINT CORPORATION
1850 M STREET NW 11TH FLOOR
WASHINGTON DC 20036

SUE D BLUMENFELD
THOMAS JONES
WILKIE FARR & GALLAGHER
COUNSEL FOR SPRINT CORPORATION
THREE LAFAYETTE CENTRE
1155 21ST STREET NW
WASHINGTON DC 20036

WORLDCOM INC
CATHERINE R SLOAN
1120 CONNECTICUT AVENUE NW
WASHINGTON DC 20036-3902

WORLDCOM INC
RICHARD J HEITMANN
515 EAST AMITE
JACKSON MS 39201-2702

ALEX J HARRIS
WORLDCOM INC
33 WHITEHALL STREET
15TH FLOOR
NEW YORK NY 10004

PETER A ROHRBACH
DAVID L SIERADZKI
F WILLIAM LEBEAU
HOGAN & HARTSON L.L.P.
555 13TH STREET NW
WASHINGTON DC 20004-1109

AMERICAN PETROLEUM INSTITUTE
KELLER AND HECKMAN LLP
WAYNE V BLACK
C DOUGLAS JARRETT
SUSAN M HAFELI
PAULA DEZA
1001 G STREET NW
SUITE 500 WEST
WASHINGTON DC 20001

AD HOC TELECOMMUNICATIONS USERS COMMITTEE
COLLEEN BOOTHBY
JAMES S BLASZAK
KEVIN S DILALLO
SASHA FIELD
LEVINE BLASZAK BLOCK & BOOTHBY LLP
2001 L STREET NW
SUITE 900
WASHINGTON DC 20036

COMPETITIVE TELECOMMUNICATIONS ASSOCIATION
GENEVIEVE MORELLI
EXECUTIVE VICE PRESIDENT
AND GENERAL COUNSEL
1900 M STREET NW SUITE 800
WASHINGTON DC 20036-3508

ROBERT AAMOTH
KELLEY DRYE & WARREN
ATTYS FOR COMPETITIVE
TELECOMMUNICATIONS ASSOC
1200 19TH STREET NW
SUITE 500
WASHINGTON DC 20036

CHARLES C HUNTER
CATHERINE M HANNAN
HUNTER & MOW PC
TELECOMMUNICATIONS RESELLERS ASSOCIATION
1620 I STREET NW
SUITE 701
WASHINGTON DC 20006

BELL ATLANTIC TELEPHONE COMPANY
EDWARD SHAKIN
1320 NORTH COURT HOUSE ROAD
EIGHTH FLOOR
ARLINGTON VA 22201

NYNEX TELEPHONE COMPANIES
JOSEPH DIBELLA
1300 I STREET NW SUITE 400 WEST
WASHINGTON DC 20005

FLEISCHMAN AND WALSH LLP
COUNSEL TO
LCI INTERNATIONAL TELECOM CORP
1400 SIXTEENTH STREET NW
WASHINGTON DC 20036

ANNE K BINGAMAN
DOUG KNKOPH
LCI INTERNATIONAL TELECOM CORP
8180 GREENSBORO DRIVE SUITE 800
MCLEAN VIRGINIA 22102

CHAD S CAMPBELL
EUGENE D COHEN
BAILEY CAMPBELL PLC
649 NORTH SECOND AVENUE
PHOENIX, ARIZONA 85003

COMPETITIVE TELECOMMUNICATIONS ASSOCIATION
GENEVIEVE MORELLI
1900 M STREET NW
SUITE 800
WASHINGTON DC 20036-3508

ROBERT AAMOTH
KELLEY DRYE & WARREN
1200 19TH STREET NW
SUITE 500
WASHINGTON DC 20036

THOMAS F O'NEILL III
WILLIAM SINGLE IV
MCI TELECOMMUNICATIONS CORP
1133 NINETEENTH STREET NW
WASHINGTON DC 20036

DONALD B VERILLI JR
JENNER & BLOCK
MCI COMMUNICATIONS CORPORATION
JENNER & BLOCK
601 THIRTEENTH STREET NW
WASHINGTON DC 20005

ACC LONG DISTANCE CORP
DANA FRIX
TAMAR HAVERTY
SWIDLER & BERLIN CHARTERED
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

IXC LONG DISTANCE INC
GARY L MANN
DIRECTOR - REGULATORY AFFAIRS
IXC LONG DISTANCE INC
98 SAN JACINTO SUITE 700
AUSTIN TX 78701

AT&T CORP
GENE C SCHAERR
DAVID L LAWSON
SCOTT M BOHANNON
JAMES P YOUNG
1722 EYE STREET NW
WASHINGTON DC 20006

ROBERT M MCDOWELL
BRIAN A CUTE
HELEIN & ASSOCIATES PC
COUNSEL FOR
TELECOMMUNICATION ASSOCIATION
8180 GREENSBORO DRIVE
SUITE 700
MCLEAN VA 22102

TELECON LLC
FAYE F HENRIS
KIERAN T MAYS
AMERICA'S CARRIERS TELECOMMUNICATION
ASSOCIATION
8180 GREENSBORO DRIVE
SUITE 700
MCLEAN VA 22102

ANNE U MACCLINTOCK
VICE PRESIDENT -
REGULATORY AFFAIRS AND PUBLIC POLICY
THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY
227 CHURCH STREET
NEW HAVEN CT 06510

FROST & JACOBS
THOMAS E TAYLOR
CHRISTOPHER J WILSON
ATTORNEYS FOR CINCINNATI BELL
TELEPHONE COMPANY
2500 PNC CENTER
201 EAST FIFTH STREET
CINCINNATI OHIO 45202

JOE D EDGE
TINA M PIDGEON
DRINKER BIDDLE & REATH
ATTORNEYS FOR
PUERTO RICO TELEPHONE COMPANY
901 15TH STREET NW
SUITE 900
WASHINGTON DC 20005

MICHAEL S PABIAN
LARRY A PECK
COUNSEL FOR AMERITECH
ROOM 4H82
2000 WEST AMERITECH CENTER DRIVE
HOFFMAN ESTATES IL 60196-1025

GENERAL SERVICES ADMINISTRATION
EMILY C HEWITT
GENERAL COUNSEL
18TH & F STREETS NW ROOM 4002
WASHINGTON DC 20405

OFFICE OF THE JUDGE ADVOCATE GENERAL
U S ARMY LITIGATION CENTER
901 N STUART STREET SUITE 713
ARLINGTON VA 22202-1837

JOHN ROTHER ESQ
DIRECTOR LEGISLATION AND PUBLIC POLICY
AMERICAN ASSOCIATION OF RETIRED PERSONS
601 E STREET NW
WASHINGTON DC 20049

JAMES LOVE
DIRECTOR
CONSUMER PROJECT ON TECHNOLOGY
P O BOX 19367
WASHINGTON DC 20036

INTERNATIONAL COMMUNICATIONS ASSOCIATION
BRIAN R MOIR
MOIR & HARDMAN
2000 L STREET NW
SUITE 512
WASHINGTON DC 20036-4907

ALLIANCE FOR PUBLIC TECHNOLOGY
DR BARBARA O'CONNOR CHAIR
GERALD DEPO PRESDENT
901 15TH STREET NW
WASHINGTON DC 20005

DAVID J NEWBURGER
NEWBURGER & VOSSMEYER
ONE METROPOLITAN SQUARE SUITE 2400
ST LOUIS MISSOURI 63102

JACK SHREVE
OFFICE OF THE PUBLIC COUNSEL
111 W MADISON ST #812
TALLAHASSEE FL 32399-1400

MIKE TRAVIESO
OFFICE OF PEOPLE'S COUNSEL
6TH ST PAUL STREET SUITE 2102
BALTIMORE MD 21202

IRWIN A POPOWSKY
OFFICE OF CONSUMER ADVOCATE
1425 STRAWBERRY SQUARE
HARRISBURG PA 17120

BLOSSOM PERETZ
DIVISION OF RATEPAYER ADVOCATE
P O BOX 46005
NEWARK NJ 06101

JAMES MARET
OFFICE OF CONSUMER ADVOCATE
LUCAS STATE OFFICE BLDG 4TH FLOOR
DES MOINES IA 50319

ELIZABETH A NOEL
OFFICE OF THE PEOPLE'S COUNSEL
1133 15TH ST NW SUITE 500
WASHINGTON DC 20005

ROB MANIFOLD
ASSISTANT ATTORNEY GENERAL
900 4TH AVENUE SUITE 2000
SEATTLE WA 98164

REGINA COSTA
TOWARD UTILITY RATE NORMALIZATION
625 POLK STREET SUITE 403
SAN FRANCISCO CA 94102

ERIC SWANSON
OFFICE OF ATTORNEY GENERAL
SUITE 1200 WCL TOWER
445 MINNESOTA ST
ST PAUL MN 55101-2130

ANNE BECKER
OFFICE OF UTILITY CONSUMER COUNSELOR
100 N SENATE AVE ROOM N501
INDIANAPOLIS IN 46204-2208

PETER ARTH JR
LIONEL B WILSON
MARY MACK ADU
ATTYS FOR STATE OF CALIFORNIA &
THE PUBLIC UTILITIES COMMISSION OF CA
HELEN M MICKIEWICZ
505 VAN NESS AVENUE
SAN FRANCISCO CA 94102

ALABAMA PUBLIC SERVICE COMMISSION
MARY NEWMEYER
FEDERAL AFFAIRS ADVISER
P O BOX 991
MONTGOMERY AL 36101

COUNSEL FOR THE COMMONWEALTH OF
THE NORTHERN MARIANA ISLANDS
THOMAS K CROWE
DAVID H SCHWARTZ
LAW OFFICES OF THOMAS K CROWE PC
2300 M STREET NW
SUITE 800
WASHINGTON DC 20037

MAUREEN O HELMER
GENERAL COUNSEL
NEW YORK STATE
DEPARTMENT OF PUBLIC SERVICE
THREE EMPIRE STATE PLAZA
ALBANY NY 12223-1350

OFFICE OF PUBLIC UTILITY COUNSEL
LAURIE PAPPAS
DEPUTY PUBLIC COUNSEL
1701 N CONGRESS AVE 9-180
P O BOX 12397
AUSTIN TX 78711-2397

OFFICE OF PUBLIC UTILITY COUNSEL
SUZI RAY MCCLELLAN
PUBLIC COUNSEL
RICK GUZMAN
ASSISTANT PUBLIC COUNSEL
1701 N CONGRESS AVE 9-180
P O BOX 12397
AUSTIN TX 78711-2397

JAMES A BURG
PAM NELSON
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION
STATE CAPITOL
PIERRE SOUTH DAKOTA 57501-5070

R MICHAEL SENKOWSKI
JEFFREY S LINDER
GREGORY J VOGT
WILEY REIN & FIELDING
1776 K STREET NW
WASHINGTON DC 20006

GTE SERVICE CORPORATION
WARD W WUESTE
GAIL L POLIVY
1850 M STREET NW
SUITE 1200
WASHINGTON DC 20036

RICHARD HEMSTAD
WILLIAM R GILLIS
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION
1300 S EVERGREEN PARK DR
P O BOX 47250
OLYMPIA WA 98504-7250

MICHAEL T SKRIVAN
HARRIS SKRIVAN & ASSOCIATES LLC
8801 SOUTH YALE SUITE 220
TULSA OK 74137

AIRTOUCH COMMUNICATIONS INC
KATHLEEN Q ABERNATHY
DAVID A GROSS
1818 N STREET NW
WASHINGTON DC 20036

PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION
MARK J GOLDEN
ROBERT L HOGGARTH
MARY MADIGAN
500 MONTGOMERY STREET
SUITE 700
ALEXANDRIA VA 223214-1561

CENTENNIAL CELLULAR CORPORATION
CHRISTOPHER W SAVAGE
COLE RAYWID & BRAVERMAN LLP
1919 PENNSYLVANIA AVENUE NW
SUITE 200
WASHINGTON DC 20006

ASSOCIATION FOR LOCAL TELECOMMUNICATIONS
SERVICES
RICHARD J METZGER
EMILY M WILLIAMS
SUITE 900
888 17TH STREET NW
WASHINGTON DC 20006

TELEPORT COMMUNICATIONS GROUP INC
TERESA MARRERO
SENIOR REGULATORY COUNSEL
TELEPORT COMMUNICATIONS GROUP INC
TWO TELEPORT DRIVE
STATEN ISLAND NY 10311

SPECTRANET INTERNATIONAL INC
GLENN B MANISHIN
CHRISTINE A MAILLOUX
BLUMENFELD & COHEN - TECHNOLOGY LAW GROUP
1615 M STREET NW SUITE 700
WASHINGTON DC 20036

TIME WARNER COMMUNICATIONS HOLDINGS
BRIAN CONBOY
THOMAS JONES
GUNNAR HALLEY
WILLKIE FARR & GALLAGHER
THREE LAFAYETTE CENTER
1155 21ST STREET NW
WASHINGTON DC 20036

TELE-COMMUNICATIONS INC
RANDALL B LOWE
PIPER & MARBURY LLP
1200 19TH STREET NW
WASHINGTON DC 20036

RURAL TELEPHONE FINANCE COOPERATIVE
JOHN J LIST
SENIOR VICE PRESIDENT
MEMBER SERVICES
2201 COOPERATIVE WAY
HERNDON VA 20171

WESTERN ALLIANCE
BENJAMIN H DICKENS JR
GERARD J DUFFY
BLOOSTON MORDKOFSKY JACKSON & DICKENS
2120 L STREET NW SUITE 300
WASHINGTON DC 20037

TDS TELECOMMUNICATIONS CORPORATION
MARGOT SMILEY HUMPHREY
KOTEEN & NAFTALIN LLP
1150 CONNECTICUT AVENUE NW
SUITE 1000
WASHINGTON DC 20036

ITC
DAVID A IRWIN
TARA S BECHT
IRWIN CAMPBELL & TANNENWALD PC
1739 RHODE ISLAND AVE NW STE 200
WASHINGTON DC 20036-3101

INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE
DIANE SMITH
ALLTEL CORPORATE SERVICES INC
655 15TH STREET NW SUITE 220
WASHINGTON DC 20005-5701

INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE
DAVID W ZESIGER
1300 CONNECTICUT AVENUE NW
SUITE 600
WASHINGTON DC 20036

INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE
RICHARD P BRESS
MICHAEL S WROBLEWSKI
LATHAM & WATKINS
1001 PENNSYLVANIA AVENUE NW
SUITE 1300
WASHINGTON DC 20004-2505

'KENT LARSEN
CATHEY HUTTON AND ASSOCIATES
2711 LBJ FREEWAY SUITE 560
DALLAS TX 75234

ALLTEL TELEPHONE SERVICES CORPORATION
CAROLYN C HILL
655 15TH STREET NW
SUITE 220
WASHINGTON DC 20005

FREDERICK & WARINNER LLC
CLINT FREDERICK
10901 WEST 84TH TERRANCE
SUITE 101
LENEXA KANSAS 66214-1631

ROSEVILL TELEPHONE COMPANY
GEORGE PETRUTSAS
PAUL J FELDMAN
FLETCHER HEALD & HILDRETH PLC
11TH FLOOR
1300 NORTH 17TH STREET
ROSSLYN VA 22209

MINNESOTA INDEPENDENT COALITION
RICHARD J JOHNSON
MICHAEL J BRADLEY
MOSS & BARNETT
4800 NORWEST CENTER
90 SOUTH SEVENTH STREET
MINNEAPOLIS MN 55402-4129

NRTA
MARGOT SMILEY HUMPHREY
KOTEEN & NAFTALIN LLP
1150 CONNECTICUT AVE NW
SUITE 1000
WASHINGTON DC 20036

NTCA
DAVID COSSON
L MARIE GUILLORY
4121 WILSON BOULEVARDE 10TH FLOOR
ARLINGTON VA 22203-1801

OPASTCO
LISA M ZAINA
KENNETH JOHNSON
21 DUPONT CIRCLE NW
SUITE 700
WASHINGTON DC 20036

JEFFREY F BECK
JILLISA BONFMAN
BECK & ACKERMAN
FOUR EMBARCADARO CENTER
SUITE 760
SAN FRANCISCO CA 94111

ALIANT COMMUNICATIONS CO
ROBERT A MAZER
ALBERT SHULDINER
VINSON & ELKINS
1455 PENNSYLVANIA AVE NW
WASHINGTON DC 20004-1008

'COMPUSERVE INC & PRODIGY SERVICES CORP
RANDOLPH J MAY
BONDING YEE
SUTHERLAND ASBILL & BRENNAN
1275 PENNSYLVANIA AVE NW
WASHINGTON DC 20004-2404

ILLUMINET
STEPHEN G KRASKIN
SYLVIA LESSE
THOMAS J MOORMAN
KRASKIN & LESSE
2120 L STREET NW SUITE 530
WASHINGTON DC 20037

THE INTERACTIVE SERVICES ASSOCIATION
EDWIN N LAVERGNE
JAY S NEWMAN
SHOOK HARDY & BACON
1850 K STREET NW
WASHINGTON DC 20006-2244

MICROSOFT CORPORATION
JACK KRUMHOLTZ
LAW AND CORPORATE AFFAIRS DEPARTMENT
MICROSOFT CORPORATION
SUITE 600
5335 WISCONSIN AVE NW
WASHINGTON DC 20015

MICROSOFT CORPORATION
STANLEY M GORINSON
WILLIAM H DAVENPORT
PRESTON GATES ELLIS & ROUVELAS MEEDS
1735 NEW YORK AVE NW
WASHINGTON DC 20006

COMMERCIAL INTERNET EXCHANGE ASSOCIATION
ROBERT D COLLET
BARBARA A DOOLEY
RONALD L PLESSER
MARK J OCONNOR
JAMES J HALPERT
PIPER & MARBURY LLP
1200 NINETEENTH ST NW STE 700
WASHINGTON DC 20036

BANKERS CLEARING HOUSE MASTERCARD INTL INC &
VISA USA INC
HENRY D LEVINE
LAURA F H MCDONALD
LEVINE BLASZAK BLOCK & BOOTHBY
1300 CONNECTICUT AVE NW
SUITE 500
WASHINGTON DC 20036

BETTY D. MONTGOMERY
ATTORNEY GENERAL OF OHIO
PUBLIC UTILITIES SECTION
180 EAST BROAD STREET
COLUMBUS OH 43215-3793

LCI INTERNATIONAL CORP NC
GREGORY M CASEY
DOUGLAS W KINKOPH
8180 GREENSBORO DRIVE
SUITE 800
MCLEAN VA 22102

TERRY MICHAEL BANKS
COUNSEL
ICG TELECOM GROUP
1303 SAWBRIDGE WAY
RESTON VA 22094

THE RURAL TELEPHONE COALITION
MARGOT SMILEY HUMPHREY
KOTEEN & NAFTALIN LLP
1150 CONNECTICUT AVENUE NW
SUITE 1000
WASHINGTON DC 20036

THE RURAL TELEPHONE COALITION
DAVID COSSON
L MARIE GUILLORY
2626 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20037

THE RURAL TELEPHONE COALITION
LISA M ZAINA
KENNETH JOHNSON
21 DUPONT CIRCLE NW
SUITE 700
WASHINGTON DC 20036

ROSEVILLE TELEPHONE COMPANY
FLETCHER HEALD & HILDRETH PLC
GEORGE PETRUTSAS
PAUL J FELDMAN
11TH FLOOR 1300 NORTH 17TH STREET
ROSSLYN VA 22209

TENNESSEE REGULATORY AUTHORITY STAFF
CHRISTOPHER KLEIN CHIEF
UTILITY RATE DIVISION
460 JAMES ROBERTSON PARKWAY
NASHVILLE TN 37243-0505

DAVID S J BROWN
E MOLLY LEAHY
NEWSPAPER ASSOCIATION OF AMERICA
529 14TH STREET NW
SUITE 440
WASHINGTON DC 20045

LESLA LEHTONEN
ATTORNEY FOR
CALIFORNIA CABLE TELEVISION ASSOCIATION
4341 PIEDMONT AVENUE
OAKLAND CA 94611

NYSERNET INC
JAMES BRENNAN
ASSOCIATE DIRECTOR OF GOV SERVICES
RENSSELAER TECHNOLOGY PARK
TROY NY 12180-7698

CYNTHIA B MILLER
SENIOR ATTORNEY
FLORIDA PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BOULEVARD
TALLAHASSEE FL 32399-0850

SONETECH INC
W FRED SEIGNEUR
PRESIDENT
109 KALE AVENUE
STERLING VA 20164

DAVID J NEWBURGER\
NEWBURGER & VOSSMEYER
COUNSEL FOR
AMERICAN ASSOCIATION FOR ADULT AND
CONTINUING EDUCATION
ONE METROPOLITAN SQUARE SUITE 2400
ST LOUIS MISSOURI 63102

CATHERINE R SLOAN
RICHARD L FRUCHTERMAN III
RICHARD S WHITT
WORLDCOM INC
1120 CONNECTICUT AVENUE NW
SUITE 400
WASHINGTON DC 20036

RICHARD J HEITMANN
WORLDCOM INC
515 EAST AMITE
JACKSON MS 39201-2702

ALEX J HARRIS
WORLDCOM INC
33 WHITEHALL STREET
15TH FLOOR
NEW YORK NY 10004

PETER A ROHRBACH
DAVID L SIERADZKI
F WILLIAM LEBEAU
HOGAN & HARTSON LLP
WORLDCOM INC
555 13TH STREET NW
WASHINGTON DC 20004-1109

TEXAS OFFICE OF PUBLIC UTILITY COUNSEL
LAURIE PAPPAS
DEPUTY PUBLIC COUNSEL
1701 N CONGRESS AVENUE 9-180
P O BOX 12397
AUSTIN TX 78711-2397

COMMUNICATIONS WORKERS OF AMERICA
MORTON BAHR
PRESIDENT
501 3RD STREET NW
WASHINGTON DC 20001

KANSAS CORPORATION COMMISSION
1500 SW ARROWHEAD RD
TOPEKA KS 66604-4027

THOMAS B WEAVER
ATTORNEY - GTE MIDWEST INCORPORATED
ARMSTRONG TEASDALE SCHLAFLY & DAVIS
ONE METROPOLITAN SQUARE SUITE 2600
ST LOUIS MISSOURI 63102

JULES M PERLBERG
ONE FIRST NATIONAL PLAZA
CHICAGO IL 60603

RCN TELECOM SERVICES INC
RUSSELL M BLAU
TAMAR E HAVERTY
SWIDLER & BERLIN CHARTERED
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

NATIONAL EMERGENCY NUMBER ASSN
JAMES R HOBSON
FREDERIC L WOOD (ATTY OF RECORD)
DONELAN CLEARY WOOD & MASTER PRICE CAP
PERFORMANCE REVIEW ORDER
1100 NEW YORK AVENUE NW #750
WASHINGTON DC 20005-3934

CARL S NADLER
JENNER & BLOCK
12TH FLOOR
601 THIRTEENTH STREET NW
WASHINGTON DC 20005

CATHERINE O'SULLIVAN
NANCY GARRISON
DEPARTMENT OF JUSTICE
ANTITRUST DIVISION
APPELLATE SECTION - ROOM 10535
PATRICK HENRY BUILDING
601 D STREET NW
WASHINGTON DC 20530

DONALD RUSSELL
DEPARTMENT OF JUSTICE
ANTITRUST DIVISION
CITY CENTER BUILDING
SUITE 8000
1401 H STREET NW
WASHINGTON DC 20530

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

SANDRA K WILLIAMS
SPRINT CORPORATION
4220 SHAWNEE MISSION PARKWAY
SUITE 303A
WESTWOOD KS 66205

JONATHAN CHAMBERS
SPRINT PCS
1850 K STREET NW
SUITE M112
WASHINGTON DC 20036