

CERTIFICATE OF SERVICE

I, Mary Ann Morris, do hereby certify that copies of the "Comments of SBC Communications Inc." in CC Docket 99-200, RM 9258, NSD File No. 99-17, NSD File No. 99-36, and NSD File No. 99-51, were served by first class United States Mail, postage prepaid, upon the parties appearing on the attached service list this 30th day of July, 1999.


Mary Ann Morris

July 30, 1999

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<p>THOMAS K. CROWE COUNSEL FOR EXCEL TELECOMMUNICATIONS LAW OFFICE OF THOMAS K. CROWE PC 2300 M STREET, NW, SUITE 800 WASHINGTON, DC 20037</p>	<p>ROBERT C. SCHOONMAKER VICE PRESIDENT GVNW, INC./MANAGEMENT 2270 LAMONTANA WAY P.O. BOX 25969 COLORADO SPRINGS, CO 80936</p>
<p>DON SCHROER, CHAIRMAN ALASKA PUBLIC UTILITIES COMMISSION 1016 WEST 6TH AVENUE, SUITE 400 ANCHORAGE, AL 99501-1963</p>	<p>ROBERT C. GLAZIER, DIRECTOR OF UTILITIES INDIANA UTILITY REGULATORY COMMISSION 320 W. WASHINGTON STREET, ROOM E306 INDIANAPOLIS, IN 46204</p>
<p>AMERICAN COMMUNICATIONS SERVICES INC RILEY M MURPHY CHARLES KALLENBACK 131 NATIONAL BUSINESS PARKWAY SUITE 100 ANNAPOLIS JUNCTION MD 20701</p>	<p>JAMES BALLER THE BALLER LAW GROUP 1820 JEFFERSON PLACE, NW., SUITE 200 WASHINGTON, DC 20036</p>
<p>AMERICAN COMMUNICATIONS SERVICES INC BRAD E MUTSCHELKNAUS STEVE A AUGUSTINO MARIEANN ZOCKHOWSKI DANNY E. ADAMS JOHN J. HEITMANN KELLEY DRYE & WARREN 1200 19TH STREET NW SUITE 500 WASHINGTON DC 200036</p>	<p>PERRY W. WOOFER UNITED CALLING NETWORK, INC. 1200 29TH STREET, N.W. SUITE 200 WASHINGTON, DC 20007</p>
<p>MARK J. PALCHICK COUNSEL FOR BUCKEYE CABLEVISION INS. VORYS SATER SEYMOUR AND PEASE 1828 L STREET, NW, 11TH FLOOR WASHINGTON, DC 20036-5104</p>	<p>ROBERT A. HART, IV HART ENGINEERS P.O. BOX 66436 BATON ROUGE, LA 70896</p>
<p>BRADLEY C STILLMAN MARK N COOPER CONSUMER FEDERATION OF AMERICAN AND CONSUMERS UNION 1424 16TH STREET NW SUITE 604 WASHINGTON DC 20036</p>	<p>CITIZENS UTILITIES COMPANY RICHARD M. TETTELBAUM ASSOCIATE GENERAL COUNSEL 1400 16TH STREET, NW, SUITE 500 WASHINGTON, DC 20036</p>
<p>JOSEPH W. WAZ, JR. BETH O'DONNELL COMCAST CORPORATION 1500 MARKET STREET PHILADELPHIA, PA 19102</p>	<p>TIM RAVEN, PRESIDENT TEXAS TELEPHONE ASSOCIATION 400 WEST 15TH STREET, SUITE 1055 AUSTIN, TX 78701-1647</p>
<p>MFS COMMUNICATIONS COMPANY INC DAVID N PORTER VICE PRESIDENT GOVERNMENT AFFAIRS 3000 K STREET NW SUITE 300 WASHINGTON DC 20007</p>	<p>SUSAN STEVENS MILLER ASSISTANT GENERAL COUNSEL STATE OF MARYLAND PUBLIC SVCE. COMM. WILLIAM DONALD SCHAEFER TOWER 6 ST PAUL STREET BALTIMORE MARYLAND 21202-6806</p>

LINDA L OLIVER COUNSEL FOR TELECOMMUNICAITONS CARRIERS FOR COMPETITION HOGAN & HARTSON LLP COLUMBIA SQUARE 555 THIRTEENTH STREET NW WASHINGTON DC 20004-1109	STATE OF FLORIDA PUBLIC SERVICE COMMISSION CYNTHIA B MILLER ASSOCIATE GENERAL COUNSEL CAPITAL CIRCLE OFFICE CENTER 2540 SHUMARD OAK BLVD TALLAHASSEE FL 32399-0850
360° COMMUNICATIONS COMPANY KENVIN C GALLAGHER SENIOR VICE PRESIDENT GENERAL COUNSEL AND SECRETARY 8725 WEST HIGGINS ROAD CHICAGO IL 60631	THE OFFICE OF THE OHIO CONSUMERS COUNSEL ROBERT S TONGREN DAVID C BERGMANN THOMAS J OBRIEN KAREN J HARDIE 77 SOUTH HIGH STREET 15 TH FLOOR COLUMBUS OHIO 43266-0500
THE ARIZONA CORPORATION COMMISSION CHRISTOPHER C KEMPLEY DEBORAH R SCOTT LEGAL DIVISION 1200 WEST WASHINGTON STREET 15 TH FLOOR PHOENIX ARIZONA 85007	U S SMALL BUSINESS ADMINISTRATION JERE W GLOVER DAVID W ZESIGER OFFICE OF ADVOCACY 409 THIRD STREET SUITE 7800 WASHINGTON DC 20416
GENERAL SERVICES ADMINISTRATION OFFICE OF GENERAL COUNSEL MICHAEL J ETTNER PERSONAL PROPERTY DIVISION 18 TH & F STREETS NW ROOM 4002 WASHINGTON DC	GENERAL SERVIES ADMINISTRATION CHIEF REGULATORY LAW OFFICE CECIL O SIMPSON JR GENERAL ATTORNEY 18 TH & F STREETS NW ROOM 4002 WASHINGTON DC 20405
OFFICE OF THE JUDGE ADVOCATE GENERAL U S RMY LITIGATION CENTER 901 N STUART STREET SUITE 713 ARLINGTON BA 22203-1837	ALLIED ASSOCIATED PARTNERS LP GELD INFORMATION SYSTEMS CURTIS T WHITE MANAGING PARTNER 4201 CONNECTICUT AVE NW, SUITE 402 WASHINGTON DC 20008-1158
GST TELECOM INC SWIDLER & BERLIN CHTD ERIC J BRANFMAN MORTON J POSNER 3000 K STREET NW SUITE 300 WASHINGTON DC 20007	KENTUCKY PUBLIC SERVICE COMMISSION AMY E COUGHERTY ATTORNEY P O BOX 615 FRANKFORT KENTUCKY 40602
ALLTEL TELEPHONE SERVIES CORPORATION CAROLYN C HILL 655 15 TH STREET NW SUITE 220 WASHINGTON DC 20005	WINSTON PITTMAN CHRYSLER MINORITY DEALERS ASSOCIATION AMERICAN CENTER 27777 FRANKLIN ROAD, SUITE 1105 SOUTHFIELD, MI 48034
STERN SCHOOL OF BUSINESS PROFESSOR NICHOLAS ECONOMIDES NEW YORK UNIVERSITY NEW YORK NY 10012	THE ERICSSON CORPORATION YOUNG & JATLOW SUITE 600 2300 N STREET NW WASHINGTON DC 20036
DEFENSE INFORMATION SYSTEMS AGENCY REBECCA S WEEKS LT COL USAF STAFF JUDGE ADVOCATE CARL WAYNE SMITH	ALLIANCE FOR PUBLIC TECHNOLOGY DR BARBARA O'CONNOR CHAIRWOMAN MARY GARDINER JONES

<p>CHIEF REGULATORY COUNSEL/TELECOMMUNICATIONS DOD 701 S COURTHOUSE ROAD ARLINGTON BA 22204</p>	<p>POLICY CHAIR 901 15TH STREET SUITE 230 WASHINGTON DC 20005</p>
<p>RICHARD N KOCH 10 LILAC STREET SHARON, MA 02067</p>	<p>DWIGHT E. ZIMMERMAN EXECUTIVE VICE PRESIDENT ILLINOIS INDEPENDENT TELEPHONE ASSOC. RR 13 24B OAKMONT ROAD BLOOMINGTON, IL 61704</p>
<p>ANNE P. SCHELLE VICE PRESIDENT EXTERNAL AFFAIRS AMERICAN PERSONEL COMMUNICATIONS ONE DEMOCRACY CENTER 6901 ROCKLEDGE DRIVE, SUITE 600 BETHESDA, MA 20817</p>	<p>JOHN CRUMP EXECUTIVE DIRECTOR NATIONAL BAR ASSOCIATION 1225 11TH STREET, NW WASHINGTON, DC 20001-4217</p>
<p>EARL PACE CHAIRMAN LEGISLATIVE COMMITTEE BDPA INFORMATION TECHNOLOGY THOUGHT LEADERS 1250 CONNECTIVUT AVE., NW, SUITE 610 WASHINGTON, DC 20036</p>	<p>BETTIE J. GARDNER, PRESIDENT THE ASSOCIATION FOR THE STUDY OF AFRO-AMERICAN LIFE AND HISTORY, INC. 1407 FOURTEENTH STREET, NW WASHINGTON, DC 20005-3704</p>
<p>HENRY M. RIVERA LARRY S. SOLOMON J. THOMAS NOLAN GINSBEURG, FELDMAN & BRESS, CHARTERED ATTORNEYS FOR METRICOM, INC. 1250 CONNECTICUT AVE., NW WASHINGTON, DC 20036</p>	<p>CAROL WEINHAUS PROJECT DIRECTOR PUBLIC UTILITY RESEARCH CENTER COLLEGE OF BUSINESS ADMINISTRATION UNIVERSITY OF FLORIDA MEETING HOUSE OFFICES 121 MOUNT VERNON STREET BOSTON, MA 02108</p>
<p>DANIEL M. WAGGONER COUNSEL FOR NEXTINK COMMUNICATIONS, LLC DAVIS WRIGHT TREMAINE 2600 CENTURY SQUARE 1501 FOURTH AVENUE SEATTLE, WA 98101-1688</p>	<p>JAMES U. TROUP L. CHARLES KELLER ARTER & HADDEN ATTORNEYS FOR BAY SPRINGS TELEPHONE CO. 1801 K STREET, NW, SUITE 400K WASHINGTON, DC 20006-1301</p>
<p>COLORADO INDEPENDENT TELEPHONE ASSOCIATION 3236 HIWAN DRIVE EVERGREEN, CO 80439</p>	<p>FRED WILLIAMSON & ASSOCIATES, INC. 2921 E. 91ST STREET, SUITE 200 TULSA, OK 74137-3300</p>
<p>GERALD M. ZUCKERMAN EDWARD B. MYERS ATTORNEYS FOR COMMUNICATIONS AND ENERGY DISPUTE RESOLUTION ASSOCIATES INTERNATIONAL SQUARE 1825 I STREET, NW, SUITE 400 WASHINGTON, DC 20006</p>	<p>JOHN G. STRAND, CHAIRMAN RONALD E. RUSSELL, COMMISSIONER JOHN L. O'DONNELL, COMMISSIONER MICHIGAN PUBLIC SERVICE COMMISSION STAFF 6545 MERCANTILE WAY LANSING, MI 48911</p>
<p>WESTERN ALLIANCE CHARLES H KENNEDY MORRISOWN & FORERSTER LLP 2000 PENNSYLVANIA AVENUE NW SUITE 5500 WASHINGTON DC 20006</p>	<p>ALABAMA PUBLIC SERVICE COMMISSION MARY NEWMAYER FEDERAL AFFAIRS ADVISOR ALABAMA PUBLIC SERVICE COMMISSION P O BOX 991 MONTGOMERY AL 36101</p>

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RURAL TELEPHONE COALITION NTCA DAVID COSSON L MARIE GUILLORY STEVEN E WATKINS 2626 PENNSYLVANIA AVENUE NW WASHINGTON DC 20037	RURAL TELEPHONE COALITION OPASTCO LISA M ZAINA KEN JOHNSON 21 DUPONT CIRCLE NW SUITE 700 WASHINGTON DC 20036
OKLAHOMA COPORATION COMMISSION OFFICE OF GENERAL COUNSEL JOHN GRAY P O BOX 25000-2000 OKLAHOMA CITY OK 73152-2000	OKLAHOMA COPORATION COMMISSION ERNEST G JOHNSON DIRECTOR PUBLIC UTILITY DIVISON P O BOX 25000-2000 OKLAHOMA CITY OK 73152-2000
OKLAHOMA CORPORATION COMMISSION MARIBETH D SNAPP DEPUTY GENERAL COUNSEL P O BOX 25000-2000 OKLAHOMA OK 73152-2000	TELEFONICA LARGA DISTANCIA DE PUERTO RICO INC ENCARNITA CATALAN-MARCHAN MARIA PIZARRO-FIGUEROA METRO OFFICE PARK BUILDING NO 8 STREET NO 1 GUAYNABO PR 00922
TELEFONICA LARGA DISTANCIA DE PUERTO RICO INC ALFRED M MAMLET PHILIP L MALET COLLEEN A SECHREST STEPTOE & JOHNSON LLP 1330 CONNECTICUT AVENUE NW WASHINGTON DC 20036	LCI INTERNATIONAL TELECOM CORPORATION ROBERT J AAMOTH JONATHAN E CANIS WENDY I. KIRCHICK JUDITH ST. LEDGER ROTY PAUL G. MADISON REED SMITH SHAW & MC CLAY 1301 K STREET NW SUITE 1100 EAST TOWER WASHINGTON DC 20005
CORPORATION MICHAEL J SHORTLEY III 180 SOUTH CLINTON AVENUE ROCHESTER NY 14646	FRONTIER COPORATION ROY L MORRIS DIRECTOR PUBLIC POLICY 1990 M STREET NW SUITE 500 WASHINGTON DC 20036
AMERICA'S CARRIERS TELECOMMUNICATION ASSOCIATION CHARLES H HELEIN GENERAL COUNSEL 8180 GREENSBORO DRIVE SUITE 700 MCLEAN VA 22102	KANSAS CORPORATION COMMISSION DAVID HEINEMANN GENERAL COUNSEL 1500 SOUTHWESTERN BELL TELEPHONE COMPANY ARROWHEAD ROAD TOPEKA KS 66604
LCI INTERNATIONAL TELECOM CORPORATION LEE M WEINER DOUGLAS W KINKOPH 8180 GREENSBORO DRIVE SUITE 800 MC LEAN VA 22102	PUBLIC SERVICE COMMISSION DISTRICT OF COLUMBIA LAWRENCE D D CROCKER III ACTING GENERAL COUNSEL 450 FIFTH STREET NW WASHINGTON DC 20001

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<p>SPRINT SPECTRUM LP JONATHAN M CHAMBERS VICE PRESIDENT OF PUBLIC AFFAIRS 1801 K STREET NW SUITE M-112 WASHINGTON DC 20036</p>	<p>AMERICAN PERSONAL COMMUNICATIONS ANNE P SCHELLE VICE PRESIDENT EXTERNAL AFFAIRS 6901 ROCKLEDGE DRIVE SUITE 600 BETHSEDA MD 20817</p>
<p>JONATHAN D BLAKE KURT A WIMMER DONNA M EPPS COVINGTON & BURLING 1201 PENNSYLVANIA AVENUE NW P O BOX 7566 WASHINGTON DC 20044-7566</p>	<p>TRINA M BRAGDON MAINE PUBLIC UTILITIES COMMISSION 242 STATE STREET 18 STATE HOUSE STATION AUGUSTA MAINE 04333-0018</p>
<p>KAREN FINSTAD HAMMEL ESQ MONTA PUBLIC SERIVCE COMMISSION 1701 PROSPECT AVENUE P O BOX 202601 HELENA MONTANA 59620-2601</p>	<p>MARY D LUCA MCI WORLDCOM 1801 PENNSYLVANIA AVENUE NW WASHINGTON DC 20006</p>
<p>AD HOC TELECOMMUNICATIONS USERS COMMITTEE COLLEEN BOTHBY LAURA F H MCDONALD LEVINE BLASZAK BLOCK & BOOTHBY LLP 2001 L STREET NW SUITE 900 WASHINGTON DC 20036</p>	<p>SUSAN M GATELY SUSAN BALDWIN ECONOMICS AND TECHNOLOGY INC ONE WASHINGTON MALL BOSTON MA 02108-2617</p>
<p>LOUISIANA PUBLIC SERVICE COMMISSION LAWRENCE ST BLANC SECRETARY GAYLE T KELLNER ESQ P O BOX 91154 BATON ROUGE LA 70821-9154</p>	<p>PUBLIC SERVICE COMMISSION DISTRICT OF COLUMBIA THOMAS R GIBBON CHARLES A ZIELINSKI ANTHONY M BLACK BELL BOYD & LLOYD 1615 L STREET NW SUITE 1200 WASHINGTON DC 200036</p>
<p>ALAN R SHARK PRESIDENT AMERICAN MOBILE TELECOMMUNICATIONS ASSOCIATION INC 1150 18TH STREET NW SUITE 250 WASHINGTON DC 20036</p>	<p>JEFFERY A FROESCHLE FLORIDA POWER 3201 THIRTY-FOURTH STREET SOUTH P O BOX 14042 ST PETESBURG FL 33733-4042</p>
<p>RUSSELL D LUKAS LUKAS MCGOWAN NACE & GUTIERREZ COUNSEL FOR BEEHIVE TELEPHONE COMPANY 1111 19TH STREET NW TWELFTH FLOOR WASHINGTON DC 20036</p>	<p>MICHAEL A RUMP SENIOR ATTORNEY KANSAS CITY POWER & LIGHT COMPANY 1201 WALNUT P O BOX 418679 KANSAS CITY MO 64141-9679</p>

<p>PAUL GLIST COLE RAYWID & BRAVERMAN 1919 PENNSYLVANIA AVENUE NW, SUITE 200 COUNSEL FOR CONTINENTAL CABLEVISION INC INTERCABLE INC, CENTURY COMMUNICATIONS CORP, CHARTER COMMUNICATIONS GROUP, PRIME CABLE, INTERMEDIA PARTNERS, TCA CABLE TV, GREATER MEDIA, CABLE TV ASSOCIATION OF GEORGIA, CABLE TELEVISION ASSOCIATION OF MARYLAND, DELAWARE & SOUTH CAROLINA CABLE TELEVISION ASSOCIATION, TEXAS CABLE & TELECOMMUNICATIONS ASSOCIATION WASHINGTON DC 20006</p>	<p>STEPHEN L GOODMAN HALPRIN TEMPLE GOODMAN & SUGRUE COUNSEL FOR NORTHERN TELECOM INC 1100 NEW YORK AVENUE NW SUITE 650 EAST TOWER WASHINGTON DC 20005</p>
<p>LINDA R EVERS ATTORNEY OHIO EDISON COMPANY 76 SOUTH MAIN STREET AKRON OH 444308</p>	<p>JOHN M GOODMAN BELL ATLANTIC 1320 NORTH COURT HOUSE ROAD 8TH FLOOR ARLINGTON VA 22201</p>
<p>J MANNING LEE VICE PRESIDENT REGULATORY AFFAIRS SENIOR REGULATORY COUNSEL TELEPORT COMMUNICATIONS GROUP INC ONE TELEPORT DRIVE SUITE 300 STATEN ISLAND NY 10311</p>	<p>MAUREEN A SCOTT ASSISTANT COUNSEL PENNSYLVANIA PUBLIC UTILITY COMMISSION P O BOX 3265 HARRISBURG PA 17055-3265</p>
	<p>CHARLES H CARRATHERS III HUNTON & WILLIAMS COUNSEL FOR VIRGINIA ELECTRIC & POWER COMPANY 951 EAST BYRD STREET RICHMOND VA 23219</p>
<p>CAMPBELL L AYLING DEBORAH HARALDSON THE NYNEX TELEPHONE COMPANIES 111 WESTCHESTER AVENUE WHITE PLAINS NY 10604</p>	<p>DANIEL L GLOSSON CAROLINA POWER & LIGHT COMPANY 411 FAYETTEVILLE STREET MALL RALEIGH NC 27602</p>
<p>DAVID L MEIER DIRECTORY LEGISLATIVE & REGULATORY PLANNING CINCINNATI BELL TELEPHONE 201 E FOURTH STREET CINCINNATI OH 45201-2301</p>	<p>WERNER K HARTENBERGER COX COMMUNICATIONS INC DOW LOHNES & ALBERTSON 1200 NEW HAMPSHIRE AVENUE NW SUITE 800 WASHINGTON DC 20036</p>
<p>JOHN H O'NEILL JR ROBERT E CONN SHAW PITTMAN POTTS & TROWBRIDGE COUNSEL FOR DELMARVA POWER & LIGHT COMPANY AND PUBLIC SERVICE COMPANY OF NEW MEXICO 2300 N STREET NW WASHINGTON DC 20037-1128</p>	<p>GREG P MACKAY PERKINS COIE COUNSEL FOR PUGET SOUTH POWER & LIGHT COMPANY 411 108TH AVENUE NE, SUITE 1800 BELLEVUE WASHINGTON 98004-5584</p>

<p>JOHN D MCMAHON MARY L KRAYESKE CONSOLIDATED EDISON COMPANY OF NEW YORK 4 IRVING PLACE ROOM 1815S NEW YORK NY 1003</p>	
<p>JEFFREY L SHELDON SEAN A STOKES UTC 1140 CONNECTICUT AVENUE NW SUITE 1140 WASHINGTON DC 20036</p>	<p>DAVID L SWANSON EDISON ELECTRIC INSTITUTE 701 PENNSYLVANIA AVENUE WASHINGTON DC 20004</p>
<p>STEVEN T. NOURSE JODI J BAIR ASSISTANT ATTORNEYS GENERAL PUBLIC UTILITIES SECTION 180 EAST BROAD STREET COLUMBUS OH 43215-3793</p>	
<p>FREDERICK M JOYCE ELAINE D CRITIDES JOYCE & JACOBS 1019 19TH STREET NW 14TH FLOOR PH-2 WASHINGTON DC 20036</p>	<p>DAVID J HATTON DIRECTOR-FEDERAL REGULATORY ACCOUNTING NYNEX GOVERNMENT AFFAIRS 1300 I STREET NW 400 WEST WASHINGTON DC 20005</p>
<p>JEFFREY A FROESCHLE FLORIDA POWER CORPORATION 3201 THIRTY-FOURTH STREET SOUTH ST PETERSBURG FL 33733-4042</p>	<p>JAMES A HIRSCHFIELD PRESIDENT SUMMIT COMMUNICATIONS INC 3633 136TH PLACE SE SUITE 107 BELLEVUE WA 98006-1451</p>
<p>W BENNY WON #76385 PUBLIC UTILITY SECTION TELEVISION ASSOCIATION ONE EMBARCADERO CENTER 30TH FLOOR SAN FRANCISCO CA 94111</p>	<p>KATHY L SHOBERT DIRECTOR FEDERAL AFFAIRS 901 15TH STREET NW SUITE 900 GENERAL COMMUNICATIONS INC WASHINGTON D 20005</p>
<p>ROBERT J BRILL ASSOCIATE COUNSEL NEW ENGLAND POWER SERVICE CO 25 RESEARCH DRIVE WESTBORO MA 01582</p>	<p>DAVID A LAFURIA LUKAS MCGOWAN NACE & GUTIERRREZ COUNSEL FOR NATIONAL TELECOM PCS 1111 NINETEENTH STREET NW SUITE 1200 WASHINGTON DC 20036</p>
<p>FROST & JACOBS THOMAS E TAYLOR JACK B HARRISON ATTORNEYS FOR CINCINNATI BELL TELEPHONE COMPANY 2500 PNC CENTER 201 EAST FIFTH STREET CINCINNATI OH 45202</p>	<p>ROBERT J HIX CHAIRMAN VINCENT MAJKOWSKI COMMISSION COLORADO PUBLIC UTILITIES COMMISSION 1580 LOGAN STREET OFFICE LEVEL 2 DENVER CO 80203</p>

<p>OREGON DEPARTMENT OF JUSTICE 1162 COURT STREET NE SALEM OR 97310</p>	<p>COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION P O BOX 3265 HARRISBURG PA 17105-3265</p>
<p>ERIC E BREISACH CHRISTOPHER C CINNAMON HOWARD & HOWARD 107 W MICHIGAN AVENUE SUITE 400 KALAMAZOO MICHIGAN 49007</p>	<p>MARTHA S HOGERTY PUBLIC COUNSEL STATE OF MISSOURI COUNSEL FOR NASUCA 1133 15TH STREET NW SUITE 550 WASHINGTON DC 20005</p>
<p>WILLIAM H SMITH JR CHIEF BUREAU OF RATE AND SAFETY EVALUATION IOWA UTILITIES BOARD LUCAS STATE OFFICE BUILDING DES MOINES IA 50319</p>	<p>ALLAN KNIEP DEPUTY GENERAL COUNSEL IOWA UTILITIES BOARD LUCAS STATE OFFICE BUILDING DES MOINES IA 50319</p>
<p>DONALD W DOWNES CHAIRPERSON STATE OF CONNECTICUT DEPARTMENT OF PUBLIC UTILITY CONTROL TEN FRANKLIN SQUARE NEW BRITAIN CONNECTICUT 06051</p>	<p>RAYMONG G BENDER JR J G HARRINGTON PETER A BATACAN DOW LOHNES & ALBERTSON ATTORNEYS FOR VANGUARD CELLULAR SYSTEMS INC 1200 NEW HAMPSHIRE AVENUE NW SUITE 800 WASHINGTON DC 20036</p>
<p>COMAV COPORATION POINT WEST PLACE 111 SPEEN STREET FRAMINGHAM MASSACHUSETTS 01701</p>	<p>SUSAN M EID RICHARD A KARRE MEDIAONE GROUP INC 1919 PENNSYLVANIA AVENUE NW SUITE 610 WASHINGTON DC 20006</p>
<p>DAVID SIEGEL MAINE INNKEEPERS ASSOCIATION 305 COMMERCIAL STREET PORTLAND MAINE 04101-4608</p>	<p>ANTHONY MARQUEZ ESQ COLORADO PUBLIC UTILITIES COMMISSION 1580 LOGAN STREET OFFICE LEVEL 2 DENVER CO 30203</p>
<p>SUSAN M EID RICHARD A KARRE MEDIAONE GORUP INCE 1919 PENNSYLVANIA AVENUE NW SUITE 610 WASHINGTON DC 20006</p>	<p>SHIRLEY S JUJIMOTO & CHRISTINE M GILL MCDERMOTT WILL & EMERY COUNSEL FOR AMERICAN ELECTRIC POWER SERVICE CORPORATION BALTIMORE GAS AND ELECTRIC COMPANY COMMONWEALTH EDISON COMPANY DUKE POWER COMPANY ENTERGY SERVICES INC FLORIDA POWER & LIGHT COMPANY METROPOLITAN EDISON/PENNSYLVANIA ELECTRIC COMPANY MONTANA POWER COMPANY NORTHERN STATES POWER COMPANY OTTER TAIL POWER COMPANY PACIFIC GAS & ELECTRIC COMPANY WISCONSIN ELECTRIC POWER COMPANY AND WISCONSIN PUBLIC SERVICE CORPORATION 1850 K STREET NW SUITE 500 WASHINGTON DC 20006</p>

<p>COMMISSIONER SHELDREW PUBLIC UTILITIES COMMISSION OF NEVADA 1150 E WILLIAM STREET CARSON CITY NV 89701-3109</p>	<p>CHRIS VAN DYCK OFFICE OF THE ATTORNEY GENERAL BUREAU OF CONSUMER PROTECTION 1000 E WILLIAM STREET SUITE 200 CARSON CITY NV 89701</p>
<p>COMMISSIONER SODERBERG PUBLIC UTILITIES COMMISSION OF NEVADA 1150 E WILLIAM STREET CARSON CITY NV 89701-3109</p>	<p>FRED SCHMIDT OFFICE OF THE ATTORNEY GENERAL BUREAU OF CONSUMER PROTECTION 1000 E WILLIAM STREET SUITE 200 CARSON CITY NV 89701</p>
<p>JEFF PARKER PUBLIC UTILITEIS COMMISSION OF NEVADA 11250 E WILLIAM STREET CARSON CITY NV 89701-3109</p>	<p>FCC REFERENCE CENTER PORTALS II 445 12TH STREET NW SUITE CY-A257 WASHINGTON DC 20554</p>
<p>AL MCCLOUD NETWORK SERVICES DIVISION PORTALS II 445 12TH STREET SW SUITE 6A-320 WASHINGTON DC 20554</p>	<p>NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS CHARLES D GRAY JAMES BRADFORD RAMSAY POST OFFICE BOX 684 1100 PENNSYLVANIA AVENUE NW SUITE 603 WASHINGTON DC 20044</p>
<p>MOBILEMEDIA COMMUNICATIONS INC GENE P BELARDI VICE PRESIDENT 2101 WILSON BOULEVARD SUITE 935 ARLINGTON VA 22201</p>	<p>VARTEC TELECOM INC TRANSTEL TELEPHONE EXPRESS CGI AND COMMUNICGROUP INC OF MISSISSIPPI ARTER & HADDEN 1801 K STREET NW STE 400K WASHINGTON DC 20006-1301</p>
<p>PUERTO RICO TELEPHONE COMPANY JOE D EDGE RICHARD J ARSENAULT TINA M PIDGEON DRINKER BIDDLE & REATH 901 FIFTEENTH STREET NW WASHINGTON DC 20005</p>	<p>NATIONAL EXCHANGE CARRIER ASSOC. INC. PERRY'S GOLDSCHHEIN - REGULATORY MANAGER JOANNE SALVATORE BOCHIS 100 SOUTH JEFFERSON ROAD WHIPPANY NJ 07981</p>
<p>WILLIAM P BARR SR VICE PRESIDENT - GENERAL COUNSEL WARD W WUESTE GAIL L POLIVY ANDRE J. LACHANCE GTE SERVICE CORPORATION 1850 M STREET NW SUITE 1200 WASHINGTON DC 20036</p>	<p>MOSS & BARNETT RICHARD J JOHNSON MICHAEL J BRADLEY 4800 NORWEST CENTER 90 SOUTH SEVENTH STREET MINNEAPOLIS MN 55402-4129</p>
<p>GUAM TELEPHONE AUTHORITY VERONICA M AHERN NIXON HARGRAVE DEVANS & DOYLE LLP ONE THOMAS CIRCLE NW SUITE 800 WASHINGTON DC 20005</p>	<p>B B KNOWLES DIRECTOR OF UTILITIES DAVE BAKER, CHAIRMAN GEORGIA PUBLIC SERVICE COMMISSION 244 WASHINGTON STREET ATLANTA GA 30334-5701</p>

<p>RICHARD E WILEY R MICHAEL SENKOWSKI JEFFREY S LINDER WILEY REIN & FIELDING ATTORNEYS FOR GTE SERVICE CORPORATION 1776 K STREET NW WASHINGTON DC 20006</p>	
<p>CHARLES C HUNTER HUNTER & MOW PC ATTORNEY FOR TELECOMMUNICATIONS RESELLERS ASSOCIATION 1620 I STREET NW SUITE 701 WASHINGTON DC 20006</p>	
<p>DANA FRIX MARY C ALBERT ANTONY R PETRILLA JEAN L. KIDDOO ELIOT J. GREENWALD SWIDLER & BERLIN CHTD 3000 K STREET NW SUITE 300 WASHINGTON DC 20007</p>	<p>LAURIE PAPPAS DEPUTY PUBLIC COUNSEL TEXAS OFFICE OF PUBLIC UTILITY COUNSEL 7800 SHOAL CREEK BLVD SUITE 290E AUSTIN TX 78757</p>
<p>DANIEL MITCHELL ASSISTANT ATTORNEY GENERAL REGULATED INDUSTRIES DIVISION PUBLIC PROTECTION BUREAU 200 PORTLAND STREET FOURTH FLOOR BOSTON MA 02114</p>	<p>KEN SOLOMON DEPARTMENT DIRECTOR TELECOMMUNICATIONS DIVISION P O DRAWER 1269 SANTE FE NM 87504-1269</p>
	<p>MAUREEN HELMER GENERAL COUNSEL STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE THREE EMPIRE STATE PLAZA ALBANY NY 12223-1350</p>
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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Connecticut Department of Public Utility Control)	RM No. 9258
Petition for Rulemaking to Amend the)	
Commission's Rule Prohibiting Technology-)	
Specific or Service-Specific Area Code Overlays)	
)	
Massachusetts Department of Telecommunications)	NSD File No. L-99-17
and Energy Petition for Waiver to Implement a)	
Technology-Specific Overlay in the 508, 617, 781,)	
and 978 Area Codes)	
)	
California Public Utilities Commission and the)	NSD File No. 99-36
People of the State of California Petition for)	
Waiver to Implement a Technology-Specific or)	
Service-Specific Area Code)	
)	
North American Numbering Council)	NSD File No. 99-51
Recommendation Concerning Replacement of)	
Central Office Code Utilization Survey)	

COMMENTS OF SBC COMMUNICATIONS INC.

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July 30, 1999

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SUMMARY

As an incumbent provider of wireline local exchange and wireless services and a wireline new entrant seeking to enter 30 major metropolitan areas as a competitive local exchange carrier, SBC Communications Inc. ("SBC") is acutely aware of the magnitude of the burden that consumers, state commissions, and carriers have borne by rapid exhaust of area codes and the pressing need to find effective methods to slow the pace of area code relief. Consumers have had to deal with the disruptions and societal costs caused by number changes and dialing pattern changes; state commissions have had to deal with the difficult and often thankless task of balancing diverse consumer interests against the competitive market's need for resources; the industry has had to incur the costs to introduce new area codes and, in some areas, has had to cope with severely restricted supplies of numbers needed to compete in the local markets.

SBC and its customers have incurred their share of the cost and inconvenience caused by the rapid pace of area code exhaust and relief efforts during the past few years. SBC recognizes that area codes cannot be allowed to continue exhausting at the current rate, particularly under existing policies governing area code relief and ten-digit dialing. Seeking to find a cost-effective solution and to minimize the costs and inconvenience to consumers and society, SBC has been an active participant in federal and state efforts to examine alternatives to increase numbering resource optimization, and it has proactively implemented measures in several areas where it provides services to assist in forestalling the need for area code relief.

SBC thus strongly supports the Commission's ongoing investigation into number resource optimization policies, and the Commission's proposal to adopt a package of cost-effective measures designed to minimize the societal cost caused by the current high demand for

numbering resources. SBC applauds the Commission for its detailed and careful examination of a wide range of potential policies in its Notice of Proposed Rulemaking (“NPRM”), and its recognition that numbering resource optimization is a complex issue that requires a careful and detailed examination of the underlying causes of the current high demand for numbering resources in certain areas.

To minimize the harm to customers and society caused by rapid area code exhaust, the Commission’s policies must address the primary driver of the tremendous spike in demand for numbering resources and the rapid introduction of new area codes: the demand by new entrants, primarily new entrants in local wireline markets, for the central office (“CO” or “NXX”) codes needed to establish or expand service territories. Rapid entry of wireline local carriers is occurring primarily in major metropolitan areas, and the Commission’s most stringent policies should be implemented in these areas. The Commission cannot effectively slow the pace of area code relief in any significant manner unless it adopts policies that are designed to address this primary cause of area code exhaust.

At the same time, the Commission must ensure that its policies are cost effective, non-discriminatory, and provide all carriers access to adequate supplies of numbering resources. In order for a solution to be considered cost-effective, it should target the root cause(s) of rapid area code exhaust and not impose costs for changes that would not result in a significant improvement in number resource utilization. In addition, a cost-effective solution should be revenue neutral and not disparately affect carriers’ returns. With these principles in mind, SBC proposes a four-part numbering optimization proposal.

First, the Commission should use a modified version of its “carrier choice” paradigm as the central component of its number optimization policies. The most cost-effective, uniform, workable, and competitively neutral means to achieve these goals is through a utilization “threshold” that applies equally to all carriers. This utilization threshold would be used in major metropolitan areas for dual purposes: (1) to determine which carriers would be required to implement thousands block number pooling (based on the carrier’s NPA-wide utilization); and (2) to verify carriers’ need for allocation of additional numbering resources (based on the carrier’s utilization at the “Lowest Code Assignment Point,” or “LCAP”). SBC proposes that this utilization threshold be phased over three years. In the first year, the threshold would be set at 55 percent, and it would increase five percent a year up to 70 percent at the end of the three-year period. At the end of the three-year period, carriers would be expected to meet this threshold to secure additional numbers at each LCAP. However, to avoid denying carriers needed numbering resources and to avoid unfairly penalizing carriers who, for legitimate reasons, cannot meet the threshold after the end of the phase-in period, certain specific, limited exceptions should be permitted.

Second, SBC strongly supports the Commission’s proposals to improve and strengthen numbering administration. Carriers should be required to prove that they need new resources as a precondition to receiving new resources. Carriers must not be denied the numbers that they legitimately need to compete, but they should not be assigned resources that are not needed promptly, and they should be required to begin using resources promptly after assignment. NANPA, working with state commissions, should ensure that carriers only receive resources in areas where they are authorized to provide service. To ensure that codes are actually

placed “in service” and not just “activated” in the LERG, carriers should be required to provide NANPA with required interconnection information – interconnection facilities, test numbers and the like – when they request initial codes. For growth codes, carriers should be required to establish that they need additional numbering resources in the area where they request them – initially through a hybrid “Months To Exhaust”/Utilization methodology, and, later, by proving that they meet the utilization threshold (with limited exceptions permitted in specific circumstances). Carriers also should be required to certify that NXX codes are actually “in service” within six months of assignment.

Enforcement of these administrative standards are critical – in fact, many of the existing issues with carriers receiving initial codes in areas where they are not authorized to provide service and carriers failing to properly place codes “in service” could be addressed today by more effective enforcement. To that end, all carriers should be required to provide forecasts of numbering resource demand, and all carriers should be required to provide utilization data in compliance with definitions of numbering usage categories developed by the industry. Unused resources should be reclaimed immediately, with state commissions working with NANPA to accomplish reclamation. Forecasts and utilization should be required every six months for the major metropolitan areas (where demand is greatest) and annually in rural areas. The Commission and state commissions should be given carrier-specific reports of forecasts and utilization where confidentiality can be protected. A comprehensive audit and enforcement program, with authority balanced between the Commission, state commissions, NANPA, and auditors, should be instituted to ensure that carriers provide accurate information and are not wasting numbering resources.

Even cost-effective solutions would not be inexpensive for the industry, and it is important that the Commission provide carriers with a means to recover their costs. Shared costs, such as increased NANPA costs and auditing program costs, should be apportioned and paid by carriers through the existing system to recover numbering administration costs. Carrier-specific costs should be recovered through the mechanism developed to recover TBNP implementation costs.

Third, thousands block number pooling with mandatory efficient data representation (“TBNP”) should be required in specific areas in the largest 100 MSAs, but only for carriers who fail to the Commission’s utilization threshold, and only if the Commission adopts a cost recovery mechanism that permits carriers to fully recover the costs associated with TBNP. Carriers who meet the utilization threshold and carriers who are not required to implement LNP under the Commission’s LNP decisions should not be required to participate. Pooling should be required only in the largest 100 MSAs, where the demand for numbering resources is highest, and should only be required in those rate centers/switches within the largest 100 MSAs where porting already exists and the appropriate state commission finds that the benefits of pooling would exceed the costs. In addition, the Commission should require that all LNP-capable carriers deploy mandatory Efficient Data Representation throughout their networks as part of TBNP implementation, to ensure that capacity and throughput limitations do not threaten to undermine existing porting or pooling capabilities. This limited, focused, and targeted application of TBNP would ensure the maximum benefit from pooling at the least societal cost.

TBNP would be extremely expensive to implement for many carriers, and the Commission must provide a meaningful and effective cost recovery mechanism for carriers with price cap requirements. SBC proposes that the Commission extend the existing LNP end user surcharge for a sufficient period of time to recover TBNP costs. While the standards for cost recovery contained in the NPRM are generally appropriate, the Commission should not limit cost recovery by later imposing additional standards for inclusion of costs that may be recovered (as it did in adding the “but for” and “directly in the provisioning of” standards for recovery of LNP costs). Instead, the Commission should provide carriers with full recovery of TBNP implementation costs.

Fourth, the Commission should modify its existing area code relief policies to ensure that area codes are assigned in the most efficient and least disruptive manner possible. To assist state commissions in making efficient area code relief decisions (thereby delaying future area code exhaust), and to minimize societal costs when relief must be performed, the Commission should establish a presumption in favor of using area code overlays to relieve exhausting area codes in the largest 100 MSAs, coupled with a requirement to use an area code overlay where either the existing or new area code would otherwise fail to meet industry standards for length of relief. The Commission also should eliminate the mandatory ten-digit dialing requirement for overlay area codes, or, at a minimum, it should provide blanket waivers of the requirement for rural areas served by overlay area codes. The Commission should not allow technology- or service-specific overlays, as they would require separate, dedicated area codes and would likely decrease, not increase, efficient use of area codes.

The Commission should not adopt policies that would provide little marginal benefit, impose unnecessarily high costs, or threaten the integrity of the LNP and TBNP infrastructure. Thus, SBC supports the Commission's tentative conclusion that individual telephone number pooling ("ITN") should not be implemented at this time, as it provides very little benefit at very high cost. Similarly, unassigned number porting ("UNP") should not be permitted, even on a voluntary basis, because it could exhaust the system capacity that is necessary and essential for the effective operation of porting and pooling. Moreover, ITN and UNP could make individual telephone numbers commodities, and thereby could *exacerbate* demand for numbering resources, as ITN has with toll free services in the 800, 888, and 877 NPAs. Finally, the Commission should reject the proposed "pricing strategy," which would involve charges for telephone numbers at some unspecified time in the future. Pricing very likely would not provide much marginal benefit (if any) beyond the other policies under consideration in this docket, and prices for telephone numbers would impose substantial additional costs on society.