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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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AUG 23 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Comprehensive Review of the) CC Docket No. 99-253
Accounting Requirements)
and ARMIS Reporting Requirements for)
Incumbent Local Exchange Carriers: Phase 1)

COMMENTS OF U S WEST COMMUNICATIONS, INC.

U S WEST Communications, Inc. ("U S WEST"), through counsel and pursuant to the Federal Communications Commission's ("Commission") Notice of Proposed Rulemaking ("Notice")¹ hereby submits its comments on the Commission's Phase 1 proposals for streamlining and eliminating accounting and reporting requirements that currently are imposed on large local exchange carriers ("LEC"). U S WEST's position on the issues raised in the Commission's Notice mirrors that of the United States Telephone Association ("USTA"). U S WEST concurs in the comments that USTA is filing today in the above-captioned proceeding and, in the interest of efficiency, will not repeat these positions in these comments.

¹ See In the Matter of Comprehensive Review of the Accounting Requirements and ARMIS Reporting Requirements for Incumbent Local Exchange Carriers: Phase 1, CC Docket No. 99-253, Notice of Proposed Rulemaking, FCC 99-174, rel. July, 14, 1999.

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While U S WEST applauds the Commission for initiating its Notice and moving in the right direction, the Commission should not delude itself into thinking that adoption of the Notice's proposed rule changes will relieve the LECs of any great burden. As USTA points out in its comments, the Notice falls far short of the proposals contained in USTA's 1998 Biennial Review Petition.²

The Commission can no longer continue to subject telecommunications carriers to a two tier system of accounting and reporting requirements -- where large LECs are subject to a wide array of wasteful and duplicative accounting and reporting requirements while other telecommunications providers face few, if any, requirements. The comprehensive accounting and reporting requirements facing large LECs are a vestige of another era when there were a limited number of highly regulated telecommunications carriers subject to rate of return regulation. This environment no longer exists. As such, it is in the interests of both the Commission and large LECs to streamline and eliminate the vast majority of these requirements at the earliest possible date.

The Commission should complete Phase 1 and proceed with Phase 2 immediately. No worthwhile purpose is served for either the large LECs or the

² USTA filed a Petition for Rulemaking recommending that the Commission undertake a comprehensive review of all of its regulations pursuant to the biennial regulatory review provisions of Section 11 of the Telecommunications Act of 1996 on September 30, 1998. See Public Notice, 13 FCC Rcd. 21857 (1998). See also USTA Petition for Rulemaking, filed Aug. 11, 1999.

Commission to devote their limited resources to complying or reviewing compliance with the present burdensome accounting and reporting requirements.

Respectfully submitted,

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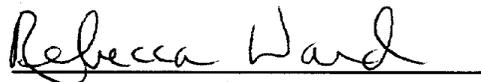
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Of Counsel,
Dan L. Poole

August 23, 1999

CERTIFICATE OF SERVICE

I, Rebecca Ward, do hereby certify that on the 23rd day of August, 1999, I have caused a copy of the foregoing **COMMENTS OF U S WEST COMMUNICATIONS, INC.** to be served, via hand delivery, upon the persons listed on the attached service list.


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