

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

In the Matter of)
)
 Numbering Resource Optimization)
)
 Connecticut Department of Public Utility Control)
 Petition for Rulemaking to Amend the Commission's)
 Rule Prohibiting Technology-Specific or)
 Service Specific Area Code Overlays)
)
 Massachusetts Department of Telecommunications)
 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 People)
 of the State of California Petition for Waiver to)
 Implement a Technology-Specific or Service-Specific)
 Area Code)

CC Docket No. 99-200

RM No. 9258

NSD File No. L-99-17

NSD File No. L-99-36

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 FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

**REPLY COMMENTS OF THE ASSOCIATION
FOR LOCAL TELECOMMUNICATIONS SERVICES**

The Association for Local Telecommunications Services ("ALTS") hereby files its Reply Comments to the Notice of Proposed Rulemaking ("NPRM"), released June 2, 1999, in the above-referenced proceedings.

I. INTRODUCTION AND SUMMARY

ALTS is encouraged by the number and diversity of comments that recognize the importance of addressing the fundamental inefficiencies in the current number administration system through measures such as thousands block number pooling and rate center consolidation. Some comments suggest, however, courses of action that

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would place an unfair and discriminatory burden on Competitive Local Exchange Carriers (“CLECs”), and would fail to improve (or in some cases would worsen) number utilization. ALTS identifies and responds below to those comments.

First, the Commission should reject any proposal to allow some pooling-capable carriers in an area to avoid participation in pooling, and recognize instead the inherent detriment this would cause to the Commission’s number optimization goals and competition. That the underlying number administration system is inefficient and needs to be fixed is not in doubt, and the FCC should ensure that *all* carriers participate equally in the effort.

Second, the Commission should reject implementation of administrative measures that are unnecessary and anticompetitive. While ALTS supports the goal of ensuring that carriers only obtain the resources they need, ALTS cautions against changes that would unnecessarily restrict the ability of new entrants to request and activate new numbering resources. Instead, ALTS recommends that the Commission focus optimization efforts in the areas that will have the greatest impact – rate center consolidation, thousands block number pooling, increased and improved reporting, audits, and enforcement.

Third, the Commission should retain federal responsibility and oversight of a national number optimization plan. Although comments from state regulators generally seek broad authority to adopt and manage number optimization measures, substantial concerns are raised about the effect such fragmentation would have on the effective and efficient administration of the NANP. ALTS believes there are important roles for states to assert as part of the overall process, but urges the Commission to retain the

primary responsibility for development and oversight of national number optimization measures.

Finally, the Commission should reject suggestions that the 10-digit dialing requirement with overlays be eliminated. The Commission's reasoning for establishing the 10-digit dialing requirement in the *Ameritech Order*¹ was sound, and none of the comments have provided any basis for the Commission to reduce or eliminate this protection.

II. THE COMMISSION SHOULD DISMISS SUGGESTIONS THAT SOME CARRIERS SHOULD BE EXCUSED FROM POOLING, AND ORDER MANDATORY POOLING FOR ALL LNP-CAPABLE CARRIERS

ALTS is encouraged by the number and diversity of comments that recognize the importance of addressing the fundamental inefficiencies in the current number administration system through measures such as thousands block number pooling and rate center consolidation. In particular, with respect to number pooling, comments filed from all segments of the industry and numerous state regulatory agencies acknowledge the substantial benefits to be gained from administering numbers in blocks of 1000 rather than in blocks of 10,000.² Most commentators further recognize that in order to be effective and fair, number pooling must be implemented by *all* LNP-capable carriers.³

¹ Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech – Illinois, *Declaratory Ruling and Order*, 10 FCC Rcd 4596 (1995) (*Ameritech Order*).

² See, e.g., Comments of the California Public Utilities Commission and of the People of the State of California (“California Comments”) at 27; Comments of the Connecticut Department of Public Utility Control (“CTDPUC Comments”) at 5; Comments of the Colorado Public Utility Commission (“COPUC”) at 2; Comments of Bell Atlantic (“BA Comments”) at 21; BellSouth Comments at 21; Comments of NEXTLINK Communications, Inc. (“NEXTLINK Comments”) at 9; Comments of Cablevision Lightpath, Inc. (“Lightpath Comments”) at 5; Comments of the Ad Hoc Telecommunications Users Committee (“Ad Hoc Comments”) at 9.

³ See, e.g., California Comments at 26; CTDPUC Comments at 6; COPUC Comments at 6; Comments of Ameritech (“Ameritech Comments”) at 42; BA Comments at 22; NEXTLINK Comments at 9; Comments of WinStar Communications, Inc. (“WinStar Comments”) at 33.

A small minority of commentators suggest instead that pooling be implemented only by carriers unable to meet a prescribed utilization threshold.⁴ Under the guise of “carrier choice,” these incumbent local exchange carriers (“ILECs”) seek to force on CLECs the primary burden of fixing the underlying inefficiencies of the number administration system created by the ILECs in the first place. The Commission should reject any proposal to allow some pooling-capable carriers in an area to avoid their pooling responsibility at the expense of those carriers that do implement pooling, and recognize the inherent detriment this would cause to the Commission’s number optimization goals and competition.

Both SBC and U S West propose that a carrier could opt out of number pooling if the carrier’s average number utilization in an NPA satisfied some utilization threshold. Since CLECs are new entrants to the local exchange market, most of them would have no choice but to participate in thousands block pooling before they would have a chance of meeting any but the lowest of utilization rates (especially if calculated on an NPA-wide basis). On the other hand, ILECs have a significantly greater opportunity to at least claim to meet higher utilization threshold, and thereby avoid pooling participation, even though vast quantity of numbers remain used in their inventories.

Implementation of thousands block pooling requires significant expenditures by carriers to alter their internal technical and administrative systems. It also significantly complicates and increases the burden of ongoing number administration. Requiring certain carriers to pool while excusing others would, in effect, require the pooling carriers to pay more for number optimization than their non-pooling competitors. Such a

⁴ See e.g., Comments of SBC Communications Inc. (“SBC Comments”) at 67; Comments of U S West Communications, Inc. (“U S West Comments”) at 24.

result would clearly violate Section 251(e) of the 1996 Act, and the Commission's stated goal in this NPRM to "ensure that no class of carrier or consumer is unduly favored or disfavored by our optimization efforts."⁵

This discriminatory effect is exacerbated because thousands block pooling greatly reduces the number inventory of participating carriers. As WinStar explained in its comments,⁶ service providers that obtain thousands blocks for initial footprint codes, rather than full NXX codes, have their inventory of so called "vanity numbers" reduced by 90 percent. This is a significant disadvantage in the competition for customers requesting new service and for customers relocating to a new rate center, which in turn requires a telephone number change. If thousands block pooling is applied uniformly, some of the ILECs' inventory advantage is mitigated. On the other hand, if service providers are permitted to opt out of thousands block pooling based on a pledge to achieve certain utilization levels, these service providers will be able to continue to receive and maintain unfairly large inventories.

Beyond the fact that the proposal to allow carriers to opt out of pooling is discriminatory on its face, it is not clear how the Commission could determine a carrier's right to opt out of pooling based on its utilization rates. ALTS agrees with the many commentators that questioned the reasonableness and practicality of using utilization thresholds to determine whether a carrier could opt out of pooling.⁷ As the California Public Utility Commission ("CPUC") recognized:

Suppose the FCC adopts a utilization threshold of 80 to 85 percent, as proposed by the states, and then allows carriers to choose how to meet that threshold. Based on their utilization claims, the ILECs could simply assert that they have

⁵ NPRM at ¶ 6.

⁶ WinStar Comments at 35.

⁷ See, e.g., California Comments at 20; Comments of AT&T Corp. ("AT&T Comments") at 59.

already met that threshold and need not participate in or implement any conservation measures. Certainly, the ILEC's utilization claims could be verified by audits. The CPUC acknowledges the NPRM's proposals for numbering audits, which California supports. But it will take some time to establish an audit process for all carriers nationwide. In the meantime, by virtue of claiming to have met a mandated threshold, a "carrier choice" option would allow the ILECs not to engage in conservation activities while they continue to control large, unaudited supplies of numbers. In essence, then, the FCC's efforts to achieve greater efficiency in the use of numbers would achieve very little, if anything.⁸

The FCC should firmly reject the prevailing view in SBC's comments that CLECs are to blame somehow for the current number exhaust problems, and that they should therefore bear the burden of fixing the problems. CLECs have correctly and in good faith followed industry guidelines for number assignments – guidelines developed primarily by and for ILECs -- to obtain the necessary numbering resources to enter new markets. That the underlying number administration system is inefficient and needs to be fixed is not in doubt, and the FCC should ensure that *all* carriers participate equally in the effort.

III. THE COMMISSION SHOULD REJECT IMPLEMENTATION OF ADMINISTRATIVE MEASURES THAT ARE UNNECESSARY AND ANTICOMPETITIVE

Several commentors propose various changes to current number administration verification and reservation practices. While ALTS supports the goal of ensuring that carriers only obtain the resources they need, ALTS cautions against changes that would unnecessarily restrict the ability of new entrants to request and activate new numbering resources. Instead, ALTS recommends that the Commission focus optimization efforts in the areas that will have the greatest impact – rate center consolidation, thousands block number pooling, increased and improved reporting, audits, and enforcement.

⁸ California Comments at 20.

Some commentors offer proposals for increasing – substantially in some cases – the information a carrier would need to provide to obtain an initial code.⁹ In the most extreme case, SBC proposes, among other things, that a requesting carrier designate for every new code request:

(a) the switch where the code will reside, and that the switch is in place and operating, or will be in place and operating by the code activation date, (b) the switch, if any, of other carrier [sic] that would be used the “routing points” [sic] to reach the carrier’s switch, and that the carrier has interconnection agreements in place with the other carrier to allow traffic to be routed through those switches; (c) that facilities are in place and operating, or are on order and are due before the code activation date, between the switches of other carriers and the requesting carrier’s switch; and (d) the inter-carrier test numbers that the carrier will use for the code.¹⁰

Obviously, the vast majority of initial code requests are by CLECs, so SBC’s proposal could certainly be viewed as a proposal by an incumbent provider to make its competitors “jump through hoops” before they can compete. As ALTS pointed out in initial comments, the current Central Office Code Assignment Guidelines (“CO Code Guidelines”) already require an applicant to certify that a code is needed, and to use that code within given timeframes.¹¹ Therefore, applicants already must consider their equipment, network and switch readiness, business plan, etc., in submitting an application for an initial code.

Obviously, only carriers with the appropriate regulatory certification to operate in an area for which a code is requested should be allowed to obtain the code. Based on the comments, it appears that the current system and practices already identify those instances in which a code may have been requested by a carrier without proper

⁹ See, e.g., SBC Comments at 42-43; Ameritech Comments at 15.

¹⁰ SBC Comments at 43.

¹¹ See Central Office Code Assignment (NXX) Guidelines, INC 95-0407-008 (rev. Apr. 26, 1999) (“CO Code Guidelines”) at §§ 4.1 and 6.3.3.

certification, and those code requests were either denied, or codes were returned after being improperly assigned. ALTS is also aware that the North American Numbering Plan Administrator (“NANPA”), working with the Colorado Public Utility Commission and industry, is developing additional practices to ensure proper certification before making code assignments, and ALTS supports those efforts. As a further check, WinStar explained in its comments that under current procedures, an applicant must have an operating company number (“OCN”) from the National Exchange Carriers Association (“NECA”) in order to obtain an initial or growth code. Before furnishing a code, NECA, in turn, requires extensive information about the service provider, and proof of certification in the state for which the OCN is to be utilized. Given NECA’s review of the detailed information submitted by the provider, combined with the NANPA’s commitment to work with states to review certification commitments by carriers, it should be unnecessary for a provider to be required to furnish further proof of certification in order to obtain a code.

Some commentors also suggest reducing the interval in which a code must be placed into service before reclamation.¹² While ALTS agrees that carriers should utilize resources as promptly and efficiently as possible, the current guidelines are sufficient to accomplish that goal. The CO Code Guidelines already recommend the reclamation of any code which is not placed in service within six months of assignment. Any more stringent provision would have a chilling effect on competition. There are many variables that can delay or preclude market entry. These include facilities limitations; limitations imposed by incumbent, interexchange, or other interconnecting service providers; construction delays; labor disputes; and acts of God. In addition, testing and

trouble-shooting to ensure network and interconnection operability, when entering a new market, can rarely be accomplished within 60 days (the amount of time suggested by SBC), especially in areas in which the ILEC has numerous rate centers. Indeed, it is even possible that an incumbent could trigger reclamation proceedings on its competitors through the delay, intentional or otherwise, of vital interconnection facilities.

There is no evidence to suggest that the current code reclamation guidelines have any appreciable negative impact on area code or NANP exhaust, and the imposition of an arbitrarily reduced deadline could severely disadvantage new market entrants. Therefore, ALTS recommends that the current standards remain unchanged.

Finally, there was considerable comment on the question of whether utilization thresholds should replace the current months-to-exhaust standard to justify growth code requests. Although there is some ILEC and state support for establishing utilization thresholds,¹³ numerous commentors identified significant problems with the establishment, verification, and negative competitive impact of utilization thresholds.¹⁴ None of the commentors supporting utilization thresholds addressed any of these fundamental problems.

For example, none of the commentors in support addressed the disproportionate impact utilization thresholds would have on CLECs, especially if the thresholds were applied uniformly to all carriers regardless of size or new entrant status. As new market entrants, CLEC growth rates can be expected to be high and varied. As established carriers, on the other hand, ILEC growth rates are slower and more predictable.

¹² See, e.g., SBC Comments at 64-66.

¹³ See, e.g., SBC Comments at 24-29; Sprint Comments at 12-13; U S West Comments at 24-25; Outline of State Responses to Numbering NPRM at 4.

Therefore, requiring all carriers to meet a fixed, uniform utilization threshold to justify code requests will more frequently result in the denial of a legitimate code request to a CLEC, *e.g.*, where the CLEC needs a growth code to meet a spike in demand, or force the CLEC to prove its need through more burdensome exception processes. None of the commentors supporting uniform utilization thresholds addressed this inevitable and discriminatory outcome.

In order to attempt to be nondiscriminatory and reflect optimal utilization rates for each industry segment and geographic area, varying utilization rates would have to be established to differentiate between, *e.g.*, newly acquired NXXs and “mature” NXXs, small vs. large carriers, established vs. new carriers, high growth vs. low growth areas, etc. However, none of the commentors supporting the use of utilization thresholds acknowledged this need, or the tremendous administrative burden it would introduce for the NANPA and carriers.

Finally, none of the commentors supporting utilization thresholds explained how self-reported utilization thresholds would be any more accurate than self-reported months-to-exhaust worksheets.¹⁵ In recognition of these competitive and administrative deficiencies, ALTS recommends that, at least for the present time, the Commission allow other, more promising number optimization measures to take effect – including rate center consolidation, pooling, increased and improved utilization reporting, audits, and enforcement measures – before determining whether there is a need for utilization thresholds.

¹⁴ See, *e.g.*, AT&T Comments at 14; Comments of MCI WorldCom, Inc. (“MCIW Comments”) at 26; BA Comments at 8-10; Ameritech Comments at 16.

¹⁵ See, *e.g.*, Ameritech Comments at 16. See also California Comments at 20 (problems with relying on ILEC utilization claims).

IV. THE COMMISSION SHOULD RETAIN FEDERAL RESPONSIBILITY AND OVERSIGHT OF A NATIONAL NUMBER OPTIMIZATION PLAN

Although state commentors generally seek broad authority to adopt and manage number optimization measures, substantial concerns are raised about the effect such fragmenting would have on the effective and efficient administration of the NANP. ALTS believes there are important roles for states to assert as part of the overall process, but urges the Commission to retain the primary responsibility for development and oversight of national number optimization measures.

As many commentors point out, the need for strong federal management is more important now than ever. The success in developing a competitive market for local exchange services is threatened by the insufficient supply of numbering resources, and the entire 10-digit numbering plan is arguably at risk of exhausting completely within the next decade. As numerous parties argue, state regulators do not necessarily have the will or the expertise to make the emergence of a competitive marketplace or the extension of the national numbering plan a priority over more local issues.¹⁶ Number exhaust has a disproportionately severe impact on competition. New entrants and companies experiencing high growth rates do not have the reserve of numbers needed to survive an exhaust. A shortage in the supply of available numbering resources not only stops the growth of competition, but it also distorts the competition that remains,

¹⁶ Several good examples provided by commentors highlight this problem. See, e.g., AT&T Comments at 5 (California suspension of area code relief when existing NPA was completely exhausted and relief was imminent) and 65 (Arizona decision for 3-way split, which would either require CLECs to force customers to get new telephone numbers, or acquire unnecessary additional NXX codes); Sprint Comments at 26-29 (California, New York and Massachusetts delay area code relief in favor of implementing number conservation measures).

because ILECs can realize a substantial — and entirely artificial — advantage in the marketplace.

FCC management, not individual state solutions, is needed to address these national issues. Indeed, if the Commission adopts the recommendations of ALTS and other carriers to (1) implement national thousands block pooling;¹⁷ (2) adopt improved and more frequent forecasting and utilization reporting; (3) implement a comprehensive audit process; and (4) specify enforcement measures, then most, if not all, of the measures states are seeking authority to implement will be in place — but in a uniform rather than disparate fashion.

Of course, in conjunction with these nationally-directed measures, states should continue to direct other critical aspects of the overall number availability and optimization policy, namely rate center consolidation and area code relief.¹⁸

V. THE COMMISSION SHOULD REJECT SUGGESTIONS THAT THE 10-DIGIT DIALING REQUIREMENT WITH OVERLAYS BE ELIMINATED

There is significant debate among commentators as to the impact on consumers of 10-digit dialing. Indeed, even among the states where 10-digit dialing has been implemented or considered, there are differing views as to the degree to which consumers are impacted. For example, the Colorado Commission reports that, “[a]dapting to ten digit dialing in Colorado has gone more smoothly than anyone could

¹⁷ ALTS shares the concern of Sprint and other commentators about the potentially harmful impact if pooling implementation is left up to individual states rather than accomplished according to a coordinated, national roll-out schedule. See, e.g., Sprint Comments at 16-18. Premature or uncoordinated pooling roll-out could result in uneconomic investment in pooling infrastructure, and potentially jeopardize local number portability capabilities.

¹⁸ With regard to area code relief, ALTS recommends that the Commission reiterate its position articulated in the *Pennsylvania Area Code Order* that, “[c]onservation methods are not . . . area code relief and it is

have predicted.”¹⁹ Similar ease of transition has been reported when 10-digit dialing was introduced in Atlanta and Maryland. Yet, California regulators expect that consumers are reluctant to accept 10-digit dialing.²⁰

In the event the Commission agrees with commentors that consumers fairly easily accommodate 10-digit dialing, then there is no basis for the argument that this vital competitive protection should be eliminated in order to make overlays more acceptable. However, if consumers are very resistant to the introduction of 10-digit dialing when an overlay is implemented, then new entrants would surely be at a disadvantage when competing with ILECs for new customer business without the requirement. Carriers like SBC and Ameritech, that support elimination of this competitive protection,²¹ have vast inventories of numbers in existing area codes, and consistently high churn rates that make new numbers available for reassignment to customers with a strong preference for a new number in the old, more desirable area code. SBC writes off this obvious advantage by baselessly asserting that CLECs will only face this disadvantage “in a small fraction of situations.”²² SBC has absolutely no basis for determining that CLECs need new numbers in only a small fraction of situations, and indeed sales of growth services to new or ported customers is an important part of CLEC business plans.

Comments by national and Texas consumer advocates, who represent residential and small business utility consumers, correctly recognize that “CLECs are

important that state commissions recognize that distinction and implement area code relief when it is necessary.” *Pennsylvania Area Code Order*, 13 FCC Rcd 19009, 19025 ¶ 22 (1998).

¹⁹ COPUC Comments at 12.

²⁰ California Comments at 24-25.

²¹ SBC Comments at 98-100; Ameritech Comments at 35.

²² SBC Comments at 99.

disproportionately assigned numbers in the overlay NPA while the ILEC controls an extensive inventory of numbers with the traditional geographic area code,” and that consumers will “resist accepting overlay NPA numbers...”²³ Obviously, this consumer resistance would be substantially exacerbated if customers in the new, less-populated area code had to dial additional digits to reach the majority of customers in the old, fully populated area code as well.

Ameritech’s attempts to “will away” the competitive disadvantages are similarly without merit. Ameritech claims that “many CLECs have obtained significant NXX code assignments in existing NPAs...,” suggesting that the disadvantage has thereby been eliminated or sufficiently mitigated.²⁴ In the first place, in most areas CLECs have only one or very few NXX codes per rate center, compared to enormous inventories held by the ILEC – there’s simply no comparison. Second, future entrants will have *no* NXXs codes in NPAs that have fully exhausted. The 10-digit dialing requirement protects not only existing CLECs, but future entrants as well.

The Commission’s reasoning for establishing the 10-digit dialing requirement in the *Ameritech Order* was sound, and none of the comments have provided any basis for the Commission to reduce or eliminate this protection.

VI. CONCLUSION

ALTS strongly endorses the comments that recognize the importance of addressing the fundamental inefficiencies in the current number administration system, through measures applied equally to *all* carriers – rate center consolidation, thousands

²³ Joint Comments of Texas Office of Public Utility Counsel and National Association of State Utility Consumer Advocates (“Joint Texas OPC and NASUCA Comments”) at 43.

block number pooling, increased and improved reporting, audits, and enforcement. These measures should be pursued as part of a comprehensive, national number optimization plan, and should be implemented in preference to other administrative measures that are unnecessary, burdensome, and anticompetitive. The Commission should also reject suggestions that the 10-digit dialing requirement with overlays be eliminated.

Respectfully submitted,

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²⁴ Ameritech Comments at 35.

Certificate of Service

I hereby certify that on this 30th day of August, 1999, copies of the foregoing Reply Comments of the Association for Local Telecommunications Services were served via first class mail, postage prepaid, or by hand, to the parties listed below.

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