USTA'S COMMENTS REGARDING OMB CONTROL NO. 3060-0854 APPENDIX A

Ordering and Billing Forum
Issue Identification Form

Exhibit 3B

OBF Issue Number	**SWB1**
Date Submitted 7/19/99	
Date Accepted	
Initial Closure	**at OBF #**
Final Closure	**at OBF #**
Issue Category	**Active**

Document Name(s): ______________________

Industry Segment: ______________________

Part A, Page 1

Issue Title: Truth-in-Billing New Service Provider Notification

Issue Statement/Business Need: The FCC mandated Truth-in-Billing order requires that new service providers be identified/highlighted on the end-user bill. A new service provider is defined as having not provided service to the end-user for the past *x (i.e., 6)* months (the time frame is currently being addressed via waivers).

The FCC Truth-in-Billing order compliance date is currently 9/5/1999.

Impact of Other Issues or Procedures:

Desired Results: Establish a new record that identifies to the billing EC that the service provider identified on the record requires identification as a new service provider on the end-user bill.

Committee Assignment: Message Processing Committee

Associated Committee:

Issue Champion(s): Chris Read

Company Name: SWBT

Address: Dallas TX

Telephone Number: (214)464-2163

Email:

Company Name:

Address:

Telephone Number:

Email:

Resolution:

Ordering and Billing Forum
Issue Identification Form

Exhibit 3B

OBF Issue Number	**SWB1**
Date Submitted	**7/19/99**
Date Accepted	**at OBF**
Initial Closure	**at OBF #**
Final Closure	**at OBF #**
Issue Category	**Active**

Document Name(s): ____________________

Industry Segment: ____________________

Part B, Page 1

Issue Title: Truth-in-Billing New Service Provider Notification

---

Status History:

New Field Description(s)

Date of New Service

A 6-position numeric date field (YYMMDD) that provides the date of when the end-user began using the associated service provider's services (i.e., date of first call, date of service authorization, date of service initiation). This date is required on the 39-10-04 record.

Type of Service Provider

A 1-position numeric indicator defining if the service provider is the presubscribed carrier. If the service provider is the presubscribed carrier, this indicator is required to be a value of "1".

Valid values: 0 – not applicable
1 – presubscribed carrier

DRAFT
REVISION DATE: ________

ISSUE # ________
DATE: ________

New Record Description

39-10-04 (this is the Record ID)

Category:	39	CUSTOMER INFORMATION
Group:	10	CUSTOMER INFORMATION
Type:	04	NEW SERVICE PROVIDER INITIAL BILLING NOTIFICATION

Use of Record:

This record is provided when billing by a "new service provider"* begins. This record would serve as notice to the billing EC (i.e., agent) that the service provider must be "highlighted"** on the end-user's next bill.

***"new service provider"** – per the FCC Truth-in-Billing order, any provider that did not bill for services on the previous month's billing statement is "new". Waivers have been filed with the FCC to redefine "new service provider" to any provider that did not bill for services within the previous 6 months.

**** "highlighted"** – per paragraph 36 of the FCC Truth-in-Billing rules, "Carriers have discretion to determine the best means to highlight the required information ..... For example, following suggestions by the FTC and NCL, colored ink or different fonts or type sizes, along with explanatory notes, could be used to highlight, within the body of the bill or on an existing summary page, the names of new presubscribed carriers and service providers."

Headers/Trailers:	CMDS	Local
20-22-03/04	Y	Y

Special Considerations:

Section 2 – Record Identification

When a new record is created, Section 2 must be updated appropriately.

New Category requires a definition of that category.
New Group requires a definition of that group.
New Type requires listing that type.

Section 2.1 – Category Definitions:

Code	Description

Section 2.2 – Group Assignments:

Code	Description

Section 2.3 – Record Type Assignments:

Category 39: Customer Information
Group 10: Customer Information
Record Type

04	New Service Provider Initial Billing Notification

NOTE: *Only applicable sections must be completed. For example, if you add a new Group to an existing Category and Record Type, only fill in the Section 2.2 – Group Assignments section.*

DRAFT
REVISION DATE: ________

ISSUE # ________
DATE: ________

New Record Layout

Customer Information
Customer Information
New Service Provider Initial Billing Notification
39-10-04

Field Name	Char	Length	Pos-Pos	Shaded
Record Identification	X	6	1-6	N
Category	X	2	1-2	N
Group	X	2	3-4	N
Record Type	X	2	5-6	N
Date of Record	9	6	7-12	N
Year	9	2	7-8	N
Month	9	2	9-10	N
Day	9	2	11-12	N
Reserved	X	42	13-54	N
Date of New Service	9	6	55-60	N
Year	9	2	55-56	N
Month	9	2	57-58	N
Day	9	2	59-60	N
Type of Service Provider	9	1	61	N
Reserved	X	8	62-69	N
Return Code	X	2	70-71	N
From RAO	X	3	72-74	N
Local Company Information	X	3	75-77	N
Reserved	X	17	78-94	N
Indicator 14	X	1	95	N
Reserved	X	9	96-101	N
Obligation Id	X	8	102-109	N
Billing RAO	X	3	110-112	N
Billing Number	X	10	113-122	N
NPA	X	3	113-115	N
NXX	X	3	116-118	N

Legend for Characteristic:
9 = Numeric
X = Alphanumeric

DRAFT
REVISION DATE: __________

ISSUE # __________
DATE: __________

New Record Layout

Line Number	X	4	119-122	N
Reserved	X	17	123-146	N
Library Code	X	2	147-148	N
Reserved	X	1	149	N
Carrier ID	9	3	150-153	N
Reserved	X	1	154	Y
Carrier ID Expanded	9	4	150-154	N
Reserved	9	11	155-165	N
Indicator 29	9	1	166	N
Reserved	X	1	167	N
LSPID	X	4	168-171	N
Reserved for Local Company Use	9	4	172-175	N

Legend for Characteristic:
9 = Numeric
X = Alphanumeric

New Record Layout

Line Number	X	4	119-122	N
Reserved	X	17	123-146	N
Library Code	X	2	147-148	N
Reserved	X	1	149	N
Carrier ID	9	3	150-153	N
Reserved	X	1	154	Y
Carrier ID Expanded	9	4	150-154	N
Reserved	9	11	155-165	N
Indicator 29	9	1	166	N
Reserved	X	1	167	N
LSPID	X	4	168-171	N
Reserved for Local Company Use	9	4	172-175	N

Legend for Characteristic:
9 = Numeric
X = Alphanumeric

USTA'S COMMENTS REGARDING
OMB CONTROL NO. 3060-0854
APPENDIX A/PART 2

Breslin

Bell Atlantic
1300 I Street, N.W.
Suite 400 West
Washington, DC 20005

Marie T. Breslin
Director
Federal Regulatory
(202) 336-7893
(202) 336-7866 (Fax)

Bell Atlantic

June 29, 1999

EX PARTE

Mr. Glenn Reynolds
Acting Chief-Enforcement Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Mr. Reynolds:

RE: CC Docket No. 98-170, Truth-in-Billing and Billing Format

I am writing to follow-up on recent discussions with you and Bureau staff about clarifying the Commission's new regulations on the format and content of telephone bills. As we have indicated, Bell Atlantic believes that its existing formats comply with the new rules. However, if our understanding of one of those requirements is not correct (and the staff has suggested that it is not), then Bell Atlantic cannot be in compliance by the rule's effective date, July 26.

Section 64.2001(a)(2) requires that telephone bills provide "notification to the customer that a new provider has begun providing service." Bell Atlantic's bills meet this requirement. First, Bell Atlantic's bills contain statements to inform the customer when she has changed her presubscribed inter- or intraLATA toll carriers. Second, the summary of charges section of the bill lists in one place all providers whose charges are included on that month's bill. A review of this list permits the customer to see at a glance when a new provider has begun providing service. If the Commission believes it to be necessary, Bell Atlantic could add language in this part of the bill urging customers to review this list carefully to identify new service providers.

The staff has suggested that language in the order adopting these rules indicates that the Commission had additional notification in mind as to non-presubscribed carriers. Paragraph 35 of that order suggests that the billing company must compare the current bill with the previous month's bill and then "highlight" new providers in some way. This is not required by the words of the new rule, however, which requires only "notification." In addition, as discussed below, the Commission could not lawfully have adopted such a requirement. Absent confirmation that the current Bell Atlantic practice described above is consistent with the rule's "notification" requirement or a Commission stay of this requirement, Bell Atlantic will be forced to seek a stay of the rule pending judicial review.

If the rules require this comparison and highlighting, then it would be impossible for Bell Atlantic to comply by July 26. Today, Bell Atlantic has no systems to do such a comparison. New databases would have to be developed to contain the latest month's billing information for all Bell Atlantic customers. As new bills are being prepared, the systems that do that work would have to stop bill processing to check with these new databases to identify any new providers. The billing systems would also have to be modified to receive this information, process it and print it on the bill. These new databases and modifications would have to be made for all five of Bell Atlantic's existing billing (including the four legacy systems which we are phasing out and plan to stop using within the next 18 months). We estimate that it would take in the neighborhood of 200,000 person-hours to do all this work. There is no reason to believe that the public benefit to be gained by "highlighting" in addition to "listing" justifies costs and dislocation of this magnitude.[1]

The Notice in this proceeding sought comment on whether the Commission should require that bills identify new services, not new service providers.[2] Bell Atlantic and numerous other commentors explained that such a requirement would be prohibitively expensive.[3] The Commission accepted that conclusion and rejected such a requirement.[4] However, the order went on to assert, without any record support whatever, that "highlighting each new service provider, as opposed to each new service, will be considerably more economical to implement."[5] As described above, this is simply not the case. The Commission's conclusion, therefore, is not supported by the record and is arbitrary and capricious.

---

1 The rule as interpreted by staff would produce bizarre results and would actually confuse consumers. The Commission has defined a "new service provider" as "any provider that did not bill for services on the previous billing statement." Section 64.2001(a)(2)(ii). Therefore, if a consumer does not use her presubscribed carrier in one month, that carrier becomes a "new service provider" under the rules the next time it bills the customer for service and would have to be "highlighted" as such. In addition, at least one major carrier has Bell Atlantic bill customers on a bi-monthly basis. Because there would never be a charge from this carrier on the customer's "previous billing statement," this provider would always be identified as "new," even where the customer had been using it for years. Consumers would surely find it confusing to have service providers that they have never changed highlighted as "new providers."

2 *Notice*, 13 FCC Rcd at 18185 ¶ 19.

3 Bell Atlantic comments at Attachment, "Answers to Specific Questions," at 6; Ameritech comments at 11-12; Sprint comments at 7-8; RCA comments at 4; MCI comments at 34-35; U S WEST comments at 5, 20; PCIA comments at 9.

4 *Order* ¶ 35.

5 *Order* ¶ 35.

Moreover, the Commission lacked authority to impose such a requirement. The Order indicates that the Commission found its authority to adopt its new rules in section 258 of the Act, the section that requires the Commission to adopt carrier change verification procedures to combat slamming.[6] Slamming, of course, is the unauthorized change in a customer's *presubscribed* carrier, and the anti-slamming provisions of the Act do not give the Commission jurisdiction to adopt rules having to do with non-presubscribed carriers. As the Commission recognized in this order, section 201(b) does not give it authority to impose any obligation on local exchange carrier billing services, as those services are not communications services subject to Title II of the Act.[7]

Bureau staff has asked whether it would be possible to change the industry EMI billing record standard to allow a service provider to send the billing entity a notification that it is a new service provider under this rule. The answer is that the EMI standard could be changed, and it typically takes at least a year for changes to be agreed to and implemented throughout the industry. However, you should understand that a service provider will not necessarily know whether it is "new" as that term is defined in the rules. Section 64.2001(a)(2)(ii) defines a "new service provider" as "any provider that did not bill for services *on the previous billing statement*." A service provider has no way of knowing exactly when its charges are included on a customer's bill — it could be the day after it sends us billing information or three weeks later. Therefore, it will not know when it submits additional charges whether it "billed for services on the previous billing statement" or on some other billing statement. Bell Atlantic believes that this will force non-presubscribed service providers to err on the side of always assuming they could be new to a customer and populating the EMI new provider indicator. In the absence of data to determine whether a customer is new for an unknown monthly billing period, Bell Atlantic expects that ALL non-presubscribed service providers will appear under the heading of new provider each month, leading to more customer confusion and complaints. It is unclear that there is any public policy/consumer benefit from a telephone bill that list "new service provider" versus one that already flags other providers on the bill

Bell Atlantic shares the Commission's concerns about cramming and has taken a number of steps to protect consumers from this practice. These actions have caused cramming complaints to drop significantly since last year. Bell Atlantic will continue to modify its billing practices in the interest of its customers, and the attached News Release is the latest example of such actions. The "new provider" rule as it is being construed will cost millions of dollars and provide little, if any, benefit. In fact, as written, it will actually confuse consumers more than help them. We again ask either that you agree that our existing bills satisfy the notification

---

6 "[T]he truth-in-billing principles and guidelines adopted herein are justified as slamming verification requirements pursuant to section 258." Order ¶ 23.

7 *Detariffing of Billing and Collection Services*, Report and Order, CC Docket No. 85-88, 102 F.C.C.2d 1150 (1986). The order recognizes this limitation in the Commission's authority and explains that, as a result, "The guidelines adopted here apply to the carrier providing service to customers, not to those carriers' billing agents." Order ¶ 25. While this statement is true for most of the requirements of the new rules, it is not accurate with respect to the "new provider" requirement.

requirement of section 64.2001(a)(2) or that the Commission on its own stay the effectiveness of this rule.

Please call me if you have any questions concerning the above information.

Sincerely,

Marie Breslin

Attachment

cc: Magalie Roman-Salas
Lawrence Strickling
Dorothy Attwood
Anita Cheng
David Konuch
Christopher Wright
Kevin Martin
Linda Kinney
Sarah Whitesell
Kyle Dixon

NEWS RELEASE

Bell Atlantic

FOR IMMEDIATE RELEASE
June 29, 1999

Contact:
Paul Miller
804-772-1460
miller@ba.com

Mark Marchand
518-396-1080
mark.a.marchand@bellatlantic.com

Bell Atlantic Escalates War on 'Crammers,' Enables Customers to Block Miscellaneous Charges

First Phone Company in Nation to Take Such Bold Action

NEW YORK – Starting today, Bell Atlantic customers from Maine to the Virginias can protect themselves from having fraudulent charges appearing on their phone bills. Bell Atlantic, a recognized leader in combating the fraudulent practice of "cramming," is the first telephone company in the country to offer customers the option of blocking "miscellaneous" charges. Miscellaneous charges are usually monthly expenses unrelated to actual telephone usage, like voice mail and Web-page design and maintenance.

Cramming, which surfaced late in 1997, is the practice of putting bogus miscellaneous charges that are unrelated to basic telephone use on phone bills.

"We have made it clear from the outset that Bell Atlantic has no patience for companies that use our bills to take unfair advantage of our customers," said Fred D'Alessio, group

--MORE--

president for Bell Atlantic Consumer Services. "This is truly one of the most important customer-care initiatives our business has undertaken. Today's action hammers another nail into the coffins of those who prey on the innocent and unsuspecting."

The blocking option does not apply to charges from Bell Atlantic or the customer's selected local-toll and long distance companies. In addition, customers who choose this option could still be billed by Bell Atlantic for calls they make using other providers, such as "10-10" dial-around companies, since such charges are not considered miscellaneous.

Residential customers who wish to block such services from their phone bills can do so, starting today, by calling the appropriate toll-free number for their place of residence: **1-800-249-8719** for New York and the New England states and **1-888-579-8926** for Pennsylvania, New Jersey, Delaware, Maryland, Virginia, West Virginia and Washington, D.C. Business customers can sign up by contacting the Bell Atlantic business office.

"Our customers can now make a choice as to whether they want these miscellaneous charges appearing on their bill," D'Alessio said. "Some may elect to keep the charges on the bill, because in many instances they are for legitimate services that the customer may want to use."

Bell Atlantic's efforts to protect its customers from cramming have served as a model for the rest of the telecommunications industry. Since launching its initiatives over a year ago, the company has discontinued providing billing services to some 80 telecommunications service providers. The move resulted in a decline of more than 80 percent in the number of cramming complaints from Bell Atlantic customers.

--MORE--

"A year or so ago we were averaging some 30,000 complaints a month related to cramming," D'Alessio said. "And most of those complaints pointed to a few bad apples." Since taking action against these suspected crammers, Bell Atlantic's complaints from residential customers have plunged to roughly 5,000 a month.

Bell Atlantic, which serves 22 million households on the east coast, provides billing services for a wide variety of telecommunications providers. Many customers prefer having all of their telecommunications services on one bill.

Last summer, Bell Atlantic was one of the first telephone companies in the country to institute a "first-call resolution" policy. Under the new policy, when a customer calls Bell Atlantic with a cramming complaint, the company immediately removes the charge from the bill, instead of referring the customer to the company that initiated the charge.

Bell Atlantic routinely screens proposals for billing new services and reserves the right not to bill for objectionable services.

Bell Atlantic is at the forefront of the new communications and information industry. With 43 million telephone access lines and nine million wireless customers worldwide, Bell Atlantic companies are premier providers of advanced wireline voice and data services, market leaders in wireless services and the world's largest publishers of directory information. Bell Atlantic companies are also among the world's largest investors in high-growth global communications markets, with operations and investments in 23 countries.

####

INTERNET USERS: Bell Atlantic news releases, executive speeches, news media contacts and other useful information are available at Bell Atlantic's News Center on the World Wide Web (*http://www.ba.com*). To receive news releases by email, visit the News Center and register for personalized automatic delivery of Bell Atlantic news releases.

USTA'S COMMENTS REGARDING OMB CONTROL NO. 3060-0854 APPENDIX B

INDUSTRY ESTIMATED COST AND RESOURCE BURDENS TO IMPLEMENT FCC TRUTH-IN-BILLING FIRST REPORT AND ORDER RELEASED MAY 11, 1999, CC DOCKET NO. 98-170

Data used for this table was taken from the public record of this proceeding or was provided informally by USTA member companies. Estimates of cost and burden are shown as a dollar cost, the number of person hours to implement TIB or both when information was available. The categories shown on the table are defined as follows:

Overall Cost: Estimates of total cost and hours to implement the Truth-In-Billing requirements. Used only when break outs of the specific subcategories was not available.
Deniable/Non-Deniable: Cost estimates for the implementation of the requirement to mark services as deniable or non-deniable of local service for non-payment.
Highlighting New Service Providers: Cost estimates for the implementation of the requirement to highlight monthly new service providers appearing on the customers bill.

	Overall Cost		Deniable/ Non-Deniable		Highlighting New Service Providers		Notes
	$	hrs	$	hrs	$	hrs	
Ameritech				3,500 hrs		8,500 hrs	1
AT&T	$4,000,000						2
Bell Atlantic						200,000 hrs	3
Cinncinati					$ 500,000		4
SBC				16,000 hrs			5
Sprint					$ 500,000	5,000 hrs	6
U S West	$1,200,000	11,000 hrs					7
Small ILECs	$ 63,000	439 hrs	$ 125,000				8
Cable Plus	$ 350,000	2,200 hrs					9
Totals of $	**$5,613,000**		**$ 125,000**		**$1,000,000**		
Totals of hrs		**13,639 hrs**		**19,500 hrs**		**213,500 hrs**	

Grand Total: $ 6,738,000 & 246,639 hrs

USTA Attachment prepared by Frank McKennedy, Director of Legal and Regulatory

Notes:

1. Ameritech's estimates provided to USTA informally. These estimates include only information systems development work. Not included in the estimates are user acceptance testing, manuals and procedures development, field training, project management and business requirements development.

2. AT&T Petition for Reconsideration, filed July 26, 1999. See page 5. AT&T's estimate reflects the costs for implementing TIB only for its business customers, including residential customers would be a much higher cost.

3. Bell Atlantic Ex parte letter filed June 29, 1999, CC Docket No. 98-170, Truth-In-Billing and Billing Format. See page 2.

4. Cincinnati Bell provided to USTA informally a broad estimate of not less then $500,000 for implementing the FCC's "highlighting" requirement .

5. SBC Petition for Reconsideration, Attachments C and D, filed July 26, 1999. See Attachments C and D, SBC estimates 2000 workdays for the Southwestern Bell and Pacific Telesis areas. For consistency in this analysis, SBC's workdays have been converted to person hours by multiplying the workdays by 8 hours per standard workday, for a product of 16,000 person hours.

6. Sprint Petition for Reconsideration filed July 26, 1999. See page 6.

7. U S West Petition for Reconsideration filed July 26, 1999. See page 19.

8. Small ILEC data was provided informally to USTA by member companies. The data has been aggregated to protect confidentiality of competitively sensitive information of each of the participants providing the data.

9. Cable Plus, L.P. and its affiliate, MultiTechnology Services, L.P., d/b/a Telephone Plus (collectively "Cable Plus") Petition for an Expedited, Temporary Waiver, filed July 20, 1999. Cable Plus is a small CLEC. See page 3.

USTA Attachment prepared by Frank McKennedy, Director of Legal and Regulatory

USTA SUMMARY OF FCC's SUPPORTING STATEMENT OF THE REQUEST FOR EMERGENCY PROCESSING OF ITS INFORMATION COLLECTION 3060-0854, TRUTH-IN-BILLING

The following table is a summary of the FCC's estimate of the individual respondent and total respondents cost and resource burdens for implementing the requirements of the FCC's First Report and Order in CC Docket No. 98-170, Truth-In-Billing. The data was taken from Item 12 of the "Supporting Statement, Paperwork Reduction Act Submission, Truth-In-Billing and Billing Format, First Report and Order" that was an attachment to the FCC's Request for Emergency Processing, Information Collection 3060-0854, Truth-In-Billing Format filed in June, 1999. Detail information was note included in the FCC's re-submission

	Per Respondent		Total Respondents	
	Hours	Dollars	Hours	Dollars
a. Clear identification of service providers:	1	$ 40	3,099	$ 123,960
b. Separation of charges by service provider and highlighting new service provider information:	80	$ 3,200	183,600	$7,344,000
c. Full and non-misleading billed charges (plain language):	2	$ 80	6,198	$ 247,920
d. Clear/conspicuous disclosure of inquiry contracts (1-800 numbers for providers):	1	$ 40	3,099	$ 123,960
Total Burden Per Respondent	**84hrs**	**$ 3,360**	**195,996 hrs**	**$7,839,840**

(cont.)

(cont.)

The FCC's revised submission of information collection 3060-0854, dated July 23, 199 to the OMB reduced the "Total Annual Burden" **downward** to 194,338 hours. (Page 1 of the attachment "Supplementary Information".) The revised filing had no supporting detail to explain the derivation of the revised estimates.

Using the $40 per hour loaded costs that the FCC used in the June, 1999 submission to OMB, the total annual industry cost would be $40 X 194,338 hours equaling $7,773,520. The FCC's June submission to the OMB showed an estimate of 195,996 hours and total costs of $7,839,840. The revised filing included no supporting detail costs.

USTA Attachment prepared by Frank McKennedy, USTA Director, Legal and Regulatory.

COMPARISON OF INDUSTRY AND FCC ESTIMATED COSTS AND BURDENS

CARRIER ESTIMATED COSTS AND WORK HOURS FOR TIB IMPLEMENTATION FROM PAGE 1:

As filed in comments on the public record (small company data excepted):

Ameritech		12,000 total work hours
AT&T	$ 4,000,000	Total costs
Bell Atlantic		200,000 work hours for highlighting
Cincinnati	$ 500,000	For highlighting
SBC		16,000 work hours for deniable/non-deniable
Sprint	$ 500,000	5000 work hours for highlighting
U S West	$ 1,200,000	11,000 total work hours
Ave. per small LEC	$ 63,000	(Average total costs of 3 small ILECs)
Cable Plus	$ 350,000	2,200 total work hours

Average per Individual Large ILEC: $ 1,550,000 and 48,800 hours

Average per Small ILEC: $ 63,000

Cable Plus $ 350,000

FCC ESTIMATE FOR INDIVIDUAL CARRIER TOTAL COST TO IMPLEMENT TIB FROM PAGE 3:

Based on the FCC June, 1999 submission to the OMB:

Total hours per respondent:	84 hours
Average total cost per respondent:	$3,360

USTA Attachment prepared by Frank McKennedy, USTA Director, Legal and Regulatory.

USTA'S COMMENTS REGARDING OMB CONTROL NO. 3060-0854 APPENDIX C

TRUTH IN BILLING

Ameritech:

Comments Filed November 13, 1998

<u>General:</u>

"In fact, Ameritech is on the verge of converting to a new wireline residential bill format that it believes will be a positive competitive differentiator for its services. To assure that its new bill format is responsive to its customer's desires, Ameritech used focus groups of residential users to determine their expectations and needs. In addition to this "front-end" customer research, Ameritech "tested" its new format with more focus groups. As a result of these efforts, 92% of residential customers surveyed found the new bill format easy to understand, and 73% rated it as extremely or very easy to find important information. Ameritech is now in the final stages of implementation and expects to begin to use the new bill format in the near future." Page 2

"...any outcome of this proceeding should recognize the wide range of system capabilities that are inherent in different billing systems, and should not impose rigid or overly detailed requirements that may needlessly impose hardships on certain carriers and their customers." Page 3

"Ameritech was only able to complete its new bill project within **18 months** with a manageable **$8 million budget** because the project was intentionally limited to format changes that entailed no significant software or hardware changes to billing and underlying legacy systems....as several of the proposals in the NPRM would require." (emphasis added) Page 3

"Thus, the $8 million cost of implementing Ameritech's new bill format pales when compared to the costs that would have to be incurred if the changes had required significant modifications to billing or legacy systems. " Page 3

"Ameritech has redesigned its bill at great expense—by the time the first bill is issued Ameritech expect to have spent $10 million dollars. Yet, in order to control costs, Ameritech was careful to ensure that the new bill involved only reformatting of existing billing information from existing billing feeds." Page 11

"...Ameritech believes that based on the content of the NPRM, this proceeding is and should be focused on residential wireline billings. Business and carrier-to-carrier billings often involve bills that are highly specialized to meet the demands of sophisticated users, and involve different circumstances and needs than residential bills. Moreover, in many cases, business and carrier-to-carrier bills are provided in special and electronic formats to enable the business to more readily review and audit them through electronic and other means. Under these circumstances, imposition of mandatory bill format requirements on business and

Ameritech (cont.):

carrier-to-carrier might actually inhibit the ability of carriers to respond to the needs of their business and carrier customers." Page 6

Deniable/Non-Deniable:

"Ameritech provides this information through a separate mailing. Ameritech's delinquency notices advise customers of the amount they must pay to avoid termination of local service, which does not include any amounts for a non-deniable service. In addition, delinquency notices include an explanation of the process to dispute charges or to request a payment arrangement to avoid disconnection. Further, Ameritech's service representatives have knowledge of this information. Thus, there is little danger that customers will pay a disputed non-deniable charge out of fear that otherwise they will lose their local or long distance service. " Page 15

Y2K Issues:

"Further complicating the issues in this proceeding is the fact that Year 2000 computer software issues apply to billing systems. As a result, Ameritech will focus on preventing these software problems in 1999. For that reason, Ameritech will generally impose a half-year moratorium on billing system changes for the latter half of 1999. It may also need to resolve in the first half of 2000, any residential problems that arise. Ameritech recommends that the Commission likewise not require implementation of any billing system changes that require software changes until the middle of 2000. " Page 19

Petition for Reconsideration Filed July 26, 1999:

General:

Ameritech requests that the new service providers and deniable/non-deniable implementation date be waived until April 1, 2000.

Y2K Issues:

"...deferring the effective date of this requirement until April 1, 2000 will provide the stable systems necessary for Ameritech to effectively identify, resolve, and test or computer software problems caused by the so-called "Y2K" problem, and to facilitate quick resolution of any Y2K problems that may arise." Page 3

AT&T:

Comments Filed November 13, 1999:

General:

"...any Commission rules on these subjects must not interfere with, or constrain, conscious choices made by customers." AT&T goes on to list a number of combinations of services that customers choose that do not fit the FCC rules mode. Page 4

"In addition, no new billing rules should apply to telecommunications services or charges for large business customers." Pages 4-5. Footnote 2 comments regarding the Commission's forbearance of geographic rate averaging for business customers: "...Such action was completely appropriate, because those services are subject to intense competition and the customers who buy them are sophisticated and have significant opportunities to negotiate all the terms and conditions of their services arrangements." Fn 2, page 5

Petition for Reconsideration Filed July 26, 1999:

Deniable and Non-Deniable:

Wants to use alternatives to marking services on bills – eg. and internet websight for business customers which give them necessary info. (Page 4)

Technical and programming efforts for residential customers not inconsiderable. (Page 4)

For business customers, particularly those in multiple jurisdictions, "implementation of those rules will be needlessly complex, burdensome and expensive when compared to AT&T's proposed alternative." (Page 4)

"...uses more then a dozen billing systems to bill its business customers." "...Each would have to be modified...." (Page 4)

"AT&T's billing systems for high-end customers have very limited messaging capability, and typically can include only a line or two of text on a bill." Page 5, fn 4.

"...it would cost over $4 million dollars to implement the billing system changes...on its business customers' bills." Page 5

"Even with the expenditure of this time and money, it is entirely possible that customers will find the final results to be inconvenient and less useful than simpler alternatives such as web-site notification. Pages 5-6

CenturyTel:

Comments Filed November 13, 1999:

General:

"CenturyTel urges that the Commission adopt broad guidelines rather than precise prescriptions...Carriers, such as CenturyTel, that have invested time, money and resources to generate bills that are reader friendly should not be burdened with additional regulations and costs that would do nothing to reduce customer confusion or serve the public interest." Pages 1-2

"CenturyTel has sought customer input and has taken such input into consideration as it has developed billing procedures and formats. As a result, these procedures and formats have evolved over time to best meet the needs of consumers. This is an ongoing process, as CenturyTel is currently investing millions of dollars in new billing and records system for its wireline services that will include even more customer-oriented enhancements." Page 2

MCI:

Petition for Reconsideration Filed July 26, 1999:

General:

"Unlike the Commission, however, MCI WorldCom believes competition, not increased regulation, is the best means of advancing these consumer interests." Page 2

Deniable and Non-Deniable:

"MCI WorldCom requests that the Commission reconsider and eliminate this requirement because it does not advance the Commission's stated objective, will impose enormous new costs on the industry, will seriously harm the ability of some carriers to recover all charges due to them, and extends beyond the Commission's jurisdiction." Page 3

Regarding jurisdiction:

"The Commission states in the Truth-in-Billing Order that, with the exception of the guidelines involving standardized labels for charges relating to federal regulatory action, the truth-in-billing principles and guidelines adopted in its Truth-in-Billing Order '...are justified as slamming verification requirements pursuant to Section 258, and this can be applied to both interstate and intrastate services.' " Pages 4-5

MCI (cont.):

"It is clear the Commission has jurisdiction over carriers' interstate charges...under section 201(b). The ...requirement ...extends to billing for intrastate services. Similarly, it is clear the Commission has authority under section 258 to take steps needed to reduce and prevent unauthorized conversions in the interstate and intrastate telecommunications markets. However, the Commission has not identified... any linkage between a customer knowing which charges, if not paid, will result in termination of basic service, and (his) ability to prevent or detect unauthorized conversions. Identifying which charges would result in termination of basic service if not paid conveys no meaningful information to the customer that would help determine...whether an unauthorized conversion has occurred." Page 5

Regarding Impact:

"...such a requirement will lead to an increase in industry fraud, uncollectables, and rapid change of carriers." Page 6

"...placing upward pressure on rates that must be paid by the very customers that should be receiving the benefits of competition." Page 6

Northwestern Indiana Telephone Company, Inc:

Comments Filed November 13, 1998:

General:

NITCO is located in Herbon, Indiana and has 12,400 subscribers in five exchange areas in rural northwestern Indiana. Page 1

"NITCO submits that such a requirement would be expensive and burdensome for carriers to implement. To provide such information to customers would require the development of a new database to track such information. The cost of compiling and maintaining such a database would be expensive, and not necessarily recoverable, particularly for small and rural carriers such as NITCO. Such LECs and their billing contractors do not presently have databases which support a presentation of the types of summary information the FCC is proposing be provided to customers. To require a complete overhaul of these systems is unreasonable and places a roadblock to competition... " Page 2 (Included because this is a small LEC even though there is no real data.)

Qwest:

Comments Filed November 13, 1998

General:

"Many of the Commission's proposals would impose significant administrative and cost burdens on carriers. ...the costs incurred by carriers complying with stringent billing rules will increase the cost of telecommunications services and ultimately be paid by consumers." Page 2

"...Qwest has implemented a simple consumer bill and is in the process of migrating business and wholesale customers to receive the same type of bill that is easy to read with a clear description of each charge. Qwest urges the Commission not to adopt overly burdensome prescriptive rules that may undermine the processes that Qwest and other carriers are already undertaking to meet consumer demand. " Page 3

Deniable/Non-Deniable:

"Qwest opposes a requirement that all bills differentiate between deniable and non-deniable charges. Qwest's billing system is not equipped to provide such a characterization, and we would incur substantial costs to implement such a modification. Qwest communicates with direct-billed customers about non-payment liability, including the termination of long distance service..." Page 7

SBC:

Comments Filed November 13, 1998:

Deniable/Non-Deniable:

"Experience has shown that bad debt increases if consumers perceive no risk in terms of disconnection of local service for non-payment of other charges. Sprint Long Distance has experienced uncollectible revenues which are 23% higher in states which prohibit termination of local service for non-payment of toll charges than in states which do not prohibit such disconnection. Sprint Local also has experienced an increase in bad debt as well as an increase of approximately 20 additional days for customers to pay in those states which require separation of deniable and non-deniable charges." Page 15

Petition for Reconsideration Filed July 26, 1999:

(SBC requests only a month delay in the new service provider and deniable/non-deniable requirements for SNET. Also they only took about four and a half

SBC (cont.):

months to completely rewrite their billing system. I think this is NOT very strong support for USTA but I included it for information.)

(SBC) SNET project started in May 18, 1999 and is scheduled for completion in October 1, 1999. This is about four and a half months. Page 5

(SBC) SNET "...has a billing project in progress..." that will allow them to list dial-around service providers. This project "...will not be completed until October 2, 1999..." past the September 6 required date. Page 4

(SBC) SNET estimated their billing project to be 1140 hours of work but "...that estimate was revised after further definition of the billing requirements and specifications for the SNET Information Technology systems. " Page 5

Deniable/Non-Deniable:

(SBC) SWBT states that because of Y2K they "...have issued a software freeze during the November 1, 1999 to March 1, 2000 timeframe (but) ...(a)n exception is being made for the deniable/non-deniable project in order to try to achieve the March 2000 implementation SWBT seeks only an extension of time until the end of March, 2000 to comply with the deniable/non-deniable requirements." Page 7

(SBC) SWBT "...the very earliest possible date by which the billing system revisions can be completed is March (1999), if the process is expedited and proceeds according to schedule. " Page 6

(SBC) SWBT "More than 1000 workdays (8000 hours) are estimated by all disciplines." Page 8

"SBC...requests ...the Commission...extend the date of compliance (with the deniable/non-deniable requirement) to the end of March 2000." Page 8

SBC attached two affidavits to their PFR, one each for SWBT and Pacific which are the source for the estimated 1000 workdays, the March, 2000 implementation date and the exception to the Y2K programming moratorium. Both affidavits state: "A typical timeline for a major billing project, such as this one, spans about a 9 to 12 month period of time from inception to implementation. For a project of this magnitude, a March of 2000 implementation date is very aggressive..." Attachments C and D, Affidavits, each at Item 4, page 1.

Sprint:

Petition for Reconsideration Filed July 26, 1999:

General:

Based on its own customer surveys, Sprint has developed a new local bill to meet same objectives FCC espouses. Page 5-6

But, its new bill is not scheduled for release until the first quarter of 2000. Page 6

In designing its new local bill, Sprint held 26 focus groups involving 260 customers in 9 cities. It also held 31 personal interviews with leaders in 13 states served by Sprint local operations. Further, it performed secondary research, benchmarking, and internal call center studies to assess billing-related contacts and issues. Fn 3, page 6

"...Sprint has invested hundreds of thousands of dollars and nearly ten thousand programming hours toward developing the new local bill." Page 6

"Sprint projects that a total of 45,000 hours and$4.5 million dollars will be needed through the first quarter of 2000 to define requirements, code, test, and install the system. This projection assumes that the new bill, as designed, satisfies the requirements of the Commission's order." Page 6

"Furthermore, it does not appear that the Commission has properly evaluated the effect of certain of its rules (including the identification of 'new' service providers and non-deniable charges...) in terms of whether they will, in fact, benefit the public. " page 9

New Service Providers:

If FCC requires highlighting of all new service providers..."the cost of implementing the new bill will increase by an estimated minimum of $500,000 and 5000 programming hours." Page 6

"If required to highlight new service providers...Sprint will require an additional three months' minimum extension until July 2000. " Page 7

Deniable/Non-Deniable:

"If required to track deniable and non-deniable charges, Sprint's implementation timeline would be further extended, depending upon the time required to properly identify non-deniable charges and to develop industry-wide definitions and standards." Page 7

"If long distance carriers are required to track non-deniable charges on every combined bill..., **in addition to the costs** of developing a database and of

Sprint (cont.):

systematically linking that to billing data, they will surely experience an increase in their bad debt and deterioration in cash flow." (Emphasis added.) Page 9

In footnote 5, Spring cites its comments filed November 13, 1998 in this proceeding where they present evidence based on experiences in the states that customers overall took longer to pay when the state prohibited termination of local service for non-payment of toll charges. Spring says in this footnote: "The Commission dismissed this concern, simply stating (Order, para.48) that carriers may still remind their customers "of their obligation to pay all authorized charges and of the consequences...of a failure to pay any authorized charge." Fn 5, page 9

<u>Y2K Issues:</u>

The Sprint timeline for implementation of its new bill "...is extended by the moratorium on software changes and redirection of resources implicated in Y2K preparation. " Page 8

Time Warner Telecom, Inc.:

Comments Filed November 13, 1998:

<u>General:</u>

"...TW Telecom billing personnel studied the proposals set forth in the <u>Notice</u> and calculated the likely impact of those proposals on TW Telecom's billing costs. Those costs include management and maintenance fees associated with the billing process, production costs, environmental enhancements, and printing and distribution costs. **TW Telecom estimated the increases to its billing costs using two sets of assumptions: a 'low end' scenario in which the currently-used billing format remained in use by with expansion of certain fields to permit enhanced description of services, and a 'high end' scenario in which all of the changes proposed by the <u>Notice</u> were factored in. Under the low end scenario, TW Telecom estimates that its billing costs would increase by approximately ten percent. Under the high end scenario, its billing costs could increase by over an estimated sixty percent!"** (emphasis added) Page 4

"Adoption of carrier billing requirements which will increase new entrants' costs of market entry will reduce the amount of capital available to those companies to fund network construction and expansion." Page 4

"...irrespective of how these additional costs are incurred, ultimately those costs will be borne by consumers of telecommunications services in the form of higher prices for those services. Imposition of price increases on consumers because

Time Warner Telecom (cont):

of regulatory action is facially inconsistent with the objectives of the Telecommunications Act of 1996." Pages 4-5

"As the Commission acknowledged in the Notice, one of the goals of the 1996 Act is to make available to consumers new services and technologies by promoting the development of competition in all aspects of telecommunications service....Congress's purpose... was to increase choice and lower prices to consumers. ...What is not debatable is that the Commission should avoid actions which raise the costs of providing service and result in higher prices to consumers for services which are supposed to be competitive. Regulations which will increase the cost of competitive entry and which raise the prices to consumers of increasingly competitive services should be avoided unless such regulations are absolutely necessary to prevent abusive practices." Page 5

"In addition to competing with each other based on such factors as interest rates and incentive premiums...banks and other financial service companies in the credit card business have modified and enhanced their billing formats and details – not in response to government regulation, but in response to consumer demand. That has begun to occur and will continue to occur in the telecommunications industry." Page 12

"Recent press reports have described the commitment of telecommunications carriers to improving their customer billing systems in response to expressions of dissatisfaction about their current systems. See, e.g. 'Telecom Talk; Carriers Tackle Cramming,' Los Angeles Times, October 12, 1998, section C, page 3 ('GTE and other phone companies have begun voluntarily enacting policies to combat rogue operators who bill consumers for unauthorized services...' 'Pacific Bell, BellSouth and Bell Atlantic also won't bill for noncommunications-related services...' 'Ameritech is changing its bills to include a summary page at the front that lists service providers' names and contact information. " fn 20, page 12

Deniable/Non-Deniable:

"TW Telecom is concerned that over time attaching the label "non-deniable" to services on telephone invoices may indicate to consumers that those charges may be ignored without risk of disruption to their telephone service....Separately identifying deniable and non-deniable charges on bills may significantly reduce the collection rate for those services listed as non-deniable, thereby increasing the collection costs for those services, **and ultimately the prices for those services**." (emphasis added) Page 14

U S West:

Comments Filed November 13, 1998

General:

"...U S West produces around 12.2 million bills a month. The billing information to populate the bill comes from seven different account centers. There are three primary billing systems across our territory. A single billing change involves manipulation of lines of code for each of those systems, in addition to re-coding of the bill formatting database itself. Additionally, around 30 different databases interact with the three primary billing systems and changes to the primary billing systems involve changing the interfaces to all of these other databases. Thus, billing changes involve large, complex database changes and interactions that require advance design, coding and testing." Page 20

" the Commission must be sensitive to the limitations inherent in the billing infrastructure. ...assess the costs...with the benefit..." Page 20

"It (the Commission) must also permit sufficient time for any required system modifications to be deployed." Pages 20-21

Petition for Reconsideration Filed July 26, 1999:

Jurisdiction:

"The Commission can cite no provision of the 1996 Act granting it jurisdiction over LEC billing for its own intrastate services." Page 11

"...that Section 'authorizes the Commission to adopt verification requirements to deter slamming in both the interstate and the intrastate markets.' But how a charge is billed with respect to its deniability has nothing to do with the matter of carrier verification or slamming, a connection the Commission itself acknowledged as critical to any exercise of jurisdiction under Section 258." Page 11, also see fn35.

Cost Burden for both Service Provider and Deniable/No-Deniable Changes:

"U S West believes that a reasonable estimate of costs to create the kinds of functionalities the Commission mandates in the area of service provider changes and deniable/non-deniable will cost U S West a minimum of about 1.2 million dollars and involve over eleven thousand person hours." Page 19

See also AFFIDAVIT and CERTIFICATION OF DALE BRECKON attached to the U S West PFR, page 6.

Para. 21 cites exact hours and dollars.

U S West (cont.):

Para. 22 states the work would take fourteen weeks to the exclusion of all other projects including Y2K compliance work.

"All told, the changes the Commission mandates cannot be accomplished easily or cheaply. And, they most assuredly cannot be accomplished at all during 1999." Page 20

Y2K Issues:

"And, the Year 2000 moratoria or embargoes means that in the best of cases the work would not be queued for completion until at least after the end of January 2000." Page 3

CERTIFICATE OF SERVICE

I, Nicole Shackelford, do certify that on August 24, 1999, Comments of the United States Telephone Association Regarding OMB Control No. 3060-0854 were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.

Nicole Shackelford

Nicole Shackelford

Charles Carbone
Michael Shames
Utility Consumer Action Network
1717 Kettner Blvd. - Suite 105
San Diego, CA 92101

Jim Hurt
Jeannette Mellinger
Consumers' Utility Counsel Division
Two Martin Luther King, Jr. Drive
Plaza Level East
Atlanta, GA 30334

Walter Steimel, Jr.
Hunton & Williams
(Pilgrim Telephone, Inc.)
1900 K Street, NW
Washington, DC 20006

Emily M. Williams
ALTS
888-17th Street, NW
Suite 900
Washington, DC 20036

Mark C. Rosenblum
Richard H. Rubin
AT&T
295 North Maple Avenue
Room 325213
Basking Ridge, NJ 07920

Douglas D. Leeds
AirTouch Communications, Inc.
One California Street
29th Floor
San Francisco, CA 94111

Pamela J. Riley
AirTouch Communications, Inc.
1818 N Street, NW
Suite 800
Washington, DC 20036

Robert M. McDowell
ACTA
8180 Greensboro Drive
Suite 700
McLean, VA 22102

Albert H. Kramer
Robert F. Aldrich
Valerie M. Furman
Dickstein Shapiro Morin & Oshinsky, LLP (APCCI)
2101 L Street, NW
Washington, DC 20037

Judith L. Harris
Brenda K. Pennington
Reed Smith Shaw & McClay, LLP (AmericaTel Corp.)
1301 K Street, NW
Suite 1100-East Tower
Washington, DC 20005

Larry A. Peck
John Gockley
Bruce Becker
Ameritech
2000 West Ameritech Center Drive-Room 4H86
Hoffman Estates, IL 60196

Mary Liz Hepburn
Bell Atlantic
1300 Eye Street, NW
Suite 400W
Washington, DC 20005

John T. Scott, III
Crowell & Moring, LLP
(Bell Atlantic Mobile)
1001 Pennsylvania Avenue, NW
Washington, DC 20004

M. Robert Sutherland
Richard M. Sbaratta
Helen A. Schockey
BellSouth
1155 Peachtree Street, NE - Suite 1700
Atlanta, GA 30309

Michael F. Altschul
Randall S. Coleman
Cellular Telecommunications Industry Assn.
1250 Connecticut Avenue, NW
Suite 200
Washington, DC 20036

Peter Arth, Jr.
Lionel Wilson
Gretchen Therese Dumas
Public Utilities Commission - State of California
505 Van Ness Avenue
San Francisco, CA 94102

Gary D. Slaiman
Kristine DeBry
Swidler Berlin Shereff Friedman, LLP
(Coalition to Ensure Responsible Billing)
3000 K Street, NW - Suite 300
Washington, DC 20007

Russell M. Blau
Eliot J. Greenwald
Swidler Berlin Shereff Friedman, LLP
(Commonwealth Telco.)
3000 K Street, NW - Suite 300
Washington, DC 20007

Robert J. Aamoth
Kelley Drye & Warren, LLP
(CompTel)
1200-19th Street, NW
Suite 500
Washington, DC 20036

Michel J. Shortley, III
Frontier
180 South Clinton Avenue
Rochester, NY 14646

John F. Raposa, **HQE03J27**
GTE
600 Hidden Ridge
P.O. Box 152092
Irving, TX 75015

Rachel J. Rothstein
Cable & Wireless USA, Inc.
8219 Leesburg Pike
Vienna, VA 22182

Eliot J. Greenwald
Swidler Berlin Shereff Friedman, LLP
(CenturyTel)
3000 K Street, NW
Suite 300
Washington, DC 20007

John Prendergast
Susan J. Bahr
Blooston, Mordkofsky, Jackson & Dickens
(CommNet Cellular, Inc.)
2120 L Street, NW - Suite 300
Washington, DC 20037

Genevieve Morelli
Competitive Telecommunications Assn.
1900 M Street, NW
Suite 800
Washington, DC 20036

Garret G. Rasmussen
Patton Boggs, LLP
(Electronic Commerce Assn.)
2550 M Street, NW
Washington, DC 20037

Barry Pineles
GST Telecom, Inc.
4001 Main Street
Vancouver, WA 98663

Andre J. Lachance
GTE
1850 M Street, NW
Suite 1200
Washington, DC 20036

Kenneth T. Burchett
GVNW
P.O. Box 2330
8050 S.W. Warm Springs Street
Suite 200
Tualatin, OR 97062

David W. Zesiger
Donn T. Wonnell
Independent Telephone & Telecommunications Alliance
1300 Connecticut Ave
Suite 600
Washington, DC 20036

Mary L. Brown
MCI
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Hubert H. Humphrey, III
Garth M. Morrisette
Amy Brendmoen
Minnesota Office of Attorney General
1200 NCL Tower - 445 Minnesota Street
St. Paul, MN 55101

Elisabeth H. Ross
Birch, Horton, Bittner and Cherot
(Missouri PUC)
1155 Connecticut Avenue, NW
Suite 1200
Washington, DC 20036

Susan Grant
National Consumers League
1701 K Street, NW
Suite 1200
Washington, DC 20006

Bruce A. Kushnick
New Networks Institute
826 Broadway
Suite 900
New York, NY 10003

Charles H. Helein
Helein & Associates, PC
(Global Telecompetition...)
8180 Greensboro Drive
Suite 700
McLean, VA 22102

David L. Nace
B. Lynn F. Ratnavale
Lukas, Nace, Gutierrez & Sachs, Chtd.
(Liberty Cellular, Inc.)
1111-19th Street, NW - Suite 1200
Washington, DC 20036

Susan M. Eid
Richard A. Karre
MediaOne Group, Inc.
1919 Pennsylvania Avenue, NW
Suite 610
Washington, DC 20006

George M. Fleming
Mississippi PSC
P.O. Box 1174
Jackson, MS 39215

Kenneth V. Reif
NASUCA
1580 Loga Street
Suite 610
Denver, CO 80203

Glenn S. Richards
David S. Konczal
Fisher, Wayland, Cooper, Leader and Zaragoza, LLP
(NevadaCom, Inc.)
2001 Pennsylvania Avenue, NW - Suite 400
Washington, DC 20006

Timothy S. Carey
Ann Kutter
Michael P. Sasso
State Consumer Protection Board
Five Empire State Plaza - Suite 2101
Albany, NY 12223

Anne F. Curtin
Douglas W. Elfner
State Consumer Protection Board
Five Empire State Plaza - Suite 2101
Albany, NY 12223

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
Nextel Communications, Inc.
1450 G Street, NW - Suite 425
Washington, DC 20005

Jodi J. Bair
Ohio PUC
30 East Broad Street
Columbus, OH 43215

Teresa S. Werner
Piper & Marbury, LLP
(Omnipoint Comms.)
1200-19th Street, NW
Seventh Floor
Washington, DC 20036

Terrence J. Buda
Frank B. Wilmarth
Bohdan R. Pankiw
Pennsylvania PUC
P.O. Box 3265
Harrisburg, PA 17105

Katherine M. Harris
Stephen J. Rosn
John P. Stanley
Wiley, Rein & Fielding (PCIA)
1776 K Street, NW
Washington, DC 20006

Mary McDermott
Todd B. Lantor
PCIA
500 Montgomery Street
Suite 700
Alexandria, VA 22314

Richard S. Myers
William R. Layton
Myers Keller Communications Law Group
(Petroleum Comms.)
1522 K Street, NW - Suite 1100
Washington, DC 20005

Marjorie K. Conner
Francine Matthews
Michelle Walsh
Hunton & Williams (Pilgrim Telephone)
1900 K Street, NW
Washington, DC 20006

Luisa L. Lancetti
Wilkinson, Barker, Knauer & Quinn, LLP
(PrimeCo)
2300 N Street, NW
Washington, DC 20037

Tiki Gaugler
Qwest
4250 North Fairfax Drive
Arlington, VA 22203

Sylvia Lesse
Marci Greenstein
Kraskin, Lesse & Cosson, LLP
(Rural Cellular Assn.)
2120 L Street, NW - Suite 520
Washington, DC 20037

Michael R. Bennet
Edward D. Kania
Bennet & Bennet, PLLC
(Rural Telecommunications)
1019-19th Street, NW - Suite 500
Washington, DC 20036

Margot Smiley Humphrey
Koteen & Naftalin, LLP
(Rural Telephone Coalition)
1150 Connecticut Avenue, NW
Washington, DC 20036

L. Marie Guillory
R. Scott Reiter
NTCA
(Rural Telephone Coalition)
2626 Pennsylvania Avenue, NW
Washington, DC 20037

Stuart Polikoff
Stephen Pastorkovich
OPASTCO
21 Dupont Circle, NW
Suite 700
Washington, DC 20036

Robert M. Lynch
Durward D. Dupre
Barbara R. Hunt
SBC Comms.
One Bell Plaza - Room 3026
Dallas, TX 75202

Irene A. Etzkorn
Siegel & Gale
Ten Rockefeller Plaza
New York, NY 10020

Carl K. Oshiro
Small Business Alliance for Fair Utility Regulation
100 First Street
Suite 2540
San Francisco, CA 94105

Carole C. Harris
Christine M. Gill
Anne L. Fruehauf
McDermott, Will & Emery (Southern Communications Services)
600-13th Street, NW
Washington, DC 20005

Leon M. Kestenbaum
Jay C. Keithley
Norina T. Moy
Sprint
1850 M Street, NW - Suite 1110
Washington, DC 20036

Jonathan M. Chambers
Sprint
1801 K Street, NW
Suite M112
Washington, DC 20006

Charles C. Hunter
Catherine M. Hannan
Hunter Communications Law Group (T RA)
1620 Eye Street, NW
Suite 701
Washington, DC 20006

Laurence E. Harris
David S. Turetsky
Stuart H. Kupinsky
Teligent, Inc.
8065 Leesburg Pike - Suite 400
Vienna, VA 22182

Philip L. Verveer
Gunnar D. Halley
Willkie Farr & Gallagher (Teligent)
Three Lafayette Centre
1155-21st Street, NW
Washington, DC 20036

Texas Citizen Action
P.O. Box 10231
Austin, TX 78756

Kenan Ogelman
Texas Office of Public Utility Counsel
1701 N. Congress
Suite 9-180
P.O. Box 12397
Austin, TX 78711

Rick Guzman
Texas Office of Public Utility Counsel
1701 N. Congress
Suite 9-180
P.O. Box 12397
Austin, TX 78711

Mitchell F. Brecher
Fleischman and Walsh, LLP
(Time Warner Telecom)
1400-16th Street, NW
Washington, DC 20036

Peter M. Connolly
Koteen & Naftalin, LLP
(US Cellular Corp.)
1150 Connecticut Avenue, NW
Washington, DC 20036

Christine O. Gregoire
Shannon E. Smith
WUTC
1400 S. Evergreen Park Drive, SW
P.O. Box 40128
Olympia, WA 98504

Kathryn Marie Krause
U S WEST
1020-19th Street, NW
Suite 700
Washington, DC 20036

Leslie A. Cadwell
Vermont Department of Public Service
112 State Street
Drawer 20
Montpelier, VT 05620

ITS
1231-21st Street, NW
Washington, DC 20036