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DOCKET FILE COPY ORIGINAL



September 29, 1999

VIA HAND DELIVERY

Ms. Magalie Roman Salas  
Secretary  
Office of the Secretary  
Federal Communications Commission  
Room TW-B-204  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

RECEIVED

SEP 29 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

99-295

Re: Application by New York Telephone Company (d/b/a Bell Atlantic - New York), Bell Atlantic Communications, Inc., NYNEX Long Distance Company, and Bell Atlantic Global Networks, Inc., for Authorization to Provide In-Region, InterLATA Services in New York

Dear Ms. Salas:

This is the cover letter for the Application by New York Telephone Company (d/b/a Bell Atlantic - New York), Bell Atlantic Communications, Inc., NYNEX Long Distance Company, and Bell Atlantic Global Networks, Inc., for Authorization to Provide In-Region, InterLATA Services in New York ("the Application").

1. The Application consists of (a) a stand-alone document entitled "Application by Bell Atlantic - New York for Authorization To Provide In-Region, InterLATA Services in New York" ("the Brief"), and (b) supporting documentation. The Application contains confidential information. We are filing confidential and redacted versions of the Application.

2. Specifically, we are herewith submitting for filing:

- a. One original of only the portions of the Application that contain confidential information (in paper form);

REDACTED -- FOR PUBLIC INSPECTION

- b. One original of a redacted Application (in paper form);
- c. Two copies of the redacted Application (in paper form);
- d. One CD-ROM set containing the supporting-documentation portion of the redacted Application;
- e. One diskette containing the Brief; and
- f. Five additional copies of the redacted Application (partly in paper form and partly on CD-ROM, in accordance with the Commission's filing requirements), so that each Commissioner may receive a copy.

3. We are also tendering to you certain copies of this letter and of portions of the Application for date-stamping purposes. Please date-stamp and return these materials.

4. Under separate cover, we are submitting copies (redacted as appropriate) of the Application to Ms. Janice Myles, Policy and Program Planning Division, Common Carrier Bureau, Federal Communications Commission, Room 5-C-327, 455 12th Street, S.W., Washington, D.C. 20554. We are also submitting copies (redacted as appropriate) to the Department of Justice, to the New York Public Service Commission, and to ITS (the Commission's copy contractor).

Thank you for your assistance in this matter. If you have any questions, please call me at 703-974-2944 or Steven McPherson at 703-974-2808.

Very truly yours,

*Mike Glover / s.e.m.*

Michael E. Glover

Encs.

**RECEIVED**

Before the  
Federal Communications Commission  
Washington, D.C. 20554

SEP 29 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Application by New York Telephone )  
Company (d/b/a Bell Atlantic - )  
New York), Bell Atlantic )  
Communications, Inc., NYNEX Long )  
Distance Company, and Bell Atlantic )  
Global Networks, Inc., for )  
Authorization To Provide In-Region, )  
InterLATA Services in New York )

Docket No. 99-295

APPLICATION BY BELL ATLANTIC - NEW YORK  
FOR AUTHORIZATION TO PROVIDE IN-REGION, INTERLATA SERVICES  
IN NEW YORK

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September 29, 1999

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**ATTACHMENTS**

Attachment A: Figures and Maps

- Exhibit 1. Bell Atlantic's Checklist Compliance Under the 1996 Act
- Exhibit 2. Local Competition in New York
- Exhibit 3. Total CLEC Lines by Area Code
- Exhibit 4. CLEC Facilities-Based Lines by Area Code
- Exhibit 5. CLEC UNE Platform Lines by Area Code
- Exhibit 6. CLEC Resold Lines by Area Code

Attachment B: Required Statements

Attachment C: Detailed Index of Appendices (Separately Bound)

**APPENDICES**

Appendix A: Declarations (and Accompanying Exhibits)

- Volume 1. (Tab 1) Joint Declaration of Paul A. Lacouture and Arthur J. Troy  
(Compliance with Section 271 Competitive Checklist)
- Volume 2. (Tab 2) Joint Declaration of Stuart Miller and Marion C. Jordan  
(Compliance with Operations Support Systems Requirements)
- Volume 3. (Tab 3) Joint Declaration of George Dowell and Julie Canny  
(Performance Metrics)
- (Tab 4) Joint Declaration of Robert H. Gertner and Gustavo E. Bamberger  
(Performance Metrics)

Volume 4. (Tab 5) Declaration of Maura C. Breen  
(Compliance with Section 272 Requirements)

(Tab 6) Declaration of Stewart Verge  
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(Tab 7) Declaration of Susan C. Browning  
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Volume 5. (Tab 8) Declaration of William Taylor  
(Long Distance and Local Exchange Competition)

(Tab 9) Declaration of Paul MacAvoy  
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Appendix B: Partial Record of New York PSC Docket No. 94-C-0095  
(All Filings Regarding Section 271 Compliance)

Appendix C: Record of New York PSC Docket No. 97-C-0271  
(Entire Section 271 Proceeding)

Appendix D: Record of New York PSC Case 98-C-0690  
(Entire Proceeding Regarding Motion of the New York PSC To Examine  
Methods by Which Competitive Local Exchange Carriers Can Obtain and  
Combine Unbundled Network Elements)

Appendix E: Record Of New York PSC Docket No. 97-C-0139  
(All Filings Regarding Carrier-to-Carrier Portion of Proceeding Regarding  
Motion of the New York PSC To Review Service Quality Standards of Telephone  
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Appendix F: Interconnection Agreements

Appendix G: New York PSC — Selected Pricing Orders  
(All Orders Regarding the Establishment of Prices for Interconnection, UNEs, and  
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Appendix H: Selected Tariffs  
(Tariffs Containing Prices for Interconnection (NY PSC 914 Tariff), Resale  
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Appendix I: Selected Materials  
(Additional New York PSC Orders Cited in Brief and Declarations; Filings in  
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Appendix J: CLEC Handbook

## INTRODUCTION AND SUMMARY

The *more than one million* lines that local telephone competitors are currently serving in New York conclusively prove that the local market in New York is not merely open to competition, but irreversibly so.

The numbers speak for themselves. Across the State, local competitors are using all 14 of the checklist items to serve:

- more than 650,000 lines through their own facilities;
- more than 300,000 lines through resale; and
- more than 160,000 lines through unbundled network elements.

In addition, competitors are exchanging roughly 2.5 billion minutes of traffic each month with Bell Atlantic over a local interconnection network that is nearly one-third the size of Bell Atlantic's own local interconnection network in New York.

Even Bell Atlantic's loudest detractors have elsewhere acknowledged how open the New York market is. For example, in late July, MCI WorldCom told the California Commission that it was investing to serve both business and residential consumers in New York because there "economic and regulatory conditions are right." MCI WorldCom recently told the Georgia Commission that it was disappointed with the Georgia process for opening up local markets and "instead will shift resources to Florida, where proposed testing more closely mirrors the successful market-opening process underway in New York." And just two weeks ago, AT&T told the Virginia Commission that "proven OSS can be achieved most reliably through objective, stringent and meaningful third-party testing": "Such testing has been performed in New York."

These candid remarks reflect years of hard work by Bell Atlantic under the close supervision of the New York Public Service Commission and in cooperation with the