

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

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DEC 15 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Access Charge Reform)	CC Docket No. 96-262
)	
Price Cap Performance Review for Local Exchange Carriers)	CC Docket No. 94-1
)	
Interexchange Carrier Purchases of Switched Access Services Offered By Competitive Local Exchange Carriers)	CCB/CPD File No. 98-63
)	
Petition of U S WEST Communications, Inc. For Forbearance from Regulation as a Dominant Carrier in the Phoenix, Arizona MSA)	CC Docket No. 98-157

**REPLY
OF THE
UNITED STATES TELECOM ASSOCIATION**

The United States Telecom Association (USTA) respectfully submits its reply to oppositions filed on December 1, 1999 in the above-referenced proceedings. In its petition, USTA requested clarification of two specific issues. First, USTA requested that when a LEC receives either Phase I or Phase II flexibility for special access services, that relief would also apply to non-price cap services, such as packet-based services. No party opposed USTA's request.

Second, USTA requested that dedicated tandem multiplexers, dedicated tandem trunk ports and dedicated local switching trunk ports be included with other dedicated services under the Section 69.709 dedicated transport showing and that shared multiplexers be included with other traffic sensitive charges pursuant to Section 69.713. Only one party opposed USTA's request. AT&T claims that trunk port costs are not dedicated, but that such costs are associated

with the switch. Therefore, AT&T does not agree that dedicated trunk ports should be included in the Section 69.709 dedicated transport showing.

AT&T's claim is wrong. Each trunk port included in Local Switching serving an interexchange carrier (IXC) point of presence is dedicated to the use of that IXC. There is a one-to-one correlation between the dedicated trunk port and the switched dedicated transport facility.

AT&T also claims that trunk ports are associated with the switch and not with dedicated transport. Likewise, this claim is wrong. Dedicated trunk ports are associated with both the switch and the dedicated transport facility. Therefore, it is appropriate to include trunk ports with dedicated transport.

Given that AT&T's basis for opposing USTA's petition is erroneous and no other party opposed USTA's request, USTA urges the Commission to grant its petition for clarification. In addition, for the reasons set forth in USTA's comments filed December 1, 1999, USTA also urges the Commission to grant the petitions filed by GTE and Bell Atlantic and to oppose the petition filed by Network Access Solutions.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION

By 

Its Attorneys:

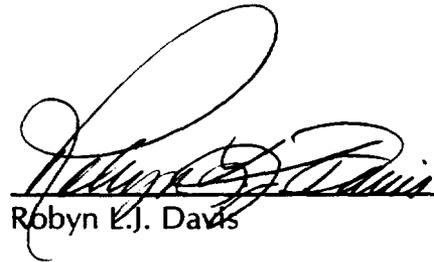
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December 15, 1999

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on December 15, 1999 Reply Comments of the United States Telecom Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


Robyn L.J. Davis