

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

In the Matters of )  
 )  
 Ameritech Corporation Telephone Operating )  
 Companies' Continuing Property Records Audit, )  
 )  
 Bell Atlantic (North) Telephone Companies' )  
 Continuing Property Records Audit )  
 )  
 Bell Atlantic (South) Telephone Companies' )  
 Continuing Property Records Audit )  
 )  
 BellSouth Telecommunications' Continuing )  
 Property Records Audit )  
 )  
 Pacific Bell and Nevada Bell Telephone )  
 Companies' Continuing Property Records Audit )  
 )  
 Southwestern Bell Telephone Company's )  
 Continuing Property Records Audit )  
 )  
 U S West Telephone Companies' Continuing )  
 Property Records Audit )  
 )  
 In the Matter of )  
 )  
 MCI WorldCom, Inc. )  
 On Request For Inspection of Records )

DOCKET FILE COPY ORIGINAL

CC Docket No. 99-117

ASD File No. 99-22

FOIA Control No. 99-163

**OPPOSITION OF SBC COMMUNICATIONS INC. TO  
PETITION FOR PARTIAL RECONSIDERATION**

SBC Communications Inc. (SBC) opposes the petition by AT&T Corp. and MCI WorldCom, Inc. for partial reconsideration of the Commission's December 6, 1999 *Memorandum Opinion and Order* ("the COE FOIA Order") in the above-referenced dockets.<sup>1</sup>

<sup>1</sup> See *In re: Ameritech Corporation Telephone Operating Companies' Continuing Property Records Audit, et al.*, *In re: MCI WorldCom, Inc. on Request for Inspection of Records*, Petition,

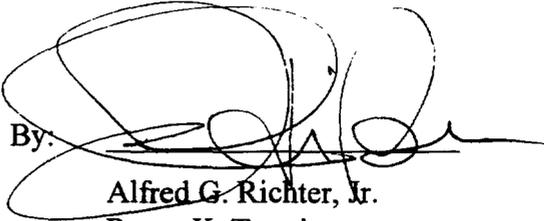
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AT&T and MCI, not satisfied with disclosure permitted by the Commission, now seek reconsideration. They claim that they should be permitted to view vendor-specific pricing information. In SBC's view, the Commission should not have allowed *any* inspection of the highly proprietary, trade secret information contained in the audit documents; and it absolutely should not extend the scope of documents permitted, and authorize even *greater* disclosure. The Commission correctly recognized that the information had little, if any, probative value to the issue of the scoring methodology on "not found" items, and it correctly concluded that keeping such information confidential would "not compromise the ability of the public to respond to" the scoring methodology issue.<sup>5</sup> Moreover, the Commission correctly concluded that the (very limited) benefits of such disclosure were outweighed by the potential harm of allowing disclosure.

Accordingly, the Commission should deny the *AT&T/MCIW Petition*.

Respectfully submitted,

SBC COMMUNICATIONS INC.

By: 

Alfred G. Richter, Jr.

Roger K. Toppins

John S. di Bene

One Bell Plaza, Room 3022

Dallas, Texas 75202

(214) 464-2040

Attorneys for SBC Communications Inc.

Date: January 20, 2000

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<sup>5</sup> *COE FOIA Order*, at ¶ 13.

## CERTIFICATE OF SERVICE

I, Katie Turner, do hereby certify that copies of the "Opposition of SBC Communications Inc. to Petition for Partial Reconsideration" in CC Docket No. 99-117, ASD File No. 99-22, and FOIA Control No. 99-163 were served by first class United States Mail, postage prepaid, upon the parties appearing on the attached service list on the date set forth below.

A handwritten signature in cursive script that reads "Katie M. Turner". The signature is written in black ink and is positioned above a horizontal line.

Katie Turner

January 20, 2000

SERVICE LIST

MAGALIE ROMAN SALAS  
SECRETARY,  
FEDERAL COMMUNICATIONS  
COMMISSION  
THE PORTALS  
445 12<sup>TH</sup> STREET SW  
WASHINGTON DC 20554

KEN MORAN  
CHIEF, ACCOUNTING SAFEGUARDS  
DIVISION  
FEDERAL COMMUNICATIONS  
COMMISSION  
ROOM 6-B201  
445 12<sup>TH</sup> STREET SW  
WASHINGTON DC 20554

SUSAN J BAHR  
LAW OFFICES OF SUAN BAHR PC  
P O BOX 86089  
MONTGOMERY VILLAGE MD 20886-6089

EDWARD H. SHAKIN  
EDWARD D YOUNG III  
MICHAEL E GLOVER  
BELL ATLANTIC CORPORATION  
1320 NORTH COURTHOUSE ROAD  
8<sup>TH</sup> FLOOR  
ARLINGTON VA 22201

MYRA KAREGIANES  
GENERAL COUNSEL  
ILLINOIS COMMERCE COMMISSION  
527 EAST CAPITOL AVENUE  
SPRINGFIELD IL 62701

ITS  
1231 20<sup>TH</sup> STREET NW  
WASHINGTON DC 20036

ANDY MULITZ  
CHIEF, LEGAL BRANCH  
ACCOUNTING SAFEGUARDS DIVISION  
FEDERAL COMMUNICATIONS  
COMMISSION  
ROOM 6-B201  
445 12<sup>TH</sup> STREET SW  
WASHINGTON DC 20554

JAMES T HANNON  
U S WEST COMMUNICATIONS INC  
1020 19<sup>TH</sup> STREET NW  
SUITE 700  
WASHINGTON DC 20036

M ROBERT SUTHERLAND  
STEPHEN L EARNEST  
BELLSOUTH CORPORATION  
1155 PEACHTREE STREET NE  
ATLANTA GA 30309-3610

MARY L HENZE  
EXECUTIVE AND FEDERAL REGULATORY  
AFFAIRS  
BELLSOUTH  
1133 21<sup>ST</sup> STREET NW  
SUITE 900  
WASHINGTON DC 20036-3351