

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

RECEIVED

APR - 5 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matters of)
)
Deployment of Wireline Services Offering)
Advanced Telecommunications Capability)
)
and)
)
Implementation of the Local Competition)
Provisions of the)
Telecommunications Act of 1996)

CC Docket No. 98-147

CC Docket No. 96-98

**REPLY OF AT&T CORP. TO RESPONSES
TO PETITIONS FOR CLARIFICATION AND RECONSIDERATION**

Mark C. Rosenblum
Stephen C. Garavito
Richard H. Rubin
AT&T CORP.
Room 1131M1
295 N. Maple Avenue
Basking Ridge, NJ 07920
(908) 221-8100

C. Michael Pfau
Public Policy Director
AT&T CORP.
295 N. Maple Avenue
Basking Ridge, NJ 07920

James L. Casserly
Christopher J. Harvie
James J. Valentino
Michael H. Pryor
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY & POPEO, P.C.
701 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 434-7300

April 5, 2000

No. of Copies rec'd
List ABCDE

219

TABLE OF CONTENTS

EXECUTIVE SUMMARY	ii
I. THE COMMENTS SUPPORT AT&T’S POSITION THAT ILECs MUST NOT PRECLUDE UNE-P CLECs FROM OFFERING VOICE AND ADVANCED SERVICES OVER A SINGLE LOOP.	1
II. THE COMMISSION SHOULD REJECT BELLSOUTH’S AND BELL ATLANTIC’S PETITIONS.	6
A. Presumption for deployment of advanced services	7
B. Modification of the 180-day implementation schedule	7
C. Disposition of known interfering technologies.....	8
D. 18,000-foot threshold for proving voice degradation	8
E. Loop testing	9
CONCLUSION.....	10

EXECUTIVE SUMMARY

The record strongly supports AT&T's request that the Commission clarify that ILECs must offer nondiscriminatory access to loop capabilities and fully functional and nondiscriminatory operational procedures necessary to enable UNE-P CLECs to offer voice and advanced services over a single loop. The ILECs offer no persuasive legal, technical, economic, or practical rationale for denying this request, nor can they. UNE-P CLECs are only seeking access to the same functionalities and operational procedures utilized when an ILEC provides both voice and xDSL services itself, shares the loop with an "advanced services affiliate," or shares the loop with a data CLEC.

The Commission adopted the Line Sharing Order because it recognized that ILECs would wield substantial cost and marketing advantages against data CLECs in the provision of advanced services if ILECs alone had the practical ability to offer voice and data service over the same line. Competitive inequities will persist, however, until the ILECs provide UNE-P carriers -- and not just data CLECs -- with non-discriminatory access to the high-frequency spectrum of the loops they purchase.

The language in the Order which has caused confusion stands for two perfectly appropriate but unremarkable propositions: (1) that mandatory line-sharing obligations apply only where incumbents retain ownership of the loop and (2) that an ILEC may not enable other carriers to use a portion of a UNE loop without the permission of the CLEC that already has purchased the entirety of the line. The ILECs, however, have hijacked paragraph 72 by seeking to use it as a means to escape their statutory obligation to provide UNE-P CLECs with all the functions and capabilities of the entire loop -- including both low and high frequencies. The Commission should reject the ILEC interpretation, as well as all their other efforts to frustrate the pro-competitive intentions and provisions of the Line Sharing Order.

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

In the Matters of)	
)	
Deployment of Wireline Services Offering)	CC Docket No. 98-147
Advanced Telecommunications Capability)	
)	
and)	
)	
Implementation of the Local Competition)	CC Docket No. 96-98
Provisions of the)	
Telecommunications Act of 1996)	

**REPLY OF AT&T CORP. TO RESPONSES
TO PETITIONS FOR CLARIFICATION AND RECONSIDERATION**

AT&T Corp. hereby replies to the oppositions and other responses to the petitions for reconsideration and/or clarification filed by various parties regarding the Line Sharing Order.

I. THE COMMENTS SUPPORT AT&T's POSITION THAT ILECs MUST NOT PRECLUDE UNE-P CLECs FROM OFFERING VOICE AND ADVANCED SERVICES OVER A SINGLE LOOP.

The comments submitted by competitive providers underscore the need for the Commission to clarify that ILECs must offer nondiscriminatory access to loop capabilities and fully functional and nondiscriminatory operational procedures necessary to enable UNE-P CLECs, either on their own or with a cooperating carrier, to offer voice and advanced services over a single loop. Tellingly, the ILECs offer no technical, economic, or practical rationale for precluding a UNE-P CLEC from utilizing the high-frequency spectrum ("HFS") of the local loop in order to offer xDSL service.^{1/} No such rationale exists, for the simple reason that UNE-P CLECs are only seeking access to the same functionalities and operational procedures utilized when an ILEC provides both voice and xDSL services itself, shares the loop with an "advanced services affiliate," or shares the loop with a data CLEC ("DLEC").

^{1/} See, e.g., SBC Comments at 4 ("SBC agrees that it is technically possible to perform the same ILEC services and functions for both shared and non-shared lines"); GTE Comments at 8 ("If the Commission nonetheless decides

Multiple parties support the clarification requested by AT&T and MCI.^{2/} The comments demonstrate that ILECs are in fact precluding UNE-P CLECs from furnishing both voice and advanced services over a single loop.^{3/} As a result, ILECs are able to leverage the growing demand for DSL service as a means to hinder carriers using UNE-P from competing in markets for both voice and bundled services.

This is not what the Commission intended, or what the law requires. The Commission adopted the Line Sharing Order because it recognized that ILECs would wield substantial cost and marketing advantages against DLECs in the provision of advanced services if ILECs alone can provide data service over the same line used to provide voice service.^{4/} Competitive inequities will persist, however, until the ILECs provide UNE-P carriers -- and not just DLECs -- with non-discriminatory access to the HFS of the loops they purchase.

The ILECs' interpretation of the Line Sharing Order is not credible. The language they seize upon really only stands for two unremarkable propositions: (1) that mandatory line-sharing obligations apply only where ILECs retain ownership of the loop and (2) that an ILEC may not enable other carriers to use a portion of a UNE loop without the permission of the CLEC that already has purchased the entirety of the line. The ILECs, however, have hijacked paragraph 72 by seeking to use it as a means to escape their statutory obligation to provide UNE-P CLECs with access to all the functions and capabilities of the entire loop -- including both the low and high frequencies.

to adopt the new rules requested by [AT&T and MCI], it must allow sufficient time for ILECs, working with AT&T, MCI WorldCom and other interested parties, to develop the requisite methods and procedures”).

^{2/} NorthPoint Reply at 2-8; Sprint Comments at 1-2; CompTel Comments at 2; Comments of Cox Communications at 2-3; Supplement to Comments of IP Communications at 1-3; Comments of the Telecommunications Resellers Association (TRA) at 3.

^{3/} BellSouth Comments at 3-11; SBC Comments at 2-4; Bell Atlantic Comments at 3. *See also* NorthPoint Reply at 3 (“incumbent LECs refuse to deliver the lower frequency portion of the line to a voice competitive LEC and the higher frequency portion to a DSL competitive LEC”); Supplement to Comments of IP Communications at 1-3.

^{4/} Line Sharing Order at ¶ 33, 39-41, 56-59.

The comments in this proceeding not only refute the ILECs' reading of the Line Sharing Order, but also underscore the need for clarification that ILECs must provide CLECs utilizing UNE-P with the support necessary to efficiently gain access to HFS and thereby offer advanced services. There is no basis for permitting the ILECs to thwart line-sharing agreements between a UNE-P CLEC offering voice service and a DLEC seeking to furnish advanced services over the HFS of a loop obtained by the UNE-P CLEC. As multiple commenters recognize,^{5/} this outcome would contravene the language and competitive objectives of the Line Sharing Order.^{6/}

Sprint notes that, in view of the Line Sharing Order's objective of promoting competition in both local and advanced services, "it is impossible to conclude that the Commission intended to prevent CLECs from using xDSL in conjunction with UNE-P."^{7/} NorthPoint notes that, unless ILECs are required to provide the necessary loop functionalities and support services to enable CLEC voice providers using the UNE-P and DLECs to share the loop obtained by the CLEC, the ILECs will succeed in "turn[ing] the Line Sharing Order on its head; customers who wished to obtain DSL service from competitive LECs via shared lines would be deprived of any choice in voice providers, a result that is clearly at odds" with the Communications Act and the Line Sharing Order.^{8/}

Commenters also stress that ILEC efforts to deny CLECs using the platform access to the HFS of loops and thereby the ability to offer advanced services contravenes Section 251(c)(3) of the 1996 Act.^{9/} Cox notes that a CLEC that purchases a loop acquires "the entire loop," including "the portions used to provide voice service and the portions used to provide DSL

^{5/} Cox Comments at 2-3; TRA Comments at 11-12; Sprint Comments at 2; NorthPoint Reply at 7-8.

^{6/} See Line Sharing Order at ¶ 47 (noting that competitors are entitled to "obtain combinations of network elements and use those elements to provide circuit switched voice service as well as data services"); *id.* at ¶ 57 (noting that line sharing is not designed to "permit incumbent LECs to become entrenched in the provision of voice service" but should instead help "enable competitive LECs to continue to compete with incumbents for the provision of a full range of services"); *id.* at n.163 (endorsing line-sharing arrangements between voice CLECs and DLECs).

^{7/} Sprint Comments at 2.

^{8/} NorthPoint Reply at 8.

^{9/} Cox Comments at 2-3; TRA Comments at 11.

service.”^{10/} The Commission’s unbundling rules expressly state that the purchase of an unbundled element includes “all of the unbundled network element’s features, functions and capabilities,” and must enable the acquiring CLEC “to provide any telecommunications service that can be offered by means of that network element.”^{11/} Thus, the fact that a UNE-P CLEC might require ILEC support to gain efficient access to the HFS of a loop does not relieve the ILEC of its unbundling obligation.^{12/} When a CLEC purchases an entire loop, it is entitled to utilize all of the loop’s capabilities, functionalities, and support, including “the frequencies above those used for analog voice services.”^{13/} Surely no law or logic supports the proposition that an ILEC may provide *less* support to a carrier willing to purchase an *entire* loop than it does to carriers purchasing only a fraction of a loop.

Bell Atlantic erroneously suggests that AT&T’s request constitutes an effort to obtain unbundled access to an incumbent’s “packet switching functionality and DSLAMs.”^{14/} This is flatly incorrect. AT&T seeks Commission affirmation that CLECs purchasing a loop as part of UNE-P are provided HFS access and support equivalent to that which the ILEC already provides to itself and will soon provide to DLECs pursuant to the Line Sharing Order.^{15/}

BellSouth argues that the Line Sharing Order precludes the clarification AT&T seeks, because that order purportedly mandates that, where a UNE-P CLEC seeks to provide advanced

^{10/} Cox Comments at 2. The language of the Line Sharing Order further supports these views, since the Commission there expressly noted its obligation to ensure that “carriers are not denied the opportunity to provision services that rely on different frequency bands within the loop.” See Line Sharing Order at ¶ 26.

^{11/} *Id.* at 3; 47 C.F.R. § 51.307(c).

^{12/} See *id.*; see also UNE Remand Order at ¶¶ 190-95 (concluding that ILECs may not deny competitors access to xDSL-capable loops).

^{13/} Line Sharing Order at ¶ 17.

^{14/} Bell Atlantic Comments at 5.

^{15/} The relief sought herein by AT&T is necessary to ensure compliance with the statutory prohibition against discrimination in the provision of loops and OSS, since AT&T is only asking for the same physical arrangements and support services that an ILEC already provides to itself and to affiliates and will soon provide to DLECs. 47 U.S.C. § 251(c)(3); TRA Comments at 11; *cf.* Line Sharing Order at ¶ 67 (“the same architecture that an incumbent uses to provide its own shared-line xDSL services is capable of providing shared line access to requesting carriers with minimal modification”). Whether DSLAMs are properly treated as a UNE is currently under review in the reconsideration phase of the UNE remand proceeding.

services over the UNE-P loop, “the CLEC would have to install the splitter in order to combine the elements to provide voice and data services.”^{16/} This interpretation flatly mischaracterizes the Line Sharing Order. In the passage cited by BellSouth, the Commission was in fact *rejecting* ILEC arguments that the scenario described by BellSouth would suffice for DLECs, and thereby obviate the need for line-sharing. The Commission was simply acknowledging one possible means by which DLECs could obtain access to the HFS portion of a loop without ILEC assistance; it then went on to mandate line-sharing due to the costs and burdens associated with the scenario proffered by the ILECs.^{17/} Forcing CLEC voice providers to relinquish UNE-P in order to offer their customers advanced services would have the same competition-constraining effects the Commission sought to redress in the Line Sharing Order. Thus, an ILEC’s failure to provide UNE-P CLECs nondiscriminatory access to the HFS of a loop necessarily impairs the CLEC’s ability to provide advanced services, either on its own or with a cooperating DLEC.

Bell Atlantic wrongly suggests that the relief sought by AT&T would put the incumbent “in the business of managing the CLEC-to-DLEC sharing relationship or otherwise playing traffic cop between the two competitive carriers.”^{18/} This is wholly inaccurate. The ILEC would provide functionality and support services that enable access to HFS on the loop purchased by the UNE-P CLEC. To offer advanced services, the UNE-P CLEC would either deploy its own DSLAM or arrange with a DLEC to do so. Whether the DSLAM is owned by the UNE-P CLEC or by a DLEC, the physical arrangements and support services the ILEC would have to offer remain the same. Responsibility for managing any relationship with the DLEC would lie with the UNE-P CLEC -- the entity with the rights to the full unbundled loop.

^{16/} BellSouth Comments at 4.

^{17/} See Line Sharing Order at ¶ 48-50. As the Commission noted, “splitters are generally located at or adjacent to the main distribution frame (MDF) at an incumbent’s central office,” which permits “the incumbent to easily control the local loop and the splitter functions.” *Id.* at ¶ 78.

^{18/} Bell Atlantic Comments at 7.

Finally, some commenters have misinterpreted AT&T's request that customers who decide to switch to a CLEC's voice service should not be denied advanced services from the ILEC if that is the only means by which advanced services can be provided. This interim solution is needed because of ILEC recalcitrance in offering – much less implementing – processes and procedures that enable a UNE-P CLEC to provide voice and advanced services on the same loop.^{19/} AT&T requests that the Commission establish an expeditious timetable for the ILECs to develop such procedures,^{20/} but in the interim ILECs must not be permitted to engage in unreasonable discrimination by withdrawing advanced (*e.g.*, DSL) service when the customer chooses a different voice provider.

Unless the Commission grants the relief requested by AT&T, ILECs will retain unfair and anticompetitive advantages in the voice market. The only consumers who will be able to benefit from the efficiencies and cost advantages of combining voice and advanced services over a single line will be those who subscribe to the ILECs' voice services.

II. THE COMMISSION SHOULD REJECT BELLSOUTH'S AND BELL ATLANTIC'S PETITIONS.

The record does not support Bell Atlantic's and BellSouth's requests that the Commission reconsider or "clarify" various important, pro-competitive rulings. As pointed out by ALTS and others, the requests rehash arguments already assessed and rejected by the Commission and provide no basis for reconsideration.^{21/}

^{19/} See Response of AT&T Corp. to Petitions for Reconsideration at 4.

^{20/} AT&T is concerned that, absent a strict timetable, ILECs may delay implementation of the needed systems and procedures in order to retain the substantial competitive benefits that accrue when only one voice provider -- the ILEC -- is capable of offering voice and advanced services over the same line.

^{21/} See, *e.g.*, ALTS Opposition at 3; Rhythms Opposition at 1; Covad Opposition at 2.

A. Presumption for deployment of advanced services

BellSouth requests that the Commission reverse its conclusion that the successful deployment of a new technology in one state creates a presumption that it is suitable for deployment elsewhere. NorthPoint and others note that BellSouth offers no technological justification for its proposal,^{22/} and that BellSouth ignores the safeguards adopted by the Commission to address the specific concerns BellSouth raises.^{23/} Moreover, the Commission's rule establishes a presumption that may be rebutted and thus affords ILECs ample opportunity to raise with state commissions any concerns about network degradation.^{24/} The Commission's rule appropriately expedites deployment of advanced services, while safeguarding the integrity of the network. BellSouth's proposal is a prescription for unnecessary delay.^{25/}

B. Modification of the 180-day implementation schedule

Bell Atlantic requests that the Commission "clarify" that the Line Sharing Order does not preclude a phased deployment schedule for line sharing if the industry agrees through a collaborative process to delay implementation. It is now clear that there is no industry consensus.^{26/} Several commenters share AT&T's concern that further delay is unwarranted and would further entrench the incumbents' advantage.^{27/} Commenters also reject a blanket extension and argue that any deferral of the deadline should be accomplished on a case-by-case

^{22/} See, e.g., NorthPoint Reply at 10 (BellSouth "does not offer one concrete example of a technology that would be compatible with certain network architectures" but not with others); Covad Opposition at 12-13.

^{23/} NorthPoint Reply at 9 (noting that the Commission specifically addressed BellSouth's concern when it concluded that a competing carrier's use of the calculation-based method of demonstrating spectrum compatibility should allay concerns about interference); Comptel Opposition at 2-3.

^{24/} TRA Comments at 9-10; NorthPoint Reply at 10; BroadSpan Opposition at 3; Sprint Comments at 4-5; Rhythms Opposition at 5.

^{25/} See TRA Comments at 10; NorthPoint Reply at 10; Covad Opposition at 12; BroadSpan Opposition at 3.

^{26/} See NorthPoint Reply at 15 (if commenting parties oppose Bell Atlantic's proposal, the record would show that the proposal lacks consensual support and should be denied).

^{27/} See e.g., TRA Comments at 7-8; Covad Opposition at 3-6; Rhythms Opposition at 5-6.

basis, pursuant to a request by waiver, or if there is unanimous agreement.^{28/} At this point, if there is any unanimity, it is that Bell Atlantic's request for "clarification" should be denied.

C. Disposition of known interfering technologies

Bell Atlantic contends that "market forces" should decide the fate of incumbent LEC facilities and that the Commission's determination that states could require incumbent LECs to remove or relocate existing disturbers in order to permit installation of new technologies violates a "first-in-time" concept. Contrary to Bell Atlantic's contention, market forces cannot be relied upon to influence the decisions of carriers that retain monopoly power and can wield that power effectively to delay competition.^{29/} A number of commenters thus agree that the Commission struck the appropriate balance by neither establishing a national sunset period for AMI T-1s nor leaving these decisions in the hands of incumbents who have a vested interest in retaining AMI T-1 lines.^{30/} Moreover, to the extent that the Commission's decision departs from the "first in time" principle, it is a narrow, fully explained, and necessary exception justified by the record.^{31/} As NAS notes, however, the Commission has not required AMI T-1 to give way to xDSL; instead, it has merely placed in the hands of states, rather than the incumbents, the decision of how to address known disturbers.^{32/} This decision was manifestly correct.

D. 18,000-foot threshold for proving voice degradation

As AT&T's response explained, Bell Atlantic's proposal to assume that conditioning loops over 18,000 feet would degrade voice services artificially focused on loop length rather

^{28/} See Sprint Comments at 3-4; TRA Comments at 8-9; MCI WorldCom at 7-8.

^{29/} See NorthPoint Reply at 15.

^{30/} See, e.g., NAS Opposition at 2; BroadSpan Opposition at 8; Rhythms Opposition at 8; Covad Opposition; TRA Comments at 6; Comptel Opposition at 7-8; NorthPoint Reply at 15.

^{31/} See North Point Reply at 16; MCI WorldCom Comments at 9 (noting that the sunset of older technologies, particularly AMI T-1, which is one of the worst known disturbers, is critical to the goal of rapid and ubiquitous deployment of advanced services); Comptel Opposition at 7-8; Rhythms Opposition at 9.

^{32/} NAS Opposition at 3.

than the loss characteristics of the loop.^{33/} The record supports AT&T's conclusions. Bell Atlantic has provided no evidence to support a sweeping, generalized exemption for loops in excess of 18,000 feet.^{34/} MCI notes that, depending on the characteristics of the loop, voice service can be provided without significant degradation in loops of 20,000 feet or longer.^{35/} Thus, adoption of Bell Atlantic's proposal could impede deployment of advanced services, particularly in rural areas.^{36/} Finally, Bell Atlantic's proposal is unnecessary as the Commission's rules clearly contemplate that, upon an appropriate showing, ILECs need not condition loops if the result is significant degradation of voice services.^{37/}

E. Loop testing

AT&T joins other CLECs opposing Bell Atlantic's request to "clarify" that CLECs may access only the HFS portion of the loop for loop testing. As noted by MCI and others, there is no need for "clarification" because the Line Sharing Order is clear that CLECs have access to the entire loop facility for testing.^{38/} Moreover, as recognized by the Commission, and reaffirmed in the comments, it is critical that CLECs have such access in order to assess all relevant loop characteristics.^{39/} As to Bell Atlantic's concerns about service disruption, the Commission specifically acknowledged and addressed those concerns by noting that both CLECs and ILECs have incentives to minimize disruption and can take steps to inform customers.^{40/} Of course,

^{33/} AT&T indicated that it would not oppose a modification of the Commission's rules to account for voice degradation concerns if premised on a sound, logical measure. *See also* NorthPoint Reply at 13 (stating it would not oppose, as a general matter, on an appropriate showing, a revision that would shift the burden to the CLEC to demonstrate that conditioning is appropriate).

^{34/} *See, e.g.*, NorthPoint Reply at 13-14; BroadSpan Opposition at 6.

^{35/} MCI WorldCom Comments at 6-7.

^{36/} *See, e.g.*, Comptel Opposition at 5; MCI Comments at 6; TRA Comments (noting evidence in the record that lines over 18,000 feet are now compatible with certain xDSL technologies); BroadSpan Opposition at 6.

^{37/} *See, e.g.*, TRA at 4; Comptel Opposition at 5; MCI Comments at 6.

^{38/} MCI WorldCom Comments at 3-5; Comptel Opposition at 4; TRA Comments at 5

^{39/} Rhythms Opposition at 7; MCI WorldCom Comments at 3-5; Covad Opposition at 8; NorthPoint Reply at 11-12. *See also* ALTS Opposition at 7-8 (noting that it would violate Section 251's nondiscrimination principles if ILECs could use mechanized loop tests for line shared loops but CLECs could not).

^{40/} *See* BroadSpan Opposition at 5.

there would be no basis to deny a competing carrier that is providing both voice and data services, either alone or in conjunction with another carrier, access to the full loop for testing.

CONCLUSION

For the foregoing reasons, and for the reasons set forth in AT&T's Petition for Expedited Clarification and in AT&T's Response, AT&T respectfully requests that the Commission (1) act swiftly and decisively to enable UNE-P carriers to access the HFS of loops and thereby have the opportunity to compete with ILECs that already combine voice and DSL services for themselves, and (2) resolve the other issues in this proceeding in accordance with the recommendations above.

Respectfully submitted,

AT&T CORP.

C. Michael Pfau
Public Policy Director
AT&T CORP.
295 N. Maple Avenue
Basking Ridge, NJ 07920

By Stephen C. Garavito Jr
Mark C. Rosenblum
Stephen C. Garavito
Richard H. Rubin
Room 1131M1
295 N. Maple Avenue
Basking Ridge, NJ 07920

MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY & POPEO, P.C.

By James L. Casserly
James L. Casserly
Christopher J. Harvie
James J. Valentino
Michael H. Pryor
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004
(202) 434-7300

April 5, 2000

CERTIFICATE OF SERVICE

I, Cathy M. Quarles, hereby certify that on the 5th day of April, 2000, I caused copies of the foregoing "REPLY OF AT&T CORP. TO RESPONSES TO PETITIONS FOR CLARIFICATION AND RECONSIDERATION," to be served by hand delivery (*) or by first class mail on the following:

Magalie Roman Salas, Secretary*
Federal Communications Commission
The Portals - TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

International Transcription Service, Inc.*
The Portals - Room CY-B402
445 12th Street, S.W.
Washington, D.C. 20554

Lawrence E. Strickling*
Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Suite 5-C450
Washington, D.C. 20554

Robert C. Atkinson*
Deputy Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Suite 5-C356
Washington, D.C. 20554

Michelle M. Carey*
Chief - Policy & Program Planning Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Room 5-C122
Washington, D.C. 20554

Margaret Egler*
Assistant Chief, Policy and Program Planning
Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Suite 5-C100
Washington, D.C. 20554

Linda Kinney*
Assistant Bureau Chief - Special Advisor for
Advanced Services
Common Carrier Bureau
Federal Communications Commission
The Portals
455 Twelfth Street, S.W.
Washington, D.C. 20554

Richard S. Whitt
Cristin L. Flynn
MCI WorldCom, Inc.
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Donna M. Epps
Bell Atlantic
1320 North Courthouse Road
Eighth Floor
Arlington, Virginia 22201

M. Robert Sutherland
Stephen L. Earnest
BellSouth Corporation
Suite 1700
1155 Peachtree Street, N.E.
Atlanta, Georgia 30306-3610

L. Marie Guillory
Daniel Mitchell
National Telephone Cooperative Association
4121 Wilson Boulevard, 10th Floor
Arlington, Virginia 22203-1801

Jeffrey S. Linder
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

James D. Ellis
Alfred G. Richter, Jr.
Roger K. Toppins
Mark P. Royer
SBC Communications, Inc.
1401 Eye Street, N.W.
11th Floor
Washington, D.C. 20005

Howard Siegel
Vice President of Regulatory Policy
IP Communications Corporation
17300 Preston Road, Suite 300
Dallas, TX 75252

Jonathan Askin
General Counsel
Ass'n for Local Telecommunications Services
888 17th Street, N.W., Suite 900
Washington, D.C. 20006

A. Richard Metzger, Jr.
Valerie Yates
Lawler, Metzger & Milkman, LLC
1909 K Street, N.W., Suite 820
Washington, D.C. 20006

Margot Smiley Humphrey
National Rural Telephone Association
Koteen & Naftalin, LLP
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036

Laura H. Phillips
J.G. Harrington
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036

Charles C. Hunter
Catherine M. Hannan
Hunter Communications Law Group
1620 I Street, N.W., Suite 701
Washington, D.C. 20006

Richard Juhnke
Norina T. Moy
Sprint Corporation
401 9th Street, N.W., Suite 400
Washington, D.C. 20094

Patrick J. Donovan
Anthony M. Black
Kevin D. Minsky
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W. - Suite 300
Washington, D.C. 20007

Michael Olsen
Vice President and Deputy General Counsel
NorthPoint Communications, Inc.
303 Second Street, South Tower
San Francisco, CA 94107

Carol Ann Bischoff
Executive Vice President and General Counsel
Jonathan D. Lee
Vice President, Regulatory Affairs
The Competitive Telecommunications Ass'n
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036

Jason Oxman
Senior Counsel
Covad Communications Company
600 14th Street, N.W., Suite 750
Washington, D.C. 20005

Rodney L. Joyce
J. Thomas Nolan
Shook, Hardy & Bacon LLP
600 14th Street, N.W.
Washington, D.C. 20005-2004

Jeffrey Blumenfeld
Vice President and General Counsel
Rhythms NetConnections Inc.
6933 South Revere Parkway
Englewood, CO 80112

Christy C. Kunin
Larry A. Blosser
Lisa N. Anderson
Blumenfeld & Cohen – Technology Law Group
1625 Massachusetts Ave., N.W. Suite 300
Washington, D.C. 20036

Jared Carlson*
Counsel to Bureau Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Room 5-C434
Washington, D.C. 20554


Cathy M. Quarles