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Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW A325
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Re: Reply Comments of SNET America, Inc. and Southwestern Bell Communications Services, Inc. CC Docket No. 96-61

Dear Ms. Salas:

Attached please find the original and 5 copies of the Reply Comments of SNET America, Inc. and Southwestern Bell Communications Services, Inc. submitted for filing in captioned proceeding.

Thank you for your assistance in this matter.

A handwritten signature in black ink, appearing to read "William A. Brown", with a long, sweeping flourish extending to the right.

William A. Brown,
Senior Counsel

Attachments

No. of Copies rec'd 0 + 4
List ABCDE

Before the
FEDERAL COMMUNICATIONS COMMISSION

Policy and Rules)
Concerning the Interstate,)
Interexchange Market)
Implementation of Section)
254(g) of the Communications)
Act of 1934, as amended.)

CC Docket No. 96-61

JUN - 9 2000

**REPLY COMMENTS OF SNET AMERICA, INC. AND
SOUTHWESTERN BELL COMMUNICATIONS SERVICES, INC.**

SNET America, Inc. (SAI) and Southwestern Bell Communications Services, Inc. (SBCS) jointly submit reply comments pursuant to the public notice, DA00-1028, in this proceeding. SAI and SBCS are non-dominant interexchange carriers and are subsidiaries of SBC Communications, Inc. SAI and SBCS agree with the initial Comments filed by AT&T Corp. concerning the transition period and web site implementation. Detariffing of bundled international and domestic interexchange services should be permissive until the later of (1) expiration of the nine-month transition period or (2) a decision by the Commission detariffing international services. Web site implementation should not be required prior to thirty days after expiration of the nine-month transition period. SAI and SBCS agree with the initial Comments of WorldCom that individually negotiated service arrangements should not be posted on a company's web site and that detariffing does not and should not authorize parties to long term contracts to alter or abrogate the contracts. SAI and SBCS oppose the GSA's suggestion that the transition period established by the Commission should be made even shorter and that the Commission should adopt an unrealistic and excessively burdensome web posting deadline. SAI and SBCS also

oppose NTCA's request that the Commission abandon its deregulatory purposes and assume control over IXC advertising by requiring inclusion of certain information such as web addresses.

I. Transition period.

The Commission should adhere to the nine month transition period, with the above noted modifications suggested by AT&T. This is the minimum amount of time necessary to ensure an orderly transition to the new detariffed regime. GSA's suggestion that this period can be cut should be rejected.

In fact, any shortening of the transition period would work a particular hardship on these two companies. SAI, for example, has numerous customer contract payment plans offered to meet specialized requirements of particular customers and which are on file at the Commission. All of these plans must be reviewed during the transition period to determine what must be done on a customer by customer basis to ensure continuation of binding carrier-customer relationships in the new detariffed environment. For the most part, these plans bundle intrastate, interstate and international originating and terminating access further complicating the review process. This major undertaking may require negotiations with hundreds of customers and revisions of many existing contracts which may now rely, in part, on references to tariffs.

SBCS is a new long distance company engaged in the throes of start-up in the numerous markets where it intends to provide service. This includes an enormous effort to prepare for possible launch of service in Texas if SBC's pending 271 application is approved. SBCS does not have the benefit of established marketing, service provisioning, and delivery channels but is now fully occupied in developing these facilities essential to

compete successfully in the long distance business. Shortening the transition period would impede SBCS's ability to do this in a timely manner since resources would have to be reallocated to meet a quicker transition deadline.

II. Web site posting requirements.

A number of commenting parties maintain that the deadline for meeting the Commission's website posting requirements should be no sooner than expiration of the transition period or upon detariffing of a service.¹ Indeed, AT&T states that it has already started preparations for its web site but will still be unable to implement the Commission's posting requirements prior to thirty days after expiration of the nine-month transition period. SAI and SBCS agree with AT&T that the web site implementation deadline should be no sooner than 30 days after expiration of the transition period.

As noted, SBCS is a start up long distance company currently preparing to enter a number of markets. To do so it will have to develop the marketing, service provisioning and delivery facilities which established carriers like AT&T already enjoy. SBCS's efforts to do so will be impeded if it must divert resources to meet an unnecessarily short and burdensome web posting deadline. SAI, moreover, must commit resources to the imposing task of evaluating all of its existing individualized customer contracts for whatever action might be necessary to maintain the current binding relationship that benefits both SAI and its customers. SAI should not be distracted from these efforts - made necessary by this Commission action - because of an unreasonably short web site implementation deadline.

¹ See Comments of Worldcom, p. 3; Comments of Sprint, p. 6; Comments of Bell Atlantic, p. 2; Comments of GTE, p. 5.

GSA (which does not have to comply with the Commission's requirements) suggests a drastically shorter deadline for web site implementation. For the reasons outlined above this suggestion should be rejected. Such an unrealistic deadline would be needlessly burdensome to carriers and serve no effective purpose. Moreover, it would result in protracted proceedings before the Commission, as carriers would be forced to seek waivers.²

III. Individually negotiated service arrangements.

SAI and SBCS do not believe the Commission's web site posting requirements apply, or should be made to apply, to individually negotiated service arrangements and agree with the Comments of Worldcom on this point. In addition, posting the prices and terms of such arrangements has the potential of resulting in anti-competitive benchmarking. Carriers could easily find out what competitors are charging for specialized arrangements and feel comfortable in pricing accordingly to the detriment of customers. There are no benefits to posting individually negotiated arrangements to counter-balance this serious drawback.

IV. Provisions in term contracts are not affected by detariffing.

SAI and SBCS also agree with Worldcom that detariffing does not authorize abrogation or alteration of the provisions of existing term contracts. However, they are aware of nothing in this docket suggesting that the Commission contemplates any action that would impair vested contract rights. Indeed, any such action would obviously raise constitutional and other issues extending well beyond the confines of this proceeding.

² In fact, GSA expressly acknowledges that carriers may not be able to meet its proposed deadline and suggests that waiver proceedings on a tariff by tariff basis may be necessary. GSA Comments, p. 6.

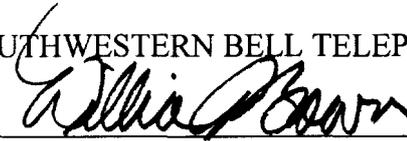
V. The Commission should not dictate the contents of IXC advertising.

FCTA's proposal that the Commission exercise editorial control over the advertising of non-dominant IXCs by requiring the inclusion of certain information such as web site addresses is completely out of step with the deregulatory purpose of this proceeding and should be rejected. Indeed, SAI and SBCS are unaware of any attempt by the Commission to dictate the contents of advertising in this manner even before the current emphasis on relaxed regulation. A mandatory detariffing docket is certainly no place to start. Instead, IXCs should be free to devise their own advertising in response to the demands of a competitive marketplace.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Dorothy Garza, hereby certify that the foregoing "Reply Comments of SNET America, Inc. and Southwestern Bell Communications Services, Inc. CC Docket 96-61, has been served on June 9, 2000, to the parties of record.



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