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

In the Matter of	
Provision of Directory Listing Information under the Communications Act of 1934, As Amended	CC Docket No. 99-273
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	CC Docket 98-67

REPLY COMMENTS OF BELL ATLANTIC

In our initial comments, Bell Atlantic[1] noted that Telegate had not provided any evidence that consumers wanted the option to separately presubscribe their DA service and would be willing to pay for it. Nor, at this point, has any other supporter of Telegate's proposal. The only comments to address this fundamental issue indicate that 92% of the individuals questioned do not even think it's worth $1.24 to be able to presubscribe to another DA provider.[2] As the initial comments demonstrated that the real cost of Telegate's proposal is far greater than this, it is plain that the public benefit of Telegate's proposal is dwarfed by its costs.

Not satisfied with Telegate's hugely expensive plan, LTD goes one better and asks the Commission to require exchange carriers to use "AIN Release 0.2 N11 Triggers" to provide additional capabilities at what LTD claims would be only "additional modest upgrade costs."[3]

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1 Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc.; New York Telephone Company and New England Telephone and Telegraph Company.

2 Richard Sayers at 1.

3 LTD at 5-6.

We are not aware of an "AIN Release 0.2" and assume that LTD is referring to the so-called "post 0.1 AIN." This capability, however, is not available at all in certain types of switches and cannot be the basis of a ubiquitous serving arrangement.

WorldCom also would go beyond Telegate's far-from-modest proposal by urging the Commission to establish third-party administration of 411 presubscription selections in order to prevent supposed exchange carrier abuses.[4] However, exchange carriers have been implementing their customers' presubscription selections for years without any suggestion of wrongdoing. If third-party administration is needed anywhere, it is over WorldCom's telemarketing operations, which seem to have repeated problems complying with the slamming rules.

InfoNXX supports Telegate's proposal as pro-competitive, but then argues that only incumbent LECs should be required to implement it. InfoNXX's rationale is that a CLEC "customer purchases DA as a bundle of services that the CLEC offers."[5] This argument must be rejected. InfoNXX's rationale, of course, works as well for ILECs as CLECs, as ILECs provide DA as part of their own bundle of services. Moreover, if a presubscription option is a good thing, it logically must be as good for CLEC customers as ILEC customers. And, finally, if 411 presubscription is a "dialing parity" obligation under section 251(b)(3), then it is an obligation that all local exchange carriers have.

MetroOne suggests a compromise between 411 presubscription and the dialing that exists today, namely 411XX access to all DA providers.[6] However, there are only 100 such XX codes, and this plan would, therefore, be limited to only 100 providers, a limit that would immediately

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4 WorldCom at 10-11.

5 InfoNXX at 8.

6 MetroOne at 6.

be reached by the exchange carriers that provide the service today. Three- or perhaps four-digit codes would be required, at which point it would not be much of an "abbreviated dialing arrangement."

Telegate's proposal is high cost and low benefit, and the Commission should reject it.

Respectfully submitted,

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