Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

RECEIVED

AUG 4 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)	
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	)	**CC Docket No. 96-98**
Inter-Carrier Compensation for ISP-Bound Traffic	)	**CC Docket No. 99-68**

REPLY COMMENTS OF SPRINT CORPORATION

In its initial comments, Sprint argued that, regardless of whether the Commission ultimately determines that calls to ISPs are jurisdictionally interstate or intrastate, it should treat these calls, for compensation purposes, exactly the same way that local calls are treated: with reciprocal compensation paid by the local carrier originating the call to the carrier to whom the call is delivered. Sprint recommended only one change in the existing regime for such compensation: the rate for local switching, which is generally now a single, minute-of-use (MOU) charge, should be bifurcated into a two-part rate consisting of a set-up charge per call and a per-minute charge. This two-part structure for local switching is necessary to properly reflect the fact that there are fixed costs involved in the use of a switch for call termination. Under the current, MOU-only charge, these costs are under-recovered for shorter than average calls, but over-recovered on longer than average calls. None of the comments of other parties warrants any change in the

course Sprint believes the Commission should pursue.[1] In this reply, Sprint will comment briefly on the RBOCs' assertions that no compensation should flow between local carriers on ISP-bound calls and that there are cost savings associated with such calls above and beyond the amount that would be reflected in the two-part local switching structure Sprint has proposed.

I. THE RBOCs' ARGUMENTS AGAINST RECIPROCAL COMPENSATION ARE WITHOUT MERIT

The RBOCs — carriers that uniformly opposed a bill-and-keep mechanism to satisfy the reciprocal compensation obligations under the Act four years ago[2] — now uniformly favor bill-and-keep arrangements as the preferred means of compensating for ISP-bound calls.[3] This reversal in position is perhaps most dramatically illustrated by comparing the RBOCs' current rhetoric with the arguments made against bill-and-keep by a Verizon predecessor in 1996:[4]

> The most blatant example of a plea for a government handout comes from those parties who urge the Commission to adopt a reciprocal compensation price of zero, which they euphemistically refer to as "bill and keep." A more appropriate name, however, would be "bilk and keep," since it will bilk the LECs' customers out of their money in order to subsidize entry by the likes of AT&T, MCI and TCG. As we demonstrated in our opening comments, a regulatorily mandated price of

[1] Even though AT&T (at 19) disputed an ILEC claim that CLECs' costs of terminating ISP traffic are lower because of the longer duration of such calls relative to the average placed call, AT&T presented this contention in the context of an argument (at 17-22) that the Commission should not attempt to distinguish calls to ISPs from other local calls and apply different compensation rates to each type of call. That is perfectly consistent with Sprint's position, since Sprint would apply this two-part rate structure to all reciprocal compensation, not just calls to ISPs. Moreover, it may be noted that AT&T's economic consultants do not quarrel with a two-part rate structure of the sort recommended by Sprint. *See* Selwyn/Kravtin Declaration, appended to AT&T's Comments, at ¶29.

[2] *See* First Report and Order in CC Docket No. 96-98, 11 FCC Rcd 15499, 16047 (¶1100) (1996).

[3] *See* BellSouth at 3-4; Qwest at 17; SBC at 49; and Verizon at 22-23.

[4] Reply Comments of Bell Atlantic, filed May 30, 1996 in CC Docket No. 96-98, at 20-21 (emphasis in original).

> zero — by any name — would violate the Act, the Constitution, and sound economic principles. ...
>
> * * *
>
> Moreover, the notion that bill-and-keep is necessary to prevent LECs from demanding too high a rate [for reciprocal compensation] reflects a fundamental misunderstanding of the market. If these rates are set too high, the result will be that new entrants, who are in a much better position to selectively market their services, will sign up customers whose calls are predominantly inbound, such as credit card authorization centers and Internet access providers. ...

Clearly, the RBOCs are the ones who "misunderstand[] ... the market." Perhaps because the RBOCs initially set rates for transport and termination too high, some CLECs responded precisely as Bell Atlantic predicted, and began targeting ISPs as customers. Having witnessed the outflow of reciprocal compensation payments that should have been (and, in Bell Atlantic's case, was) foreseen, they are now negotiating sharply lower reciprocal compensation rates. *See* WorldCom Comments at 35.

The RBOCs offer a number of specious arguments as to why there should be no intercarrier compensation for ISP-destined calls. First, SBC (at 40) and Verizon (at 11-14) argue that having to pay reciprocal compensation to the LEC serving the ISP discourages entry by CLECs into the residential market. Verizon focuses on the alleged typical charge for a second residential line and compares that charge with the pay-outs that would be made to the ISP's LEC using different assumptions as to the amount of Internet use on the second line. Aside from Verizon's possible misrepresentation of typical revenues from second lines,[5] Verizon's example assumes a business plan that no

[5] Verizon represents (at 13) that the "typical basic monthly charge for a second line is $15" without indicating the basis for this estimate. If, as Sprint believes, this represents only the intrastate charge for the line, it omits the very substantial revenue stream — as much as $7.00 per month — that ILECs assess as an end-user common line charge for non-primary residential lines.

CLEC of which Sprint is aware is pursuing: going after second dial-up residential lines that are used for Internet access. In Sprint's experience, CLECs that market to residential customers attempt to meet all of the customer's residential needs, including primary as well as secondary lines, long-distance services, and perhaps non-communications services, such as Internet access, as well. If there is a dearth of meaningful competition in the local residential market today — and Sprint will concede that this is the case — it is due to a host of reasons other than the threat of having to make reciprocal compensation payments to the LEC serving an ISP, reasons that can be summed up simply as dependence on one's primary competitor for essential facilities.

SBC (at 40-42) and Verizon (at 14-15) also argue that ISP reciprocal compensation dampens the incentives of CLECs and ISPs to deploy advanced services, because reciprocal compensation is available only on dial-up traffic. Again, their arguments are long on rhetoric, but short on reality. Prominent CLECs, such as Covad, NorthPoint, and Rhythms, have built their entire strategy around providing xDSL services to connect consumers with ISPs. Sprint and WorldCom have each invested $1 billion to purchase MMDS licensees so as to provide broadband wireless access to consumers. In addition, Sprint is aggressively pursuing collocation in ILEC central offices to deploy its broadband Sprint ION service, and expects to be collocated in nearly 1,000 offices by the end of this year. Perhaps the most succinct delineation of the rapid deployment of broadband advanced services by CLECs is found in ¶307 of the Commission's *UNE Remand Order*:[6]

[6] CC Docket No. 96-98, Third Report and Order, 15 FCC Rcd 3696, 3835-36 (1999) (footnotes omitted).

> 307. Both the record in this proceeding, and our findings in the *706 Report*, establish that advanced services providers are actively deploying facilities to offer advanced services such as xDSL across the country. Competitive LECs and cable companies appear to be leading the incumbent LECs in their deployment of advanced services. For example, in 1999, Rhythms expects to roll out xDSL services in 1,000 end offices nation wide. Covad's planned network deployment is expected to reach 51 MSAs by the end of 1999. In the past year, NorthPoint deployed facilities capable of transmitting xDSL signals in 17 metropolitan markets. NorthPoint plans to expand the DSL-based local networks from 25 major markets, representing 37 metropolitan statistical areas (MSAs), to 28 markets, or 61 MSAs, by the end of 1999. Qwest announced in August 1999, that it is now providing DSL service in 13 U.S. markets and plans to expand to more than 30 major markets by the end of 1999. In addition, EarthLink has partnered with Sprint to offer nationwide xDSL service. KMC Telecom Inc. announced aggressive rollout of DSL services with plans to introduce additional broadband applications by year-end. ...

These findings, which were consistent with the RBOCs' contentions (*id.* at 3832), formed the basis of the Commission's determination that, except in limited circumstances, packet switching does not have to be made available as an unbundled element. One cannot avoid observing that the RBOCs tout the existence of widespread local competition when it suits their strategic purposes (such as restricting availability of UNEs, gaining §271 approvals, etc.), while arguing — sometimes in the very same docket, as is the case here — that there are insufficient incentives for local competition when that argument suits their purposes.

The RBOCs also claim that the availability of compensation for ISP-bound calls encourages "bad" behavior.[7] The only example of such behavior that is truly bad concerns a single CLEC — US LEC — that was found to have engaged in fraudulent schemes to generate reciprocal compensation from the ILEC — schemes that had nothing

[7] *See, e.g.,* BellSouth at 13-14; SBC at 42-46; and Verizon at 16-20.

to do with completion of calls to ISPs. There will always be bad actors in any industry that must be dealt with effectively and swiftly with proper law enforcement measures — as was the case with US LEC. But the relationship between fraud and reciprocal compensation for ISP-bound calls is a nexus that the RBOC have simply failed to establish.

Their other examples of "bad" conduct are equally irrelevant. They point to the fact that Brooks Fiber obtained 54 NNX codes in various local exchanges in Maine and routed calls to these numbers in those exchanges to an ISP customer in Portland. Sprint concedes that using 54 NNXs for this purpose might be a wasteful use of scarce numbering resources, but the Commission's recent numbering conservation measures are the appropriate solution to that problem. There is no reason why Brooks Fiber should deploy a switch in every local exchange in which it interconnects with the ILEC nor any reason why Brooks Fiber's ISP customer should have to establish locations in each of these 54 communities in Maine, if it is more efficient to utilize a centralized location. As long as the ISP's LEC interfaces with the end user's LEC within that local exchange area, reciprocal compensation should be paid, and the originating LEC should be indifferent to how the terminating LEC handles that call within its own network.[8] The Commission should not second-guess CLEC network configuration decisions when they have no harmful effect on the originating LEC.

The RBOCs further decry CLECs whose ISP customers collocate in the CLEC's central office and CLECs that do not employ conventional switching technology. The

[8] SBC argues (at 43) that the ILEC must bear the additional transport costs in such cases, but offers no factual support for its assertion. Sprint believes that this is not the case and that the CLEC would bear any extra transport costs associated with this type of network configuration.

RBOCs cannot have it both ways. They cannot argue, on the one hand, that reciprocal compensation for ISP traffic discourages investment in new technologies and then argue that it is unfair to pay reciprocal compensation to CLECs that serve ISPs through the use of new technology. There is no reason why the RBOCs cannot compete on an equal footing for ISP traffic using the same sort of innovative technology and network configurations that some CLECs are deploying. Indeed, the very existence of reciprocal compensation that the RBOCs believe to be excessive should be ample incentive for them — since it is their own costs on which the compensation level is based — to employ more efficient technology themselves, thereby reducing the reciprocal compensation rates on which both they and the CLECs are paid.

II. VERIZON'S COST ARGUMENTS, OTHER THAN SWITCHING SET-UP, ARE SPECIOUS

Verizon, relying on a declaration of William Taylor attached to his comments, argues (at 23-25) that even when CLEC's use the same equipment and serving arrangements as an ILEC, the CLEC's costs to deliver calls to ISPs is far less than the ILEC's costs to deliver a voice local call. One element of such cost difference is the switching set-up costs (Taylor Declaration at 14-15), which would be fully addressed by adoption of Sprint's proposal to require a two-part rate structure for local switching tasks for purposes of reciprocal compensation. The other alleged cost differences are unsupported and without merit.

One category of alleged cost differences (*id.* at 15-17) relates to busy hour line CCS costs. According to Taylor, since a number of line circuits used for voice calls share a single trunk circuit (and the circuit path through the switch), line CCS costs are traffic-sensitive (and thus recoverable through the reciprocal compensation rate) because the

peak hour use of the shared facility by one customer imposes congestion costs on other customers sharing the facility. According to Taylor, line CCS costs for Internet-bound traffic are not traffic-sensitive, because CLECs typically use ISDN Primary Rate Interfaces to serve ISPs and build switches at a concentration ratio of 1:1. These costs, according to Taylor, are thus fixed with respect to usage, since each line has dedicated capacity through the switch and is unaffected by demand on other lines. This simplistic view of line CCS costs ignores the fact that, as traffic increases, the ISP must order additional trunks to maintain a given grade of service (or blocking probability). The ISDN PRI trunks are not purchased on a 1:1 basis — ISPs do not have dedicated capacity to every end user customer that accesses them — and thus must be engineered in a similar manner as voice trunks, the cost of which varies directly with usage for any given quality of service. If peak traffic increases on voice trunks, the LEC will need to lower its concentration ratio and add additional trunks to maintain a given quality of service. Likewise, if Internet traffic volumes rise, additional trunks will be needed as well

Another cost difference claimed by Taylor (at 17) is that Internet-bound calls are uni-directional and thus do not involve switching costs for features and functions on the originating end of a call, while some TELRIC prices for reciprocal compensation (he claims) are based on the costs of both originating and terminating local exchange traffic. Although Taylor offers no substantiation that this is the case, to the extent that it is, it is purely the fault of the ILEC for improperly including costs of originating switching functions in the price for the termination of a call, and has nothing to do with the fact that the call is destined for an ISP instead of an ordinary voice customer.

Finally, Taylor posits (at 17-18) that the time-of-day distribution of ISP-bound calls is different than for other types of calls and tends to flatten the load distribution throughout the day, thereby requiring less switching investment to provide capacity to meet peak demand than does ordinary voice traffic. The central assumption — that Internet-bound traffic flattens peaks and therefore is less costly to carry — is wholly unsupported. Peak periods can vary from one end office to the other, and it is by no means clear that Taylor's assumption that Internet usage tends to flatten, rather than exacerbate, peaks is correct. In many end offices, Internet usage has tended to shift peaks to the late evening timeframe from earlier periods. Moreover, there is no reason to differentiate between calls to ISPs and voice calls, and not differentiating among other types of calls (*e.g.*, business voice versus residential voice) that also may have different peaking characteristics. In some offices and for some carriers, different types of traffic may tend to flatten overall peaks, while in other offices or for other carriers, different types of traffic might accentuate the peak load. It is simply impractical to devise a reciprocal compensation rate that would vary with each end office's characteristics and remain accurate for any period of time.

In short, other than call set-up costs that would be fully addressed through Sprint's local switching proposal, none of the cost differences between ISP-bound calls and other calls alleged by Verizon has any merit. The proponents of carving out ISP-bound calls and treating them separately from voice calls for purposes of compensation for transport and termination of such calls have simply not carried their burden of proof.

III. CONCLUSION

Sprint urges the Commission to resolve the issues before it as expeditiously as possible and, whichever way it ultimately rules on the jurisdictional issue, to subject ISP-bound calls dialed using a local number to the same reciprocal compensation system that is in place for local calls today, modifying that system only to require (after a reasonable period for implementation) the use of a two-part rate structure for the recovery of local switching costs. If some recipients of this compensation are over-compensated in relation to their underlying costs, that is a reward for efficiency and an incentive to the complaining RBOCs to compete more efficiently in the marketplace themselves.

Respectfully submitted,

SPRINT CORPORATION

Leon M. Kestenbaum
Jay Keithley
Jon Chambers
Richard Juhnke
401 9th Street, NW, Suite 400
Washington, DC 20004
202-585-1912

August 4, 2000

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Reply Comments of Sprint Corporation in CC Docket Nos. 96-98 and 99-68 was hand delivered (noted by an *) or sent by United States First-Class Mail, postage prepaid, on this 4th day of August, 2000 to the parties listed below.

Sharon Kirby

*Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

*International Transcription Service
445 12th Street, SW, CY-B400
Washington, DC 20554

*Dorothy Attwood
Chief, Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

*Michelle Carey
Chief, Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

*Jane Jackson
Chief, Competitive Pricing Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Rodney McDonald
Competitive Pricing Division
Common Carrier Bureau
445 12th Street, SW
Washington, DC 20554

Tamara Preiss, Deputy Chief
Competitive Pricing Division
Common Carrier Bureau
445 12th Street, SW
Washington, DC 20554

Staci Pies
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Katherine Farroba
Deputy Chief, Policy Division
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Anthony J. DeLaurentis
Competitive Pricing Division
Common Carrier Bureau
445 12th Street, SW
Washington, DC 20554

Yog Varma
Deputy Bureau Chief
Common Carrier Bureau
445 12th Street, SW
Washington, DC 20554

Donald Stockdale
Competitive Pricing Division
Common Carrier Bureau
445 12th Street, SW
Washington, DC 20554

Deena Shetler
Competitive Pricing Division
Common Carrier Bureau
445 12th Street, SW
Washington, DC 20554

William Bailey III, Counsel
Common Carrier Bureau
445 12th Street, SW
Washington, DC 20554

Thomas Nevin
Competitive Pricing Division
Common Carrier Bureau
445 12th Street, SW
Washington, DC 20554

William Bailey
Office of Commissioner Furchtgott-Roth
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Valerie Yates
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Sarah Whitesell
Office of Commissioner Tristani
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Robert Atkinson
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Kyle Dixon, Office of Commissioner Powell
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Linda Kinney
Office of Commissioner Ness
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Jake E. Jennings
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Claudia Fox
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Chairman William E. Kennard
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Mark C. Rosenblum
Stephen C. Garavito
Teresa Marrero
AT&T Corp.
295 North Maple Avenue
Basking Ridge, NJ 07920

David W. Carpenter
David L. Lawson
James P. Young
Sidley & Austin
1722 Eye Street
Washington, DC 20006
Counsel for AT&T Corp.

Albert H. Kramer
Jacob Farber
Dickstein Shapiro Morin & Oshinsky LLP
2101 L Street, NW
Washington, DC 20037
Counsel for ICG Telecom Group, Inc.

Lee Schroeder, V.P.
Government and Regulatory Strategy
Cablevision Lightpath, Inc.
1111 Stewart Avenue
Bethpage, NY 11714-3581

Cherie R. Kiser
Michael H. Pryor
Elizabeth B. Dickerson
Mintz, Levin, Cohn, et al.
701 Pennsylvania Ave., NW
Suite 900
Washington, DC 20004
Counsel for Cablevision Lightpath, Inc.

Richard M. Rindler
Michael W. Fleming
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, DC 20007
Counsel for Focal Communications Corporation; Allegiance Telecom, Inc.; and Adelphia Business Solutions, Inc.

Jonathan Askin, General Counsel
Association for Local Telecommunications Services
888 17th Street, NW, Suite 900
Washington, DC 20006

Gary L. Phillips
Roger K. Toppins
Alfred G. Richter, Jr.
SBC Communications, Inc.
1401 Eye Street, NW, Suite 1100
Washington, DC 20005

John M. Goodman
Michael E. Glover
Edward Shakin
1300 I Street, NW
Washington, DC 20005
Counsel for Verizon telephone companies

Michael D. Schneider
Darryl Bradford
Jenner & Block
601 13th Street, NW
Washington, DC 20005
Counsel for WorldCom

Richard S. Whitt
Cristin L. Flynn
WorldCom, Inc.
1801 Pennsylvania Ave., NW
Washington, DC 20006

William T. Lake
Lynn R. Charytan
Jonathan J. Frankel
Mary E. Kostel
Wilmer, Cutler & Pickering
2445 M Street, NW
Washington, DC 20037
Counsel for Qwest Corporation

Robert B. McKenna
Jeffry A. Brueggeman
Dan Poole
Qwest Communications International, Inc.
1020 19th Street, NW
Washington, DC 20036

M. Robert Sutherland
Richard M. Sbaratta
BellSouth Corporation
Suite 1700
1155 Peachtree Street, NE
Atlanta, Georgia 30309-3610

Stephen J. Davis, Director of Policy Development
Public Utility Commission of Texas
1701 N. Congress Avenue
PO Box 13326
Austin, TX 78711

Susan Grant
Vice President, Public Policy
National Consumers League
1701 K Street, NW, #1200
Washington, DC 20006

Pace A. Duckenfield
Counsel
Alliance for Public Technology
919 18th Street, NW, #900
Washington, DC 20006

Renee R. Crittendon
Deputy Chief Counsel - Telecommunications
Prism Communications Services
1667 K Street, NW, #200
Washington, DC 20006

Cleo Manuel, Executive Director
Keep America Connected
PO Box 27911
Washington, DC 20005

Aliceann Wohlbruck, Executive Director
National Association of Developing Organizations
444 North Capitol Street, NW, #630
Washington, DC 20001

Nancy Bloch, Executive Director
National Association of the Deaf
814 Thayer Avenue
Silver Spring, MD 20910

Harry Alford, President
National Black Chamber of Commerce
1350 Connecticut Ave., NW
Suite 825
Washington, DC 20036

Stan Silverman, Director
Technology Based Learning Systems
New York Institute of Technology
PO Box 9029
Central Islip, NY 11722

Daniel McVeigh, President
Ocean of Know
178 Dover Furwave Road
Dover Plains, NY 12522

Claude L. Stout, Executive Director
Telecommunications for the Deaf, Inc.
8630 Fenton Street, #604
Silver Spring, MD 20910-3803

George Herrara, President & CEO
United States Hispanic Chamber of Commerce
1019 19th Street, NW
Washington, DC 20003

Charles C. Hunter
Catherine M. Hannan
Hunter Communications Law Group
1620 I Street, NW, #701
Washington, DC 20006
Counsel for Association of Communications Enterprises

Lawrence G. Malone
General Counsel
New York State Department of Public Service
Three Empire State Plaza
Albany, NY 12223

Cynthia B. Miller
Bureau of Intergovernmental Liaison
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Richard A. Askoff, Esq.
Joe A. Douglas, Senior Regulatory Manager
National Exchange Carrier Association
80 South Jefferson Road
Whippany, New Jersey 07981

Christopher W. Savage
Karlyn D. Stanley
Brenda Boykin
Cole, Raywid & Braverman, LLP
1919 Pennsylvania Ave., NW, #200
Washington, DC 20006
Counsel for Global NAPS, Inc.

Lawrence E. Sarjeant
Linda L. Kent
Keith Townsend
John W. Hunter
Julie E. Rones
United States Telecom Association
1401 H Street, NW, #600
Washington, DC 20005

Peter Arth, Jr.
Lionel Wilson
Ellen S. Levine
505 Van Ness Avenue
San Francisco, CA 94102
Counsel for the People of the State of California and the California Public Utilities Commission

Philip F. McClelland, Sr.
Assistant Consumer Advocate
Joel H. Cheskis, Assistant Consumer Advocate
Pennsylvania Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923

Brad E. Mutschelknaus
Robert J. Aamoth
Jonathan E. Canis
John J. Heitman
Kelly Drye & Warren LLP
1200 19th Street, NW, 5th Fl.
Washington, DC 20036
Counsel for Advanced Telcom Group, Inc.; e.spire Communications, Inc; Intermedia Communications, Inc.; KMC Telecom, Inc.; NEXTLINK Communications, Inc.; and the Competitive Telecommunications Association

John Cleven Tooker,
President
Western Telephone
Integrated Communications, Inc.
303 East Jackson Street
Medford, OR 97501

George N. Barclay, Associate
General Counsel
Michael J. Ettner, Sr.
Assistant General Counsel
Personal Property Division
General Services Administration
1800 F Street, NW, Room 4002
Washington, DC 20405

Snavely King Majoros
O'Connor & Lee, Inc.
1220 L Street, NW, #410
Washington, DC 20005
Economic Consultants for the General Services Administration

Brian Conboy
Thomas Jones
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036
Counsel for Time Warner Communications Holdings, Inc.

David Cosson
John Kuykendall
Kraskin, Lesse & Cosson, LLP
2120 L Street, NW, #520
Washington, DC 20037
Counsel for Rural Independent Competitive Alliance

Patrick Donovan
Robin L. Redfield
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, #300
Washington, DC 20007
Counsel for Pac-West Telecomm, Inc.

Christopher W. Savage
Brenda J. Boykin
Cole, Raywid & Braverman, LLP
1919 Pennsylvania Ave., NW, #200
Washington, DC 20006
Counsel for Centennial Communications Corp.

Paul G. Afonso, Esq.
General Counsel
Massachusetts Department of Telecommunications & Energy
One South Station
Boston, MA 02110