

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

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Application of Verizon New England Inc., Bell)
Atlantic Communications, Inc. (d/b/a Verizon)
Long Distance), NYNEX Long Distance)
Company (d/b/a Verizon Enterprise Solutions))
and Verizon Global Networks, Inc. for Authoriz-)
ation to Provide In-Region, InterLATA Services)
in Massachusetts)
_____)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF THE
NEW ENGLAND PUBLIC COMMUNICATIONS COUNCIL, INC.

In accordance with the Commission's Public Notice DA 01-106, released January 16, 2001, the New England Public Communications Council, Inc. ("NEPCC"), acting through its President, hereby submits its Initial Comments in this matter.

The NEPCC is an industry trade organization representing independent pay providers ("IPPs") which own and operate payphones throughout the Commonwealth of Massachusetts. The NEPCC's perspective in this proceeding is one of major users of (and competitors with) Verizon current services in Massachusetts who question whether there is true competition in the provision of those services so as to justify grant of the authority now being requested by Verizon in the Commonwealth.

NEPCC is a great proponent of local competition. As IPPs, the local rates charged by Verizon comprise the majority of underlying costs in providing payphone services to the Massachusetts public. For years, NEPCC members have had no choice but to purchase service from the local incumbent who also is each member's biggest competitor in the

payphone market. NEPCC members, as a group, remain dissatisfied with the rates and level of service they receive from Verizon. They look forward to the day when there will be robust competition allowing customers to select from a variety of pricing and service options.

The NEPCC, like many others, viewed the Telecommunication Act of 1996 as assuring that local service alternatives would become a reality in the near future. However, more than five years after passage of that Act, the vast majority of NEPCC members have no meaningful choice but to purchase local service from Verizon. If a competitive marketplace can bring reduced rates to NEPCC members and in doing so lower their costs of doing business, they will be in a much better position to provide better and cheaper services to their payphone user customers.

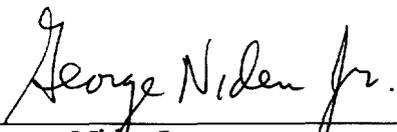
The lack of competitive options for NEPCC members to date is not caused by the lack of interest on the part of competitive local exchange carriers ("CLECs") to serve NEPCC members. Members have been approached by a number of CLECs who thought they could provide an attractive offer to Massachusetts payphone providers. However, at the present time, despite their interest and our ability to provide a carrier with a significant amount of business, NEPCC members have virtually no competitive alternative for local service other than Verizon. While from being experts in regulatory matters, as businessmen, NEPCC members have to assume that CLECs do not have a means of economically providing competitive service in most areas in any meaningful fashion in part because of the failure of Verizon to meet its obligations under the Telecommunications Act of 1996 to open up its local exchange market to competitors.

Although the NEPCC and its members remain enthusiastic about local competition, we are convinced that as part of acting on Verizon's petition the Commission must

reevaluate the rates that Verizon is permitted to charge CLECs and take other steps which will enable local competition to flourish and provide service alternatives to businesses like those included in the NEPCC's membership.

Respectfully submitted,

**NEW ENGLAND PUBLIC
COMMUNICATIONS COUNCIL, INC.**

By: 
George Niden Jr.
President 

Dated: February 6, 2001