

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

RECEIVED

APR 2 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of the Subscriber Carrier)
Selection Changes Provisions of the)
Telecommunications Act of 1996)
)
Policies and Rules Concerning)
Unauthorized Changes of Consumers)
Long Distance Carriers)

CC Docket No. 94-129

AT&T RECONSIDERATION PETITION

Pursuant to Section 1.429 of the Commission's Rules, 47 C.F.R.

§ 1.429, AT&T Corp. ("AT&T") hereby requests the Commission to reconsider and/or to clarify portions of its Third Report and Order in this docket prescribing further modifications to the Commission's rules to control unauthorized changes in subscribers' selections of a preferred carrier, commonly referred to as "slamming".¹ As shown below, in several respects the Commission's actions in that decision are likely to have clearly unintended consequences that will not increase consumer

¹ Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers Long Distance Carriers, CC Docket No. 94-129, Third Report and Order and Second Order on Reconsideration, FCC 00-255, released August 15, 2000 ("Third Report and Order"), published at 66 FR 12877 (March 1, 2001). The rule revisions adopted by the Commission are effective April 2, 2001. See Public Notice, "Common Carrier Bureau Announces Effective Date of Rules Adopted in Slamming Third Report and Order," DA 01-755, released March 27, 2001.

No. of Copies rec'd 014
List A B C D E

protection and will needlessly impose burdens and inconvenience upon both consumers and carriers providing service to those subscribers.

ARGUMENT

I. The Expiration Provisions For LOAs Should Be Modified and Clarified.

Although no party to this proceeding presented any probative evidence that outdated or “stale” carrier selection authorizations present a problem that warrants additional regulatory relief,² the Commission in the Third Report and Order (¶¶ 80-81) adopted a 60 day limit on the time within which a carrier may submit a preferred carrier change order after obtaining a signed LOA or electronic authorization from a customer.³ If applied by executing carriers in a neutral and nondiscriminatory fashion, this requirement may have relatively little adverse impact on residential consumers and small businesses, because their carrier change orders are usually submitted within a relatively short interval after those subscribers’

² The Commission has already adopted provisions that, if adhered to by submitting and executing carriers, should adequately address any problems caused by superseded authorizations. Specifically, in its June, 1985 Allocation Plan Reconsideration Order, the Commission permitted all LECs to process carrier selection change orders on the basis of the latest date of authorization, thereby obviating changes based on outdated requests. See Investigation of Access and Divestiture Related Tariffs, 102 F.C.C.2d 503, 505-506 (1985)(“Allocation Plan Reconsideration Order”). However, virtually all LECs continue to process carrier selection orders on a “last in time, first in right” basis that ignores any authorization date reported to them by a submitting carrier.

³ See 47 C.F.R. § 64.1130(j). Paradoxically, however, the Commission did not impose any limitation whatever on the effectiveness of carrier change authorizations obtained through telemarketing, which AT&T’s experience indicates accounts for the majority of residential customers’ carrier changes and a substantial portion of business customers’ carrier change authorizations.

authorizations are obtained by a submitting carrier.⁴ However, even if it is applied in such a nondiscriminatory manner, the Commission's "sunset" requirement for the effectiveness of LOAs from larger, typically multi-line and multi-location business customers will impose significant-- and wholly unnecessary-- burdens on those customers and on carriers that provide presubscribed services to those entities.

Unlike residential and small business customers, whose installations do not vary frequently once in place, large business customers often add presubscribable lines at their existing locations and/or open additional business locations requiring presubscribed service. Moreover, to obtain more economical calling rates, many of these large businesses subscribe to carrier services with minimum usage commitments. Accordingly, such businesses typically execute LOAs authorizing their preferred carrier to presubscribe all (or a substantial portion) of the customer's existing and newly added lines to the designated carrier. Many of these installations may not take place until months, or even years, after the LOA has been executed.

⁴ Even for these customers, however, the effects of limitation may be far from benign. As the Commission's decision implicitly recognizes (¶ 81), the limitation on effectiveness of LOAs may create strong incentives for executing carriers (typically LECs) to "slow roll" their processing of changes submitted by carriers that often directly compete with those entities, thereby stalling implementation of an order until after the 60 day limitation on the customer's authorization expires. Moreover, the Commission recognizes (*id.*) that it may be necessary for the submitting carrier to recontact the customer for various reasons, such as to arrange to lift a "PIC freeze" after an order has been submitted to the executing carrier. The Commission should clarify that a carrier change order submitted to the executing carrier within the 60 day limitation period will be considered timely, notwithstanding the need for subsequent activities such as lifting a carrier freeze.

Limiting the effectiveness of LOAs for these customers to 60 days from the date of execution will only burden the subscribers and their carriers with the need to repeatedly update those documents, without providing any additional consumer protection. Moreover, without such periodic renewals, application of the limitation could also in some instances, interfere with the business customer's ability to obtain presubscribed service from the carrier authorized by that entity under an "outdated" LOA. Given both the absence of customer benefit from the sunset provision, and the potential disruption and inconvenience that provision may create for larger customers, the Commission should reconsider and modify its rule to exempt multi-line and/or multi-location business customers from the scope of that provision.

II. The Commission Should Eliminate the Inconsistency Between the Verification Elements for LOAs and Third Party Verification Calls.

The Third Report and Order (§§ 39–40) correctly rejected proposals to mandate a "script," or to prescribe specific language, for third party verification calls. Instead, the Commission set forth minimum guidelines for the content of those verification calls. Among these items, the Commission called for verifiers to elicit from customers "the names of the carriers affected by the change" -- apparently a reference to securing the identity of the carrier(s) being supplanted by the customer's change order. The Commission further stated that these verification contents (including the identity of the supplanted carrier) "do not differ in substance from our rules regarding LOAs." Id., § 40.

In this respect, the Third Report and Order erroneously created a serious and wholly unnecessary discrepancy between the contents of LOAs and third party verification calls that should be reconsidered and eliminated by the

Commission. Contrary to the assertion in the Third Report and Order, Section 64.1130 of the Commission's rules governing the form and content of LOAs does not require such written authorizations to specify the identity of the customer's current preferred carrier for a presubscribed service.⁵ Moreover, the Commission's order cites no record support indicating that there is any need for, or benefit from, the collection of this information by submitting carriers.

Indeed, although the Commission first prescribed presubscription rules more than fifteen years ago, to date no industry standards body has adopted any process for a submitting carrier to notify an executing carrier of the identity of the customer's current carrier. The reason for the absence of such a procedure is readily apparent: the sole relevant consideration in executing a change order is identification of the carrier to whose service the change is being authorized, not the identity of the carrier being displaced.

Requiring submitting carriers to compile and provide the identity of the customer's current carrier would also be seriously disruptive, as well as entirely superfluous. AT&T's experience indicates that many customers do not know and understand the identity of the carrier that provides their presubscribed

⁵ Section 64.1130(e)(2) of the Commission's rules provides that the LOA must state "in clear and unambiguous language," that the customer has made "a decision to change the preferred carrier from the current telecommunications carrier to the soliciting telecommunications carrier." This provision does not, however, require identification by the customer of "the current telecommunications carrier" as a precondition to effectiveness of the LOA.

telecommunications service.⁶ Requiring submitting carriers to provide such inaccurate information to executing carriers (even assuming that appropriate procedures for exchanging such data could be implemented) would simply create opportunities for disputes that could be exploited by LECs to delay or reject change orders submitted by carriers that compete with those entities. Moreover, even where customers accurately comprehend the identity of their current carrier, they may be unwilling (out of privacy concerns or for other reasons) to disclose that information to another carrier soliciting their presubscription orders, even where the customer authorizes a change to the soliciting carrier. There is no basis for disenfranchising carriers from submitting otherwise properly authorized change orders on behalf of such customers.⁷

⁶ For example, customers who are served by a switchless reseller may often inaccurately believe that their carrier is the reseller's underlying facilities-based telecommunications provider. Moreover, even seventeen years after the Bell System divestiture, some subscribers still believe erroneously that their long distance service is provided by Bell Operating Companies that are legally precluded from offering that service.

⁷ There is likewise no rational basis for requiring submitting carriers to obtain and compile -- but not provide to executing carriers -- the identity of the customer's current carrier (whether or not the customer's identification by the customer is in fact accurate). Recording and storing such information would serve no purpose in the overwhelming majority of carrier changes (amounting to tens of millions of transactions annually) that never result in a dispute.

Moreover, even in the relatively small proportion of change orders that may be disputed by customers, such claims focus in the first instance on whether the carrier change was authorized, not on the identity of the displaced carrier. And to the extent that adjudication of such disputes by state public utilities regulators or the Commission may become necessary, the Commission has prescribed other procedures that will identify the allegedly slammed carrier. See 47 C.F.R.

(footnote continued on following page)

In light of these serious burdens, and the absence of any demonstrated need for compiling such information, the Commission should reconsider its decision and should eliminate the inconsistency between its LOA and third party verification requirements by dispensing with a requirement that submitting carriers in the latter transactions attempt to obtain the identity of a customer's current telecommunications service provider.

III. The Commission Should Require Executing Carriers To Lift Freezes And Process Carrier Change Requests In the Same Three-Way Call.

In its Section 258 Order released in 1998,⁸ the Commission recognized that executing carrier procedures for lifting preferred carrier freezes may unreasonably burden consumers seeking to change their selected carrier, and as a result could unreasonably inhibit competition in the provision of presubscribed telecommunications services.⁹ To address this serious problem, the Commission required LECs that administer preferred carrier freeze programs to accept three-way calls between the a submitting carrier, that carrier's customer, and the LEC for the

(Footnote continued from preceding page)

§ 64.1150(a)(requiring executing carrier to notify both the authorized and allegedly unauthorized carrier of a slamming claim, and to identify both carriers to one another).

⁸ Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers Long Distance Carriers, 14 FCC Rcd 1508 (1998)(“Section 258 Order”).

⁹ Id. at 1548 (¶ 127). The Commission noted that such potential burdens on consumers raise “particularly acute” concerns in nascent telecommunications markets where competition has not yet fully developed.

purpose of lifting a carrier freeze previously applied to the customer's account.¹⁰ Lifting the freeze, however, addresses only one part of the transaction required by a customer and the submitting carrier; the consumer's designation of a new preferred carrier must also be submitted to, and implemented by, the LEC. To that end, MCI requested the Commission to clarify that executing carriers are obligated to both lift a preferred carrier freeze, and to switch the customer to the new preferred carrier, in the same three-way call transaction.¹¹

Astonishingly, even though the Commission expressly acknowledged that the procedure proposed by MCI would be "an efficient means of effectuating a consumer's carrier change request" (§ 74), the Third Report and Order declined to require LECs to both lift a freeze and accept a carrier change order for processing in the same three way call. Id., §§ 74-76. However, the decision provides no reasoned basis for imposing such substantial, and wholly unnecessary, inconvenience and burdens upon either consumers or their new preferred carriers.¹²

Thus, the fact that the Section 258 Order required LECs to adopt additional "simple, easily understandable but secure way[s]" for customers to lift a freeze, as noted in the Third Report and Order (§ 74), does not address or explain why customers and submitting carriers that have availed themselves of the three-way

¹⁰ Id. (§ 128).

¹¹ Third Report and Order, § 73.

¹² The Commission's observation (id., §§ 74-75) that its current rules allow LECs to employ separate transactions to lift freezes and process carrier changes does not explain or justify continuing that practice; the statement simply underscores the necessity for the relief MCI requested in its petition.

calling mechanism mandated by the Commission as a vehicle for lifting freezes should be subjected to the potential disruption of having to pursue a second contact with the LEC to process a subsequent carrier change order. Indeed, LECs could have no legitimate basis for objecting to combining these transactions in a single call, because that procedure will obviously reduce the time and cost for those carriers to implement customers' carrier changes.¹³

Moreover, and of paramount importance, requiring LECs to lift carrier freezes and to accept carrier changes in the same three-way call will manifestly improve enormously the ease and convenience of the three-way calling procedure for consumers whose interests the Commission is obligated to serve. Because the Third Report and Order does not identify any countervailing factors that could militate against that result (and it is clear that there are none), the Commission should reconsider this aspect of its order and should require executing carriers to lift freezes and to process carrier change requests in the same three-way call.

¹³ Since 1985, LECs have been required by the Commission to accept carrier change orders submitted by customers to their local business offices. See Investigation of Access and Divestiture Related Tariffs, 101 F.C.C.2d 911, 931 (1985)(“Allocation Plan Order”). Accepting such change orders in conjunction with the Commission’s mandate allowing three-way calls to lift a carrier freeze thus would impose no additional obligation on the LECs.

CONCLUSION

For the reasons stated above, the Commission should reconsider and modify, or in the alternative clarify, its Third Report and Order to the extent described above.

Respectfully submitted,

AT&T Corp.

By Peter H. Jacoby / ha
Mark C. Rosenblum
Peter H. Jacoby
Room 1134L2
295 North Maple Avenues
Basking Ridge, N.J. 07920
Tel. (908) 221-4243
Fax (908) 221-4490

Its Attorneys

April 2, 2001

CERTIFICATE OF SERVICE

I, Theresa Donatiello Neidich, do hereby certify that on this 02nd day of April, 2001 a copy of the foregoing "AT&T Reconsideration Petition" was served by US first class mail, postage prepaid, on the parties named on the attached service list.

April 02, 2001

Theresa Donatiello Neidich/ha
Theresa Donatiello Neidich

Kevin C. Gallagher
360° Communications Company
8725 W. Higgins Road
Chicago, IL 606031

Gary L. Phillips
Ameritech
1401 H Street, N.W. - Suite 1020
Washington, D.C. 20005

Kathleen Abernathy
David A. Gross
AirTouch Communications
1818 N St., Suite 800
Washington, DC 20036

Grant Wood, Attorney General
State of Arizona
1275 West Washington
Phoenix, AZ 85007

Charles D. Cosson
Airtouch Communications
One California Street, 29th Floor
San Francisco, CA 94111

Lawrence W. Katz
Michael E. Glover
James Pachulski
Bell Atlantic Telephone Companies
1320 North Court House Rd - 8th Floor
Arlington, VA 22201

Charles H. Helein
Robert M. McDowell
Rogena Harris
Helein & Associates, PC
8180 Greensboro Drive – Suite 700
McLean, VA 22102
Counsel, America's Carriers
Telecommunications Association

Mr. Robert Sutherland
Richard M. Sbaratta
Helen A. Shockey
BellSouth Corporation
Suite 1700
1155 Peachtree Street, N.E.
Atlanta, GA 30306-3610

Bruce M. Botelho,
Attorney General
State of Alaska
PO Box 110300
Juneau, AK 99811-0300

Danny E. Adams
Rebekah J. Kennett
Kelley Drye & Warren LLP
1200 19th Street, NW - Suite 500
Washington, D.C. 20036
Counsel, Billing Information
Concepts Corp.

Robert W. Taylor
Brittan Communications
International Corporation
600 Jefferson, Suite 500
Houston, TX 77002

Rachel J. Rothstein
Paul W. Kenefick
Jonathan Session
Cable & Wireless USA, Inc.
8219 Leesburg Pike
Vienna, VA 22182

Donald E. Lungren
Attorney General
State of California
1515 K Street, Suite 511
PO Box 944255
Sacramento, CA 94244-2550

Perth Arth, Jr.
Lionel B. Wilon
Mary Mack Adu
505 Van Ness Avenue
San Francisco, CA 94102
Counsel, People of the State of CA
and the Public Utilities Commission

Wendy C. Chow
Michael Altschul
Randall S Coleman
Cellular Telecommunications
Industry Association
1250 Connecticut Ave., NJ
Washington, DC 20036

Christopher J. Wilson
Cincinnati Bell Telephone Company
201 East 4th Street, Room 102-620
Cincinnati, OH 45201

John B. Adams
Citizens Utilities Company
1400 16th Street, NW, Suite 500
Washington, DC 20036

Carol Ann Bischoff
Competitive Telecommunications
Association/ACTA
1900 M Street, NW - Suite 800
Washington, D.C. 20036

Danny E. Adams
Steven A. Augustino
Peter A. Batacan
Kelley Drye & Warren LLP
1200 19th Street, NW - Suite 500
Washington, D.C. 20036
Counsel, CompTel/ACTA

Richard Blumenthal, Chairperson
Telecommunications Subcommittee
Consumer Protection Commission
National Association of Attorneys General
55 Elm Street – 7th Floor
Hartford, CT 06106

M. Jane Brady
Attorney General
State of Delaware
Carvel State Office Building
820 N. French Street
Wilmington, DE 19801

Cynthia B. Miller
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Pamela Arluk
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, D.C. 20007
Counsel, CoreComm, Ltd.

Robert A. Butterworth
General Attorney
State of Florida
The Capitol
Tallahassee, FL 32399-1050

Ian D. Volner
Health L. McDowell
Venable, Baetjer Howard & Civiletti, LLP
1201 New York Ave, NW – Suite 1000
Washington, DC 20005
Counsel, The Direct Marketing
Association

Michael J. Shortley, III
Frontier Corporation
180 South Clinton Avenue
Rochester, NY 14646

Elizabeth A. Noël
Sandra Mattavous-Frey
Julie E. Rones
Office of the People's Counsel
District of Columbia
1133 15th Street NW – Suite 500
Washington, DC 20005

Barry Pineles
GST Telecom Inc.
4001 Main Street
Vancouver, WA 98663

James M. Smith
Excel Telecommunications, Inc.
1133 Connecticut Avenue, NW
Suite 750
Washington, D.C. 20036

John F. Raposa
GTE Service Corporation
600 Hidden Ridge, HQE03J27
PO Box 152092
Irving, TX 75015-2092

Pamela Arluk
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, D.C. 20007
Counsel, Excel Telecommunications, Inc.

Andre J. Lachance
GTE Service Corporation
1850 M Street, NW
Washington, D.C. 20036

Jeffrey S. Linder
Suzane Yelen
Wiley Rein & Feilding
1776 K Street, NW
Washington DC 20006
Counsel, GTE Service Corporation

Kenneth T. Burchett
GVNW Consulting
8050 SW Warm Springs
Tualatin, OR 97062

Al Lance
Attorney General
State of Idaho
210 Statehouse
Boise, ID 83720-1000

James E. Ryan
Attorney General
State of Illinois
500 S. Second Street
Springfield, IL 62796

Illinois Commerce Commission
160 No LaSalle Street - Suite C-800
Chicago, IL 60601

Jeffrey A. Modisett
Attorney General
State of Indiana
219 State House
Indianapolis, IN 46204

Thomas J. Miller
Attorney General
State of Iowa
Hoover Building, 2nd Floor
Des Moines, IA 50319

Carla J. Stovall
Attorney General
State of Kansas
Kansas Judicial Center – 2nd Floor
Topeka, KS 66612-1597

Jonathan E. Canis
Andrea D. Pruitt
Kelley Drye & Warren LLP
1200 19th Street, NW - Suite 500
Washington, D.C. 20036
Counsel, Intermedia Communications

Gary L. Mann
IXC Long Distance, Inc.
98 San Jacinto Boulevard
Suite 700
Austin, TX 78701

Douglas W. Kinkoph
LCI International Telecom Corp.
8180 Greensboro Drive #800
McLean, VA 22102

J. Joseph Curran, Jr.
Attorney General
State of Maryland
200 St. Paul Place
Baltimore, MD 21202-2021

Bryan G. Moorhouse
Susan Stevens Miller
Maryland Public Service Commission
6 Saint Paul Street
Baltimore, MD 21202

Frank J. Kelley
Attorney General
State of Michigan
Law Building
PO Box 30212
Lansing, MI 48909

Humbert H. Humphrey, III
Attorney General
State of Minnesota
102 State capitol
St Paul, MN 55155

Dana K. Joyce
Lera L. Shemwell
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Robin McHugh
Montana Public Service Commission
PO Box 202601
Helena, MT 59620-2601

Michael J. Travieso
Maryland People's Counsel
6 Saint Paul Street, Suite 2102
Baltimore, MD 21202
For the National Association of State
Utility Consumer Advocates (NASUCA)

Linda F. Golodner
Susan Grant
National Consumers League
1701 K Street, NW – Suite 1200
Washington, DC 20006

L. Marie Guillory
Jill Canfield
National Telephone Cooperative
Association
2626 Pennsylvania Avenue, NW
Washington, D.C. 20037

Frankie Sue Del Papa
Attorney General
State of Nevada
Capitol Complex
Carson City, NV 89710

Tom Udall
Attorney General
State of New Mexico
PO Drawer 1508
Santa Fe, NM 87504-1508

Dennis C. Vacco
Attorney General
State Capitol of New York State
Albany, NY 12224-0341

Timothy S. Carey
Ann Kutter
NYS Consumer Protection Board
Five Empire State Plaza-Suite 2101
Albany, NY 12223-1556

Cheryl L. Callahan
Elaine H. Bartley
New York State Public Service
Commission
Three Empire State Plaza
Albany, NY 12223-1350

Michael F. Easley
Attorney General
State of North Carolina
PO Box 6239
Raleigh, NC 27602-0629

Robert P. Gruber
Antoinette R. Wike
Public Staff
North Carolina Utilities Commission
PO Box 29520
Raleigh, NC 27626-0520

Betty D. Montgomery
Attorney General
State of Ohio
30 East Broad Street – 17th Floor
Columbus, OH 43266-0410

Robert S. Tongren
Evelyn R. Robinson
Ohio Consumers' Counsel
77 South High Street – 15th Floor
Columbus, OH 43266-0550

Betty Montgomery
Duane Luckey
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215-3793

Lemora Burdine
Assistant General Counsel
Oklahoma corporation Commission
PO Box 52000-2000
Oklahoma City, OK 73152

Nancy C. Woolf
Jeffrey B. Thomas
Pacific Bell/Nevada Bell
140 New Montgomery St - Room 1529
San Francisco, CA 94105

James L. Wurtz
Pacific Bell/Nevada Bell
1275 Pennsylvania Avenue, NW
Washington, DC 20004

Irwin a. Popowsky
Philip F. McClelland
Office of Attorney General
Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Steven D. Hitchcock
Neil S. Ende
Technology Law Group, L.L.C.
5335 Wisconsin Avenue, NW, Suite 440
Washington, D.C. 20015
Counsel, PriceInteractive, Inc.

Genevieve Morelli
Jane Kunka
Qwest Communications Corporation
4250 North Fairfax Drive
Arlington, VA 22203

Joseph Kahl
RCN Telecom Services, Inc.
105 Carnegie Center
Princeton, NJ 08540

Michael Donahue
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, D.C. 20007
Counsel, RCN Telecom Services, Inc.

Jeffrey B. Pine
Attorney General
State of Rhode Island
72 Pine Street
Providence, RI 02903-2856

David Cosson
Marci E. Greenstein
Kraskin, Lesse & Cosson, LLP
2120 L Street, NW, Suite 520
Washington, D.C. 20037
Counsel, Rural LECs

Robert M. Lynch
Roger K. Toppins
Barbara R. Hunt
SBC Communications Inc.
One Bell Plaza, Room 3026
Dallas, TX 75202

Reginald R. Bernard
SDN Uses Association, Inc.
P O Box 4014
Bridgewater, NJ 08807

Wendy S. Bleumling
The Southern New England
Telephone Co.
227 Church Street
New Haven, CT 06510

Richard M. Firestone
Paul S. Feira
Nicholas I. Porritt
Arnold & Porter
555 Twelfth Street, NW
Washington, D.C. 20004-1202
Counsel for Tel-Save.com, Inc.

Leon M. Kestenbaum
Jay C. Keithley
Michael B. Fingerhut
Norina T. Moy
Sprint Corporation
1850 M Street, NW, Suite 1110
Washington, D.C. 20036

Steven P. Goldman
Teltrust, Inc.
6322 South 3000 East
Salt Lake City, UT 84121

Bryan Rachlin
General Counsel
Telco Communications Group, Inc.
4219 Lafayette Center Drive
Chantilly, VA 20151

Leonard J. Kennedy
Loretta J. Garcia
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Ave., NW
Washington, D.C. 20036
Counsel, Teltrust, Inc.

Colleen Boothby
Thomas Lynch
Levine Blaszak Block & Boothby, LLP
1300 Connecticut Ave, NW – Suite 500
Washington, DC 20036
Counsel for Telco Communications

John Knox Walkup
Attorney General
State of Tennessee
500 Charlotte Avenue
Nashville, TN 37243-0497

Charles C. Hunter
Catherine M. Hannan
Hunter Communications Law Group
1620 I Street, NW – Suite 701
Washington, DC 20006
Counsel, Telecommunications Resellers
Association

Lynn Greer
Sara Kyle
Melvin Maline
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37218-0902

Aloysius T. Lawn, IV
Tel-Save.com, Inc.
6805 Route 202
New Hope, PA 18938

Suzie Ray McClellan
Kristen Doyle
Texas Office of Public Utility Counsel
1701 N. Congress Ave – Suite 9-180
PO Box 12397
Austin, TX 78711-2397

Pat Wood III
Judy Walsh
Public Utility Commission of Texas
1701 N. Congress Ave – 7th Floor
Austin, TX 78711-2397

Paul B. Jones
Janis Stahlhut
Donald F. Shephard
Time Warner Communications
290 Harbor Drive
Stamford, CT 06902

David R. Poe
Yvonne M. Coviello
LeBoeuf Lamb Green & MacRae LLP
1875 Connecticut Ave, NW – Suite 1200
Washington, DC 20009
Counsel, Time Warner Communications

William R. Gardner
William J. Gildea, III
Harvey Kellman
Law Offices of Michael R. Gardner, PC
1150 Connecticut Ave, NW – Suite 710
Washington, DC 20036
Counsel, TV Services, Inc.

Mary McDermott
Linda Kent
US Telephone Association
1401 H Street, NW – Suite 600
Washington, DC 20005

Kathryn Marie Krause
U S West, Inc.
1801 California Street, Suite 5100
Denver, CO 80202

William H. Sorrell
Attorney General
State of Vermont
109 State Street
Montpelier, VT 05609-1001

Peter M. Bluhm
Vermont Public Service Board
Drawer 20
Montpelier, VT 05620-2701

E.C. Addison
Virginia State Corporation Commission
Division of Communications
PO Box 197
Richmond, VA 23218

James Veilleux
VoiceLog LLC
9509 Hanover South Trail
Charlotte, NC 28210

Christine O. Gregoire
Attorney General
State of Washington
125 Washington Street, SE
PO Box 401011
Olympia, WA 98504-0100

Darrell V. McGraw, Jr.
Attorney General
State of West Virginia
Room 26 – East Wing
State Capitol
Charleston, WV 25305-0220

Timothy R. Graham
Joseph M. Sandri
Robert G. Berger
WinStar Communications, Inc.
1146 19th Street, NW – Suite 200
Washington, DC 20036

James E. Doyle
Attorney General
State of Wisconsin
PO Box 7857
Madison, WI 53707-7857

Walter N. McGee
Working Assets
701 Montgomery Street – 4th Floor
San Francisco, CA 94111

Maryl L. Brown
Karen Reidy
WorldCom, Inc.
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Brian Sulmonetti
WorldCom, Inc.
1515 South Federal Highway, Suite 400
Boca Raton FL 33432

Douglas F. Brent
WorldCom, Inc.
9300 Shelbyville Rd – Suite 700
Louisville, KY 40222

John T. Scott, III
Crowell & Moring, LLP
1001 Pennsylvania Ave NW
Washington, DC 20004
Counsel, Verizon

Winston Bryant
Attorney General
State of Arkansas
200 Tower Building
323 Center Street
Little Rock, AR 72201-2610

David Cosson
Kraskin, Lesse & Cosson, LLP
2120 L Street, NW, Suite 520
Washington, D.C. 20037
Counsel, National Telephone
Cooperative Association