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

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Local Competition and Broadband Reporting ) CC Docket No. 99-301

REPLY COMMENTS  
OF THE  
UNITED STATES TELECOM ASSOCIATION

The United States Telecom Association ("USTA") hereby files its reply comments in response to the Commission's Second Notice of Proposed Rulemaking ("Notice") in the above-referenced proceeding. The clear consensus among reporting companies from different industry segments is that the Commission's proposed changes in reporting obligations are unnecessary. There is general agreement among reporting carriers that if changes proposed in the Commission's Notice were adopted, they would be burdensome and costly for reporting carriers, and provide no public interest benefits when weighed against the costs to companies providing the data. The Commission's existing Form 477 provides sufficient data for the Commission to assess competition in the local and broadband markets. There is also general agreement among reporting carriers that the Commission should not revise the standard for treating information provided by carriers as non-confidential. Adoption of a presumption against confidential treatment of competitively sensitive data would limit Commission access to vital information about the scope of local and broadband competition.

The request by state regulators for more reporting obligations is simply unsupportable. The data collected by the Commission on Form 477 is broad. State regulators provide no

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reasons to justify changes in existing reporting obligations.

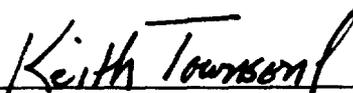
The data collected in this proceeding should be used to eliminate unintended consequences of current telecommunications public policy. Industry-specific regulations should no longer hold sway over Commission directed public policy. Carriers providing functionally equivalent services, like Internet access services, should be regulated, or unregulated, regardless of the type of network configuration used to provide competitive services. ILEC broadband unbundling is unnecessary given the competition among facilities-based providers of broadband services. Competitive services should be totally unregulated. Market forces, not government regulators, can best drive access to new and innovative products and services to all Americans in all regions of the country. These simple changes in Commission policy will promote additional customer choices, price competition, and speed the deployment of new and innovative broadband services to all Americans throughout the country.

Respectfully submitted,

**UNITED STATES TELECOM ASSOCIATION**

Date: April 2, 2001

By:

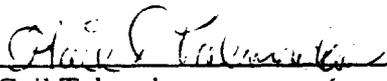
  
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## CERTIFICATE OF SERVICE

I, Gail Talmadge, do hereby certify that on April 2, 2001 a copy of *Reply Comments of the United States Telecom Association* in CC Docket No. 99-301, was either hand-delivered or sent via U.S. Mail, first-class, postage prepaid, to the persons on the attached service list.

  
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Gail Talmadge