CompTel 2001: Policy Goals

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CompTel

CompTel aggressively advocates pro-competitive, open entry policies. CompTel represents its Members before the FCC, the U.S. Department of Justice, the federal courts, state PUCs, the U.S. Congress and state legislatures. Internationally, CompTel participates in proceedings at the FCC, the U.S. Congress and the Office of the United States Trade Representative.

CompTel Affiliations

- ***In addition, CompTel participates in the following***
  - ***North American Numbering Council (NANC)***
  - ***North American Numbering Plan Billing and Collection Agent (NBANC)***
  - ***Rural Task Force (RTF)***
  - ***Competitive Universal Service Coalition (CUSC)***
  - ***Competitive Broadband Coalition (CBC)***
  - ***Voices for Choices***
  - ***No-Name Coalition***
  - ***Smart Buildings Policy Project (SBPP)***
  - ***Congressional Internet Caucus Advisory Committee***

CompTel 2001 Policy Mission

- ***To continue to serve as a powerful advocate for competitive communications providers on the key policy and regulatory issues of concern to them, whether local, national or international***

Five Principal CompTel Policy Objectives for 2001

- *#1. Local Access*
- *#2. Competitive Broadband Access*
- *#3. Fair Compensation*
- *#4. Structural Separation*
- *#5. International Market Access*

Five Principal CompTel Policy Objectives for 2001

- *CompTel's policy focus areas reflect its ever-evolving Membership:*
  - *CLEC/ICP*
  - *Long-haul Broadband*
  - *International*
  - *Internet*
  - *Energy*

CompTel Policy Objective #1: Local Access

- ***CompTel's 20-year commitment to competition extends to every corner of the market, particularly <u>local</u> access:***
  - ***CompTel argues that <u>all</u> providers must have equal access to the "first mile," with access to UNEs at economic cost***
  - ***CompTel's battle to secure a truly local telecommunications marketplace is being waged on many fronts***

CompTel Policy Objective #1: Local Access

- *Unbundled Network Elements & Pricing*
- *UNE Combinations (e.g., UNE-P,EELs)*
- *Collocation*
- *Line Sharing/Line Splitting*
- *New Networks Proceeding/Project Pronto*
- *Section 271*
- *Cable Open Access*

CompTel Policy Objective #1: Local Access

- ***UNE Remand*** *(CC Docket No. 96-98)*
  - ***CompTel Petition for Reconsideration*** *asks the FCC to increase the availability of unbundled local switching (ULS)*
  - *CompTel has urged the FCC to expand the number of lines on which competitors can provide service using ILEC ULS (i.e., the Unbundled Network Element Platform, or "UNE-P")*

CompTel Policy Objective #1: Local Access

- ***Enhanced Extended Link ("EELs") (CC Docket No. 96-98)***
  - ***<u>CompTel v. FCC,</u> Case No. 00-1272, appeals the FCC's interim use restrictions on the use of EELs (loop-transport combinations)***
  - ***CompTel will oppose permanent use restrictions on the use of UNEs and UNE combinations***

CompTel Policy Objective #1: Local Access

- ***Collocation Remand***
  (CC Docket No. 98-147)
  - ***ILECs must allow competitors to collocate any equipment "necessary" for interconnection or access to UNEs***
  - ***CompTel has proposed that the FCC define "necessary" as any equipment or practice that allows a competitor to increase its "collocation throughput" (i.e., interconnection or number of UNEs accessed from a given collocation)***

CompTel Policy Objective #1: Local Access

- ***Line Sharing/Line Splitting (CC Docket Nos. 98-147; 96-98)***
  - ***CompTel advocates the competitive availability of unbundled access to the high-frequency portion of the local loop***
  - ***<u>CompTel Petition for Reconsideration/ Clarification</u> asks the FCC to clarify certain issues in its recent "Line Splitting Order"***

CompTel Policy Objective #1: Local Access

- ***New Networks Proceeding/ Project Pronto (5th and 6th FNPRMs, CC Docket No. 97-98)***
  - ***CompTel has championed competition in the burgeoning market for advanced services***
  - ***FCC has initiated a proceeding on <u>CompTel's Petition for Reconsideration</u> of SBC's proposed "Project Pronto" fiber-fed, next-generation digital loop carrier overlay network***

CompTel Policy Objective #1: Local Access

- *Section 271*
  - *<u>Verizon Section 271 Application for MA</u> (CC Docket No. 01-9)*
  - *CompTel reiterated Members' concerns about poor trunk and special access provisioning*
  - *CompTel asked the FCC to impose performance monitoring for special access on VZ and its interLATA affiliate*

CompTel Policy Objective #1: Local Access

- ***Cable Open Access (GN Docket No. 00-185)***
  - ***CompTel has called for "minimum cable open access rules" to ensure competitive providers of advanced telecommunications and information services have access to facilities operated by incumbent cable service operators***

CompTel Policy Objective #2: Competitive Broadband Access

- ***CompTel has proposed a forward-looking national broadband policy:***
  - ***eliminate local broadband access bottlenecks***
  - ***keep Internet free from unnecessary regulation and open for business to all***
  - ***promote meaningful industry self-regulation as preferred approach to address consumer concerns***

CompTel Policy Objective #2: Competitive Broadband Access

- ***CompTel vigorously opposes the very real threat of the anti-competitive Tauzin/Dingell bill:***
  - ***CompTel has met with numerous Members of Congress and their staffs to convince them to resist joining the Bells' legislative efforts and to support our alternative, pro-competitive legislation, which advocates UNEs, increased enforcement and structural separation***

CompTel Policy Objective #2: Competitive Broadband Access

- *CompTel's Federal Broadband Advocacy:*
  - *"Break the Bottleneck" Strategic Communications and Grassroots Lobbying Campaign (700 letters to Congress in FL)*
  - *Annual Legislative Conference (April 19-21) Kingsmill Resort, Williamsburg, VA*
  - *Competitive Broadband Coalition (CBC)*
  - *Voices for Choices*
  - *No-Name Coalition*

CompTel Policy Objective #3: Fair Compensation

- *As the umbrella association of competitive carriers, CompTel advocates for cost-based ILEC access charges for circuit-switched voice traffic; champions the right of CLECs to reciprocal compensation; and defends against efforts to impose legacy-based access charges on evolving packet-switched technologies (e.g., VoIP, VON)*

CompTel Policy Objective #3: Fair Compensation

- ***Reciprocal Compensation for ISP-Bound Traffic (CC Docket Nos. 96-98; 99-68)***
  - ***CompTel has argued that the FCC should not cause unnecessary financial hardship to the competitive industry by radically changing this aspect of inter-carrier compensation***
  - ***CompTel believes that "bill and keep" is inappropriate, illegal and bad public policy if imposed for only one type of traffic***

CompTel Policy Objective #3: Fair Compensation

- ***Inter-Carrier Compensation NOI***
  - ***CompTel is formulating its position for the FCC's expected <u>Notice of Inquiry</u> (NOI) on inter-carrier compensation***

CompTel Policy Objective #4: Structural Separation

- ***CompTel believes that the <u>RBOCs should be split into separate retail and wholesale affiliates</u>. Structural separation:***
  - ***minimizes or eliminates the inevitable conflict that results from an RBOC's dual competitor/ supplier role***
  - ***creates a level playing field***
  - ***in the long-term, reduces the need for regulation***

CompTel Policy Objective #4: Structural Separation

- ***CompTel has led the industry in spearheading the issue of structural separation as the ultimate tool to speed the opening of local markets:***
  - ***Frisby NARUC Speech***
  - ***Pennsylvania PUC Verizon Order***
  - ***Capitol Hill***

CompTel Policy Objective #5: International Market Access

- ***As early as 1996, CompTel was the first association to form an International Communications Committee, reflecting the association's ongoing commitment to competition on a worldwide scale, and to help its members navigate the often-complex rules, regulations and business practices of U.S. overseas trading partners.***

CompTel Policy Objective #5: International Market Access

- *CompTel is actively urging policymakers to ensure that other countries satisfy their commitments under the World Trade Organization (WTO) Basic Telecommunications Agreement*
  - *CompTel 2001 USTR Section 1377 Telecom Trade Review Comments (Germany, Mexico, South Africa, Japan and Taiwan)*