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Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of	)	WT Docket No. 97-207
	)	
Calling Party Pays Service Offering	)	
In the Commercial Mobile Radio Services	)	
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MEMORANDUM OPINION AND ORDER ON RECONSIDERATION AND ORDER TERMINATING PROCEEDING

Adopted: April 9, 2001 **Released:** April 13, 2001

By the Commission:

I. INTRODUCTION

1. In the *Memorandum Opinion and Order on Reconsideration*, in response to a Petition for Reconsideration of the *Declaratory Ruling and Notice of Proposed Rulemaking* (*Declaratory Ruling and Notice*)[1] filed by the Ohio Public Utilities Commission (Ohio Petition),[2] we reaffirm our determination that calling party pays is a commercial mobile radio service subject to the regulatory structure set out in Section 332(c)(3) of the Telecommunications Act.[3] As fully discussed below, we find that calling party pays service is an interconnected, for profit service to the public and, therefore, constitutes commercial mobile radio service under the Act. Accordingly, we deny the Ohio Petition.

2. In the *Order Terminating Proceeding*, we decide to terminate this proceeding[4] because it is not clear that regulatory intervention by this Commission is warranted. Our existing rules do not prevent a carrier from offering a calling party pays service to its subscribers. Based on the record before us, we believe it best not to adopt any specific rules to govern calling party pays. Accordingly, we terminate this proceeding without taking any action on the issues raised in the

[1] Calling Party Pays Service Offering in the Commercial Mobile Services, WT Docket No. 97-207, *Declaratory Ruling and Notice of Proposed Rulemaking*, 14 FCC Rcd 10861 (1999).

[2] Petition for Reconsideration and Clarification and Further Comments on Jurisdictional Issues Submitted by the Public Utilities Commission of Ohio, filed Aug. 16, 1999 (Ohio Petition).

[3] Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, codified at 47 U.S.C. § 332(c)(3) (Telecommunications Act).

[4] Calling Party Pays Service Offering in the Commercial Mobile Services, WT Docket No. 97-207, *Notice of Proposed Rulemaking*, 14 FCC Rcd 10861, 10872-10917 (1999).

Notice. By so doing, we remove any remaining regulatory uncertainty regarding calling party pays occasioned by the pendency of this proceeding.

II. BACKGROUND

3. In a Notice of Inquiry (*Inquiry*) issued in 1997, we sought information about calling party pays and whether regulatory action was necessary to facilitate more widespread implementation of calling party pays in the United States.[5] Under calling party pays, wireless subscribers pay only for the calls they place to others; the calling party is responsible for any charges associated with calls placed to a wireless subscriber. Under the predominant system currently in place in the U.S. for commercial mobile radio service calls, however, wireless subscribers pay both for calls they place as well as for calls they receive. The *Inquiry* was initiated to explore evidence from other parts of the world that calling party pays could provide a number of benefits, for example, by making wireless service more affordable for lower income consumers, and by encouraging greater use of wireless phones by removing the incentive to keep the phone turned off to avoid the costs of incoming calls.

4. On June 10, 1999, we adopted a *Declaratory Ruling and Notice of Proposed Rulemaking* in this proceeding. The *Notice of Proposed Rulemaking* sought comment on several key issues identified from the *Inquiry*, including how to notify wireline callers that they will incur charges when placing a call to a wireless phone, and how to bill callers for calling party pays calls. In the *Declaratory Ruling*, we addressed the regulatory status of calling party pays and determined that calling party pays should be classified as a commercial mobile radio service.[6] As a commercial mobile radio service, calling party pays thus would fall under the regulatory structure set out in Section 332(c)(3) of the Act.[7] We based our determination on an analysis of the statutory definition of "commercial mobile service" and our rules and policies implementing that definition. We determined that calling party pays offerings are mobile services that are offered for profit and make interconnected service available to the public or to such classes of eligible users as to be effectively available to a substantial portion of the public.[8]

5. On August 16, 1999, the Public Utilities Commission of Ohio filed a petition requesting reconsideration or clarification of the *Declaratory Ruling*.[9] Nine parties filed oppositions or comments on the Ohio Petition and Ohio filed reply comments.[10]

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[5] Calling Party Pays Service Offering in the Commercial Mobile Services, WT Docket No. 97-207, *Notice of Inquiry*, 12 FCC Rcd 17693(1997) (*Inquiry*).

[6] *Id.*

[7] 47 U.S.C. § 332(c)(3).

[8] *Declaratory Ruling*, 14 FCC Rcd at 10869-71 (paras. 15-16).

[9] Petition for Reconsideration and Clarification and Further Comments on Jurisdictional Issues Submitted by the Public Utilities Commission of Ohio, filed Aug. 16, 1999. (Ohio Petition).

[10] A list of parties commenting on the Ohio Petition appears in Appendix A.

6. The *Notice* sought comment on possible solutions to obstacles that appeared to be preventing commercial mobile radio service carriers from offering calling party pays. Specifically, the *Notice* sought comment on: (1) four elements that would be included in a uniform oral notification message to provide calling parties with sufficient information to make an informed decision before completing a calling party pays call to a wireless subscriber and incurring additional charges; (2) whether an oral notification based on these four elements would be sufficient to create an "implied-in-fact" contract between the caller and the commercial mobile radio service carrier; (3) the need for Commission action to protect callers from unreasonable calling party pays rates; (4) the means by which commercial mobile radio service providers may bill and collect from the calling party for calls to calling party pays subscribers, including local exchange carrier billing and collection; and (5) the accessibility of calling party pays offerings to people with disabilities, including those using telecommunications relay service centers and tele-typewriters. In response to the *Notice*, 55 parties filed comments and 23 parties filed reply comments.[11]

III. MEMORANDUM OPINION AND ORDER ON OHIO PETITION FOR RECONSIDERATION OF CPP DECLARATORY RULING

7. **Background.** The Ohio Petition alleges that the *Declaratory Ruling* contains ambiguous and potentially conflicting conclusions that should be clarified.[12] The Ohio Petition asks that, to the extent the *Declaratory Ruling* purports that the FCC has exclusive national jurisdiction over calling party pays, the ruling should be reconsidered in the context of a further ruling on the *Notice*.[13]

8. In its petition, Ohio alleges that calling party pays is not properly classified as a commercial mobile radio service.[14] Ohio contends that calling party pays is not a commercial mobile radio service because it does not meet the interconnected service criteria.[15] According to Ohio, calling party pays does not give subscribers the capability to communicate to, or receive communications from, all other users of the public switched telephone network.[16] Ohio also argues that calling party pays is not a new commercial mobile radio service but is plainly a billing option.[17]

9. In the eight oppositions to the Ohio Petition, the commenters agree with the Commission's decision that calling party pays offerings should be classified as a commercial mobile radio

[11] A list of parties filing comments and reply comments in response to the *Notice*, along with short title references used to cite commenting parties, appears in Appendix B. We note that numerous informal comments, such as letters, e-mails, and *ex parte* filings, were also received. These comments were made a part of the record in this proceeding and taken into account in our deliberations.

[12] Ohio Petition at 2.

[13] *Id.*

[14] *Id.* at 2, 6.

[15] Ohio Petition at 9. *See also* Ohio Reply to Oppositions at 5.

[16] Ohio Petition at 9. *See also* Ohio Reply to Oppositions at 5.

[17] Ohio Petition at 6.

service.[18] These parties urge the Commission to deny the Ohio Petition.

10. **Discussion.** We affirm that calling party pays is a commercial mobile radio service and deny the Ohio Petition. At the outset, we point out that the only determination reached in the *Declaratory Ruling* was that calling party pays is properly classified as a commercial mobile radio service.[19] Many commenters observe that, because that determination is the only final one reached by the Commission, it is the only decision properly subject to reconsideration at this time.[20] Although we sought comment in the *Notice* on additional jurisdictional issues surrounding calling party pays, such as the jurisdictional bases for requiring the provision of local exchange carrier billing and collection for calling party pays,[21] we reached no additional judgment on the merits of those jurisdictional questions. Our rules permit parties to file petitions for reconsideration only of final Commission actions.[22] Thus, except for the ruling that calling party pays is a commercial mobile radio service, the Ohio Petition seeks reconsideration or clarification of a non-final action. We do not, therefore, address the remaining jurisdictional issues raised in the Ohio Petition.[23]

11. Turning to the substance, we find that Ohio has failed to present any valid basis for reconsideration of our determination that commercial mobile radio services with a calling party pays option are commercial mobile radio services. We therefore affirm our determination that calling party pays is properly classified as a commercial mobile radio service.

12. We first reject as an inaccurate description of our *Declaratory Ruling*, Ohio's argument that we classified calling party pays as a commercial mobile radio service based on the belief that such services are regulated exclusively by the FCC.[24] Instead, we based our conclusion on an examination of relevant statutory language and our implementing rules.[25] We reiterate that this is the correct approach.

13. Under this approach, as we stated in the *Declaratory Ruling*, and as several commenters

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[18] *See* AirTouch Opposition at 1-3; America One Opposition at 2-4; Ameritech Opposition at 3; AT&T Opposition at 1-3; Bell Atlantic Opposition at 1-2; CTIA Opposition at 2; GTE Opposition at 2-3; PCIA Opposition at 2, 8-10.

[19] *See Declaratory Ruling*, 14 FCC Rcd at 10866, 10869 (paras. 8, 15).

[20] *See* AirTouch Opposition at 1, 8-9; CTIA Opposition at 2, 8-9. *See also* 47 C.F.R. § 1.429.

[21] *See Notice*, 14 FCC Rcd at 10895-97 (paras. 64-68).

[22] *See* Sections 1.106(a)(1), 1.429 of the Commission's Rules, 47 C.F.R. §§ 1.106(a)(1), 1.429.

[23] Ohio itself recognized that the *Declaratory Ruling* did not dispose of all the jurisdictional issues discussed in its petition and requested that that the "jurisdictional comments relating to the NPRM herein should also be considered as supplemental NPRM comments by the Ohio Commission." Ohio Petition at 3.

[24] Ohio Petition at 2.

[25] *Declaratory Ruling*, 14 FCC Rcd at 10869-71 (paras. 15-17).

note,[26] to determine whether a particular service should be classified as commercial mobile radio service, we must first examine Section 332(d)(1) of the Act. The statute provides that:

> the term "commercial mobile service" means any mobile service as defined by section 3) that is provided for profit, and makes interconnected service available (A) to the public or (B) to such classes of eligible users as to be effectively available to a substantial portion of the public, as specified by regulation by the Commission . . . .[27]

"Mobile service" is defined in Section 3(27) of the Telecommunications Act and Section 20.3 of the Commission's Rules as "a radio communication service carried on between mobile stations or receivers and land stations, and by mobile stations communicating among themselves."[28]

14. Ohio has not challenged our determination that calling party pays offerings meet the "mobile service" part of the definition. Nor has it disputed that calling party pays would also be provided for profit. Ohio does argue, however, that calling party pays service is not interconnected.[29] Ohio contends that, as long as the commercial mobile radio service customer remains a calling party pays subscriber, that customer cannot receive calls from the public switched telephone network unless a caller also becomes a customer of the same commercial mobile radio service provider. If the caller refuses to become a customer of that commercial mobile radio service provider, then the calling party pays customer is unable to receive a call from the public switched telephone network and is connected to a private network consisting only of other customers of the same commercial mobile radio service provider. Ohio claims that, because becoming connected to receive a call from the public switched telephone network is beyond the control of a commercial mobile radio service provider or a commercial mobile radio service customer who has chosen calling party pays, calling party pays is not interconnected to the public switched telephone network.[30] On reply, Ohio further disputes that the provision of a notification message requires interconnection with the public switched telephone network.[31] Commenters who oppose the Ohio Petition assert calling party pays clearly satisfies the interconnected service element of the commercial mobile radio service definition.[32]

15. We affirm our determination that calling party pays service is interconnected. We first agree with commenters who assert that, for a service to be "interconnected," our rules merely

[26] *See* America One Opposition at 3; AT&T Opposition at 1-3; CTIA Opposition at 3; PCIA Opposition at ii, 8-10.

[27] 47 U.S.C. § 332(d)(1).

[28] 47 U.S.C. § 3(27); 47 C.F.R. § 20.3.

[29] Ohio Petition at 9; Ohio Reply to Oppositions at 5, 8-9.

[30] Ohio Petition at 9; Ohio Reply to Oppositions at 8-9.

[31] Ohio Reply to Oppositions at 7.

[32] AirTouch Opposition at 6-8; AT&T Opposition at 2-3; Bell Atlantic Opposition at 1-2; CTIA at Opposition 6; PCIA Opposition at 14.

require the technical capability to communicate or receive calls from other users of the public switched telephone network.[33] If a calling party pays call is not completed by the caller, the failure to complete the call is a matter of the caller's choice rather than a technical inability of the called party to receive the call. As explained in the *Declaratory Ruling*, we determined that calling party pays is an interconnected service because "a calling party would be sending a message over the 'public switched network,' as those terms are defined by the regulation, to reach the mobile phone of the commercial mobile radio service subscriber."[34]

16. In addition to the use by the calling party of the public switched telephone network to complete a calling party pays call, other factors support the interconnection basis of our decision to classify calling party pays as a commercial mobile radio service. As PCIA points out, commercial mobile radio service customers who subscribe to calling party pays service use the public switched telephone network to make outgoing calls without any need for special consent by the called party.[35] That capability, in and of itself, is sufficient to meet our definition of "interconnected service." We also agree with PCIA that access to the oral notification message also requires interconnection even if the calling party does not complete the call.[36] We therefore conclude that calling party pays service meets the interconnected service element of the commercial mobile service definition.

17. As in the *Declaratory Ruling*, we reject arguments that calling party pays is not a commercial mobile radio service but merely a billing option.[37] As discussed above, calling party pays satisfies the elements of the definition of commercial mobile radio service set out in the statute and our regulations. The definition of commercial mobile radio service does not reference who pays for the call.[38] Transferring the payment obligation from one party to another does not alter the regulatory classification of the call. America One contends that regulatory classifications are generally unaffected by the identity of the party being charged for the service.[39] The commercial mobile radio service airtime – the underlying service -- remains classified and regulated as a commercial mobile radio service regardless of whether the calling party or the called party pays for that service. As America One points out, dial one service, 800 services, and casual calling services, which are different means of paying for a long distance call, are all classified as different

[33] *See* Section 20.3 of the Commission's Rules, 47 U.S.C. § 20.3. *See also*, CTIA Opposition at 6; GTE Opposition at 7, citing Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services, GN Docket No. 93-252, *Second Report and Order*, 9 FCC Rcd 1411, 1434 (1994).

[34] *Declaratory Ruling*, 14 FCC Rcd at 10870 (para.16). *See* Section 20.3 of the Commission's Rules, 47 C.F.R. § 20.3 for the definition of interconnected service.

[35] *See* PCIA Opposition at 14.

[36] *Id.*

[37] Ohio, supported by California, also claims that calling party pays is not a new commercial mobile radio service but is merely plainly a billing option. Ohio Petition at 6; Ohio Reply to Oppositions at 6; California Support at 3, 4-5.

[38] *See* 47 C.F.R. § 20.3.

[39] America One Opposition at 3.

interexchange services for regulatory purposes.[40] AT&T points out that 800 and 900 calls may be identical in terms of facilities and routing but they are considered separate services based on differences in the party responsible for paying. These services are not considered to be merely billing options.[41] As with the 800 and 900 services, when calling party pays places responsibility for payment on the calling party rather than on the commercial mobile radio service subscriber, it can be classified as a distinct service rather than as merely a billing option of the same service.

18. Consequently, we find that it is not unusual for a calling party to be a customer of a carrier only for purposes of making selected calls. The fact that the calling party pays caller uses local exchange carrier facilities in making the call does not mean that the caller is not a customer of the commercial mobile radio service provider. We conclude that calling party pays is a business arrangement in which the calling party pays caller is the customer of the commercial mobile radio service provider.

19. For these reasons, we reaffirm our decision that calling party pays is properly classified as a commercial mobile radio service. Therefore, we deny the Ohio Petition.

IV. ORDER TERMINATING PROCEEDING

20. **Background.** In the *Notice*, we sought comment on a number of issues related to consumer notification and billing and collection for calling party pays service. We asked for comment on the need for uniform notification requirements.[42] We also solicited comment on the corresponding issue of how to implement such notification requirements while incorporating the expertise and concerns of the states in the areas of consumer notification and protection.[43] We sought comment on four elements that we believed would be important, at least initially, to effectively inform callers to calling party pays subscribers of both the nature of the call and the charges that would accrue to the calling party.[44] We also asked interested parties to comment on whether the proposed oral notification would establish an "implied-in-fact" contract between the caller and the commercial mobile radio service provider.[45] Finally with respect to notification, we sought comment on other options for ensuring that calling parties have adequate notification, such as establishing a dedicated service code or codes to be assigned to calling party pays subscribers so that callers could more readily identify a calling party pays call.[46]

21. The *Notice* invited comment as well on whether the Commission should require

[40] *Id.* at 3.

[41] AT&T Opposition at 3.

[42] *Notice*, 14 FCC Rcd at 10877 (para. 30).

[43] *Id.*

[44] *Notice*, 14 FCC Rcd at 10883 (para. 42).

[45] *Notice*, 14 FCC Rcd at 10889 (para. 52).

[46] *Notice*, 14 FCC Rcd at 10886 (para. 48).

incumbent local exchange carriers to provide billing and collection services on a non-discriminatory basis to all commercial mobile radio service providers that request them.[47] We also sought comment on whether we should require incumbent local exchange carriers to provide commercial mobile radio service carriers billing name and address information sufficient for commercial mobile radio service carriers or third parties to bill calling parties for calling party pays-related calls.[48] Further, we sought comment on a range of accessibility issues, including whether the broader implementation of calling party pays raised accessibility concerns, including the rates to be paid by persons with disabilities, that need to be addressed by the Commission. In response to concerns expressed in comments to the *Inquiry* that rates charged to calling parties for calls to calling party pays subscribers could be higher than competitive levels,[49] we sought comment on whether market conditions exist or are likely to develop to discipline calling party pays rates.[50].

22. Commenters in this proceeding express significantly different views on how best to resolve the many issues raised in the *Notice*. For example, most commenters contend that there is no need for the Commission to take any regulatory action regarding calling party pays rates.[51] AARP, on the other hand, argues that the Commission must act to regulate calling party pays rates to prevent consumers from excessive charges for calls to wireless phones.[52]

23. **Discussion.** We conclude that the best course of action at this time is to terminate the calling party pays proceeding. The substantial record in this proceeding highlights the diverse views of commenters regarding what would be appropriate actions by the Commission. The primary issue is whether Commission action is needed to facilitate the broader implementation of calling party pays. The comments demonstrate a significant difference of opinion. Some commenters argue that the Commission must take certain actions if calling party pays is to become a widespread service option in the U.S.[53] Other commenters argue that there is no need for the Commission to do anything because carriers will provide this service if consumers demand it.[54]

24. Based on this record, we decline to adopt any specific rules to govern calling party pays at this juncture. We note that our existing rules do not prevent a carrier that wishes to offer calling

[47] *Notice*, 14 FCC Rcd at 10894 (para. 62).

[48] *Notice*, 14 FCC Rcd at 10894 (para.62).

[49] *See* Rural Telephone Companies' Comments to Inquiry at 3-4; *see generally* Ohio PUC Comments to Inquiry at 7-10.

[50] *Notice* at 10889.

[51] *See, e.g.*, AirTouch Comments at 57, BellSouth Comments at 21, GTE Comments at 28, Leap Wireless Comments at 12, Motorola Comments at 9, PCIA Comments at 32, and Pilgrim Comments at 48.

[52] AARP Comments at 4.

[53] *See, e.g.*, Bell Atlantic Comments, CTIA Comments, Pilgrim Telephone Comments, and VoiceStream Wireless Comments.

[54] *See, e.g.*, BellSouth Comments, SBC Communications Comments, USTA Comments, and US West Comments.

party pays from doing so. Also, the market now offers commercial mobile radio service subscribers pricing options generally unavailable when we started this proceeding, such as flat-rate pricing plans and service plans under which the first minute of an incoming call is free. Along with the continued reduction of commercial mobile radio service prices, these plans appear to offer consumers many of the same benefits we identified as potential benefits of calling party pays. We also see no need to adopt rules to govern the manner in which a carrier may offer a calling party pays service, but can deal in an enforcement context with any individual carrier offerings that result in charges that may violate the Communications Act.[55] Of course, if the need arises, we may revisit the issue of whether rules are needed, initiate a new proceeding, and gather a fresh record to consider rules to govern the offering of calling party pays services. Based on these factors, we terminate this proceeding without reaching any decisions on the issues raised in the *Notice*.

V. ORDERING CLAUSES

25. Accordingly, **IT IS ORDERED** that the Petition for Reconsideration of the Declaratory Ruling in this proceeding, filed by the Public Utility Commission of Ohio on August 16, 1999, **IS DENIED.**

26. In addition, **IT IS ORDERED** that this proceeding **IS TERMINATED** without further action.

27. This action is taken pursuant to Sections 1, 4(i), 7, 201, 202, 303(r), and 332 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 154(i), 157, 201, 202, 303(r), 332.

FEDERAL COMMUNICATIONS COMMISSION

Magalie Roman Salas

Magalie Roman Salas
Secretary

[55] We note the concerns expressed in the comments by the PBX community about their inability to block calling party pays calls from behind a PBX, potentially resulting in the billing of such calls to wireless phones where they are not authorized. We believe, however, that mechanisms exist to protect PBX owners from unauthorized calls, such as the use of call screening capabilities in existing operator services LIDB systems. Nortel Comments at 8. Although we decline to adopt any specific rules to address this concern, we remind carriers that charges for unauthorized calls could raise significant questions under Sections 201 and 202 of the Communications Act.

APPENDIX A

LIST OF PARTIES TO PETITION FOR RECONSIDERATION*

AirTouch
America One Communications, Inc. (America One)
Ameritech
AT&T Corp. (AT&T)
Bell Atlantic
California Public Utilities Commission (California)
Cellular Telecommunications Industry Association (CTIA)
GTE Service Corporation (GTE)
Personal Communications Industry Association (PCIA)
Public Utilities Commission of Ohio (Ohio)

* For a complete list of all documents filed in this proceeding, refer to the Commission's web site and the Electronic Comment Filing System at http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ecfs/comsrch_v2.hts, and enter 97-207 in the "proceeding" window.

APPENDIX B

LIST OF PARTIES TO NOTICE OF PROPOSED RULEMAKING*

AARP
Ad Hoc Telecom Users Committee & ACUTA: The Association of Telecommunications Professionals in Higher Education (Ad Hoc/ACUTA)
AirTouch
America One Communications, Inc. (America One)
American Hotel & Motel Association
American Public Communications Council (APCC)
Ameritech
AT&T Corp. (AT&T)
Bell Atlantic
BellSouth Corporation (BellSouth)
Cable & Wireless USA, Inc. (Cable & Wireless)
California Public Utilities Commission (California)
Cellular Telecommunications Industry Association (CTIA)
Celpage, Inc. (Celpage)
Cincinnati Bell Telephone Company
Coalition to Ensure Responsible Billing (CERB)
Competition Policy Institute (CPI)
Connecticut Department of Public Utility Control (Connecticut)
Consumer Federation of America (CFA) (Joint with Texas Office of Public Utility Counsel and Consumers Union) (Texas)
Consumers Union (CU)(Joint with Texas Office of Public Utility Counsel and Consumer Federation of America) (Texas)
Federal Trade Commission (FTC)
Florida Public Service Commission (Florida)
Global Wireless Consumers Alliance
Illuminet
GTE Service Corporation (GTE)
Lander University
Leap Wireless International, Inc. (Leap)
MCI WorldCom, Inc. (MCI WorldCom)
Missouri Office of Public Counsel (joint with Pennsylvania Office of Consumer Advocate)
Motorola, Inc.
Moultrie Independent Telephone Company (Moultrie)
National Telephone Cooperative Association (NTCA)
Nevadacom, Inc.
New York Department of Public Service (New York DPS)
New York State Attorney General's Office (New York AG)
Nextel Communications, Inc. (Nextel)
Nortel Networks, Inc. (Nortel)
Omnipoint Communications, Inc. (Omnipoint)
Organization for the Promotion and Advancement of Small Telephone Companies (OPASTCO)
Pennsylvania Office of Consumer Advocate (joint with Missouri Office of Public Counsel)

Personal Communications Industry Association (PCIA)
Pilgrim Telephone, Inc. (Pilgrim)
Public Service Commission of Wisconsin (Wisconsin)
Public Utilities Commission of Ohio (Ohio)
Qwest Communications Corp. (Qwest)
Rural Telecommunications Group (RTG)
SBC Communications Inc. (SBC)
Small Business Administration, Office of Advocacy (SBA)
Sprint
Telecommunications Resellers Association (TRA)
Texas Office of Public Utility Counsel (Joint with Consumer Federation of America and Consumers Union) (Texas)
United States Cellular Corporation
United States Telephone Association (USTA)
University of Michigan, Information Technology Division
US West Communications, Inc. (US West)
Utility Consumers Action Network (UCAN)
VoiceStream Wireless Corp. (VoiceStream)
Washington Utilities and Transportation Commission (WUTC)

* For a complete list of all documents filed in this proceeding, refer to the Commission's web site and the Electronic Comment Filing System at http://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/ecfs/comsrch_v2.hts, and enter 97-207 in the "proceeding" window.