

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of

Developing a Unified Intercarrier
Compensation Regime

CC Docket No. 01-92 ✓

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS
of the
GENERAL SERVICES ADMINISTRATION

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Summary

GSA responds to comments on proposals concerning a unified compensation framework for all regulated forms of intercarrier compensation.

Comments by nearly all carriers, state regulators and end users identify deficiencies in the existing compensation procedures for traffic exchanged between incumbent and competitive LECs. While generally concurring that some changes are necessary, parties disagree on whether the Bill-and-Keep procedure is the most efficient approach for addressing these deficiencies.

GSA believes that Bill-and-Keep can provide significant benefits to end users and carriers. Therefore, GSA urges the Commission not to heed assertions that Bill-and-Keep fails to meet the vital requirements that an intercarrier compensation system be easy to implement, relatively inexpensive to operate, and nearly transparent to end users.

In addition, **GSA** urges the Commission not to be swayed by claims that Bill-and-Keep will present barriers to competition. Indeed, numerous carriers concur with the findings in reports released by the Commission's Office of Plans and Policy that Bill-and-Keep will motivate carriers to compete for subscribers through innovative pricing structures, and provide additional pro-competitive benefits.

The Commission expresses the goal of prescribing a consistent regime for all forms of intercarrier compensation. Since Bill-and-Keep can be employed for local and long distance traffic exchanged between both wireline and wireless carriers, **GSA** believes that the procedure can meet the Commission's objective of a unified compensation regime. However, comments responding to the Notice demonstrate that disparate intercarrier compensation methods lead to increased arbitrage opportunities. Therefore, **GSA** recommends that the staff develop a definite, coordinated plan to transition all services to Bill-and-Keep over a three-year period.

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**REPLY COMMENTS
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GENERAL SERVICES ADMINISTRATION**

The General Services Administration (“GSA”) submits these Reply Comments on behalf of the customer interests of all Federal Executive Agencies (“FEAs”) in response to the Notice of Proposed Rulemaking in CC Docket No. 01-928 (“Notice”) released on April 27, 2001. The Notice seeks comments and replies on intercarrier compensation plans for interstate telecommunications traffic.

I. INTRODUCTION

The Commission established this proceeding to obtain comments on procedures employed by telecommunications carriers to compensate each other for the costs of originating, terminating and transporting traffic on their respective networks.’ On the same day that the Notice was released, the Commission adopted orders addressing intercarrier compensation procedures for two specific types of traffic. In the *ISP Intercarrier Compensation Order*, the Commission adopted a three-year interim measure that will reduce intercarrier payments associated with the

¹ Notice, para. 1.

delivery of traffic to Internet service providers (“ISPs”).² In the *LEC Access Charge Order*, the Commission adopted another interim measure that will allow competitive local exchange carriers (“LECs”) to file tariffs establishing access rates if the prices do not exceed those charged by the incumbent LEC.³

In the present Notice, the Commission proposes to employ a unified approach to compensation arrangements “between all types of carriers interconnecting with the local telephone network and to all types of traffic passing over the local telephone network.”⁴ The Commission postulates that Bill-and-Keep could be the centerpiece of this approach.⁵ With Bill-and-Keep, neither carrier charges the other for terminating message traffic, but each recovers the costs to originate and terminate messages from its own users.⁶

On August 21, 2002, GSA submitted Comments on Bill-and-Keep in response to the Notice. In those Comments, GSA noted that existing intercarrier compensation arrangements are economically inefficient and may discourage additional competition.⁷ Therefore, GSA urged the Commission to recognize the advantages of

² *Id.*, para. 3, citing *In the Matter of Intercarrier Compensation for ISP-Bound Traffic*, CC Docket No. 99-68, Order on Remand and Report and Order, released April 27, 2001 (“*ISP Intercarrier Compensation Order*”).

³ *Id.*, para. 3, citing *In the Matter of Access Charge Reform; Reform of Access Charges Imposed by Competitive Local Exchange Carriers*, CC Docket No. 96-262, Seventh Report and Order, released April 27, 2001 (“*CLEC Access Charge Order*”).

⁴ *Id.*, para. 2.

⁵ *Id.*, para. 37.

⁶ *In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, Notice of Proposed Rulemaking released April 19, 1996; and First Report and Order, released August 8, 1996 (“*Local Competition Order*”), para. 1096.

⁷ Comments of GSA, pp. 3-5.

Bill-and-Keep as the compensation method for all traffic exchanged between all wireline LECs.⁸

In addition to GSA, more than 60 parties submitted comments in response to the Notice. These parties include:

- 54 incumbent LECs and associations of these companies;
- 7 state regulatory agencies and public advocates; and
- a consortium of end users.

In these Reply Comments, GSA responds to the positions advanced by those parties.

II. COMMENTS SHOW THE NEED TO MODIFY EXISTING INTERCARRIER COMPENSATION PLANS.

Incumbent carriers, competitive carriers and end users concur on the need to modify existing intercarrier compensation plans. For example, the United States Telecom Association (“USTA”) notes that “regulatory arbitrage and outdated regulatory distinctions” are increasing the need to modify intercarrier compensation procedures.⁹

USTA explains:

Certain drivers are creating anomalies in the current systems that compel new FCC policies. . . . In some cases, they represent regulation created for an analog, circuit-switched environment that is evolving out of existence. In others, the drivers represent increasing market demand for new services and greater data communications capacity.¹⁰

USTA concludes that the Commission must ultimately implement changes in intercarrier compensation procedures that allow providers to react to these drivers in a manner that is efficient and responsive to consumers’ needs.¹¹

⁸ *Id.*, pp. 5–12.

⁹ Comments of **USTA**, p. 2.

¹⁰ *Id.*, p. 3.

¹¹ *Id.*

Cable and Wireless USA (“C & W”), an interexchange carrier, also provides a comprehensive assessment of present intercarrier compensation procedures. **As** a carrier offering voice, data and Internet services, C & W describes several infirmities in the current compensation regime.¹² For example, C & W explains that above-cost pricing is not effectively controlled by market forces, the utility of services to users is not reflected in pricing, and interconnection prices discriminate among carriers with no reasonable basis.¹³

From their perspective as end users, the Ad Hoc Telecommunications Users Committee (“Ad Hoc”) also points to infirmities in the current intercarrier compensation plans. Ad Hoc explains that intercarrier Compensation rates are set in excess of the costs of originating and terminating traffic.¹⁴ Thus, Ad Hoc endorses a “fundamental examination of all currently regulated forms of intercarrier compensation.”¹⁵

Speaking for carriers providing wireless services, the Cellular Telecommunications and Internet Association (“CTIA”) explains that the current system of reciprocal and symmetrical compensation is not efficient for Commercial Mobile Radio Service (“CMRS”).¹⁶ First, the existing rules present opportunities for regulatory arbitrage because they allow similar services to **be** priced differently.¹⁷ Also, interexchange carriers must acquire terminating access from the end user’s local

¹² Comments of C & W, p. 1.

¹³ *Id.*, pp. 5-9.

¹⁴ Comments of Ad Hoc, p. 2.

¹⁵ *Id.*, p. 1, citing Notice, para. 2.

¹⁶ Comments of CTIA, p. 18.

¹⁷ *Id.*

carrier, so that most LECs are able to price access far above costs without losing any customers at all.”¹⁸ This is frequently called the “access monopoly problem.”

III. CONTRARY TO CLAIMS BY SEVERAL PARTIES, BILL-AND-KEEP CAN PROVIDE SIGNIFICANT BENEFITS TO END USERS AND CARRIERS.

A. Bill-and-Keep is less costly to operate than alternative compensation procedures.

The Commission suggests that Bill-and-Keep is likely to provide the most efficient approach for intercarrier compensation, at least for local traffic exchanged between incumbent and competitive LECs.¹⁹ In its Comments, GSA concurred with that assessment, explaining that Bill-and-Keep has important operational advantages because it eliminates the need to design, implement and monitor complex procedures for allocating costs between carriers.²⁰

Several parties contend that Bill-and-Keep would create more problems than it solves. For example, in joint comments with several other carriers, Focal Communications (“Focal”) asserts that Bill-and-Keep does not meet the fundamental objective that an intercarrier compensation procedure be relatively simple, straightforward and transparent to the end user.²¹ According to Focal, even if it were possible to make the regulatory changes to implement Bill-and-Keep, the steps would be so complex that they could not be implemented quickly as a practical matter.²²

Similarly, the Competitive Telecommunications Association (“CompTel”) states that Bill-and-Keep would lead to inefficient network configurations, and would spawn

¹⁸ *Id.*, pp. 18-19.

¹⁹ Notice, para. 44

²⁰ Comments of GSA, pp. 5-12.

²¹ Comments of Focal, p. 5.

²² *Id.*, p. 6.

a new series of disputes over what costs the respective carriers must bear as networks and technologies evolve.²³ Thus, according to CompTel, imposition of mandatory Bill-and-Keep would result in an inefficient intercarrier compensation regime.²⁴

GSA urges the Commission to regard Bill-and-Keep in a more favorable light. Both larger and smaller carriers explain that Bill-and-Keep has significant operational benefits. For example, Sprint Corp. (“Sprint”) notes that under the present compensation regime, costs are incurred because the terminating carrier must monitor, measure and bill the originating carrier for terminating calls.²⁵ Additional transaction costs are incurred in establishing termination charges.²⁶ Moreover, significant costs are incurred to develop, implement and monitor procedures for allocation of costs between carriers.²⁷ Sprint observes that all of these costs must be covered by end users in one form or another, so consumers will benefit from cost savings if Bill-and-Keep is implemented.²⁸

In comments along similar lines, Voicestream Wireless (“VoiceStream”), explains that Bill-and-Keep is an efficient procedure.²⁹ Voicestream notes that adoption of Bill-and-Keep should eliminate the market distortions and inequities inherent in the intercarrier compensation regime, and significantly reduce billing and other administrative costs.³⁰

²³ Comments of CompTel, p. 4.

²⁴ *Id.*

²⁵ Comments of Sprint, p. 6.

²⁶ *Id.*

²⁷ *Id.*, p. 7.

²⁸ *Id.*, p. 6.

²⁹ Comments of Voicestream, p. 10.

³⁰ *Id.*

In its Comments, **GSA** pointed to additional reasons why **Bill-and-Keep** is an efficient intercarrier compensation plan.³¹ For example, **Bill-and-Keep** eliminates the need to address a number of difficult policy issues.³² **Also**, with **Bill-and-Keep** it is not necessary to make decisions concerning the extent to which originating carriers will reimburse terminating carriers for the costs of facilities, such as local loops, employed in providing both regulated and unregulated services.³³

B. Bill-and-Keep will foster additional competition for local telecommunications services.

In addition to asserting that **Bill-and-Keep** will not reduce costs, some parties opposing the procedure contend that it will present barriers to competition. Indeed, the Oklahoma Rural Telephone Coalition asserts that competitive LECs that terminate more traffic than they originate could be put out of business.³⁴

KMC Telecom (“KMC”) states that fostering competition should be the Commission’s primary focus in this proceeding.³⁵ According to KMC, **Bill-and-Keep** is not consistent with this objective because it would blunt the forces that have prevented carriers with market power from exercising that power anti-competitively.³⁶

While more competition is critical, GSA urges the Commission not to be swayed by these claims. The existing compensation rules, which encourage facilities-based carriers to serve only users with high terminating message volumes and not meet other telecommunications needs of these consumers, do not engender a balanced competitive marketplace.

³¹ Comments of **GSA**, p. 7.

³² *Id.*

³³ *Id.*

³⁴ Comments of the Oklahoma Rural Telephone Coalition, p. 39.

³⁵ Comments of **KMC**, p. 2.

³⁶ *Id.*

Diversified carriers concur with GSA on this issue. For example, Qwest Communications International (“Qwest”) explains that Bill-and-Keep is the most direct method for addressing the access monopoly problem? Similarly, BellSouth states that Bill-and-Keep will provide an incentive for carriers to compete for subscribers through innovative pricing structures.³⁸ Thus, BellSouth observes, “[B]ill and Keep will enhance price competition, with the consumer being the beneficiary, and the promise of the 1996 Act being fully realized.³⁹

New entrants also address the pro-competitive aspects of Bill-and-Keep. For example, Mpower Communications (“Mpower”) explains that a Bill-and-Keep arrangement accurately reflects the economic nature of a local network.⁴⁰ Mpower states that although the Commission should not drastically overhaul the overall regulatory framework during this period of transition, “carriers that exchange local traffic should not charge each other to terminate their respective calls.⁴¹

GSA supports Bill-and-Keep because it will foster more competition among carriers.⁴² In its Comments, **GSA** noted that working papers in two studies commissioned by the Commission’s Office of Plans and Policy concluded that Bill-and-Keep will help to remove barriers to competition among carriers for several reasons.⁴³ **As** one example, per-minute charges are a poor measure of costs in a

³⁷ Comments of Qwest, p. 9.

³⁸ Comments of BellSouth, p. 16.

³⁹ *Id.*, pp. 16-17.

⁴⁰ Comments of Mpower, p. 2.

⁴¹ *Id.*

⁴² Comments of GSA, pp. 11-12.

⁴³ *Id.*, p. 11, citing Jay M. Atkinson and Christopher C. Barnekov, *A Competitively Neutral Approach to Network Interconnection*, OPP Working Paper 34, December 2000; and Patrick DeGraba, *Bill and Keep at the Central Office as the Efficient Interconnection Regime*, OPP Working Paper 33, December 2000.

packet-switched network. Thus, elimination of termination charges, historically based on minutes-of-use, will motivate LECs to cooperate with each other in implementing a compatible packet-based technology that handles both voice and data traffic more efficiently.⁴⁴

C. Bill-and-Keep can be employed for traffic exchanged between wireline and wireless carriers.

Traffic involving commercial mobile radio services ("CMRS") introduces an additional dimension to intercarrier compensation issues. Traffic between CMRS carriers is not currently rate-regulated, but the Commission continues to maintain price surveillance over traffic from wireline LECs to CMRS carriers.⁴⁵ In the Notice, the Commission seeks comments on intercarrier compensation for this traffic, noting the advantages of maintaining consistency with the intercarrier compensation framework for traffic exchanged between wireline carriers that may be adopted in the proceeding.⁴⁶

CMRS carriers usually exchange traffic with each other on a Bill-and-Keep basis, so Bill-and-Keep is also the logical intercarrier compensation procedure for LEC-to-CMRS messages.⁴⁷ However, the Notice identifies numerous interconnection configurations that may be employed for LEC-to-CMRS messages.⁴⁸ From GSA's perspective, it was not clear that Bill-and-Keep reasonably reflects the structure of costs for some of these interconnection arrangements.⁴⁹ Therefore, **GSA**

44 *Id.*

45 Notice, para. 95.

46 *Id.*, para. 90.

47 *Id.*

48 *Id.*, para. 91.

49 Comments of **GSA**, p. 15.

withheld recommending Bill-and-Keep for this type of traffic pending review of comments submitted by CMRS carriers.⁵⁰

Comments in response to the Notice demonstrate that Bill-and-Keep is efficient for traffic exchanged between wireline and wireless carriers. For example, the Cellular Telecommunications & Internet Association (“CTIA”) states that Bill-and-Keep is the most efficient policy choice for LEC-to-CMRS interconnections, because the procedure approximates costs and introduces important administrative efficiencies.⁵¹ Similarly, AT&T Wireless Services (“AWS”) explains that the Commission should adopt Bill-and-Keep for local traffic exchanged with CMRS providers.⁵²

While supporting Bill-and-Keep, CMRS carriers also demonstrate that the Commission should continue surveillance over LEC-to-CMRS traffic in order to protect the interests of consumers. For example, CTIA observes that incumbent LECs have greater negotiating leverage than their competitors.⁵³ Thus, even with Bill-and-Keep, continued monitoring of pricing arrangements for exchanged traffic must continue to be a high priority on the Commission’s agenda.⁵⁴

AWS expresses similar concerns, explaining that anti-competitive actions by incumbent LECs demonstrate the power of these carriers to forestall CMRS competition.⁵⁵ Thus, even if it prescribes Bill-and-Keep, AWS urges the Commission to address issues concerning barriers to the full development of CMRS and to provide

50 *Id.*

51 Comments of CTIA, pp. 15-29.

52 Comments of AWS, p. 24.

53 Comments of CTIA, p. 17.

54 *Id.*

55 Comments of AWS, p. 6.

continuing guidance on the rights and obligations of incumbent telecommunications carriers.⁵⁶

GSA concurs with CTIA and AWS on the need for continued regulatory surveillance. Therefore, if Bill-and-Keep is prescribed, GSA urges the Commission to monitor interconnection and pricing practices in order to ensure that no carrier is able to take steps that could thwart competition or harm consumers in the mixed monopoly and competitive environment.

IV. COMMENTERS EXPLAIN THAT BILL-AND-KEEP SHOULD NOT BE EMPLOYED EXCLUSIVELY FOR TRAFFIC BETWEEN INCUMBENT AND COMPETITIVE LECs.

A. Application of different Compensation methods for local and interstate messages would increase arbitrage opportunities.

Bill-and-Keep offers significant advantages for consumers and carriers, but comments in response to the Notice demonstrate that this procedure cannot be implemented for traffic exchanged between LECs, and not employed simultaneously for long distance messages. The comments show that disparate intercarrier compensation methods would lead to increased arbitrage opportunities.

Ad Hoc emphasizes the importance of a unified intercarrier compensation plan to end users.⁵⁷ Ad Hoc states:

There is no good justification for structuring different intercarrier compensation rules for ISP-bound local traffic, non-ISP-bound local traffic, and interstate access services, or for applying one set of compensation rules to intercarrier relationships and another — and entirely incompatible — set of rules to the retail pricing of all services.⁵⁸

⁵⁶ *Id.*, p. 19.

⁵⁷ Comments of Ad Hoc, pp. 1-9, citing Notice, para. 2.

⁵⁸ *Id.*, p. 10.

Ad Hoc explains that in all cases, economic signals to the market must be based on the economic cost of originating or terminating the calls.⁵⁹

Along similar lines, AT&T Corp. (“AT&T”) explains that arbitrary differences in regulatory treatment that have been allowed in the past are increasingly inefficient in rapidly converging markets.⁶⁰ AT&T also observes that the compensation rule that best promotes the Commission’s goals will be uniform, regardless of the legacy labels associated with the carriers or the type of traffic involved.⁶¹ For example, intrastate access charges are a substantial portion of total intercarrier compensation payments, and it would therefore be impossible to achieve a unified Bill-and-Keep approach to intercarrier compensation until all states also agree to abandon current reciprocal compensation plans.⁶²

State regulators also express concerns with disparate regulatory procedures. For example, the Office of the Public Utility Counsel of Texas (“OPUCT”) explains that Bill-and-Keep can create additional arbitrage opportunities. Moreover, OPUCT is concerned that state agencies will not follow the Commission’s lead, and that varying policies among regulatory agencies will move the industry further away from a unified regime, thus increasing possibilities for tariff arbitrage.⁶³

B. With synchronized implementation, Bill-and-Keep can provide a consistent framework for many services.

The Commission has established the goal of a “uniform regime for all forms of intercarrier compensation, including interstate access charges.”⁶⁴ GSA believes that

59 *Id.*

60 Comments of AT&T, p. 2.

61 *Id.*

62 *Id.*, p. 4.

63 Comments of OPUCT, p. 38.

64 Notice, para. 97.

Bill-and-Keep is the appropriate centerpiece for this regime. However, comments demonstrate that if Bill-and-Keep is used for local services (wireline or wireless), the procedure must be implemented simultaneously for interstate messages. In the first place, local and interstate traffic are usually not distinguishable operationally. Secondly, wireline and wireless services are very often considered direct substitutes by consumers. Therefore, piecemeal implementation of Bill-and-Keep would cause severe arbitrage problems.

The Commission adopted major revisions in the access charge regime for most large and mid-size LECs less than two years ago.⁶⁵ This framework was established through extended reviews and revisions of plans produced in deliberations of the Coalition for Affordable Local and Long Distance Services (“CALLS”). It would not be practical or consistent with the goals of reasonable regulatory and rate stability to discard the CALLS framework and substitute a Bill-and-Keep framework on a flash-cut basis.

Addressing the implementation schedule, the National Exchange Carrier Association (“NECA”) observes that the Commission has not yet adopted an equivalent interim access reform plan for LECs under rate-of-return (“RoR”) regulation, and has just recently prescribed universal service reform for these carriers.⁶⁶ Therefore, NECA explains that the current Notice should not serve as the basis for immediate changes in the Commission’s intercarrier compensation rules for RoR and price-cap LECs.⁶⁷

⁶⁵ *In the Matter of Access Charge Reform, CC Docket No. 96-262 et. al, Eleventh Report and Order, released May 31, 2000, passim.*

⁶⁶ *Comments of NECA, p. 18.*

⁶⁷ *Id., pp. 3-12.*

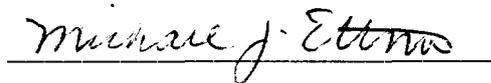
From GSA's perspective, the Commission must balance the benefits of Bill-and-Keep and the need for uniformity in intercarrier compensation procedures with the timetable of recent and pending changes in intercarrier compensation rules for various types of traffic. As discussed previously in these Reply Comments, the Commission prescribed three-year transition periods for revisions to rules concerning access charges for traffic to ISPs and competitive LECs. To conform with this timetable, GSA recommends that the Commission staff develop a coordinated plan to transition all services to Bill-and-Keep over a three-year period. The plan would be published in the *Federal Register*, with comments and replies for review by the Commission.

V. CONCLUSION

As a major user of telecommunications services, GSA urges the Commission to implement the recommendations set forth in these Reply Comments.

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