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

RECEIVED & INSPECTED
MAR 29 2002
FCC - MAILROOM

In the Matter of

Joint Petition for Expedited Rulemaking)
Establishing Minimum Notice Requirements)
for Detariffed Services)

CC Docket No. 02-22

Policy and Rules Concerning the Interstate,)
Interexchange Marketplace, Implementation)
of Section 254(g) of the Communications Act)
of 1934, as amended)

CC Docket No. 96-61

REPLY TO ASCENT'S COMMENTS BY ECONOBILL CORPORATION

In the interest of making peace between contending petitioners ECONOBILL Corporation suggests a reasonable compromise.

The Joint Petition has proposed a rule change to require telecommunications interexchange carriers to provide 30-days' notice before making any significant changes to the rates, terms or conditions for detariffed domestic interexchange or long distance services.¹ The Association Communications Enterprises ("ASCENT") responds that this measure will "severely limit the ability of such carriers to react swiftly to market forces"²,

¹ Public Notice, DA 02-271 (released February 6, 2002).

² Comments of the Association of Communications Enterprises, (March 11, 2002), p. 7.

and, as a result, "withhold from all consumers the benefits of rapid carrier innovation of new product offerings and response to consumer pricing demands." ³

We recommend that the Commission respect both sides by amending the proposed rule change as follows.

- IXC's may institute, without any previous notice to the consumer, the introduction of new services and reduction in rates.
- However, for rate increases, the carrier should be willing to provide the consumers with a minimum 30-day advanced notice, in accordance with the Joint Petition's request.

Econobill urges the Commission to incorporate the above suggestion in establishing a minimum notice requirement ruling for detariffed services.

Respectfully submitted,



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Dated: March 18, 2002

³ Id., p. 2.

CERTIFICATE OF SERVICE

I, Nissan Rosenthal, do hereby certify that the foregoing **REPLY TO ASCENT'S COMMENTS BY ECONOBILL CORPORATION**, concerning CC Docket Nos. 02-22 and 96-61, was sent by first class United States mail, postage prepaid, to the parties listed below on this 18th day of March, 2002.



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