

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Petition for Declaratory Ruling that AT&T's) WC Docket No. 02-361
Phone-to-Phone IP Telephony Services Are)
Exempt from Access Charges)

**COMMENTS
OF
SPRINT CORPORATION**

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Sprint Corporation, pursuant to the Public Notice released on November 18, 2002 (DA 02-3184), hereby respectfully submits its comments on AT&T's "Petition for Declaratory Ruling" that its phone-to-phone IP telephony services are exempt from access charges. As discussed below, because the type of service at issue here does not involve any net change in content or format, AT&T's petition should be denied. Indeed, rather than finding that AT&T's phone-to-phone VOIP service is *exempt from* access charges, the Commission should declare that henceforth such traffic is *subject to* access charges.

I. INTRODUCTION AND SUMMARY.

In its petition, AT&T explains (pp. 18-19) that it originates some portion of its phone-to-phone traffic over Feature Group D access facilities (for which it pays originating switched access charges) to its local IP gateway, translates that traffic to Internet Protocol (IP) and transmits it over its Internet backbone facilities, and terminates those calls either over local business private lines (PRI trunks) obtained from the ILEC, or through a CLEC, which terminates AT&T's (and other customers') traffic over reciprocal compensation trunks when the called party is an ILEC customer. Neither the

calling nor the called party requires special hardware or software to place these calls, and the calls originate and terminate in circuit switched protocol (TDM) -- there is no net change in format or content.

AT&T now asks that the Commission clarify that such phone-to-phone IP telephony services offered over the Internet are exempt from the access charges applicable to circuit switched interexchange calls, and are lawfully being provided over end user local services. AT&T states that such a finding would be consistent with the Commission's "established policy of exempting all voice over Internet Protocol ("VOIP") services from access charges pending the future adoption of nondiscriminatory regulations on this subject" (Petition, p. 2), specifically citing the Commission's 1998 *Universal Service Report to Congress*¹ to support its view that all VOIP services are nascent services which are exempt from access charges. AT&T asserts that grant of its petition is necessary because certain incumbent LECs (ILECs) are "engaging in self-help" by refusing to provision or by taking down local business lines used to terminate phone-to-phone IP telephony services, and by using calling party number identifiers to assess access charges on phone-to-phone IP telephony calls that terminate over reciprocal compensation trunks (Petition, pp. 4-5).

Sprint agrees with AT&T that prompt clarification about assessment of access charges on phone-to-phone VOIP calls would be in the public interest. However, Sprint believes that the Commission should revisit its statements in the *Universal Service Report* and find that the type of VOIP services described by AT&T should henceforth be subject

¹ *Federal-State Joint Board on Universal Service, Report to Congress*, 13 FCC Rcd 11,501 (1998).

to, not exempt from, access charges, based on the long-standing basic/enhanced service dichotomy and implementing regulations (still in effect) established under Computer II. The potential ramifications of exempting basic VOIP traffic from access charges -- on ILECs' revenues, on competition in the interexchange market, and on USF funding -- are too severe to adopt the policy interpretation requested by AT&T.

II. UNDER WELL-ESTABLISHED COMMISSION RULES, VOICE TRAFFIC WHICH IS TRANSMITTED WITHOUT A NET CHANGE IN FORM OR CONTENT SHOULD BE SUBJECT TO ACCESS CHARGES.

In its petition, AT&T emphasized that the Commission, in its 1998 *Universal Service Report to Congress*, did not definitively assert that phone-to-phone VOIP services were telecommunications services or that such services were subject to access charges. Indeed, the *Universal Service Report* created an exception from the normal classification of services offered over a telecommunications network as either basic or enhanced as delineated in Computer II.² Under this well-established standard, phone-to-phone VOIP which is not subject to any net change in form or content is a basic service which is not entitled to the enhanced services exemption from access charges.³ The *Universal Service Report* offers no reasoned basis for treating phone-to-phone telephony that uses IP protocol any differently than any other basic service involving no net change in protocol. The Commission should end the confusion it created in 1998 by declaring

² *Amendment of Section 64.702 of the Commission's Rules and Regulations (Computer II)*, 77 FCC 2d 384 (1980) (*Final Decision*), *recon.* 84 FCC 2d 50 (1980), *further recon.* 88 FCC 2d 512 (1981), *affirmed sub nom. Computer and Communications Industry Assn. v. FCC*, 693 F.2d 198 (D.C. Cir. 1982), *cert. denied*, 461 U.S. 938 (1983).

³ Sprint would emphasize that its comments here are limited specifically to phone-to-phone VOIP traffic which does not experience any net change in protocol, content or format. We do not suggest that all VOIP services or any legitimate enhanced services should be subject to access charges, as such suggestion is well beyond the scope of the instant petition for declaratory ruling.

that henceforth, the Computer II definition of basic services will govern, regardless of the transmission protocol used by a carrier.

A. Under Computer II, Services for Which There Is No Net Protocol Conversion Are Considered Basic and Subject to Access Charges.

In Computer II, the Commission defined basic service as “transmission capacity [offered on a common carrier basis] for the movement of information,” including “pure transmission capability over a communications path that is virtually transparent in terms of its interaction with customer supplied information” (*Final Decision*, 77 FCC 2d at 419 (paras. 93-94)). Basic services are regulated under Title II of the Act, and are subject to interstate access charges. Enhanced services, on the other hand, were defined to include

services, offered over common carrier transmission facilities used in interstate communications, which employ computer processing applications that act on the format, content, code, protocol or similar aspects of the subscriber’s transmitted information; provide the subscriber additional, different, or restructured information; or involve subscriber interaction with stored information.⁴

Enhanced services are not subject to Title II regulation and are not assessed interstate access charges.

The basic/enhanced framework adopted in Computer II is a bedrock principle on which the Commission and Congress have relied heavily over the past 22 years to set policies regarding the appropriate degree of regulatory oversight for both existing and new services. For example, in drafting the 1996 Act, Congress adopted the Computer II “change to form or content of the information as sent and received” standard almost verbatim, defining “telecommunications” as “the transmission, between or among points specified by

⁴ Codified at 47 C.F.R. 64.702(a). This regulation remains in effect today.

the user, of information of the user's choosing, without change in the form and content of the information." Based on such statutory language and on the legislative history of the 1996 Act, the Commission concluded that "Congress intended the 1996 Act to maintain the *Computer II* framework."⁵

The Commission again relied upon the Computer II "net change in form or content" standard in considering how to implement the non-accounting safeguard provisions of Sections 271 and 272 of the 1996 Act. The Commission concluded that "'no net' protocol conversion services constitute telecommunications services, rather than information services, under the 1996 Act."⁶ As such, "no net" protocol services are subject to Title II regulation and are assessed access charges.

According to AT&T's own service description, its phone-to-phone VOIP traffic does not involve any net change in format, content, code or protocol; what the caller sends is identical to what the called party receives. The mere fact that AT&T transports this voice traffic over its Internet facilities does not render such traffic enhanced, or an information service; AT&T does not in any way provide additional, different, restructured information or access (by the end user) to any stored information. Because the consumer "receive[s] nothing more than pure transmission, the service is a telecommunications service,"⁷ and the phone-to-phone VOIP traffic should, consistent

⁵ *Universal Service Report to Congress*, 13 FCC Rcd at 11524 (para. 45).

⁶ *Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended*, 11 FCC Rcd 21905, 21958 (para. 106) (1996).

⁷ *Universal Service Report to Congress*, 13 FCC Rcd at 11530 (para. 59).

with the principles established in Computer II, be considered basic service subject to access charges.⁸

B. The Exception Created by the *Universal Service Report* Was Unexplained, Lacks A Rational Basis, and Should Be Eliminated.

In its *Universal Service Report*, the Commission all but said that phone-to-phone VOIP traffic is a telecommunications service:⁹

In using the term “phone-to-phone” IP telephony, we tentatively intend to refer to services in which the provider meets the following conditions: (1) it holds itself out as providing voice telephony or facsimile transmission service; (2) it does not require the customer to use CPE different from that CPE necessary to place an ordinary touch-tone call (or facsimile transmission) over the public switched telephone network; (3) it allows the customer to call telephone numbers assigned in accordance with the North American Numbering Plan, and associated international agreements; and (4) it transmits customer information without net change in form or content.... [T]his type of IP telephony lacks the characteristics that would render them “information services” within the meaning of the statute, and instead bear the characteristics of “telecommunications services.”

However, despite having concluded that phone-to-phone VOIP looks, quacks, and walks like a telecommunications duck, the Commission pulled back and stated that it would not be appropriate “to make any definitive pronouncements [about phone-to-phone as well as other forms of IP telephony] in the absence of a more complete record focused on individual service offerings” (*id.*, para. 90). In stopping short of a straightforward application of Computer II principles, the

⁸ Whether a carrier uses the “public” Internet or a “private” Internet for transmission is irrelevant, as AT&T in effect concedes (Petition, p. 25). To distinguish between the two would beg the question of what the “public” Internet is. AT&T (at p. 24) implies that its VOIP traffic uses the public Internet, but the description of its practices suggests that it is merely using the same backbone transmission facilities that it uses for Internet traffic that connects to other backbone providers; significantly, AT&T does not state that its VOIP traffic is ever routed on anyone’s network but its own.

⁹ *Universal Service Report to Congress*, 13 FCC Rcd at 11543-11544 (paras. 88-89).

Commission created an exception for phone-to-phone IP telephony – and correspondingly enlarged the enhanced services exemption – until it issues a more definitive pronouncement. Thus, it stated that “to the extent that we conclude [in a future proceeding] that certain forms of phone-to-phone IP telephony service are ‘telecommunications services,’ and to the extent the providers of those services obtain the same circuit-switched access as obtained by other interexchange carriers, and therefore impose the same burdens on the local exchange as do other interexchange carriers, *we may find it reasonable that they pay similar access charges*” (*id.* at 11,545, para. 91, emphasis supplied), which suggests that an obligation to pay access charges would only have forward-looking effect.

However, given that AT&T has raised the issue of phone-to-phone IP telephony in a focused fashion by filing its petition, there is no logical reason why the Commission should not, as a prospective matter, clear the confusion it itself has engendered, and apply Computer II in a straightforward fashion unless or until Computer II itself is revisited.

There is no record evidence to suggest that phone-to-phone VOIP traffic uses the local exchange network any differently than does circuit-switched interexchange traffic. Indeed, at least one ILEC, US West, has previously stated for the record that it “provides precisely the same interstate access service to IP Telephony service providers as it does to other IXCs.”¹⁰ More recently, the New York PSC found that the IP telephony service provided by US DataNet

¹⁰ *Petition of US West, Inc. for Declaratory Ruling Affirming Carrier’s Carrier Charges on IP Telephony*, filed April 5, 1999, p. 2.

(analogous for purposes of a Computer II analysis to the phone-to-phone VOIP service offered by AT&T) was “simple, transparent long distance telephone service” which “imposes the same burdens on the local exchange” as does other IXC traffic, and which should be subject to “all applicable and appropriate charges paid by other long distance carriers, including access charges.”¹¹

Significantly, the NY PSC based its finding in large part on the Commission’s analysis of phone-to-phone VOIP services in the *Universal Service Report to Congress*.

AT&T’s phone-to-phone VOIP service certainly meets all four of the criteria set forth in the *Universal Service Report to Congress*: AT&T holds itself out as offering voice telephony; its customers use standard, non-specialized CPE to place the calls; its customers dial according to the NANP; and the calls are transmitted with no net change in form or content. Thus, except for the Commission’s reluctance in the *Universal Service Report to Congress* to explicitly assert that this type of VOIP traffic is a telecommunications service, there would seem to be no doubt that such traffic should be treated under long-standing Commission rules as a basic service which is subject to access charges.

¹¹ *Complaint of Frontier Telephone of Rochester Against US DataNet Corp. Concerning Alleged Refusal to Pay Intrastate Carrier Access Charges*, Case 01-C-1119, *Order Requiring Payment of Intrastate Carrier Access Charges* issued May 31, 2002, pp. 8-9. This case focused on avoidance of originating access charges. The IXC’s service was provided by having the caller dial a local number and authorization code before dialing the called number.

In short, the phone-to-phone VOIP traffic at issue here is clearly a basic service pursuant to Computer II rules, and should henceforth be assessed access charges.

Sprint does not dispute AT&T's assertion (pp. 28-32) that there are a wide variety of other forms of IP telephony that may compete with the phone-to-phone IP telephony here at issue. However, those services likewise compete with other basic telephony services using other transmission protocols, too. Sprint suggests that the Commission consider initiating a proceeding to explore, in detail, the relationships among these services and to determine whether or not it makes sense to change the treatment of these other forms of IP telephony for purposes of intercarrier compensation, assuming intercarrier compensation is not eliminated altogether in the pending Intercarrier Compensation rulemaking in CC Docket No. 01-92. However, in the meantime, it makes no sense to preserve the exception of phone-to-phone VOIP from the normal application of Computer II principles, particularly since, if left unaddressed, the exception could quickly swallow the rule (as will be discussed in the next section).

III. GRANT OF AT&T'S PETITION WILL HAVE SEVERE FINANCIAL REPERCUSSIONS ON ILEC ACCESS REVENUES, IXC COMPETITION, AND UNIVERSAL SERVICE FUNDING.

Sprint agrees with AT&T that there is a pressing need for the Commission to clarify whether phone-to-phone VOIP traffic should be subject to or exempt from access charges.¹² As discussed above, Sprint believes that but for the 1998

¹² On December 17, 2002, the Florida PSC dismissed a petition filed by CNM Network, Inc., for declaratory statement that phone-to-phone IP telephony is not

Report, assessment of access charges on this VOIP traffic is warranted under existing Commission regulations and policy. Failure to assess access charges on this traffic places ILEC access charge revenues at extreme risk, could exacerbate cost imbalances among IXC competitors, and could jeopardize universal service funding.

A. Impact on LEC Access Charge Revenues

AT&T states (Petition, p. 18) that its phone-to-phone VOIP traffic is only a small fraction of its existing circuit switched traffic. However, there has been “slow, but steady growth, in phone-to-phone and other VOIP services” (*id.*, p. 17), and AT&T, the owner of “the nation’s largest circuit switched long distance network,” is apparently seriously considering investments that would allow it to transition increasing amounts of ordinary voice traffic to IP (*id.*, pp. 17-18). The Commission-created exception from access charges for phone-to-phone VOIP traffic has already led some IXCs to originate and terminate increasing amounts of their phone-to-phone IP traffic over private lines or reciprocal compensation trunks, since PRI rates (when divided by usage to derive an effective rate per minute of use) and reciprocal compensation rates are only a fraction of access charges. A number of entities have approached Sprint’s long distance unit, offering to convert its traffic into and out of IP and to terminate it for a fraction of the cost Sprint now pays to ILECs and CLECs for terminating access. As major competitors such as AT&T are utilizing IP to avoid access charges, the pressure on Sprint Long

telecommunications (PSC Docket No. 021061-TP). The PSC cited, among other factors, the instant proceeding before the FCC as a reason to defer action at the state level at this time. Thus, it is clear that at least some state PUCs expect the FCC to assume a leadership role in this matter and clarify the national policy.

Distance to employ a middleman or even to perform the in-and-out-of-IP steps itself is rapidly becoming a business imperative. A Commission decision -- whether affirmative or through inaction -- to continue to exempt phone-to-phone VOIP traffic from interstate access charges will surely accelerate this trend.

Concern over the impact on ILEC access charge revenues is not frivolous, particularly for ILECs such as Sprint Local for whom access charges constitute a relatively high percentage (as compared to the RBOCs) of total revenues. Because access revenues generally account for between one-third to one-half of an ILEC's revenue stream, access revenues greatly influence corporate decisions regarding capital investment, operational expense, and employment levels. These decisions, in turn, impact the company's stock prices and investor portfolios. Because telecommunications is such a large and vital segment of the US economy, decisions affecting ILEC revenues can have a substantial ripple effect through the rest of the economy. If phone-to-phone VOIP service providers are allowed to avoid access charges for such traffic, thereby draining away an increasing percentage of ILEC access revenues, such policy should be made explicit on the basis of a reasoned analysis and a public record, not on the scant basis of the *Universal Service Report*.

Although Sprint is certainly concerned about the impact of phone-to-phone VOIP on its access charge revenue stream, AT&T grossly mischaracterizes the "self-help" measures which it alleges Sprint Local employed. AT&T asserts (Petition, p. 21) that Sprint began "refusing to terminate AT&T's VOIP calls over Sprint local business lines in Tallahassee, Florida...[and instead] began to route the calls to 'dead air.'" What happened, in fact, is that Sprint had no idea that AT&T was attempting to terminate its

voice long distance traffic over Sprint Local PRI lines until we began to investigate trouble tickets from Sprint customers who were unable to receive certain calls in Tallahassee. Initial contacts with AT&T vendor relations and billing personnel led Sprint Local to conclude that this routing was not intentional, but rather a translation error. Sprint technicians determined that the problem involved calls from AT&T PRI trunks, a handful of which were now terminating a portion of voice traffic from AT&T to Sprint Local end users. Because the PRI trunks were primarily configured for data, not Feature Group D voice traffic, certain network information needed to terminate calls to specific end user classes of service was not available, and the resulting compatibility problem in the Sprint Local switch prevented some of AT&T's voice calls from terminating properly. Sprint promptly contacted AT&T, who initially denied that it was using its PRI trunks for voice traffic. Sprint therefore offered to block voice traffic from terminating on the PRI trunks, and asked AT&T to reroute that voice traffic to a FG D trunk to ensure that it terminated properly. When AT&T subsequently advised us that it had intentionally been routing voice traffic over the PRI trunks, Sprint refrained from any action to block the traffic. Thus, far from routing AT&T's phone-to-phone VOIP traffic to dead air, Sprint actively attempted to assist AT&T to identify and resolve the problem. The conflicting information provided by different AT&T representatives impeded Sprint's efforts to resolve the service issue.

B. Impact on IXC Competition

As noted above, terminating phone-to-phone VOIP traffic over PRI lines or reciprocal compensation trunks is considerably less expensive than terminating such traffic over Feature Group D access trunks – as much as 90% less,

depending upon traffic volumes. Phone-to-phone VOIP traffic is, to the end user, indistinguishable from non-IP voice service, and IXCs which have elected to terminate their VOIP traffic over PRI or reciprocal compensation trunks or originate their traffic by means that effectively avoid originating access charges enjoy a significant cost advantage, without sacrificing any material difference in quality of termination service, over other IXCs which interpret the rules as requiring origination and termination of basic voice traffic over feature group facilities. The resulting cost imbalance, as noted above, will quickly force all IXCs to convert all their voice traffic into and out of IP to match their competitors' costs. A prompt decision by the Commission as to the applicability of access charges to phone-to-phone VOIP would help to resolve the question of whether investment in IP equipment and PRI/reciprocal compensation arrangements is a rational financial and engineering strategy, or simply an uneconomic form of short-term access charge arbitrage.

The ambiguity over applicability of access charges to phone-to-phone VOIP traffic also has a significant impact on IXC competition to the extent that individual carriers do or do not include such traffic in the revenues reported for purposes of determining universal service funding. AT&T states (Petition, pp. 32-33) that it pays universal service support "on the revenues from all its non-enhanced VOIP calls that it carries over the Internet and that fall within the definition of phone-to-phone IP telephony and of telecommunications services." Since AT&T's petition turns on the Commission's 1998 *Universal Service Report*, in which it stopped short of finding that phone-to-phone IP telephony is a "telecommunications service," it would appear that AT&T is saying, in

so many words, that it is not including its VOIP revenues in its USF contribution base. Carriers that do not consider phone-to-phone VOIP revenues to be contributory for USF purposes will have an additional cost/price advantage over IXCs that do treat such basic traffic as contributory. Because the interstate USF surcharge charged by various IXCs is approximately 10%, a decision to treat VOIP traffic as non-contributory constitutes another significant (and, in Sprint's view, artificial) cost advantage which, like access charge avoidance, will soon compel all IXCs to convert voice traffic into and out of IP.

C. Impact on Universal Service Funding

As discussed above, IXCs that do not treat their phone-to-phone VOIP revenue as contributory for USF purposes enjoy a significant cost advantage by avoiding the USF burden on their VOIP services. In addition, the siphoning off of basic service revenues from the USF contribution base increases the funding factor assessed on carriers that do contribute, since USF costs are allocated across a smaller base of contributory revenues. The impact of this siphoning off of revenues will increase exponentially if the Commission grants, or even delays action on, AT&T's petition, as such a decision or inaction will encourage carriers to push ever-increasing amounts of their basic voice traffic over IP facilities and to reclassify the revenues associated with that service from basic telecommunications (which is contributory for USF purposes) to information services (which is not contributory for USF purposes). The Commission recognized this risk in the *Universal Service Report to Congress*, stating that if carriers shift traffic to Internet protocol as a means of avoiding universal service contributions, "it could increase the burden on the more limited set of companies

still required to contribute....[and] could well undermine universal service.”¹³

While Sprint acknowledges the Commission’s reluctance to rule at this time on IP services generally, there is no reason why it should not render a decision on the narrower issue of phone-to-phone VOIP which undergoes no net change in protocol, form or content, which can readily be classified as a basic telecommunications service under existing Commission policies and rules.

IV. CONCLUSION.

Sprint agrees with AT&T that there is a pressing need for the Commission to clarify whether access charges apply to phone-to-phone IP telephony calls which do not undergo any net change in protocol, form or content. On the basis of long-standing Commission rules originally established under Computer II, Sprint believes that such traffic is a basic service which should be subject to access charges. The VOIP exemption created by the Commission in its 1998 *Universal Service Report* to Congress was unexplained and lacks a rational basis; however, because parties may have relied in good faith on the pronouncements in this Report, Sprint’s recommendation that phone-to-phone VOIP traffic which undergoes no net change in protocol be subject to access charges should be applied on a prospective basis (from the effective date of the order) only. Prospective application of access charges to such traffic is critical to avoid severe financial repercussions on ILEC access charge revenues, IXC competition, and universal service funding.

¹³ 13 FCC Rcd at 11549 (para. 98).

Respectfully submitted,

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A handwritten signature in black ink, appearing to read "Norina Moy", is written over a horizontal line.

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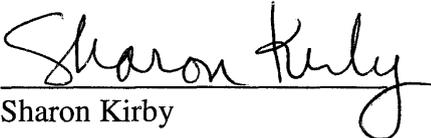
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December 18, 2002

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments of Sprint Corporation in WC Docket No. 02-361 was delivered by electronic mail or U.S. First Class Mail, postage prepaid, on this 18th day of December 2002 to the parties listed below.


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