

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

In the Matter of	)	
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	
	)	
1998 Biennial Regulatory Review –	)	CC Docket No. 98-171
Streamlined Contributor Reporting	)	
Requirements Associated with	)	
Administration of Telecommunications	)	
Relay Service, North American Numbering	)	
Plan, Local Number Portability, and	)	
Universal Service Support Mechanisms	)	
	)	
Telecommunications Services for	)	CC Docket No. 90-571
Individuals with Hearing and Speech	)	
Disabilities, and the Americans with	)	
Disabilities Act of 1990	)	
	)	
Administration of the North American	)	CC Docket No. 92-237
Numbering Plan and North American	)	NSD File No. L-00-72
Numbering Plan Cost Recovery	)	
Contribution Factor and Fund Size	)	
	)	
Number Resource Optimization	)	CC Docket No. 99-200
	)	
Telephone Number Portability	)	CC Docket No. 95-116
	)	
Truth-in-Billing and Billing Format	)	CC Docket No. 98-170

**AT&T COMMENTS ON VERIZON, SBC AND BELLSOUTH’S  
PETITION FOR INTERIM WAIVER**

AT&T Corp. (“AT&T”) hereby comments on the Petition for Interim Waiver filed by Verizon, SBC and BellSouth (collectively, “ILECs”).<sup>1</sup>

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<sup>1</sup> Petition for Interim Waiver of Verizon Telephone Companies, SBC Communications Inc., & BellSouth Corp., in CC Dockets Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, & 98-170 (filed Feb. 6, 2003) (“ILEC Waiver”).

The Commission should not grant ILECs' alternative request that, if the Commission denies their request for waiver of limits on universal service contribution recovery fees, the Commission then reduce the amount of ILECs' USF contribution assessment by the aggregate difference between the Centrex equivalency amount and the full contribution amount on each Centrex line without the reduction. ILECs' alternative requested relief would simply transfer \$60 million in USF assessments to other carriers' USF assessments.

AT&T does not object to ILECs being permitted—on an interim basis pending Commission disposition of ILECs' petitions for reconsideration—to average ILEC universal service recovery charges among all multiline business customers while retaining the Centrex equivalency ratio, or to average the recovery of USF assessments attributable to charges for changing a primary interexchange carrier (“PIC”) or presubscribed interexchange carrier charges (“PICC”) that are billed to end users. However, if the Commission is going to permit ILECs to average recovery among users, it should also grant AT&T's waiver petition<sup>2</sup> and permit AT&T to adjust its recovery fees to average the recovery of unbillables and to account for the inability of some billing systems to handle a six-decimal-place contribution factor. The Commission should recognize that implementation of its limitations on universal service recovery charges creates problems, shortfalls, and implementation costs for a variety of carriers, and it should not arbitrarily choose to grant some carriers and not others relief from such implementation problems and shortfalls, pending the Commission's disposition of the petitions for reconsideration.<sup>3</sup>

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<sup>2</sup> AT&T Petition for Interim, Limited Waiver, in CC Dockets Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, & 98-170 (filed Feb. 12, 2003).

<sup>3</sup> In addition to AT&T, the following parties filed petitions for reconsideration and/or clarification: Ad Hoc Telecommunications User Committee (“Ad Hoc”); National Exchange Carrier Association (“NECA”); Nextel Communications, Inc. (“Nextel”); SBC Communications,

ILECs should not be permitted, even on an interim basis, to transfer their USF assessment obligations to other carriers. The Commission, however, should consider granting all carriers an interim waiver of Section 54.712 to accommodate specified implementation problems that would otherwise prevent a carrier from having a reasonable opportunity to recover its universal service assessments.

Respectfully submitted,

AT&T Corp.

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February 19, 2003

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Inc. ("SBC"); The United States Telecom Association ("USTA"); Verizon Wireless; and WorldCom, Inc. ("WorldCom").