

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

Petition of USTelecom for Forbearance Under )  
47 U.S.C. § 160(c) from Obsolete ILEC ) WC Docket No. 14-192  
Regulatory Obligations that Inhibit )  
Deployment of Next Generation Networks )

**REPLY COMMENTS  
OF  
NTCA–THE RURAL BROADBAND ASSOCIATION,  
THE NATIONAL EXCHANGE CARRIER ASSOCIATION,  
AND WTA-ADVOCATES FOR RURAL BROADBAND**

NTCA–The Rural Broadband Association, the National Exchange Carrier Association Inc., and WTA-Advocates for Rural Broadband hereby submit their Reply Comments in the above-captioned proceeding. These comments are submitted specifically with respect to potential forbearance from (and resulting elimination of) equal access obligations imposed pursuant to Section 251(g) of the Communications Act of 1934, as amended (the “Act”).<sup>1</sup>

USTelecom observes in the above-referenced petition (the “Petition”) that Section 251(g) sustains obligations that were first imposed as part of the 1982 Modification of Final Judgment, as well as equal access requirements adopted by the Federal Communications Commission (the “Commission”) prior to passage of the Telecommunications Act of 1996 (the “1996 Act”).<sup>2</sup> As USTelecom notes, the 1996 Act subsequently added a requirement for all local exchange carriers to provide dialing parity. USTelecom then requests forbearance from all such obligations based upon the assertion that standalone long distance service is an anachronism in the face of bundled services, such that equal access and dialing parity obligations with respect to interexchange

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<sup>1</sup> 47 U.S.C. § 251(g).

<sup>2</sup> Petition at 35.

services “serve no further purpose in protecting consumers or ensuring just and reasonable long distance charges and policies.”<sup>3</sup>

To support this request for forbearance, USTelecom points to previously granted relief from one aspect of prior equal access obligations – the scripting requirement that compelled local exchange carriers to ensure consumers were aware of the ability to choose from among multiple long distance carriers.<sup>4</sup> USTelecom reasons that the same factors that justified forbearance from the scripting requirement support elimination of all other equal access requirements and related dialing parity obligations with respect to interexchange calls.<sup>5</sup> It is important, however, to understand the full consequences of USTelecom’s requested relief – and, unfortunately, those consequences are not clear on the face of the petition.

Taking a step back, the best way to understand the potential effects of the relief sought in the most recent petition is to examine in more detail what equal access and dialing parity obligations exist today. Equal access refers to a class of service, also commonly referred to as Feature Group D access, easy dialing, and 1+ service, whereby all long distance service providers receive equivalent connections to a local exchange carrier’s network. The features of full equal access are: (1) dialing parity; (2) rotary dial access; (3) network control signaling; (4) answer supervision; (5) automatic calling number identification; (6) carrier access code; (7) directory services; (8) testing and maintenance of facilities; (9) provision of information necessary to bill customers; and (10) presubscription. Absent any clarification, it is uncertain whether the relief

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<sup>3</sup> *Id.* at 36-37.

<sup>4</sup> *Id.* (citing *Petition of USTelecom for Forbearance Under 47 § 160(c) from Enforcement of Certain Legacy Telecommunications Regulations, et al.*, WC Docket No. 12-61, *et al.*, Memorandum Opinion and Order, Report and Order, Further Notice of Proposed Rulemaking, and Second Further Notice of Proposed Rulemaking, 28 FCC Rcd 7626, 7634-38 (2013), at ¶¶ 11-17).

<sup>5</sup> Petition at 37.

requested in the Petition would, for example, require consumers to “dial around” to place calls through other long distance providers (*e.g.*, presubscription and dialing parity). Eliminating specific equal access requirements might also have consequences on interconnection and traffic exchange (*e.g.*, network control signaling, automatic calling number identification, and testing and maintenance of facilities), call completion objectives, (*e.g.*, answer supervision), and consumer bills and intercarrier compensation arrangements (*e.g.*, information necessary to bill customers). Although the Commission took substantial steps to modify intercarrier compensation arrangements in 2011, it established a specific transition for such modifications – and it certainly did not articulate any intent to abandon or otherwise modify the fundamental ways in which carriers interconnect and exchange traffic with one another. Prior to any blanket grant of forbearance, it should therefore be made more clear whether and to what degree the relief sought might cause significant confusion for consumers (particularly those who do *not* subscribe to bundles) or call into question the effectiveness or applicability of existing interconnection and traffic exchange arrangements and already-defined transitions with respect thereto.

The undersigned parties therefore request that the Commission defer action on the portion of the Petition seeking forbearance from equal access and dialing parity obligations pending further clarification of the scope of this request and reasonable opportunity for interested parties to provide further comment with respect to any such clarified request for relief.

Respectfully Submitted,

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