

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

COPY

In the Matter of)
)
THE BELL ATLANTIC TELEPHONE)
COMPANIES)
)
Offer of Comparably Efficient)
Interconnection To Providers)
Of Voice Messaging Services)

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Federal Communications Commission
Office of the Secretary

PLAN TO OFFER COMPARABLY EFFICIENT INTERCONNECTION

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Bell Atlantic ONA Plan Provisions

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PLAN TO OFFER COMPARABLY EFFICIENT INTERCONNECTION

Introduction and Summary

The Bell Atlantic telephone companies^{1/} hereby submit a plan to provide comparably efficient interconnection ("CEI") to other vendors and users to enable them to offer enhanced services comparable to Bell Atlantic's proposed voice messaging service. This plan is in all essential respects identical to the CEI plan for voice mail service submitted July 2, 1987 by Pacific Bell and Nevada Bell which the Commission has recently approved.^{2/}

The Commission has said that it will endeavor to give expedited consideration to CEI plans which are substantially the

1. The Bell Telephone Company of Pennsylvania, the four Chesapeake and Potomac Telephone Companies, The Diamond State Telephone Company and New Jersey Bell Telephone Company.

2. Pacific Bell and Nevada Bell, Plan for the Provision of Voice Mail Services, Memorandum Opinion and Order, FCC 88-11, released February 18, 1988.

same as those which it has already approved for another carrier.^{3/} Expeditious review of this plan is particularly warranted because the United States District Court has recently authorized the Bell operating companies to offer voice messaging services.^{4/} Commission approval of this plan is therefore the only remaining legal impediment to offering voice messaging services, and Bell Atlantic plans to initiate such services during the fall of 1988.

The plan demonstrates how Bell Atlantic will comply with each of the CEI requirements the Commission has established.^{5/}

1. Description of Service:^{6/} Bell Atlantic's voice messaging service, which is similar to services offered by unaffiliated enhanced service providers, will allow users to leave and retrieve voice messages. As detailed below, using their existing touchtone telephones, subscribers may record messages for later retrieval by or delivery to one or more

3. Amendment of Section 64.702 of the Commission's Rules and Regulation (Third Computer Inquiry), Report and Order, 104 F.C.C.2d 958, 1055 (1986) ("R&O").

4. United States v. Western Elec. Co., C.A. No. 82-0192, Opinion (D.D.C. March 7, 1988).

5. These include the additional conditions established in the Phase II Reconsideration Order, Amendment of Section 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry), CC Docket No. 85-229, Phase II, Memorandum Opinion and Order on Reconsideration, FCC 88-10, released February 18, 1988, as well as those imposed in the R&O.

6. R&O, 104 F.C.C.2d at 1054-5.

designated individuals. The actual enhanced features which Bell Atlantic will deploy will depend upon the voice messaging equipment which is available at the time of deployment. In any event, the underlying basic services and features which Bell Atlantic will use for its voice messaging offering will be no greater than those described in this plan.

The initial voice messaging services which Bell Atlantic proposes to deploy are:

A. Telephone Answering - A service principally for residential customers which provides automated telephone answering for a subscriber whose line is busy or does not answer within a prescribed number of rings. The caller will hear a personalized greeting which the subscriber has previously recorded and will be given a prompt to record a message. The subscriber will be notified of a waiting message by a stutter dial tone or message waiting lamp. Messages may be retrieved from any touchtone telephone.

B. Voice Mail - A service principally for small business customers, voice mail provides subscribers with 24 hour a day telephone answering and message storage. The service also provides (1) the ability to prioritize delivery of messages, i.e., standard, urgent and private; (2) the ability to send the same message to a predesignated group of recipients by making one call; and (3) a caller help feature which transfers an incoming caller to an attendant if needed. Voice mail also

contains a remote message notification feature that will call a subscriber at a predesignated telephone number to inform him of waiting messages.

C. Call Delivery - A service for occasional users which will allow a customer to dial a local seven-digit number and record a message for delivery to a third party within that LATA. At the time the caller has specified, the equipment will dial the recipient's telephone and deliver the message to whomever answers. In the event the called telephone is busy or is not answered, the equipment will make repeated completion attempts. The person recording the message will be able to call a separate seven-digit number to determine if the message was successfully delivered.

2. Interface Functionality:^{7/} Both Bell Atlantic's voice messaging service and other vendors and end users may connect to the CEI offering through existing standard line-side and trunk-side network interfaces. Customers may reach the service through any voice-grade connection, dial-up or private line. No special interfaces, signalling, abbreviated dialing, or other unique capabilities will be provided to Bell Atlantic's enhanced service or to other vendors through this offering.

7. Id. at 1039.

3. Unbundling of Basic Services:^{8/} Certain of the basic services which underlie Bell Atlantic's proposed voice messaging offering are currently offered under tariff in all seven Bell Atlantic jurisdictions on an unbundled basis.^{9/} Other features, which are currently available only on a bundled basis, will be offered on an unbundled basis prior to initiation of Bell Atlantic's voice messaging service.^{10/} All will be available to Bell Atlantic's voice messaging service and to unaffiliated competing vendors under the same rates, terms and conditions.^{11/}

In order to use the telephone answering service or voice mail service, the customer subscribes to a dial-up voice communication line between the customer's premises and the serving central office, plus call forwarding on busy or no answer. Bell Atlantic's voice messaging service will offer to arrange for call forwarding service on the customer's behalf. Call delivery requires only a dial-up voice communications line.

8. Id. at 1040.

9. These are local business exchange service and 800 Service.

10. These are call forwarding on busy or no answer, and Message Desk (Automatic Message Link). The latter feature provides the capability of delivering the called directory number and an alerting function, such as a stutter dial tone.

11. Copies of illustrative tariff pages for all underlying basic services are reproduced in Appendix A to this plan. Message Desk (Automatic Message Link) and call forwarding on busy or no answer are illustrated in their present form, as features of Centrex service. Prior to initiation of voice messaging service in any jurisdiction, these services will be offered as unbundled features in that jurisdiction.

4. Resale:^{12/} Bell Atlantic's voice messaging service will obtain all needed underlying basic services at tariffed rates, add the voice messaging enhancements, and provide them as part of the enhanced service on an unregulated basis.

5. Technical Characteristics:^{13/} Interconnection to Bell Atlantic's voice messaging services will be through existing standard network interfaces. These line and trunk side interfaces will support identical transmission, switching and signalling functions for voice messaging services offered by Bell Atlantic and its competitors.

The facilities provided to Bell Atlantic's voice messaging service and to its competitors will fully comply with the Commission's parameters for technical equality, i.e., no user-perceived qualitative differences and no systematic differences in measured quality.^{14/} Moreover, Bell Atlantic's procedures for processing and assigning circuits are highly mechanized and assure that there can be no systematic discrimination in circuit assignment based upon the customer or proposed use. Finally, pursuant to Commission requirements, Bell Atlantic will file an annual affidavit attesting that its

12. R&O, 104 F.C.C.2d at 1040.

13. Id. at 1041.

14. Amendment of Section 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry), Memorandum Opinion and Order on Reconsideration, 2 FCC Rcd 3035, 3048 (1987).

procedures have been followed and that no discrimination has in fact occurred.^{15/}

6. Installation, Maintenance and Repair:^{16/} Bell Atlantic recently amended its Open Network Architecture ("ONA") plan to include a detailed description of its installation and maintenance procedures and how such procedures assure that Bell Atlantic cannot discriminate between its enhanced service and those offered by others. To avoid unnecessary repetition, these amendments are hereby incorporated by reference in this filing.^{17/}

7. End User Access:^{18/} Customers using Bell Atlantic's voice messaging service or a competitor's service will dial the same number of digits. No abbreviated dialing or signalling or derived channels will be associated with this service.^{19/}

8. CEI Availability:^{20/} Most of the underlying basic services which Bell Atlantic will use in the provision of its

15. See Bell Atlantic Open Network Architecture Plan, filed January 28, 1988, amended March 10, 1988, at 69-78. These pages are reproduced in Appendix B.

16. R&O, 104 F.C.C.2d at 1041, 1055-6.

17. See Appendix B.

18. R&O, 104 F.C.C.2d at 1041.

19. End users may obtain optional abbreviated dialing under the Speed Calling feature of the existing Custom Calling Service in all Bell Atlantic jurisdictions.

20. R&O, 104 F.C.C.2d at 1041.

voice messaging service are currently offered under tariff in all seven jurisdictions. Others, specifically call forwarding on busy or no answer and Message Desk, will be offered on an unbundled basis prior to initiation of Bell Atlantic's voice messaging service in any jurisdiction.

9. Minimization of Transport Costs:^{21/} The Commission has held that this condition is satisfied where, as here, affiliated and unaffiliated enhanced services vendors are charged the same rate for all underlying basic services.^{22/}

10. Recipients of CEI:^{23/} All of the basic services used by Bell Atlantic's voice messaging service will be available to all users for any lawful purpose.

11. Allocation of Joint and Common Costs:^{24/} Joint and common costs will be allocated pursuant to Bell Atlantic's amended Cost Allocation Manual, filed March 14, 1988.^{25/}

21. Id. at 1042.

22. Amendment of Section 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry), CC Docket No. 85-229, Phase I, Memorandum Opinion and Order on Further Reconsideration, FCC 88-9, released February 18, 1988 at ¶46.

23. R&O, 104 F.C.C.2d at 1042.

24. Id. at 1068, 1075-6.

25. See Bell Atlantic Operating Companies' Permanent Cost Allocation Manual for the Separation of Regulated and Nonregulated Costs, 3 FCC Rcd 109 (1988).

12. Sample Tariffs:26/ Illustrative tariff pages are reproduced in Appendix A.

13. Nondiscrimination Reporting:27/ Bell Atlantic will track promised installation dates met and maintenance time intervals for basic services provided to Bell Atlantic's voice messaging service and for those provided to a sample of all basic service customers. Reports, which will be prepared and filed quarterly, will include:

- The percent of installation orders for which the promised intervals were met, for Bell Atlantic's voice messaging service and for a sample of all customers, as specified in the attached ONA plan amendments.
- The average duration of reported troubles or outages, for Bell Atlantic's voice messaging service and a sample of all customers.

14. Customer Proprietary Network Information ("CPNI"):28/ Bell Atlantic's compliance with the Commission's CPNI requirements are discussed in detail in the attached ONA

26. R&O, 104 F.C.C.2d at 1055.

27. Id. at 1055-7.

28. Id. at 1068, 1089-92; Phase II Reconsideration Order at ¶¶99, 104-109.

plan amendments which are hereby incorporated by reference.^{29/}
In its letter to multiline business customers informing them of their CPNI rights and enclosing a response form, Bell Atlantic will not refer specifically to voice messaging service. Bell Atlantic anticipates that it will offer additional enhanced services this year. Rather than sending customers notification letters for each enhanced service, Bell Atlantic will issue a single enhanced services mailing.^{30/}

15. Disclosure of Network Information:^{31/} No changes to existing network interface specifications will be made in connection with provision of Bell Atlantic's voice messaging service.

WHEREFORE, Bell Atlantic respectfully requests approval of this plan to provide comparably efficient interconnection and permission to begin the unseparated offering of voice messaging service. Since this plan is identical in all essential respects

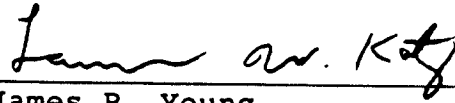
29. See Appendix B.

30. As stated in the ONA plan, this notification will be repeated annually.

31. R&O, 104 F.C.C.2d at 1068-9, 1080-6.

to that already approved for Pacific Bell and Nevada Bell,
expedited approval is requested.

Respectfully submitted,



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ILLUSTRATIVE TARIFF PAGES

Attached are tariff pages for The Chesapeake and Potomac Telephone Company of Virginia, which are illustrative of the tariffs in all Bell Atlantic jurisdictions. References to comparable provisions in other jurisdictions are also included. The tariff pages from these other jurisdictions will be supplied on request.

The attached pages cover the following services:

Local Business Exchange Service
800 Service (Not available in the District
of Columbia)
Message Desk Service (Automatic Message Link)
(Available untariffed in West Virginia)
Call Forwarding, Busy Line or No Answer