

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

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

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

For the first time since divestiture, the former Bell operating companies, including the Bell Atlantic telephone companies ("OTCs"),^{1/} are now permitted to provide the public with an information services gateway. By allowing customers to obtain easy access to information providers, the way will be cleared for many users who have never before used these exciting new services to enjoy the benefits of the Information Age.

The judicial relief which allowed Bell Atlantic to offer a gateway service was issued on March 7, only a few short weeks ago. In order to offer this gateway capability as soon as possible after receiving such relief, Bell Atlantic asks for expedited review and approval of this plan to offer comparably efficient interconnection ("CEI") to competing gateway service

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.

vendors so that it may begin providing its Gateway Service on a trial basis in Pennsylvania during August, 1988. This service will allow a customer with a personal computer and a communications capability to reach a wide array of enhanced service providers, including a Bell Atlantic electronic mail service.

The enhanced features of Bell Atlantic's proposed Gateway Service are customer interaction with stored information, electronic mail, storage of enhanced service providers' data bases, and asynchronous/X.25 protocol conversion.^{2/} Bell Atlantic will obtain all underlying basic services at their full tariffed rates, with no "short loop" or colocation discount. As shown in the following sections, Bell Atlantic will fully comply with each of the CEI requirements the Commission has established.

1. Description of Service:^{3/} Bell Atlantic's Gateway Service will provide customers access to services offered by a number of enhanced service providers ("ESPs").^{4/} Customers will access Gateway Service by dialing a seven or ten digit

2. Gateway Service will also offer to provide billing for enhanced service providers on a nondiscriminatory basis.

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, 1054-5 (1986) ("R&O").

4. Gateway Service will provide end users with access to both unaffiliated ESPs and to other authorized Bell Atlantic enhanced services.

number,^{5/} or directly via analog or digital private lines. Upon reaching the Gateway processor, the customer will be asked to enter an identification number, name and billing address.^{6/} The customer may obtain a listing of available information service providers or, at the customer's option, a "key word" index of specific services.^{7/} From the ESP listing, the customer may view a description of the provider's service and pricing structure which the ESP has provided. From the key word menu, the customer will receive a second menu of ESPs offering the selected service.^{8/} Upon selection of an ESP, Gateway Service will route the customer's call to the selected ESP.

The Gateway processor will maintain, for each subscriber, information on the type of terminal the customer plans to use; the ESPs to which the customer has subscribed; the customer's assigned identification numbers, if any, with those

5. Gateway Service operations will subscribe to either 800 Service or One Number Service under existing OTC tariffs. One Number Service provides a uniform seven-digit telephone number throughout a state or LATA, giving the subscriber the appearance of a local presence.

6. The Gateway processor will initially be owned by and located on the premises of a third party contractor to Bell Atlantic. The contractor will provide the communications link between its premises and Bell Atlantic's network facilities leased by Gateway Service. After the initial trial phase of the service, the processor may be located on Bell Atlantic property but will be entirely owned by and dedicated to the enhanced Gateway Service.

7. A new customer must first subscribe to Gateway Service. This subscription may be accomplished on-line.

8. Gateway Service may provide customers with a more sophisticated search function as well.

ESPs; and the billing method (direct or credit card) the customer has selected. This is information which the customer has provided directly to Gateway Service and which the customer may change on-line at any time.

Gateway Service will bill the end user and the ESP for use of Gateway Service and will also offer to bill end users for the ESP's service. This billing will either be done by a third party contractor or by the OTC's billing department. In the latter event, such billing services will be offered to competing gateway service providers under the same terms and conditions.

Bell Atlantic also proposes to market and offer two storage services. The first is an electronic mail service which Bell Atlantic will market under its own name and offer as a selection through Gateway Service. Electronic mail service involves the storage and transmission of customer-originated printed messages, including documents. The messages are forwarded to the intended recipients in the same form and content as they are created by the originator. Bell Atlantic intends initially to resell the electronic mail service of a third-party vendor.^{2/}

9. If Bell Atlantic offers an electronic mail service integrated within its basic network prior to approval of its Open Network Architecture plan, it will first submit for approval a separate request for that offering.

The second is a service offered to ESPs through which Bell Atlantic will provide the computer capacity in which an ESP may store its information. Customers may obtain access to this information through Gateway Service. Bell Atlantic will have no control over the content of the information. Instead, the customer will obtain the ESP's information just as the ESP entered it into the Bell Atlantic computer.^{10/}

2. Interface Functionality:^{11/} Customers may access Gateway Service through any dial-up line, such as business or residential exchange service or foreign exchange service. Applicable message unit charges under the local tariff will be collected, as will any toll charges if the call is placed outside the local calling area. Alternatively, the customer may obtain access to Gateway Service through a voice-grade analog or a digital private line.^{12/} All these access arrangements are currently available under effective tariffs in all Bell Atlantic jurisdictions, and full tariffed rates will be charged.

When a customer dials the Gateway Service telephone number, the call will be routed by the serving central office switch to a dedicated protocol-agile packet assembler-

10. The storage capacity may be located in one or more Bell Atlantic central offices and connected to the network through business dial tone lines or PDN service, for which the Gateway Service operations will pay full tariffed rates.

11. R&O, 104 F.C.C.2d at 1039.

12. Gateway Service can support dedicated digital access at speeds up to 9.6 Kbps.

disassembler ("PAD"), which will perform asynchronous/X.25 protocol conversion and add certain signalling used by the gateway processor.^{13/} The PADs, which will be owned by Bell Atlantic's Gateway Service operation and dedicated exclusively to the enhanced Gateway Service, will be located in OTC central offices.^{14/} Each PAD will be connected to a central office circuit switch by local business exchange lines, along with Message Desk service.^{15/} From the PAD, the call will be routed over the Public Data Network ("PDN") to the contractor's communications link to the Gateway processor.

When a customer selects an ESP from the menu,^{16/} the call is routed back to the PAD which "dials" the ESP through the PDN network. If the ESP is located in another LATA, PDN delivers the call to an ESP-selected interexchange service provider or private facility through which the call is completed to the ESP.

13. Routing to the PAD from the customer's serving central office will be through normal 800 service or One Number Calling translations and routing and charged at the tariffed rate for those services. Dedicated access lines will terminate directly into the PAD.

14. These PADs will not be used in the provision of any basic service.

15. Message Desk service provides the capability of delivering the called directory number from the switch to the PAD.

16. A customer may obtain access to an ESP without going through the menu by dialing a mnemonic code assigned to that ESP.

Gateway Service will obtain all its basic services under effective tariffs which are equally available to competing gateway providers. The Bell Atlantic telephone companies will provide neither Gateway Service nor its competitors with any special interfaces, signalling, or other unique capabilities.^{17/}

3. Unbundling of Basic Services:^{18/} The basic services underlie Bell Atlantic's proposed gateway service will use are currently offered under tariff.^{19/} These services are local business exchange service, 800 Service, One Number Service,^{20/} Message Desk service, and PDN service. All are available to Bell Atlantic's Gateway Service and to competing gateway service vendors under the same rates, terms and conditions. Illustrative tariff pages for these services are reproduced in Appendix A.

4. Resale:^{21/} Bell Atlantic's Gateway Service operations will obtain all underlying basic services at their

17. The signalling functions used in Gateway Service are added in the dedicated PAD, not in the basic network.

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

19. Message Desk service is currently provided as part of Centrex Service but will be offered on a separate unbundled basis prior to initiation of Gateway Service.

20. One Number Service will be available to Gateway Service only in those jurisdictions in which it is offered to others.

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

tariffed rates, add the gateway enhancements, and provide them as part of the enhanced service on an unregulated basis.

5. Technical Characteristics:^{22/} Interconnection to Bell Atlantic's Gateway Service will be through standard network interfaces. These line side interfaces will support identical transmission, switching and signalling functions for gateway services offered by Bell Atlantic and its competitors.

The facilities provided to Gateway Service and 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.^{23/} Moreover, Bell Atlantic's procedures for processing and assigning circuits is highly mechanized and assures 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 procedures have been followed and that no discrimination has in fact occurred.^{24/}

22. Id. at 1041.

23. 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).

24. 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.

6. Installation, Maintenance and Repair:^{25/} 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.^{26/}

7. End User Access:^{27/} Customers using Bell Atlantic's Gateway Service or a competitor's service will dial the same number of digits. No abbreviated dialing or derived channels will be needed to access Gateway Service.^{28/}

8. CEI Availability:^{29/} All underlying basic services which Bell Atlantic will use in the offering of its Gateway Service are available equally to Bell Atlantic and to its competitors.

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

26. See Appendix B.

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

28. Mnemonic dialing will be translated entirely within dedicated Gateway Service equipment, which will "dial" the ESP's number.

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

9. Minimization of Transport Costs:^{30/} 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.^{31/}

10. Recipients of CEI:^{32/} All of the basic services used by Bell Atlantic's Gateway Service will be available to all users for any lawful purpose.

11. Allocation of Joint and Common Costs:^{33/} Joint and common costs will be allocated pursuant to Bell Atlantic's Cost Allocation Manual, filed March 14, 1988.^{34/}

12. Sample Tariffs:^{35/} Illustrative tariff pages are reproduced in Appendix A.

30. Id. at 1042.

31. 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.

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

33. Id. at 1068, 1075-6.

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

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

13. Nondiscrimination Reporting:^{36/} Bell Atlantic will track promised installation dates met and maintenance time intervals for basic services provided to Bell Atlantic's Gateway 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 Gateway 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 Gateway Service and a sample of all customers.

14. Customer Proprietary Network Information:^{37/} Bell Atlantic's compliance with the Commission's CPNI requirements are discussed in detail in the attached ONA plan amendments which are hereby incorporated by reference.^{38/} In its letter to multiline business customers informing them of their CPNI rights and enclosing a response form, Bell Atlantic will not refer

36. Id. at 1055-7.

37. R&O, 104 F.C.C.2d at 1068, 1089-92; Amendment to 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, at ¶¶99, 104-109.

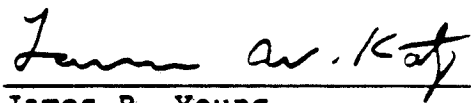
38. See Appendix B.

specifically to its Gateway 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.^{39/}

15. Disclosure of Network Information:^{40/} No changes to existing network interface specifications will be made in connection with provision of Bell Atlantic's Gateway Service.

WHEREFORE, Bell Atlantic respectfully requests expedited approval of this plan to provide comparably efficient interconnection and permission to begin the unseparated offering of its Gateway Service in August, 1988.

Respectfully submitted,



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

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

ILLUSTRATIVE TARIFF PAGES

Attached are tariff pages for The Bell Telephone Company of Pennsylvania, 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)
Public Data Network Service (Not available
in West Virginia)
One Number Service (This service is
presently available only in
Pennsylvania)
Message Desk Service (Automatic Message Link)
(Available untariffed in West Virginia)