

Katz

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

In the Matter of)
)
THE BELL ATLANTIC TELEPHONE)
COMPANIES)
)
Offer of Comparably Efficient Inter-)
connection to Providers of Elec-)
tronic Data Interchange Service)

PLAN TO OFFER COMPARABLY EFFICIENT INTERCONNECTION

The Bell Atlantic telephone companies^{1/} hereby submit a comparably efficient interconnection ("CEI") plan for its proposed Electronic Data Interchange ("EDI") service. EDI is a series of functions which allow users to exchange formatted documents, such as purchase orders, invoices, and acknowledgments, electronically, without the need to wait for "hard copies" of the documents.

The enhanced services used to provide EDI consist of storage (to allow documents to be stored for later retrieval or delivery) and standards translations (to allow users in different industries to exchange documents using different industry formats). As demonstrated in this plan, Bell Atlantic will comply fully with all of the Commission's CEI requirements. Bell Atlantic therefore respectfully requests the Commission to approve this plan without delay.

^{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.

A. Description of Service^{2/}

EDI provides for the transmission, storage and delivery of formatted business information. An EDI transaction, such as a purchase order, typically is formatted at the sender's computer by software in that computer into a "transaction set" or electronic document in a format which is standard within the sender's industry.^{3/}

The electronic document is transmitted through Bell Atlantic's basic network to the recipient's computer or to multiple destinations designated by the sender. The transmission may be instantaneous, or it may be delayed until a time specified by the sender or until the recipient retrieves the document. Responsive EDI transactions, such as acknowledgments or invoices, will be initiated and transmitted in a similar manner.^{4/}

Bell Atlantic's EDI service will also provide the user with additional features such as:

^{2/} Amendment of Section 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry), Report and Order, 104 F.C.C.2d 958, 1054-5 (1986) ("R&O").

^{3/} Since document formats developed independently within different industries, there is no uniform transaction set standard that all industries follow.

^{4/} Bell Atlantic's proposed EDI network is diagrammed in Figure 1.

0 Validation of data fields - the ability to determine whether the proper data is sent within each data field in the transaction set and to notify the sender of any errors in order that the data may be retransmitted.

0 Message status reporting - allows the user to determine the number and types of documents (transaction sets) transmitted, the time of day the documents were transmitted, and the identity of the sender or recipient.

0 Department transaction routing - allows the sender to direct documents to specified locations within the sender's and recipient's companies.

Bell Atlantic will, at the customer's option, perform translations among the various industry standards within its EDI processor, so that users in different industries may efficiently exchange documents electronically.^{5/}

There are three major EDI standards currently in use, with several subsets that are unique to particular industries. Bell Atlantic's EDI service will be capable of performing translations among the major EDI standards and their subsets, such as the following:

^{5/} Standards translations may take place in the EDI network or through the use of software in the customer's processor. Because these translations are format conversions, they appear to be enhanced services under the Commission's Computer Rules, 47 C.F.R. § 64.702(a). In the event this format conversion within Bell Atlantic's EDI network requires relief under the AT&T Consent Decree, Bell Atlantic will obtain such relief before providing this aspect of the service. Commission approval, however, should not be delayed pending any such relief. The Decree Court has stated that enhanced service "proposals with the imprimatur of the Federal Communications Commission will be considered to be prima facie valid." United States v. Western Elec. Co., No. 82-0192, slip op. at 34, n.43 (D.D.C. March 7, 1988).

ANSI (American National Standards Institute) ASC (Accredited Standards Committee) X.12

Chemical Industry Data Exchange
Automotive Industry Action Group
Electrical Data Exchange
Telecommunications Industry Forum
Metals Industry, Aluminum and Steel

TDCC (Transportation Data Coordinating Committee)

Ocean
Air
Rail
Motor
Warehousing Information Network System
Uniform Communications Standards (Grocery)

EDIFACT (Electronic Data Interchange for Administration, Commerce and Trade)

Bell Atlantic will bill its EDI customers either on their telephone bill, with EDI charges separately identified, or on a separate bill. To date, there has been no demand from other EDI providers for Bell Atlantic to provide billing services. However, as Bell Atlantic said in its ONA Plan, "Bell Atlantic is willing to work with any ESP to determine the feasibility of Bell Atlantic performing billing and collection services."^{6/} Efforts are currently underway to assess the potential market for enhanced services billing to determine if a general offering is warranted.

^{6/} Bell Atlantic Open Network Architecture Plan, filed January 28, 1988, Appendix B at 83.

B. Interface Functionality^{7/}

Customers may reach the EDI processor through either Bell Atlantic's Public Data Network ("PDN") or private line services.^{8/} PDN, in turn, may be reached on a dial-up or direct access basis. Network-based protocol conversions may take place in the PDN.^{9/} In the EDI processor the data may be stored for later retrieval or delivery and standards translations may be performed. The call will then be routed through PDN or private lines to the destination or destinations. EDI will obtain its PDN and/or private line services at full tariffed rates, with no short loop or other discount.

C. Unbundling of Basic Services^{10/}

PDN is currently offered under Bell Atlantic's interstate access tariff and in intrastate tariffs in four Bell Atlantic jurisdictions^{11/} on an unbundled basis. Intrastate

^{7/} R&O at 1039.

^{8/} Any interLATA links will be provided by interexchange service providers selected by the end users.

^{9/} On December 21, 1988, Bell Atlantic filed a CEI plan to perform additional protocol conversions. Offer of Comparably Efficient Interconnection to Providers of Protocol Conversion Services. Upon approval of that plan, EDI will have the option of obtaining any protocol conversions which are offered within the PDN in addition to asynchronous to X.25 and X.75, which are currently offered.

^{10/} R&O at 1040.

^{11/} Pennsylvania, New Jersey, Virginia and Maryland.

private line services are offered on an unbundled basis in all Bell Atlantic jurisdictions. Unbundled interstate private line (special access) services are offered under Bell Atlantic's interstate access tariff. No further unbundling is required to comply with CEI requirements.

D. Resale^{12/}

Bell Atlantic will take all underlying basic services at full rates, add the EDI enhancements, and provide the resulting enhanced service on an unregulated basis.

E. Technical Characteristics^{13/}

Interconnection to Bell Atlantic's EDI service will be through standard network interfaces.^{14/} The facilities provided to EDI and all other PDN and private line customers will be equal in quality. As the Commission has required, Bell Atlantic will provide details of the systems and automated procedures it uses to assure equal quality of service in its Open Network Architecture ("ONA") Plan amendment to be filed by May 19, 1989

^{12/} R&O at 1040.

^{13/} Id. at 1041.

^{14/} For example, interface specifications for PDN are published in Bell Atlantic Technical Reference TR 72211 dated November, 1987.

("May 19 filing").^{15/}

F. Installation, Maintenance and Repair^{16/}

Bell Atlantic will use the installation, maintenance and repair procedures that the Commission has reviewed and approved.^{17/}

G. End User Access^{18/}

Customer access to the basic services underlying Bell Atlantic's EDI service and those underlying a comparable competitor's service will be identical.

H. CEI Availability^{19/}

PDN is currently available under interstate tariff throughout the Bell Atlantic region and is available under intrastate tariffs in four jurisdictions, as enumerated above. Private lines services are universally available.

^{15/} Filing and Review of Open Network Architecture Plans, CC Docket No. 88-2, Phase I, Memorandum Opinion and Order, FCC 88-381, released December 22, 1988, at ¶ 473 ("ONA Order").

^{16/} R&O at 1041, 1055-6.

^{17/} ONA Order at ¶¶ 468-70.

^{18/} R&O at 1041.

^{19/} Id.

I. Minimization of Transport Costs^{20/}

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

J. Recipients of CEI^{22/}

All of the underlying basic services which Bell Atlantic will use to provide its EDI service and which customers may use to access EDI are available to all users for any lawful purpose.

K. Allocation of Joint and Common Costs^{23/}

Joint and common costs will be allocated pursuant to Bell Atlantic's Cost Allocation Manual.

^{20/} Id. at 1042.

^{21/} Amendment of Section 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry), Phase II Reconsideration Order, 3 FCC Rcd 1150 (1988) at ¶¶ 32-4.

^{22/} R&O at 1042.

^{23/} Id. at 1068, 1075-6.

L. Sample Tariffs^{24/}

References to effective tariffs for the underlying basic services appear in Appendix A. A copy of the effective tariff pages for representative Bell Atlantic jurisdictions is being supplied to the Commission staff.

M. Nondiscrimination Reporting^{25/}

Bell Atlantic will submit reports in the existing format until such time as the revised reporting procedures to be submitted in its May 19 filing become effective.

N. Customer Proprietary Network Information ("CPNI")^{26/}

Bell Atlantic will initially use the CPNI procedures which were filed in its ONA Plan. These procedures have been implemented. All multiline business customers have been informed of their CPNI rights and the procedures for restricting the records of any customer requesting such a restriction have been carried out. Revisions to those procedures, which will be included in the May 19 filing, will be implemented when approved.^{27/}

^{24/} Id. at 1055.

^{25/} Id. at 1055-7.

^{26/} Id. at 1068, 1089-92.

^{27/} Use of the previously filed procedures until the revised procedures are approved is authorized by the ONA Order at 222, n. 1046.

O. Disclosure of Network Information^{28/}

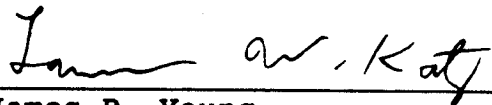
Bell Atlantic does not intend to implement any changes to existing network interface specifications in connection with EDI service. In the event future network changes are required, Bell Atlantic will fully comply with the Commission's disclosure requirements.

WHEREFORE, Bell Atlantic respectfully requests approval of this plan to provide comparably efficient interconnection and permission to begin the unseparated provision of electronic data interchange service.

Respectfully submitted,

The Bell Atlantic Telephone
Companies

By Their Attorneys



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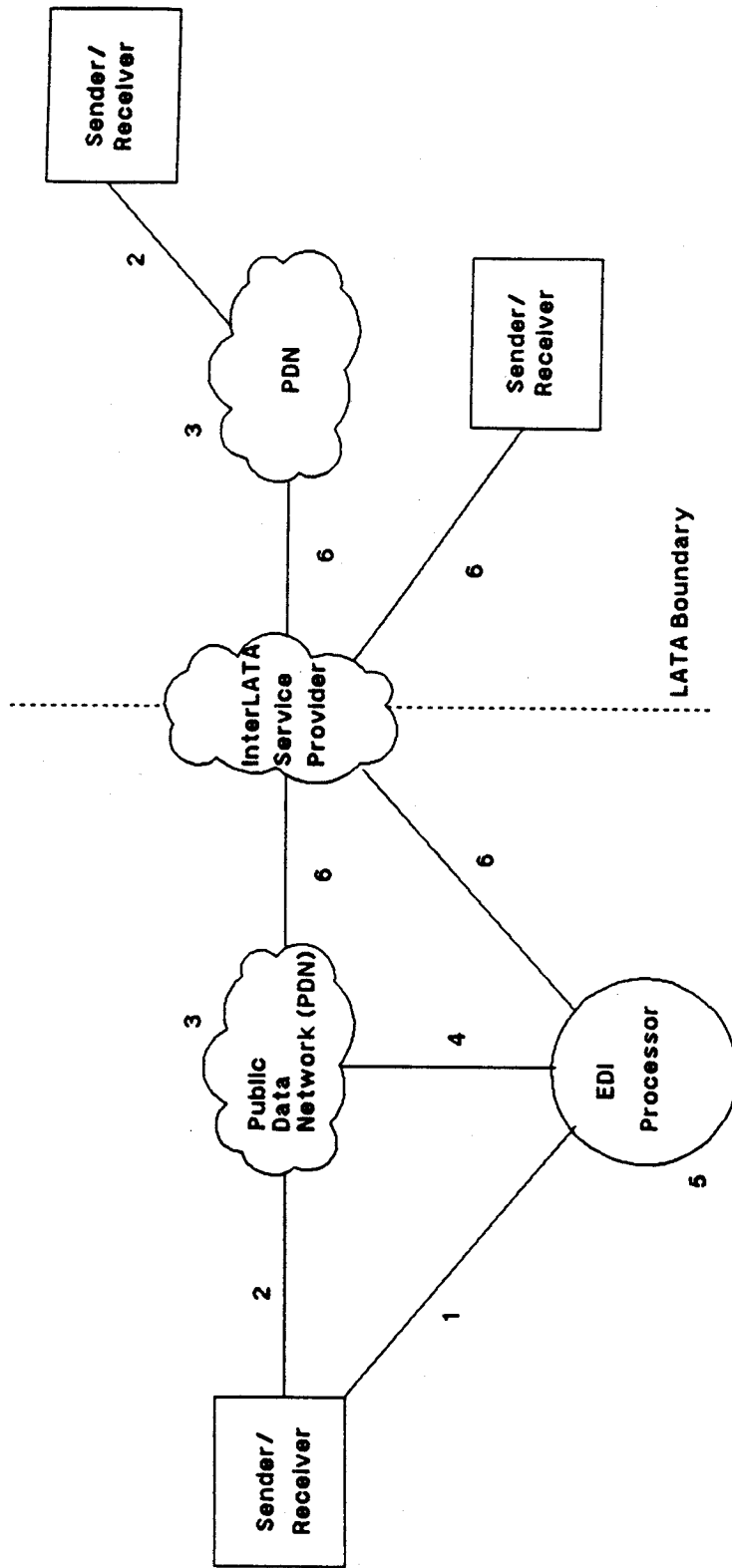
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January 30, 1989

^{28/} R&O at 1068-9, 1080-6.

EDI Network Architecture



6) If the sender/receiver is in a different LATA than the EDI processor, the call is routed through the InterLATA service provider of the sender/receiver's choice

* PSTN : Public Switched Telephone Network

- 1) Sender may access EDI via private line
- 2) Sender may access PDN via private line or PSTN*
- 3) Protocol conversion and any other PDN functions will occur in the PDN network
- 4) PDN will route sender's call to EDI processor via private line
- 5) EDI processor will perform storage and transaction set translation if required

Figure 1

Basic Service and Tariffs

<u>SERVICE</u>	<u>TARIFF</u>	<u>SECTION</u>
<u>PUBLIC DATA NETWORK (PDN)</u>		
Bell of PA	P.U.C. No. 302	13
C&P		
District of Columbia	Available through interstate tariff	
Maryland	P.S.C.-Md.-No. 217	14
Virginia	S.C.C.-Va.-No. 217	14
West Virginia	Available through interstate tariff	
Diamond State	Available through interstate tariff	
New Jersey Bell	B.P.U.-N.J.-No. 2	A12
	B.P.U.-N.J. No. 2	8
Bell Atlantic - Interstate	F.C.C. No. 1	16
<u>PRIVATE LINE SERVICE</u>		
Bell of PA	Pa. P.U.C.-No. 304	
C&P		
District of Columbia	P.S.C.-D.C.-No. 204	
Maryland	P.S.C.-Md.-No. 204	
Virginia	S.C.C.-Va.-No. 204	
West Virginia	P.S.C.-W.Va.-No. 204	
Diamond State	P.S.C.-Del.-No. 1	
New Jersey Bell	B.P.U.-N.J.-No. 2	

SPECIAL ACCESS SERVICE

Bell of PA

Pa. P.U.C.-No. 304 1-7

C&P

District of Columbia

Available through interstate tariff

Maryland

P.S.C.-Md. No. 217 7

Virginia

P.S.C.-Md. No. 217 7

West Virginia

P.S.C.-W.Va. No. 217 7

Diamond State

Available through interstate tariff

New Jersey Bell

B.P.U.-N.J.-No. 2 9

Bell Atlantic - Interstate

F.C.C. No. 1 7