

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

In the Matter of)
)
NYNEX Telephone Companies)
)
Offer of Comparably Efficient)
Interconnection to Providers)
of Voice Messaging Services)

Amendment To The NYNEX VMS Comparably Efficient Interconnection Plan

The NYNEX Telephone Companies¹ (NYNEX) hereby submit an
amendment to their Voice Messaging Services (VMS) CEI Plan,² in accordance with the
Commission's Waiver Order.³

¹ The NYNEX Telephone Companies are New York Telephone and the New England Telephone and Telegraph Company.

² NYNEX's VMS CEI Plan, filed June 21, 1988, as amended by: Informational Amendment to NYNEX Telephone Companies CEI Plan for VMS to Mr. Brock, Chief, Common Carrier Bureau from Mr. G. Evans, dated February 15, 1989; Amendment to NYNEX Telephone Companies CEI Plan for VMS to Mr. Brock, Chief, Common Carrier Bureau from Mr. G. Evans, dated February 28, 1989; Informational Update to NYNEX Telephone Companies Plans for Voice Messaging Services to Mr. Richard M. Firestone, Chief, Common Carrier Bureau from Ms. Mary McDermott, dated August 20, 1990; Informational Update to NYNEX Telephone Companies Plans for Voice Messaging Services to Mr. Richard M. Firestone, Chief, Common Carrier Bureau from Mr. Campbell Ayling, dated August 2, 1991; Letter to Richard Firestone, Chief, Common Carrier Bureau from Ms. Susanne Guyer, dated February 28, 1992; and Informational Update to NYNEX Telephone Companies Plans for Voice Messaging Services to Ms. Tritt, Chief, Common Carrier Bureau from Mr. Campbell Ayling, dated June 30, 1992. (collectively referred to herein as NYNEX's VMS CEI Plan)

³ Bell Operating Companies' Joint Petition for Waiver of Computer II Rules, Memorandum Opinion and Order, DA 95-36, ¶ 2 (rel. Jan. 11, 1995) (Waiver Order).

I. INTRODUCTION AND SUMMARY

This amendment describes two voice messaging related applications -- Enhanced Messaging and Facsimile Messaging -- which were not included in NYNEX's VMS CEI Plan, but were offered as of the effective date of the Waiver Order. The amendment also identifies additional basic network services that may be used in conjunction with providing VMS. The Waiver Order requires BOCs to file amendments to their approved CEI Plans within sixty days of the release date of the Waiver Order to cover such changes and permits BOCs to continue to provide these services while the Commission reviews the amendments.⁴ As shall be seen below, these changes represent only minor modifications to NYNEX's approved VMS CEI Plan. Minor amendments to CEI Plans are generally deemed approved after 14 days of filing with the Bureau unless problems are identified by the staff.⁵ Therefore, unless informed otherwise, NYNEX will assume that the amendment has been approved effective March 27, 1995.

II. DESCRIPTION OF SERVICE

As described in NYNEX's VMS CEI Plan, VMS provides business and residence customers with the ability to receive, store, and retrieve telephone messages. The VMS CEI Plan identified two generic applications: Call Answering and Voice Mail.⁶ NYNEX has since added two additional generic applications: Enhanced Messaging and Facsimile Messaging.

⁴ Waiver Order at ¶ 28.

⁵ Waiver Order at ¶ 30, n.71.

⁶ NYNEX's VMS CEI Plan filed June 21, 1988, ¶ 3.

A. Enhanced Messaging

Enhanced Messaging represents a wide array of VMS capabilities that go beyond basic Call Answering and Voice Mail applications. These capabilities provide the ability to create, send, receive, and retrieve messages for specific messaging applications such as Reminder Call and Community Mailbox. NYNEX uses Enhanced Messaging capabilities, which reside within its VMS equipment and are not integrated with basic network equipment, to design innovative voice messaging services that expand the overall utility of VMS to subscribers.

For example, NYNEX's Reminder Call permits a subscriber to record a message and set a time and day for the message to be delivered. The message can be delivered to the customer's own mailbox or to any telephone number within the LATA.⁷ Upon delivery, the message is repeated three times to increase the likelihood that the message is delivered appropriately.⁸

Another application of Enhanced Messaging is Community Mailbox. Utilizing Community Mailbox, a "group" sponsor has the capability to leave voice messages, either on an individual or broadcast basis, in a "group" member's voice mailbox specifically established for the user group. An example of this application is a school district that establishes mailboxes for parents where school administrators and teachers would be able to leave voice messages for an individual student's parents or to a group of parents.

⁷ The voice messaging equipment initiates a call to the telephone number provided by the VMS subscriber using tariffed exchange services, as outlined in the NYNEX VMS CEI Plan.

⁸ This would accommodate the circumstance, for example, where an answering machine happened to answer the call initiated by VMS.

Enhanced messaging and the VMS platform can also be used to create a personalized messaging service where messages, such as, daily stock quotes or sports results, can be placed in a subscriber's VMS mailbox or delivered to a telephone number using the Reminder Call application described above.⁹

B. Facsimile Messaging

VMS's Facsimile Messaging capability provides subscribers with the capability to send, store, receive, and retrieve facsimile messages along with their voice messages using NYNEX's VMS platform.¹⁰ Similar to Voice Messaging applications, Facsimile Messaging provides generic applications: Facsimile Call Answering (redirects facsimile messages to a VMS mailbox capable of storing facsimile messages for no answer or busy line conditions), Facsimile Mail (ability to send, store, receive, and retrieve facsimile messages) and Enhanced Facsimile Messaging (specially designed messaging applications which are beyond the basic call answering and facsimile mail applications).

A VMS subscriber uses Facsimile Messaging much in the same way Voice Messaging is used. For example, in a Facsimile Call Answering application, incoming calls directed to a facsimile machine can be forwarded to a VMS facsimile mailbox when encountering a no answer and/or busy line condition.

⁹ A non-affiliated information provider could subscribe to NYNEX's VMS and provide such service independently. Also, NYNEX may offer these services directly or in conjunction with a non-affiliated information provider, such as a newspaper publisher, where the service would be jointly provided. NYNEX would provide such services pursuant to this CEI Plan.

¹⁰ NYNEX's facsimile messaging application utilizes the same VMS equipment that is used to provide voice messaging service. The only difference is that the messaging mailbox (i.e., enhanced equipment) is capable of detecting and storing facsimile formatted messages. No additional exchange access services are required by the customer to utilize VMS's facsimile storage capability and no new network services are required for interconnection of enhanced services equipment.

A typical business application of VMS Facsimile Messaging would be where a manager uses VMS's Facsimile Mail and Enhanced Facsimile Messaging applications to send facsimile messages to VMS facsimile mailboxes specifically established for his or her mobile sales force. Facsimile messages, along with voice messages, could be sent on an individual or broadcast basis and be preset to be delivered to a VMS mailbox at a certain time. The VMS messages could then be retrieved from the VMS mailbox at the convenience of the individual salesperson. In the alternative, the message could also be delivered to any telephone number within the LATA by using VMS's Reminder Call application.

III. COMPLIANCE WITH CELAND NONSTRUCTURAL SAFEGUARDS

As stated in the NYNEX VMS CEI Plan, the equipment used by NYNEX for its voice messaging services is not physically integrated into the central office equipment. Rather the VMS equipment interconnects with the telephone network by using the same existing standard interfaces and tariffed transmission offerings that are available and can be used by other voice messaging providers.¹¹

As required by the Waiver Order,¹² and as set forth in its VMS CEI Plan and its ONA Plan, in offering these new applications, NYNEX will continue to comply fully with the Commission's CEI parameters and other equal access standards and safeguards, including the Commission's Customer Proprietary Network Information

¹¹ In addition to the network services identified in NYNEX's VMS CEI Plan, NYNEX may use the basic network services identified in Appendix A pursuant to tariffs already in effect.

¹² Waiver Order at ¶ 23.

Rules, nondiscrimination reporting requirements, network information disclosure rules, and cost allocation and accounting rules.

IV. CONCLUSION

The two applications described herein -- Enhanced Messaging and Facsimile Messaging -- represent only minor changes to the NYNEX VMS CEI plan. They do not by any means change the nature of the service nor the manner in which the service is delivered or interconnected to the telephone network; other voice message providers may use the same standard interfaces and tariffed transmission offerings.

WHEREFORE, for the reasons set forth herein, this amendment should be approved.

Respectfully submitted,

NYNEX Telephone Companies

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BASIC SERVICES AND TARIFFS

<u>SERVICE</u>	<u>TARIFF</u>	<u>SECTION</u>
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Private Line Services

New England Telephone

Maine	PUC Me 15	B, C
Massachusetts	DPU Mass 10	B, C
New Hampshire	NHPUC 75	B, C
Rhode Island	PUC RI 15	B, C
Vermont	PSB VT 20	B, C

New York Telephone

PSC 900	12, 21
PSC 910	