

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

In the Matter of)
)
NYNEX Telephone Companies)
)
Offer of Comparably Efficient)
Interconnection to Customized)
Announcement Services Providers)

**Comparably Efficient Interconnection Plan
For Customized Announcement Services**

The NYNEX Telephone Companies¹ (NYNEX) hereby submit their Comparably Efficient Interconnection (CEI) Plan to offer Customized Announcement Services (CAS), in accordance with the Commission's Waiver Order.² The Waiver Order requires a BOC to file CEI plans for new enhanced services.³

I. **INTRODUCTION AND SUMMARY**

This plan describes CAS and sets forth the means by which NYNEX plans to provide CEI to other customized announcement enhances services providers (ESPs). NYNEX intends to offer CAS as described herein upon Commission approval of this CEI Plan.

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

² Bell Operating Companies' Joint Petition for Waiver of Computer II Rules, DA 95-36, Memorandum Opinion and Order released January 11, 1995 by Common Carrier Bureau (Waiver Order), paras. 2-3.

³ For purposes of the Waiver Order, the Commission considered "new enhanced services" to include any enhanced service which was not being offered to customers as of the effective date of the Waiver Order. Waiver Order at para. 30, n. 73.

In providing these services, NYNEX will subscribe to a number of existing underlying basic network services. All of these basic network services are now available, either region-wide or in most NYNEX jurisdictions. CAS only uses tariffed network services available to other enhanced service providers and purchases such services at tariffed rates, terms and conditions.

II. DESCRIPTION OF SERVICE

CAS are computer based audiotext services that enable subscribers to create, store, access and retrieve customized announcements. Subscribers and end users with a telecommunications capability would access and interact with CAS through the use of a Touch-Tone telephone. Access to CAS will be via tariffed services and enhanced functions will be separate from NYNEX telephone network equipment.⁴

CAS will permit customers to use NYNEX's enhanced CAS equipment and services to develop and store customized messages⁵ in conjunction with NYNEX network services. For example, customers subscribing to NYNEX's Automatic Call Distribution (ACD) service would be able to utilize NYNEX's CAS equipment to leave promotional and/or informational messages for calls which are held in queue by the ACD or made to the ACD at night when the ACD customer has no one available to answer the call. When encountering a no answer condition, night calls would be forwarded to NYNEX's CAS equipment to advise the customer to call back at a different time, or the ACD customer (i.e., the called party) could use the opportunity to leave a promotional message as well.

⁴ CAS equipment is not integrated with NYNEX's telephone network equipment and may or may not be physically collocated within NYNEX's network switching centers. CAS equipment interconnects to the network using tariffed network services that are available on the same rates, terms and conditions to all ESPs.

⁵ NYNEX may directly provide the CAS content or utilize a third party.

CAS could also be used by a customer for incoming calls which encounter a busy or no answer condition; those calls would be call forwarded to NYNEX's CAS which could be used to advise the caller to call back at a different time, or provide other additional information.

To enter or update a customized announcement, a CAS subscriber, or NYNEX on behalf of the customer, using the public switched network and a Touch-Tone telephone, would first dial the telephone number associated with NYNEX's CAS equipment.⁶ After being connected to CAS, a customer, through interaction with voice prompts, would be able to create and leave a voice message which would be heard by incoming callers under the conditions described above.

III. COMPLIANCE WITH CEI PARAMETERS

This section describes how NYNEX's CAS offering meets the Commission's CEI parameters.⁷

A. Interface Functionality

The equipment used for CAS by NYNEX is not integrated with NYNEX's telephone network equipment. Depending on the application, CAS equipment may or may not be physically collocated with NYNEX's network switching centers. In either case, CAS equipment interconnects to the network using the same existing standard interfaces and tariffed transmission offerings that are available on the same terms and conditions to all ESPs. A list of the underlying basic services and applicable tariffs that may be used by

⁶ CAS would utilize a standard seven or ten digit number of the form NPA NXX-XXXX.

⁷ See Amendment of Section 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry), CC Docket No. 85-229, FCC 86-252, Report and Order, released June 16, 1986 (Computer III Phase I Order) (R&O), paras. 154-66.

NYNEX CAS, and are available to competitive ESPs to provide information services, is included in Appendix A. All ESPs can, therefore, connect their equipment to the telephone network through identical standard hardware and software interfaces and access arrangements associated with existing tariffed basic services. These interfaces support transmission, switching and signaling functions, the details of which are currently available to the industry.

In addition to the interfaces for the currently available basic services, NYNEX CAS may avail itself of new basic services when they are made generally available to others. In the event NYNEX CAS uses any new basic services, NYNEX will include such services in an amendment to this plan. NYNEX will offer these services in state and/or federal tariffs as appropriate, and make them available to all users on a nondiscriminatory basis.

B. Unbundling of Basic Services

All basic services and functions used by NYNEX CAS are unbundled to the extent that they are functionally useful to ESPs and end users. They represent the minimum set of network functions that are required for connectivity to the network. All basic services that NYNEX CAS uses are under tariff. NYNEX does not use any network functions for its AIS that are not available to all ESPs under the same rates, terms and conditions.

C. Resale

NYNEX CAS fully complies with the CEI parameter that requires NYNEX enhanced service offerings to take the same underlying basic services at unbundled tariff rates. NYNEX procures CEI elements at the same tariffed rates, terms and conditions as available to other ESPs.

D. Technical Characteristics

Interconnection to NYNEX CAS offerings and to offerings of non-affiliated ESPs is through the same standard network interfaces. These interconnections are provided under existing tariffs and support all the transmission, switching and signaling functions used in NYNEX CAS.

E. Installation, Maintenance, and Repair

The procedures for ordering, installing, maintaining, and repairing underlying basic services are identical for affiliated and unaffiliated ESPs. The procedures are designed to preclude discrimination in response or intervals for these functions.⁸

F. End User Access

NYNEX CAS subscribers use the same tariffed services that would be used by any other user -- e.g., dial access, residence and business exchange access lines, Centrex lines, foreign exchange lines -- and all service features and options available under tariff for NYNEX CAS are available to all other users under the same rates, terms and conditions.

⁸ The Commission approved NYNEX's procedures. See Filing and Review of Open Network Architecture Plans, Memorandum Opinion and Order, 4 FCC Rcd. 1, paras. 467-73 (1988).

G. CEI Availability

NYNEX only uses tariffed network services to provision CAS service that are available under the same rates, terms and conditions and at the same time to all ESPs.

H. Recipients of CEI

The basic services NYNEX uses to access CAS are offered under existing tariffs to all ESPs and end users. This satisfies the Commission's requirement that carriers must not restrict the availability of CEI to any particular class of customer or enhanced service competitor.

I. Minimization of Transport Costs

The Commission held that this CEI condition is satisfied where, as here, affiliated and unaffiliated enhanced service providers are charged the same rates for underlying basic services.⁹

IV. COMPLIANCE WITH NONSTRUCTURAL SAFEGUARDS

In addition to CEI, the Commission has required certain other nonstructural safeguards to ensure nondiscriminatory treatment and to prevent cross-subsidization. These other nonstructural safeguards required by the Commission cover: (a) nondiscrimination, (b) protection of Customer Proprietary Network Information (CPNI), (c) allocation of joint and common costs, and (d) disclosure of network interconnection information. NYNEX has complied, and will continue to comply fully with the existing, and any revised, requirements regarding these nonstructural safeguards.

⁹ Amendment of Section 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry), Phase II Reconsideration Order, 3 FCC Rcd. 1155, paras. 32-34 (1988). Price sheets for sample tariffs that illustrate the basic interconnection charge and the distance-sensitive transmission charges are attached as Appendix B.

V. CONCLUSION

For the reasons stated, the Commission should expeditiously approve NYNEX's Plan to provide Comparably Efficient Interconnection to providers of Customized Announcement Services.

Respectfully submitted,

NYNEX Telephone Companies

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BASIC SERVICES AND TARIFFS

SERVICE	TARIFF	SECTION
<i>I. Exchange Telephone Service</i>		
New England Telephone		
Maine		
Residence, Business	PUC Me 15	5
Foreign Exchange (FX)	" " "	6
CENTREX, DID	" " "	7, C
ISDN, Digital PBX Flexpath	" " "	C
Massachusetts		
Residence, Business, FX	Mass DPU 10	5*
CENTREX, DID	" " "	7, C
ISDN, Digital PBX Flexpath	" " "	C
ACD	" " "	C
New Hampshire		
Residence, Business, FX	NH PUC 75	5
CENTREX, DID	" " "	7, C
ISDN, Digital PBX Flexpath	" " "	C
Rhode Island		
Residence, Business, FX	PUC RI 15	5
CENTREX, DID	" " "	7, C
ISDN, Digital PBX Flexpath	" " "	C
Vermont		
Residence, Business, FX	PUC RI 15	5
CENTREX, DID	" " "	7, C
ISDN, Digital PBX Flexpath	" " "	C
New York Telephone		
Residence, Business	PSC 900	1
FX, ISDN	" "	2
CENTREX, DID	" "	4
Digital PBX Flexpath	" "	4
ACD	" "	8

* Price sheets for the tariffed basic services are attached.

BASIC SERVICES AND TARIFFS

<u>SERVICE</u>	<u>TARIFF</u>	<u>SECTION</u>
<i>II. Private Line Services (PLS)</i>		
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 PSC 910	12, 21*

* Price sheets for the tarified basic services are attached.