

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

In the Matter of )  
 )  
NYNEX Telephone Companies )  
 )  
Offer of Comparably Efficient )  
Interconnection to Remote )  
Data Processing Services Providers )

**Comparably Efficient Interconnection Plan  
For Remote Data Processing Services**

The NYNEX Telephone Companies<sup>1</sup> (NYNEX) hereby submit their Comparably Efficient Interconnection (CEI) Plan to offer Remote Data Processing Services (RDP), in accordance with the Commission's Waiver Order.<sup>2</sup> The Waiver Order requires a BOC to file CEI plans for new enhanced services.<sup>3</sup>

I. **INTRODUCTION AND SUMMARY**

This plan describes RDP and sets forth the means by which NYNEX plans to provide CEI to other remote data processing enhanced services providers (ESPs).

NYNEX intends to offer RDP as described herein upon Commission approval of this CEI Plan.

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<sup>1</sup> The NYNEX Telephone Companies are New York Telephone Company and New England Telephone and Telegraph Company.

<sup>2</sup> 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.

<sup>3</sup> 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. RDP only uses tariffed network services available to other ESPs and purchases such services at tariffed rates, terms and conditions.

NYNEX requests expeditious Commission review and approval of this Plan.<sup>4</sup>

## **II. DESCRIPTION OF SERVICE**

RDP are computer based applications which require a remote data processing capability and the development of application specific software. Rather than a ubiquitous general offering, RDP would entail designing and establishing specific remote data processing applications for specific customers or markets where a remote data processing capability is needed in order to provide the service.<sup>5</sup>

Customers with a telecommunications capability access and interact with RDP through the use of a personal computer or a suitably equipped terminal. RDP will enable customers, or NYNEX on behalf of customers, to store, retrieve and/or manipulate data stored in computers provided by NYNEX or others.<sup>6</sup> The following describes NYNEX's

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<sup>4</sup> This CEI Plan proposes enhanced services and CEI arrangements that are substantially the same as those proposed in U S West's Comparably Efficient Interconnection Plan For On-Line Database Access, filed with the Commission on March 13, 1995, and therefore warrants expedited Commission action upon Commission approval of that CEI Plan. 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), para. 191.

<sup>5</sup> NYNEX may develop and/or offer these services and any associated content independently or in conjunction with a third party.

<sup>6</sup> RDP equipment is not integrated with NYNEX's telephone network equipment and may or may not be physically collocated within NYNEX's network switching centers. RDP equipment interconnects to the network using tariffed network services that are available on the same terms and conditions to all ESPs.

Point-Of Sale Data Processing (POS) application which will be the first RDP application to be introduced by NYNEX.<sup>7</sup>

### **Point-Of-Sale Data Processing**

POS will permit merchants to remotely track their retail sales.<sup>8</sup> Through the use of suitably equipped point-of-sale customer premises equipment (CPE) and the public switched network, a merchant will be able to remotely access a NYNEX POS database specifically developed to track the merchant's retail sales. The POS database will be programmed to provide a "real-time" tracking capability and provide the merchant with individual customer sales records for the purpose of providing a discount to a valued customer or providing the merchant with other general or customer specific sales information.

To utilize POS, a merchant's point-of-sale customer premises equipment<sup>9</sup> would be programmed to call the telephone number associated with NYNEX's POS database<sup>10</sup> and to transmit the appropriate customer sales information to POS.<sup>11</sup> POS would then transmit the appropriate customer specific or general sales and/or promotional information to be displayed on the merchant's CPE.

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<sup>7</sup> The Commission will be notified prior to the introduction of any new RDP application.

<sup>8</sup> POS would encompass the enhanced services to be trialed as part of NYNEX's planned PowerPass<sup>™</sup> Market Trial which is scheduled to begin on or after October 1, 1995, pending Commission approval of NYNEX's market trial notice which was filed June 30, 1995.

<sup>9</sup> Typically, a merchant would use a CPE device, such as a cash register or charge card reader, which is capable of reading the magnetic strip of a charge card or specialty shoppers card.

<sup>10</sup> A standard telephone number of the form NPA NXX-XXXX would be used for this purpose.

<sup>11</sup> For high volume applications, such as a large department store, tariffed private lines or other high speed tariffed services may be used to interconnect a merchant's CPE to NYNEX's POS database.

### **III. COMPLIANCE WITH CEI PARAMETERS**

This section describes how NYNEX's RDP offering meets the Commission's CEI parameters.<sup>12</sup>

#### **A. Interface Functionality**

The equipment used for RDP by NYNEX is not integrated with NYNEX's telephone network equipment. Depending on the application, RDP equipment may or may not be physically collocated with NYNEX's network switching centers. In either case, RDP 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 NYNEX RDP, 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 RDP may avail itself of new basic services when they are made generally available to others. In the event NYNEX RDP 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.

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<sup>12</sup> See R&O at paras. 154-66.

**B. Unbundling of Basic Services**

All basic services and functions used by NYNEX RDP 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 RDP uses are under tariff. NYNEX does not use any network functions for its RDP that are not available to all ESPs under the same rates, terms and conditions.

**C. Resale**

NYNEX RDP 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 RDP 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 RDP.

**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.<sup>13</sup>

**F. End User Access**

NYNEX RDP 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 RDP are available to all other users under the same rates, terms and conditions.

**G. CEI Availability**

NYNEX only uses tariffed network services to provision RDP 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 RDP 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.<sup>14</sup>

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<sup>13</sup> 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).

<sup>14</sup> 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

#### IV. COMPLIANCE WITH NONSTRUCTURAL SAFEGUARDS

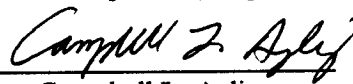
In addition to CEI, the Commission has required certain other nonstructural safeguards to ensure nondiscriminatory treatment and to prevent cross-subsidization. These other nonstructural safeguards required by the Commission cover: (a) nondiscrimination, (b) protection of Customer Proprietary Network 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.

#### V. CONCLUSION

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

Respectfully submitted,

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tariffs that illustrate the basic interconnection charge and the distance-sensitive transmission charges are attached as Appendix B.

**BASIC SERVICES AND TARIFFS**

<b>SERVICE</b>	<b>TARIFF</b>	<b>SECTION</b>
<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
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

\* Price sheets for the tariffed basic services are attached.

**BASIC SERVICES AND TARIFFS**

<b><u>SERVICE</u></b>	<b><u>TARIFF</u></b>	<b><u>SECTION</u></b>
<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*
<i>III. INFOPATH</i>		
New England Telephone		
Maine	PUC Me 15	C
Massachusetts	DPU Mass 10	C
New Hampshire	NHPUC 75	C
Rhode Island	PUC RI 15	C
Vermont	PSB VT 20	C
New York Telephone	PSC 900	21*

\* Price sheets for the tariffed basic services are attached.

**APPENDIX B**

**PRICE SHEETS FOR SAMPLE TARIFFS**