

J. Caputo

Susanne Guyer
Executive Director
Federal Regulatory Policy Issues

December 6, 1995

Ex Parte

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

RE: CEI Plans, CC Docket Nos. 85-229, 90-623, 95-20

Dear Mr. Caton:

As requested by Ms. Radika Karmarkar of the Policy and Program Planning Division of the Common Carrier Bureau, the NYNEX Telephone Companies¹ (NYNEX) hereby provide supplemental information to their Remote Data Processing Services (RDP), Customized Announcement Services (CAS) and Audiotext Information Services (AIS) Comparably Efficient Interconnection (CEI) Plans which were filed with the Commission on July 28, 1995.

As identified in the individual CEI Plans², NYNEX may physically collocate enhanced services equipment within NYNEX's network switching centers. NYNEX will comply with the Commission's pricing parity rules when such equipment is collocated.³ In addition, all of the basic services that are to be used to provision CAS, AIS and RDP are existing tariffed services for which network interfaces exist and no further network disclosures are required.

At the present time, while certain CAS, AIS and RDP applications⁴ may be offered through NYNEX Telephone Company affiliates for marketing purposes, NYNEX plans to offer CAS, AIS and RDP in an "integrated" fashion, i.e., subject to the Commission's CEI and nonstructural safeguards established under Computer Inquiry III and Open Network

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

² RDP CEI Plan, CAS CEI Plan, and AIS CEI Plan at page 2.

³ NYNEX's pricing parity compliance procedures have been approved by the Commission. See Filing and Review of Open Network Architecture Plans, Memorandum Opinion and Order, 4 FCC Rcd. at 1, 86, para 166 (1988).

⁴ Commercially available customer premises equipment (CPE) may be provided in conjunction with enhanced service offerings. For example, as described in NYNEX's RDP CEI Plan on page 3, to utilize NYNEX's RDP Point-of-Sale application, a customer would require the use of a commercially available CPE device, such as a charge card reader, which is capable of reading the magnetic strip of a charge card. Such CPE will be available from NIRC or other vendors.

Architecture.⁵ We plan for Consumer Tips to be the first AIS application and PowerPass to be the first RDP application.⁶ Upon approval of NYNEX's AIS and RDP CEI Plans, we plan to market these applications through the NYNEX Information Resources Company (NIRC) which conducts NYNEX's directory publishing operations. NIRC is a nonregulated NYNEX affiliate but does not meet the Commission's Computer Inquiry II separate subsidiary requirements.

In regard to NYNEX's plans to introduce CAS in conjunction with its tariffed Automatic Call Distribution (ACD) service. ACD is a basic service feature associated with NYNEX's local exchange Centrex service offering which permits an even distribution of incoming calls to a group of associated Centrex lines. The tariffed ACD offering includes the Basic Service Element (BSE), called Access to Customer Premises Announcement (ACPA), which gives customers or enhanced service providers on behalf of a customer, the option to interconnect audiotext equipment. Because ACPA is inextricably tied to Centrex service and Centrex and ACD are not offered and have no identified application in the interstate jurisdiction, ACPA will only be offered on an intrastate basis. In addition, the existing interstate access arrangements do not provide a logical or technically appropriate service platform to provide ACPA BSE on an interstate basis.⁷

In regard to NYNEX's Cost Allocation Manual (CAM), as noted above, the first applications of AIS and RDP will be marketed through NIRC, already listed as a nonregulated affiliate in the CAM. If and when AIS or RDP applications are provided directly out of the NYNEX Telephone Company, NYNEX will amend the CAM and describe those nonregulated activities.⁸ CAS, which will be offered directly out of the NYNEX Telephone Company, will be listed separately in the CAM in NYNEX's next quarterly update due to be filed on December 31, 1995, pending the Commission approval of NYNEX's CAS CEI Plan.

Sincerely,

cc: R. Crellin
R. Karmarkar

⁵ See Interim Waiver of Computer II Rules, DA 95-36, Order by Chief, FCC Common Carrier Bureau, released January 11, 1995, 10 FCC Rcd. 1724.

⁶ NYNEX is currently performing a market trial of Consumer Tips and PowerPass. See Notification of NYNEX's Market Trial of NYNEX Consumer Tips filed on May 15, 1995 and See Notification of NYNEX's Market Trial of NYNEX PowerPass filed on June 30, 1995.

⁷ ACPA is currently only available in New York and Massachusetts. NYNEX will amend its CAS CEI Plan if it plans to introduce and utilize ACPA to provision CAS in other jurisdictions. Present plans anticipate AIS and RDP to be introduced region wide. All of the basic services which may be used to provision AIS and RDP are ubiquitously deployed throughout NYNEX. See NYNEX's AIS and RDP CEI Plans, Appendix A

⁸ See Section 64.903 of FCC Rules.