

Donald W. McLeod
Vice President-Local
Competition/Interconnection



GTE Telephone
Operations

April 15, 1996

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Irving, TX 76015-2092
214/718-8330
FAX: 214/718-4363

Mr. Rian J. Wren
Vice President
Southwest States LSO
AT&T
Suite 445, 5501 LBJ Freeway
Dallas, TX 75240

Dear Mr. Wren:

Subject: INTRALATA EQUAL ACCESS/LOCAL COMPETITION

Your letters dated April 3, 1996, to Mr. Larry Sparrow have been referred to me for response and appropriate action. GTE has established a Local Competition/Interconnection Program Office, to negotiate and coordinate the activities associated with alternative local exchange company interconnection agreements resulting from enactment of the Telecommunications Act of 1996, (the Act). I have been appointed to lead this newly established program office and to manage local interconnection negotiations and related local competition matters.

Your first letter requested that GTE furnish you with our plan for providing dialing parity in the states of Texas, Missouri, Oklahoma and Arkansas. You further state in your letter, that you are only requesting information from GTE and are not submitting a request to commence negotiations pursuant to sections 251 and 252 of the Act.

It is GTE's position that section 251 and 252 of the Act require state-by-state negotiations when requested by individual carriers, and these negotiations are intended to cover a variety of matters that include intraLATA equal access. Accordingly, for numerous reasons, including the ability of GTE to satisfy its obligations in all states in which it operates, we will not negotiate separately the various matters contained in the Act.

GTE is committed to providing facilities for 1+intraLATA equal access during 1996 and 1997 where technically feasible. It is important to understand that implementation cannot occur immediately in any individual state let alone simultaneously, in 27 states (excluding Alaska, GTE has more than 1640 host switches) because of the labor intensive requirements associated with equipping each switch with the functional capability to offer intraLATA equal access.

While this requirement varies by switch type, the GTE-5, 5-ESS and

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DMS 10:100/200 require in excess of 20 employee-hours per end office and access tandems are even more labor intensive. Additionally, GTE must try to reasonably balance the impacts this change will have on its administrative systems and processes and customer support (for example, Customer Contact Centers and Business Service Centers).

GTE is prepared, however, to discuss the methods, procedures and timing of dialing parity deployment at such time as we begin state negotiations with AT&T

Your second letter asks if GTE has submitted any interconnection agreements between GTE and other entities to the State Commissions in Texas, Missouri and Oklahoma for their approval as required in the Act. GTE has not yet executed any such agreements either prior to or post enactment of the Telecommunications Act of 1996 in these states and therefore have not filed any such agreements. Pursuant to the Act copies of Commission approved and executed agreements will be available from the Commission granting said approval.

Should you have questions concerning this response please contact Meade Seaman, Director-Local Competition/Interconnection Program Office, at 214/718-1333, or me at 214/718-6330.

Sincerely,



Donald W. McLeod
Vice President-Local
Competition/Interconnection

DWM:mlh

- c. K. J. Harless - TXD1981A - Irving, TX
- J. B. Hunt - TXD1933G - Irving, TX
- B. W. Paulson - MO681WPW - Wentzville, MO
- M. C. Seaman - HQE03D52 - Irving, TX
- L. J. Sparrow - HQE04E57 - Irving, TX

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