Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of
NEW ENGLAND TELEPHONE AND
TELEGRAPH COMPANY
AND
NEW YORK TELEPHONE COMPANY

Plan to Provide Comparably Efficient
Interconnection to Providers of Enhanced
Protocol Processing Services

PLAN TO PROVIDE COMPARABLY EFFICIENT INTERCONNECTION
TO PROVIDERS OF ENHANCED PROTOCOL PROCESSING SERVICE

New England Telephone and
Telegraph Company and
New York Telephone Company

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Dated: May 17, 1989
The NYNEX Telephone Companies (NTCs) submit this Plan to provide Comparably Efficient Interconnection (CEI) for enhanced protocol processing offered in connection with Exchange Telephone Service, Private Line Services (PLS), INFOPATH® Packet Switching Service, and the Central Office Local Area Network (CO-LAN) services, including CENTREX LAN. Pursuant to this Plan, the NTCs propose to provide enhanced protocol processing on a structurally unseparated basis in accordance with the Commission's Orders in the Third Computer Inquiry.

This plan describes how the NTCs will comply with the CEI requirements established in the Third Computer Inquiry, as well as the Commission's other nonstructural safeguards. The plan demonstrates how the basic services in connection with enhanced protocol processing will be available to other enhanced services providers under the same terms and conditions.

This Plan is very similar to the Bell Atlantic Telephone Companies Plan to Offer Comparably Efficient Interconnection to Providers of Protocol Conversion Services which was recently approved by the Commission. No new issues are raised and the Commission may and should expeditiously approve the NYNEX Telephone Companies' Plan so that the NTCs can timely and effectively meet the needs and requirements of their customers.
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In the Matter of
NEW ENGLAND TELEPHONE
AND TELEGRAPH COMPANY
AND
NEW YORK TELEPHONE COMPANY
Plan to Provide Comparably Efficient
Interconnection to Providers of Enhanced
Protocol Processing Services

PLAN TO PROVIDE COMPARABLY EFFICIENT INTERCONNECTION
TO PROVIDERS OF ENHANCED PROTOCOL PROCESSING SERVICES

I. INTRODUCTION

New England Telephone and Telegraph Company and New
York Telephone Company (the NYNEX Telephone Companies or NTCs)
submit this plan to provide Comparably Efficient Interconnection
(CEI) to enhanced service providers (ESPs) that offer enhanced
protocol processing. The terms of this plan satisfy the
Commission's Orders in the Third Computer Inquiry\(^1\) which
permit the NTCs to provide enhanced protocol processing services
on an unseparated basis, contingent upon approval of a CEI plan.

\(^1\) Amendment of Section 64.702 of the Commission's Rules and
Regulations (Third Computer Inquiry), CC Docket No.
85-229, Report and Order, FCC 86-252, 104 F.C.C. 2d 958
released June 16, 1986 ("Computer III Phase I Order");
Memorandum Opinion and Order on Reconsideration, FCC
87-102, released May 22, 1987 ("Computer III Phase I
Reconsideration Order"); Report and Order, FCC 87-103,
released May 22, 1987 ("Computer III Phase II Order").
The NTC's enhanced protocol processing services will utilize four different classes of underlying basic network services. These services are: Exchange Telephone Services, Private Line Services (PLS), INFOPATH® Packet Switching Service, and Central Office Local Area Network (CO-LAN) services.\(^2\)

This Plan is very similar in material respects to the Bell Atlantic Telephone Companies Plan to Offer Comparably Efficient Interconnection to Providers of Protocol Processing Services which was approved by the Commission on March 31, 1989.\(^1\) The substantive features of the NTC Plan and the approved Plan of the Bell Atlantic Telephone Companies are essentially equivalent. No issues of substance are raised in this filing which have not been raised and dealt with by the Commission already. Therefore, the NYNEX Telephone Companies request expeditious approval of this Plan.

\(^2\) CO-LAN is both the generic term for a class of central office based services and the name of the NTCs specific Tariff offering of CO-LAN Service. Throughout this Plan, the term CO-LAN is used in the generic sense to include both the CENTREX Local Area Network (CENTREX-LAN) service offering and the CO-LAN Service offering. CENTREX LAN is functionally equivalent to CO-LAN except that CENTREX LAN is accessible only to CENTREX customers over CENTREX lines. Once the CO-LAN tariff becomes effective, the CO-LAN service offering will replace the CENTREX LAN service offering on a prospective basis and the CENTREX LAN service offering will be restricted to current CENTREX customers.

II. DESCRIPTION OF ENHANCED SERVICE

NYNEX requests authority to provide enhanced protocol processing on a structurally unseparated basis for the variety of protocols listed in Attachment A.

The NTCs also request permission to provide enhanced protocol processing for additional protocols as new protocols become available. The NTCs will provide new enhanced protocol processings consistent with this CEI Plan, and the Commission's CEI Requirements. The processing of such additional protocols will use the underlying basic services specified in this CEI plan and will use such basic services in the same manner as specified in this plan.

In addition, the NTCs seek authority under this CEI plan to engage in joint marketing of enhanced protocol processing with their INFOPATH® service for asynchronous to X.25 and X.75 as well as those protocols listed in Attachment A.

The Commission's grant of permission to offer enhanced protocol processing for future protocols will speed the implementation of new technology and facilitate the introduction of new services which are responsive to the requirements of the public.

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The Commission has stated in other Orders that "there is no reason to require separate CEI Plans for enhanced services that are provided as a package if a carrier demonstrates that the CEI requirements for those services comply with the Commission's CEI requirements". (Bell Atlantic Offer Comparably Efficient Interconnection to Providers of Protocol Processing Services, DA-89-352, released: March 31, 1989).
III. UNDERLYING BASIC NETWORK SERVICES

The NTCs will provide to end users and competing enhanced service providers, all underlying basic network services utilized to access enhanced protocol processing, under the same terms, conditions, and rates that are available to the NTCs. Representative tariffs and complete tariff references for existing network services to be utilized by the NTCs in the provision of enhanced protocol processing are provided in Attachment B. These services are each described briefly below.

A. Exchange Telephone Services

Exchange Telephone Service provides access to the exchange network for the purpose of placing and receiving calls through a line which connects the central office and the customer's premises. The Exchange Telephone basic services which can be used to gain access to the enhanced protocol processing offering include Business Access Lines, Residence Access Lines, CENTREX Lines, and Foreign Exchange Lines.

B. Private Line Services (PLS)

PLS provides dedicated analog or digital communication at various bandwidths and transmissions speeds. Protocol processing accessed through PLS enables the customer to connect disparate terminal equipment within a single private network. The basic PLS that can be utilized to gain access to the enhanced protocol processing offering are Analog Private Line, Quickway™ and Digipath™ (Digital Data Service (DDS)), 
Superpath™ 1.544 megabit/sec services and Superpath™ Optical 1.544 megabit/sec services.

C. INFOPATH® Packet Switching Service

INFOPATH® Packet Switching Service provides basic packet switching data transmission capabilities and furnishes access to enhanced protocol processing for customers with data communications requirements. It is typically used for interactive data communication between terminals and computers. This CEI Plan will permit the NTCs to also provide those additional enhanced protocol processing services described herein, on an unseparated basis. Enhanced protocol processing employing INFOPATH® will be provided in the same manner that protocol conversion is provided through INFOPATH® under the existing Compliance Plan. The NTCs also seek authority under this CEI Plan to engage in joint marketing of enhanced protocol processing with INFOPATH® (i.e., for asynchronous to X.25 and X.75 as well as those protocols listed in Attachment A.)

5 The NTCs currently provide asynchronous to X.25 and X.75 enhanced protocol processing with INFOPATH®, pursuant to Compliance Plans approved by the Commission under the Protocol Waiver Order and will continue to provide it under these Compliance Plans. New York Telephone Petition for Waiver of Section 64.702 of the Commission’s Rules (Computer II), Memorandum Opinion and Order, AAD 5-1242, Memo No. 6782 (released September 11, 1986).

New England Telephone and Telegraph Petition for Waiver of Section 64.702 of the Commission’s Rules (Computer II), Memorandum Opinion and Order, AAD 7-1890 (released October 13, 1988).

6 The Commission has granted similar permission to Bell South, CEI Plan for Synchronous Protocol Processing Services, August 19, 1988, DA 89-140, Memorandum Opinion and Order (released February 15, 1989).
D. Central Office Local Area Network (CO-LAN) Service

CO-LAN is a switched data communications network service which provides simultaneous voice and synchronous or asynchronous data transmission over a customer's exchange service lines within a Local Area Network. CO-LAN service requires a customer-provided DVM at the customer premises and a similar device at the Telephone Company central office. The basic service component which will be used to access enhanced protocol processing services is a CO-LAN line. A CO-LAN line consists of a derived data channel and a data switch termination. Depending on the customer's requirements, either asynchronous or synchronous communications over a CO-LAN line will be used to access the proposed enhanced protocol processing capabilities.

The NYNEX Telephone Companies' enhanced protocol processing offered with a CO-LAN line may be provided outside the CO-LAN switch or integrated within the CO-LAN switch. In the case where the protocol processor is located outside the CO-LAN switch, the NTCs will use CO-LAN lines, including DVMs, to connect the CO-LAN switch to the protocol processor. In the case where the protocol processor is integrated within the CO-LAN switch, the NTCs will impute the charges for the CO-LAN lines, as if the protocol processor were located outside the CO-LAN switch.

CO-LAN is currently tariffed in Massachusetts, and we plan to file a CO-LAN tariff in New York in June 1989. CENTREX LAN is currently tariffed in Massachusetts, and New York.
IV. COMPARABLY EFFICIENT INTERCONNECTION

This section describes how the NYNEX Telephone Companies Plan will meet the nine CEI parameters established in the Third Computer Inquiry.⁷

A. Interface Functionality⁸

All basic network services in this plan use interfaces that are standard published interfaces. They support transmission, switching and signaling functions widely known in the industry.

B. Unbundling⁹

This CEI parameter requires that basic services and basic service functions that underlie the NTCs' enhanced protocol processing services "be unbundled from other basic service offerings and associated with a specific rate element in the CEI tariff."¹⁰

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⁷ Amendment of Section 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry) Report and Order, 104 F.C.C. 2d 958 (June 16, 1986), (Computer III Phase I, Order). The basic network services used to access enhanced protocol processing are set forth in Section III. These services will be offered in conformity with the Commission's CEI requirements and non-structural safeguards as described herein.

⁸ Id. at 1039

⁹ Computer III Phase I Order, 104 F.C.C. 2d. 958

All basic services and functions that will be utilized by the NTCs' enhanced protocol processing service have been unbundled to the extent that they are functionally useful to ESPs and end users. They represent the minimum set of network functions required for connectivity to the network. All basic services underlying the enhanced services in this plan are currently available under tariff. The NYNEX Telephone Companies will not use any network functions for these enhanced services that are not available to all ESPs under the same terms and conditions, and at the same degree of unbundling.

C. Resale

The NTCs will fully comply with this CEI parameter which requires that the NTCs' enhanced services take basic services at unbundled tariff rates. The NTC enhanced protocol processing services in this CEI plan will purchase the underlying basic services at the same unbundled tariffed rates, terms and conditions as available to other ESPs.11

D. Technical Characteristics

Interconnection to the NYNEX Telephone Companies' enhanced protocol processing offerings and to the offerings of unaffiliated providers will be through the same standard network interfaces. These interconnections are currently available under tariff and will support all transmission, switching and

11 Ibid. para. 159
signaling functions used in the NTCs' enhanced protocol processing service.

To the extent that the NYNEX Telephone Companies offer enhanced protocol processing services within their central offices, they will subscribe to underlying tariffed services to which the same interface parameters apply as for other ESPs. These specifications guarantee that the signals delivered to the network interface will fall within an acceptable upper and lower limit for a given transmission parameter, regardless of the identity of the ESP using the service.

The NYNEX Telephone Companies have designed their entire network to ensure that all services will meet these parameters, so that all customers are assured services that are equivalent in technical quality.

E. Installation, Maintenance, and Repair

This CEI parameter requires that the time periods for installation, maintenance and repair of the basic services and facilities underlying the services in this CEI plan when provided to enhanced service providers (ESPs) "be the same as those the carrier provides to its own enhanced service operations".\(^{12}\)

Procedures are in place at the NYNEX Telephone Companies to ensure that personnel involved in the installation, maintenance and repair place as top priority the rendering of prompt and efficient service to the customer without regard to

\(^{12}\) Computer III, Phase I Order, para. 16.
whether the customer is internal or external to the NTCs. These procedures ensure the equality of treatment of all customers. The NYNEX installation, maintenance and repair procedures have been reviewed and approved by the Commission. 13

F. End User Access

This CEI parameter requires that the NTCs provide the same capabilities to end users of any enhanced protocol processing provider that are made available to end users of the NTCs' enhanced protocol processing service.

The NTCs' enhanced protocol processing subscribers will use the same tariffed services that will be utilized by any other user, e.g. residence and business access lines, CENTREX lines, private line services, and CO-LAN service. Thus, all service features and options available under tariff for the NTCs' enhanced protocol processing service will be available to all end users on the same terms and conditions.

G. CEI Availability

All underlying basic services required for the enhanced protocol processing services described in this CEI plan will be available to all ESPs and the NYNEX Telephone Companies at the same time and under the same terms and conditions. The NYNEX

Telephone Companies will not use an underlying basic service that is not available to all ESPs under the same tariffed terms and conditions for the enhanced protocol processing described in this CEI Plan.

H. Recipients of CEI

The basic services which the NTCs will use to access enhanced protocol processing are offered under existing tariffs to all ESPs and end users, without restriction as to the identity of the user. 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. In the event that state tariffs contain restrictions which run counter to this CEI parameter, the NTCs will utilize the waiver process established by the Commission to rectify the inconsistency. There are no such restrictions today.

I. Minimization of Transport Costs

The NYNEX Telephone Companies' enhanced protocol processing services will be charged the same rates as those paid by non-collocated enhanced service providers for access connections. In the case where the NTCs' enhanced protocol processing is located within the central office, the NTC service will be charged for tariffed services as though the operations were located outside the central office building, but within the central office district. These charges will be the same as those to any ESP within that central office district.
The vast majority of the basic network services to be utilized by the NTCs in the provision of enhanced protocol processing services are tariffed at averaged rates. That is, there are no distance sensitive charges for intraoffice facilities. There are a few services, however, which have distance sensitive charges for intraoffice loops, e.g. Superpath™ 1.544 megabit/sec service. When the NTCs' enhanced protocol processing operations subscribe to these services, they will be charged as though they were located two miles from the central office, in those central office districts where the distance from the central office to the boundary is two miles or more. Most of the central office districts in densely populated business areas, however, cover very small geographic areas, significantly less than two (2) miles. In some cases, these central office districts encompass only a few city blocks, making it impossible to apply the "two mile rule". In those central office districts, the NTCs will compute the farthest distance from that central office to the boundary of that central office and impute charges to the NTCs' enhanced protocol processing service as though it were located one-half (1/2) of that distance. This average distance will be calculated individually for each central office from which the NTCs provide enhanced protocol processing\(^{14}\). For services

\(^{14}\) The ONA Order para. 496 E.(17), required that US West describe how it would comply with the Commission's requirement that, in applying its price parity approach to a distance sensitive transmission tariff, it would charge its enhanced service operations no less than it would charge an ESP two miles from the relevant central

(Footnote Continued On Next Page)
located outside the central office district, tariffed interoffice mileage rates will be charged without regard to the identity of the user.

V. COMPLIANCE WITH NONSTRUCTURAL SAFEGUARDs

In addition to establishing specific CEI and ONA requirements, the Commission requires certain other nonstructural safeguards to ensure nondiscriminatory treatment and to prevent cross-subsidization. These other nonstructural safeguards required by the Commission are a) nondiscrimination, b) protection of Customer Proprietary Network Information ("CPNI"), c) allocation of joint and common costs, and d) disclosure of network information.\textsuperscript{15} The NYNEX Telephone Companies' CEI Plan fully complies with these requirements.\textsuperscript{16}

\textsuperscript{14} (Footnote Continued From Previous Page)

office. When that order was released, the NTCs foreshaw no circumstance in which they would utilize their few distance sensitively priced intra-office loops in the provision of an enhanced service. Recently, however, the NTCs' product developers have identified a market demand for the provision of enhanced protocol processing utilizing such services. For that reason, the NTCs are hereby describing their compliance with the Commission's US West directive in central office districts in which the "two mile rule" cannot be applied. This approach is consistent with the Commission's determination that requiring a BOC to charge itself the furthermost distance from the central office "would be an extreme approach" producing results that "would not be desirous". (See ONA Order, paragraph 167.)

\textsuperscript{15}\textit{Computer III Phase I Order}, paras. 223-265; \textit{Computer III Phase II Order}, paras. 72-76.

\textsuperscript{16} The NTCs will implement, for its enhanced protocol processing service, any amendments to its ONA Plan, to be filed 5/19/89, when the Commission approves such amendments.
A. Nondiscrimination

The NYNEX Telephone Companies have demonstrated in their Open Network Architecture (ONA) Plan\textsuperscript{17} and CEI Plan for VMS\textsuperscript{18} that their current procedures for installation, maintenance and repair ensure nondiscriminatory provision of basic services. The NTCs will utilize these same methods in connection with their enhanced protocol processing.

Procedures are in place in the NYNEX Telephone Companies to ensure that all personnel involved in the maintenance and installation of network services render prompt and efficient service to customers without regard to whether the customer is internal or external to the NTCs.\textsuperscript{19}

The Commission observed in its ONA Order that the NTCs demonstrated their installation procedures are nondiscriminatory.\textsuperscript{20} Like the installation process, the

\textsuperscript{17} Appendix K of ONA Plan for the NTCs, CC Docket No. 88-2, Phase I, filed February 1, 1988, and amended on March 10, 1988.

\textsuperscript{18} Comparably Efficient Interconnection Plan for VMS filed 6/21/88, Approved 1/12/89 (DA 88-2059 Memorandum Opinion and Order) and Amended 2/15/89, 2/28/89.

\textsuperscript{19} NYNEX employees will be advised that violations of these procedures may result in disciplinary action. ONA Order at ¶454.

\textsuperscript{20} ONA Order at ¶ 467 and fn. 1140. The Commission has ruled that NYNEX's provisioning procedures and systems preclude quality-based discrimination. ONA Order at ¶¶ 472 and 481. Accordingly, NYNEX will file, on an annual basis, affidavits, signed by the officers principally responsible for installation procedures, attesting that it has followed the procedures described in its ONA Plan, and that it has not, in fact, discriminated with respect to the quality of services it has provided.
maintenance of circuits provided to customers by the NYNEX Telephone Companies is highly automated and is in no way governed by whether an ESP receiving service over a circuit is a NYNEX Telephone Company ESP. The Commission has recognized that such procedures are nondiscriminatory and approved our maintenance plan.\footnote{11}

The NTCs will report on installation by underlying basic network service categories\footnote{22} separately for each telephone company. The reports will compare installation performance by underlying basic network service category provided to NYNEX Telephone Company ESPs with that provided to all other customers.\footnote{23} In order to comply with the Commission's directive to track maintenance of facilities provided to ESPs, a reporting process similar to that described for tracking installation intervals will be followed. The NTCs will utilize quarterly reports with respect to maintenance. These reports will enable a comparison of the level of maintenance service by underlying basic network service category delivered to NYNEX Telephone Company ESPs with that provided to all other customers.

\footnote{11}{ONA Order at ¶ 470.}

\footnote{22}{As described in our Petition for Clarification, dated February 24, 1989, filed in CC Docket No. 88-2, Phase I.}

\footnote{23}{NYNEX will file, on an annual basis, affidavits, signed by the officers principally responsible for installation and maintenance procedures, attesting 1) that it has followed the nondiscrimination procedures in its ONA Plan, 2) that the installation and maintenance reports it has filed during the preceding year are true and accurate and comply with the Commission's requirements, and 3) that it has not discriminated in its installation and maintenance of basic services.}
This CEI Plan has been filed prior to the scheduled filing on May 19, 1989 of the NTCs amended plan for Open Network Architecture. This CEI Plan complies with the NTCs original ONA Plan and will be conformed to any modifications to the NTCs ONA Plan arising from the NTCs scheduled filing on May 19, 1989 of an amended plan.

B. Customer Proprietary Network Information

The NYNEX Telephone Companies will comply with the Commission's CPNI requirements as described in the NTCs' CEI Plan for VMS. The NTCs have notified multi-line business customers of their CPNI rights by utilizing the notification letter response form approved by the Commission.

Non-proprietary aggregated CPNI, to the extent provided to NYNEX's enhanced service operations, must be made available to ESPs. If the NYNEX Telephone Companies release aggregate CPNI to NYNEX personnel engaged in the sales or marketing of enhanced services, notification of the availability of such aggregated information will be made to the enhanced services industry in accordance with the Commission's requirements. This aggregated CPNI will be made available on the same terms and conditions as to NYNEX personnel engaged in the sales or marketing of enhanced services.

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24 Comparably Efficient Interconnection Plan for VMS filed 6/21/88, Approved 1/12/89 (DA 88-2059 Memorandum Opinion and Order) and Amended 2/15/89, 2/28/89.

25 Appendices E-H, Reply Comments of the NTCs. Approved December, 1988 ONA Order.

26 Computer III Phase II Order, para. 176.
C. Allocation of Joint and Common Costs

The Commission requires that the unseparated provision of enhanced services be subject to the cost allocation requirements of CC Docket No. 86-111.\textsuperscript{27}

The NYNEX Telephone Companies' approved Cost Allocation Manual (CAM) describes the procedures to be used for identification of revenues, investments and expenses associated with nonregulated activities undertaken by the NTCs. The CAM fully complies with the Commission's Orders in the CC Docket No. 86-111 and ensures the proper segregation of nonregulated and regulated revenues, investments and expenses in the NTCs' books of accounts. This ensures that cross-subsidization of nonregulated activities such as enhanced protocol processing can not occur.

D. Network Information Disclosure

The NTCs' enhanced protocol processing service utilizes existing interconnection arrangements, the specifications of which have already been disclosed. Should any new network interfaces arise as a result of modifications to this Plan, such new network interfaces will be disclosed and made available in compliance with the Commission's network information disclosure requirements.\textsuperscript{28}

\textsuperscript{27} Computer III Phase I Order, paras. 234 and 235.

\textsuperscript{28} Computer III, Phase I Order, paras. 252-255.
Thus, the NYNEX Telephone Companies CEI Plan to Provide Comparably Efficient Interconnection to Providers of Enhanced Protocol Processing Services fully complies with the Commission's requirements for nonstructural safeguards.

IV. CONCLUSION

For the reasons stated, the Commission should expeditiously approve the NYNEX Telephone Companies' Plan to provide Comparably Efficient Interconnection to providers of enhanced protocol processing services offered in conjunction with Exchange Telephone Services, Private Line Services (PLS), INFOPATH®, and Central Office Local Area Network (CO-LAN) Service.

Respectfully submitted,

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Dated: May 17, 1989
Authority to provide enhanced protocol processing on a structurally unseparated basis is requested for the following protocols:

- Asynchronous
- X.25 Packet Switching Protocol
- High Level Data Link Control
- X.75 Internetworking Packet Protocol
- X.400 Electronic Mail Protocol
- Binary Synchronous Protocol (BSC)
  3270 Display System Protocol BSC
  Binary Synchronous Interface BSC
  Multi-leaving Interface BSC
- System Network Architecture/Synchronous Data Link Control (SNA/DLC)
  3270 SNA
  QLLC X.25/SDLC
- 2780/3780 Houston Automatic Spooling Protocol/Remote Job Entry
- 2946 Synchronous
- Transmission Control Protocol/Internet Protocol (TCP/IP)
  - Ethernet (e.g. IEEE 802.3)
  - Token Ring (e.g. IEEE 802.5)
  - Distributed Queue Dual Bus - IEEE 802.6
  - Fiber Distributed Data Interface - X379
- Burroughs Data Link Control
- Burroughs B-20
- DEC Digital Data Communications Message Protocol
- NCR TOWER 1632
- NCR MODUS
- NCR 9300
- Olivetti SP 624/644
- Sperry Universal Data Link Control
- Sperry Uniscope
- Tandem 6530
- Universal Receiver Protocol
## BASIC SERVICES AND TARIFFS

### I. Exchange Telephone Service

**New England Telephone**

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### II. Private Line Services (PLS)

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| IV. Central Office Local Area Network (CO-LAN) and CENTREX Local Area Network (CENTREX LAN) |         |
| New England Telephone                  |            |         |
| Maine                                  | Not Available | 7**     |
| Massachusetts                          | DPU Mass 10 |         |
| New Hampshire                          | Not Available |       |
| Rhode Island                           | Not Available |       |
| Vermont                                | Not Available |       |
| New York Telephone                     | PSC 900    | 4***    |

* Price sheets for the Tariffed basic services are attached.

** CO-LAN Tariff for Massachusetts has been effective since December 18, 1988.