

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

CC Docket No. 87-339

In the Matter of

Establishment of a Program
to Monitor the Impact of
Joint Board Decisions

MEMORANDUM OPINION AND ORDER

Adopted: January 30, 1989; Released: February 8, 1989

By the Chief, Common Carrier Bureau:

1. The United States Telephone Association (USTA) requests an extension of time from March 1, 1989, to May 1, 1989, for local exchange carriers (LECs) to file reports identifying the impact of the new Part 36 Separations Manual that was adopted by the Commission in 1987 and became effective January 1, 1988. In the *Monitoring Report and Order*¹ the Commission required that LECs report changes in revenue requirement of 5 percent or more in state or interstate annual revenue requirements that result from the conformance of the revised Part 36 Separations Manual to the new Part 32 Uniform System of Accounts. In the *Monitoring Report and Order*, the Commission required that LECs submit two reports, one at the beginning of March, 1989 for calendar year 1988 and one at the beginning of March, 1990 for calendar year 1989.

2. In the *Monitoring Reconsideration Order*,² the Commission requested that USTA and other parties submit proposals for modeling the results of separations conformance. On August 29, 1988, USTA filed comments in response to that request, proposing a model that compares cost allocations for calendar year 1988 and 1989 with cost allocations for calendar year 1987. At that time, USTA suggested that a May 1 date for filing jurisdictional impact reports would be preferable to the current March 1 date because carriers will not be able to compile complete 1988 data by March 1, 1989. USTA also stated that the short time frame to propose the jurisdictional impact report, coupled with the March 30, 1989, deadline for filing the Automated Reporting Management Information System (ARMIS) data, places unnecessary burdens and costs on Tier 1 carriers, especially in light of the fact that the ARMIS data must be compiled before the monitoring data can be developed.

3. We grant USTA's request. The Docket 86-297 Joint Board and the Commission intended that the monitoring program assess the jurisdictional impact of the new Separations Manual on state and interstate revenue requirements. The Joint Board Staff needs complete and actual 1988 data to adequately evaluate the impact of the new rules, which were in effect for calendar year 1988. If the carriers are required to file data on March 1, 1989, that data may not reflect complete and actual 1988 revenue

requirements and may merely approximate the impact of the new manual for 1988. We are also concerned about unduly burdening Tier 1 carriers, which are required to file ARMIS reports on March 30, 1989. We believe an extension of time will allow the carriers adequate time to compile actual 1988 data. We therefore believe that the filing date for the 1988 report should be extended until May 1, 1989.

ACCORDINGLY, IT IS ORDERED, That the United States Telephone Association's request for an extension of time to file the 1988 Monitoring Report IS GRANTED.

FEDERAL COMMUNICATIONS COMMISSION

Gerald Brock
Chief, Common Carrier Bureau

FOOTNOTES

¹ Establishment of a Program to Monitor the Impact of Joint Board Decisions, CC Docket No. 87-339, 2 FCC Rcd 5266 (1987) (*Monitoring Report and Order*). This decision was based on the recommendation of the Docket 86-297 Joint Board. See Amendment of Part 67 (new Part 36) of the Commission's Rules and Establishment of a Joint Board, CC Docket Nos. 78-72, 80-286 and 86-297, 2 FCC Rcd 2639 (1987) (*Separations Report and Order*).

² Establishment of a Program to Monitor the Impact of Joint Board Decisions, CC Docket No. 87-339, FCC 88-244, (July 19, 1988) (*Monitoring Reconsideration Order*).