

November 29, 1988

RE: FCC Docket #88-136

Network Communications, Inc., (Network) submits the following comments concerning the uniform tariffing of DS3's in response to our recent meeting in Washington, D.C. These comments were prepared by F. Scott Yeager with no assistance from legal counsel and represent Network's opinion of the situation and understanding of the law.

BACKGROUND

Network is presently composed of two company founders, F. Scott Yeager and Larry Koonce. Network is not operational nor does it have any revenues as of this date. Ultimately, it plans to employ about 40 people.. It will utilize diversely routed fiber optic cable with redundant electronics and a computerized network monitor and control system to offer DS0, DS1 and DS3 services. This means Network will be the low cost provider if cross-subsidization by the LEC is not allowed by the regulatory bodies.

SUMMARY

The FCC should require the uniform tariffing of high capacity services (DS3's) and eliminate the ICB tariffing of DS3's. These existing contracts are discriminatory in nature. It is questionable that all costs are being recovered. They appear to be predatory and, in Network's case, preemptive of competition. This is anti-competitive. It is Network's understanding that this is against the law.