

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

\_\_\_\_\_)  
UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 ) Civil Action No. 82-0192 (HHG)  
WESTERN ELECTRIC COMPANY, )  
INC., et al., and )  
 )  
AMERICAN TELEPHONE & )  
TELEGRAPH COMPANY, )  
 )  
Defendants. )  
\_\_\_\_\_)

**MOTION OF THE UNITED STATES FOR A MODIFICATION  
OF THE DECREE TO PERMIT A TRIAL, SUPERVISED BY  
THE DEPARTMENT OF JUSTICE AND THE COURT, IN WHICH  
AMERITECH COULD PROVIDE INTEREXCHANGE SERVICE FOR A  
LIMITED GEOGRAPHIC AREA, WITH APPROPRIATE SAFEGUARDS,  
WHEN ACTUAL COMPETITION AND SUBSTANTIAL OPPORTUNITIES FOR  
ADDITIONAL COMPETITION IN LOCAL EXCHANGE SERVICE DEVELOP**

The United States, pursuant to section VII of the decree, moves for modification of section II(D)(1) of the decree. The proposed modification would allow a trial, supervised by the Department of Justice and the Court, in which Ameritech could provide interexchange service for a limited geographic area, with appropriate safeguards, when competitive local exchange services become available. The terms and conditions for the trial are set forth in the attached proposed order. Ameritech and AT&T have consented to the proposed order.

In the accompanying Preliminary Memorandum, the United States briefly explains why we believe that the proposed modification will serve the public interest in competition in both

local exchange and interexchange telecommunications markets. That Memorandum also summarizes the general structure of the proposed modification order and its conditions for entry and post-entry safeguards. The United States will file a more detailed memorandum regarding this significant proposal. We respectfully suggest that the Court establish a schedule for the United States' Memorandum and for responses and replies by all interested persons, as set forth in the accompanying Motion To Establish Briefing Schedule.

Respectfully submitted,

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APRIL 3, 1995