

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,

ANNE K. BINGAMAN
Assistant Attorney General

WILLARD K. TOM
Counselor to the Assistant Attorney General

DAVID S. TURETSKY
Senior Counsel to the
Assistant Attorney General
U. S. Department of Justice
Antitrust Division
Washington, D.C. 20530
202-616-0962

DONALD J. RUSSELL
Chief, Telecommunications
Task Force
U.S. Department of Justice
555 4th Street, N.W.
Washington, D.C. 20001
202-514-5621

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