

September 13, 1984

CONCURRING STATEMENT OF
FCC COMMISSIONER JAMES H. QUELLO

In re: Notice of Proposed Rulemaking to streamline application processing under Part 68 of the rules and to eliminate unnecessary regulations.

While I am generally in favor of streamlining our processes for the benefit of the public and this agency, I am concerned that here we may be proposing to walk away from some rules that have continued utility. Performing my own imprecise cost/benefit analysis, it seems likely that some of the rules which this Notice proposes to eliminate might well have benefits far above their costs.

For example, equipment-to-equipment connections are now made in a standard manner which, it seems to me, permits the public to be confident that when telephone attachments are purchased they can be quickly and easily interconnected. I fail to see the burden imposed by such equipment-to-equipment rules. Also, certain stress tests now are required for packaged equipment so as to increase the likelihood that it will reach the consumer still in compliance with our registration program. I find this burden to be very reasonable and the benefit considerable.

Perhaps I can be persuaded by the comments in this proceeding that the costs are higher than my preliminary analysis indicates or that the benefits are not significant. I will review those comments with interest.

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