

November 8, 1984

STATEMENT OF
COMMISSIONER JAMES H. QUELLO
DISSENTING IN PART

In re: Petitions Seeking Amendment of Part 68 of the
Commission's Rules Concerning Connection of Telephone
Equipment, Systems and Protective Apparatus to the
Telephone Network

While I generally support this Report and Order, I disagree that mandatory loopback devices are not required. In proposing these changes to Part 68, the Commission does not dispute the obvious benefits of loopback capability. Nor can the Commission logically claim that, absent this capability, some harm to the network is unlikely. See 94 F.C.C. 2nd 5, 20 (1983). I do not agree with the majority that competitive forces will always provide these features. Because facilities which have the "loopback state" facilitate end-to-end testing necessary to provide high quality service, I believe this feature should be mandated.

Therefore, I dissent in part.

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