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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

ORIGINAL  
FILE

In the Matter of )  
Billed Party Preference )  
for 0+ InterLATA Calls )

CC Docket No. 92-77

AT&T'S REPLY

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June 17, 1992

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## SUMMARY

The comments on the "0+ public domain" proposal of CompTel and other competing operator service providers ("OSPs") revealed a broad consensus that the OSPs proposal cannot be squared with the public interest. Many commenters confirm what AT&T's comments in this proceeding and in CC Docket No. 91-115 have already showed: the OSPs' proposal would not produce a single customer benefit but would stifle competition and create substantial unnecessary customer confusion and frustration. In particular, the comments confirm that the OSPs' proposal would either subject tens of millions of IXC cardholders to unwanted service and excessive rates from carriers they do not wish to use, or subject those customers to unnecessary inconvenience and inefficiencies on scores of millions of calls each year.

The comments show that IXCs' issuance of proprietary cards that can be used with 0+ access responds to customer needs, and that any decision to make such IXC cards non-proprietary would nullify the very features and protections those cards were designed to provide. The comments also showed there is no logical basis to penalize carriers for meeting customers' needs or to harm customers by reducing the added choices that calling card competition has made available. In all events, virtually all commenters (including the OSPs) concur that the decision of whether to issue a proprietary card rests

solely in the business discretion of the IXC. Thus, there is no basis (and no jurisdiction) to overrule AT&T's decision to retain the proprietary status of its new CIID cards.

The comments also confirm that the OSPs' mandatory access code dialing proposal would not only unnecessarily inconvenience millions of customers on scores of millions of calls each year, it would also be technically complex, prohibitively costly, and create significant network inefficiencies. The OSPs themselves make no effort to refute these facts. Rather, they assert that customers should be required to suffer such unnecessary costs and inconvenience because of unsupported claims of market imbalance and naked assertions that AT&T might "remonopolize" the 0+ business. The facts, however, demonstrate that an access code dialing requirement would not have any significant market impact (other than inconveniencing customers), and they also belie the OSPs' remonopolization claim. AT&T's new cards represent less than one-fourth of all telephone calling cards, and AT&T's use of the CIID format (which is available to all IXCs, including the OSPs) forecloses any argument that AT&T is the beneficiary of any unfair advantage arising out of its prior relationship with the BOCs.

In sum, the OSPs' proposal would yield no customer benefits. Rather, it would penalize tens of millions of customers for the sole purpose of giving the OSPs an undeserved advantage against competitors who have made substantial investments to serve the express needs of the calling public. The proposal should be rejected.

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AT&T'S REPLY

American Telephone and Telegraph Company ("AT&T") hereby replies to the comments of CompTel and other competing operator service providers ("OSPs")\* on the expedited portion of the Notice of Proposed Rulemaking herein, which inquires whether AT&T and other interexchange carriers ("IXCs") who issue proprietary calling cards should be ordered either (i) to make such calling cards non-proprietary by providing validation and billing capabilities to competing OSPs; or (ii) to deny their customers convenient 0+ dialing for all calls charged to those cards.

The comments of a broad cross-section of participants confirm what AT&T's comments demonstrated: the alternatives described in the Notice cannot be squared with the public interest and should not be adopted. Indeed, those alternatives largely mirror the self-serving proposals which CompTel and its OSP members have

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\* A list of all commenters and the abbreviations used to refer to their comments is set forth in Attachment A.

persistently proffered in earlier proceedings and which AT&T has consistently shown to be without merit. As USTA points out (p. 7), the OSPs' proposal would permit some OSP competitors improperly to avoid the normal costs of doing business in the competitive long distance market; increase customer confusion; reduce network efficiency; introduce significant new costs; and dilute or nullify any potential benefits of billed party preference if the Commission should decide to adopt such a process in the future. Against this largely undisputed backdrop of costs and customer inconvenience, the comments also confirm that adoption of the OSPs' proposal would yield no public benefits. In fact, the only beneficiaries of a decision to expropriate IXCs' proprietary card validation and billing systems, or to erect senseless barriers to customers' convenient use of IXC cards, would be the OSPs themselves.

I. REQUIRING IXCs TO PROVIDE THEIR COMPETITORS WITH VALIDATION AND BILLING DATA ON THEIR PROPRIETARY CARDS WOULD DISSERVE THE PUBLIC INTEREST AND EXCEED THE COMMISSION'S JURISDICTION.

USTA (p. 6) correctly describes the OSPs' proposal to make 0+ IXC cards non-proprietary as an attempt "to confiscate the value of one carrier's efforts so that others that have depended on a competing carrier's resources may continue to do so in the future." U S West (p. 5) agrees that it would be inappropriate to penalize a

carrier which has gone to the expense of establishing a "proprietary" card and mutual honoring arrangements with LECs "simply because certain other IXCs, who are free to take similar steps, have chosen not to do so."

Other commenters likewise recognize that the issuance of 0+ proprietary IXC cards has increased, rather than decreased, customer choice and thus promoted customer-focused competition among IXCs. As AT&T explained,\* AT&T issued its new cards in order to be able to compete more effectively with other IXCs (especially MCI and Sprint) who had issued their own proprietary cards, and to offer customers added choices of features and services. In particular, AT&T's cards responded to customers' demands for a calling card that protected them from the exorbitant AOS rates and unwanted service to which they were exposed by virtue of the "shared" nature of other types of calling cards (including AT&T's former card). The new AT&T card also makes possible the offering of new service features and pricing options to AT&T's customers, because the new card does not depend on billing and validation systems that are shared with the LECs.

The SDN Users Association (p. 2), the only customer group to comment here, confirms that AT&T's proprietary card was developed "AT CUSTOMERS' REQUEST"

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\* AT&T's Opposition to CompTel's Motion for an Interim Order, CC Docket No. 91-115, filed February 10, 1992, ("AT&T's CompTel Opposition") pp. 8-10.

(emphasis in original). SDN (id. at 2-3) also agrees that requiring AT&T's cards to become non-proprietary by opening up AT&T's validation and billing capabilities to other OSPs would harm customers by subjecting them to the OSPs' "higher, non-competitive rates" and also to increased fraud risks and responsibilities. Sprint, which itself issues proprietary cards that can now be used with 0+ access,\* concurs (pp. 5-6) that requiring IXC cards to be made non-proprietary would confer on the OSPs an enormous and undeserved benefit, and that "[t]he biggest losers" in such a situation "would be the members of the public who would have to pay . . . higher charges for their calls."\*\*

In short, any action by the Commission to override the business decisions made by AT&T and other IXCs to offer their own "proprietary" calling cards would seriously distort the market forces by which competing suppliers respond to customer needs. It would also represent a dramatic and regrettable backward step that would recreate or exacerbate the very risks and abuses

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\* Sprint, p. 8.

\*\* In addition, several LECs point out that customers would face substantial confusion if IXCs' proprietary cards were made available for use by their OSP competitors, because customers would be receiving service and bills from carriers with whom they are not familiar and have not established any relationship. GTE, pp. 4-5; SWBT, p. 5; U S West, p. 5 n.9.

that led the Commission in 1988 to issue an extraordinary warning to consumers about the unscrupulous practices of some AOS firms,\* and that led AT&T to develop its new card in the first place as a means of offering consumers a reliable new alternative.

Having made the decision to offer customers the choice of such a calling card,\*\* AT&T has no intention of rekindling the confusion and discontent that resulted when its former cards were used by some of its OSP competitors to rip off unwary customers. Nor does AT&T intend to aid in the creation of the new problems for customers that would result when features designed and offered specifically for use with AT&T's cards on AT&T's network (e.g., geographic restrictions) do not work when these cards are "accepted" by other carriers. Accordingly, AT&T cannot conceive of any circumstances in which it would "choose" to make its new cards "non-proprietary" by making them available to competing OSPs for billing or

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\* Consumer Information Bulletin Regarding Alternate Operator Services (AOS), issued April 5, 1988.

\*\* There is consensus among the commenters that the choice of whether to offer a proprietary or non-proprietary card is up to the issuing carrier. E.g., MCI, p. 4; APCC, p. 16; Cleartel, p. 6. This is consistent with the Common Carrier Bureau's recent publication on Telephone Calling Cards, DA 92-666, released June 8, 1992, p. 2, in which the Bureau stated that the decision of which type of calling card to issue "rests solely with the long distance telephone company that issues the card."

validation.\* Instead, AT&T remains strongly committed to offering the particular features and safeguards associated with its new cards, which AT&T believes best meet customers' needs. If AT&T is correct in that belief, other carriers are free to offer similar cards (as some have) or to develop different forms of proprietary cards (as others have). If AT&T is incorrect, and customers do want cards that can be used interchangeably on any OSP's network, there are over 50 million cards now in the market, issued by LECs, that precisely meet that description. In neither case is there any legitimate basis for the Commission to supersede carriers' business judgments by eliminating or constraining the current range of choices enjoyed by consumers.

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\* AT&T's decision not to open its validation and billing systems to its OSP competitors renders moot (from AT&T's perspective) a detailed discussion of the technical problems such an action would create. AT&T notes, however, that the implementation of such arrangements would be much more difficult than the OSPs make it appear. One of the most significant issues is that millions of AT&T's CIID card numbers (including, but not limited to, those appearing on AT&T Universal Cards) are not related to any telephone number, so that the "translation" by a third party billing agent suggested by ZPDI (p. 11) could not take place for calls charged to such cards. In addition, even ZPDI (id.) recognizes that AT&T's proprietary customer information must be maintained as confidential. This, however, would preclude the OSP from having access to essential information that is necessary to respond to customers' inquiries about their bills for OSP-handled calls. Nor would competing OSPs effectively be able, as Cleartel suggests (p. 10), to apply AT&T's rates to customers who participate in AT&T optional calling plans, because the OSPs will not have access to the AT&T usage information (or other AT&T account data) needed to calculate such discounts.

In all events, as AT&T (p. 4) demonstrated and Sprint (p. 11) concurs, there is no authority under the Communications Act for requiring IXCs to make validation and billing services for "IXC joint use" cards available to their direct competitors.\* Unlike "LEC joint use cards," the data and systems used to support IXCs' cards (including AT&T's CIID card) are not derived from or integral to the provision of local exchange and access service. Thus, IXCs' cards are not subject to any of the Title II obligations imposed upon LECs.\*\* Moreover, the Commission has recognized that the availability of substantial competitive alternatives makes it unnecessary to exercise its Title I jurisdiction.\*\*\* It is undisputed

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\* Pacific (pp. 2-3) acknowledges that AT&T has no MFJ-related duty to open its proprietary calling card databases to competing IXCs.

\*\* Despite the arguments of some commenters (e.g., APCC, p. 15, BellSouth, p. 3), AT&T's anachronistic status as a so-called "dominant" IXC is insufficient to create unique Title II duties pursuant to Sections 201 or 202. Such duties are imposed on the LECs because validation services for their own cards are integral to their provision of exchange access services. In the Matter of Policies and Rules Concerning Local Exchange Carrier Validation and Billing Information for Joint Use Calling Cards, CC Docket No. 91-115 (Report and Order), released May 8, 1992 ("LEC Joint Use Card Order"), ¶ 85. Moreover, as the Commission has correctly held, the substantive provisions of Title II apply equally to dominant and non-dominant carriers. See Policy and Rules Concerning Rates for Competitive Carrier Services, CC Docket No. 79-252, First Report and Order, 85 F.C.C.2d 1, 4; id., Second Report and Order, 91 F.C.C.2d 59, 69 (1982).

\*\*\* See Detariffing of Billing and Collection Services, 102 F.C.C.2d 1150, 1170, recon. denied, 1 FCC Rcd. 445 (1986).

that OSPs can today accept over 50 million "0+" LEC cards\* and an even larger number of commercial credit cards for use in billing calls placed over their networks. Thus, there is no need or basis under Title I to require any IXC also to make its cards available to its competitors.

II. DENYING CUSTOMERS' ABILITY TO USE 0+ DIALING WHERE IT IS OTHERWISE AVAILABLE SERVES NO LEGITIMATE PURPOSE.

Alternatively, the OSPs' proposal would require customers who use proprietary IXC cards always to dial a "10XXX" or other access code to reach their chosen carrier, even at telephones which are presubscribed to that carrier.\*\* Neither the Commission's equal access rules nor the technical arrangements at such telephones require customers to abandon the convenience of 0+ dialing for such calls. Thus, as SWBT recognizes (p. 4), the OSPs' proposed requirement would "greatly inconvenience

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\* LEC Joint Use Card Order, ¶ 1.

\*\* A few commenters (Advanced p. 6; CNS, p. 13; Value-Added, p. 5) go even farther, and argue that customers should only be allowed to use an IXC's proprietary card by dialing an 800 or 950 number. Given the Commission's earlier finding in CC Docket 91-35 that 10XXX access is more convenient and desirable than 800 and 950 access codes, Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation, 6 FCC Rcd. 4736, 4739 ¶ 10 n.36 (1991), recon. pending, it would be a major regression, and completely counterproductive, "to force IXCs to give up 10XXX access in order to keep their cards proprietary." Sprint, p. 9. See also APCC, p. 11 n.9.

and frustrate customers."\* It could also potentially create disruption on other 0+ calls that are not billed to an IXC's proprietary calling cards.\*\* Moreover, the costs of implementing an access code dialing rule appear to be prohibitive and are plainly unnecessary.

The comments confirm that it is currently "impossible for [IXCs] to reject 0+ calls billed to proprietary cards since they cannot specifically identify 0+ calls."\*\*\* Furthermore, the technology necessary to permit such identification on an automated basis will not be available for several years.\*\*\*\* Interim solutions that could provide IXCs with the ability to reject 0+ calls, such as separate trunking for 0+ and 10XXX calls, would be costly, create network inefficiencies and impose other unnecessary costs on the LECs.\*\*\*\*\* These added

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\* Emphasis in original. Bell Atlantic (p. 3) states that such a requirement would needlessly inconvenience customers on over 20 million calls per year from Bell Atlantic payphones alone. See also SDN, p. 3; Ameritech, p. 3.

\*\* U S West, p. 7 (collect, billed to third party calls); SWBT, p. 6 (calls charged to LEC non-proprietary cards).

\*\*\* Ameritech, p. 3. See also NYNEX, p. 2; SWBT, p. 6; U S West, p. 6; USTA, p. 6.

\*\*\*\* SWBT, pp. 5-6; NYNEX, p. 3 n.3; USTA, p. 6.

\*\*\*\*\* NYNEX, pp. 2-3; GTE, pp. 2-3. As AT&T noted (p. 8), such costs would likely run into the tens of millions of dollars. In addition, depending upon the type of technical arrangements made to implement the technical "solution", call processing delays or other service degradation would also result. See U S West, pp. 6-7.

costs would, in turn, raise questions relating to cost recovery by the LECs and could also result in higher rates for customers.\*

None of the proponents of mandatory access code dialing (especially those who demand rejection of 0+ calls charged to proprietary IXC cards\*\*) offers any solution to the technical problems and cost and pricing impacts such a requirement would cause. Nor are they apparently concerned about the customer inconvenience that would result if IXC cardholders had to use access codes unnecessarily on scores of millions of calls each year. Rather, they insist upon a "punish the customer" solution that would increase, rather than decrease, the inconvenience, frustration and confusion customers already experience at aggregator locations as a result of 10XXX code blocking and inadequate signage identifying the 0+ carrier.\*\*\*

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\* GTE, p. 3; USTA, p. 6; Sprint, p. 14.

\*\* E.g., MCI, p. 4; CompTel, p. 13.

\*\*\* Congress and the Commission have appropriately required signage at all aggregator telephones, and audible carrier identification ("branding") on all operator services calls. Enforcement of these requirements, together with the prompt implementation of unblocking of 10XXX access codes for telephones at aggregator locations, is needed to reduce customer confusion and provide customers with the ability to reach their carrier of choice at all such telephones. Moreover, as Bell Atlantic (pp. 3-4) correctly states, "[h]astening the unblocking of [10XXX access at] aggregator phones will mean that the other carriers will have to handle fewer calls destined for" carriers other than the presubscribed IXC.

In fact, an access code dialing requirement would create no customer benefits, and the proponents of such a requirement do not seriously contend otherwise.\* Instead of devoting their energies toward creating and marketing features and services that would create such customer benefits, the OSPs fall back upon their repeated claims of market failure and threats of remonopolization, and they suggest that imposing a dialing penalty on customers would rectify the imbalance. This argument is wrong both factually and fundamentally, and has been correctly recognized by many commenters as no more than an effort by the OSPs to achieve market success by handicapping competitors rather than by competing on the merits for customers.\*\*

First, the access code requirement would not substantially change customers' usage habits. The OSPs readily acknowledge that many AT&T customers know how to

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\* There is no support for the OSPs' oft-repeated assertion (e.g., ITI, p. 22) that customers always want their cards to work on a 0+ basis. Indeed, ITI itself has stated that three out of four AT&T cardholders who reach ITI on a 0+ basis choose not to provide an alternate billing mechanism. ITI's Comments in CC Docket No. 91-115, filed February 10, 1992, p. 7. This fact also effectively disposes of CompTel's related argument (p. 8) that AT&T's customers are "denied their choice" when they place a 0+ call at a telephone that is not presubscribed to AT&T. Any customer who wants to complete a 0+ call at such a phone needs only to offer a payment mechanism the OSP accepts, whether it be a non-proprietary LEC card, a commercial credit card, or collect or third party billing.

\*\* E.g., USTA, pp. 6-7; U S West, p. 5; Sprint, pp. 5-6.

use AT&T's 10288 access code.\* If required to use this less convenient dialing method on all their calls, AT&T's customers would likely do so, because of their established relationship with AT&T and their desire to receive AT&T's quality, value and service. Presumably, other carriers' customers who want to use IXC proprietary cards also know how to reach their preferred carriers when necessary. Thus, the customer inconvenience and costs associated with the proposed blocking of "0+" card calling would impose significant inconvenience on customers with little or no offsetting effect in the market.\*\*

More significantly, the claims by proponents of the OSPs' proposal that denial of "0+" dialing is needed to address some market imbalance or prevent "remonopolization" of the card business by AT&T proceed from a demonstrably invalid premise. Despite their naked assertions about AT&T's position in the card business,\*\*\* the facts are that MCI and Sprint together have issued

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\* The OSPs concede that AT&T has spent considerable resources in educating customers on how to use AT&T's access code when they cannot reach AT&T on an 0+ basis. See, e.g., CompTel, p. 10.

\*\* Many LECs and Sprint, however, agree with AT&T (p. 9) that an access code dialing requirement would likely drive customers away from 0+ calling and thus would have a negative impact upon any form of billed party preference the Commission might ultimately decide to adopt in the main portion of this NPRM. Ameritech, p. 4; SWBT, p. 5; Sprint, p. 13; USTA, p. 4; U S West, p. 5.

\*\*\* E.g., MCI, p. 3; CompTel, p. 2; ITI, p. 19.

millions more proprietary calling cards than AT&T has,\* that Sprint's proprietary calling card can be used on a 0+ basis from Sprint-presubscribed telephones, and that there are over 50 million non-proprietary 0+ LEC cards available to OSPs today, substantially more than there were a few years ago. This enormous array of choices has put substantial downward pressure on AT&T's market share, and forecloses any basis for concern about "remonopolization" by AT&T. Moreover, the introduction of the CIID format -- which is available to any interested IXC -- ended any arguable discrimination in favor of AT&T arising out of the pre-divestiture era. All IXCs are now able to issue proprietary calling cards that can also be used to place calls over the LECs' intraLATA networks.

In addition to its erroneous factual predicate, the purported OSP concern about AT&T "remonopolization" reflects a total mischaracterization of competition and of the Commission's pro-competitive policies. Far from any market failure, the card business is today functioning exactly as it should: suppliers investing in innovative

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\* AT&T's CompTel Opposition, p. 13 n.\*\*, p. 9 n.\*\*. Moreover, contrary to the misimpression of some OSPs (e.g., PhoneTel, pp. 4-5), only about one-third of AT&T's new cards were issued in its card replacement program. The remaining two-thirds were issued in response to customers' direct requests. AT&T's Reply Comments in Opposition to CompTel's Motion for an Interim Order, CC Docket No. 91-115, filed March 11, 1992 ("AT&T's CompTel Reply"), p. 2 n.\*\*. Moreover, the vast majority of the replaced AT&T cards were not "holdovers" from the pre-divestiture era, but rather were issued in response to a direct request from the cardholders at some time between 1984 and 1991.

new offerings to attract end users' business. AT&T's CIID card is one such offering; other IXCs have developed others. Many OSPs, in contrast, have chosen to invest virtually nothing in making their services attractive to end users, and seek to "compete" by creating and preserving arrangements that "trap" unwary consumers. It is no surprise that these carriers fear and oppose the appearance of new products that are more attractive and responsive to customers, but it is completely illegitimate for these OSPs to seek to tarnish the offerings of others, rather than improve their own offerings, as a means of competing in the market.

The only other argument advanced by the proponents of the OSPs' "0+" blocking proposal is that customers in the rapidly changing away-from-home marketplace have not received appropriate marketing information from AT&T about their calling cards and how they can use those cards to reach AT&T.\* AT&T has already demonstrated that its marketing information to customers is accurate and fair. For example, AT&T's advice that new CIID customers should destroy their old AT&T cards was dictated by the requirements of the Federal Reserve Board.\* AT&T has also shown\*\* -- and the OSPs admit\*\*\* -- that AT&T's instructions that customers should dial 0+, and then try "10288" if they do not hear "AT&T," are in fact the correct and simplest procedure for most customers

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\* See, e.g., CompTel, p. 3; ITI, p. 7; APCC, p. 5.

at most locations. Nor is there any dispute that AT&T has heavily promoted its 10288 access code, so that customers know how to reach AT&T when they see or hear that 0+ access is not available. These instructions are consistent with the Commission's most recent report on the implementation of signage and network branding, which shows that audible branding provides substantially more reliable information than does signage about the identity of the presubscribed carrier at an aggregator location.\*\*\*\* Thus, AT&T's instruction to its customers to dial 0+ "and hang up if you don't hear AT&T" is one of the most effective and most easily understood ways to tell customers how they can reach AT&T.

More fundamentally, even if there were any basis for concern that AT&T's (or any carrier's) marketing messages were inaccurate or improper, which is not the

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\* AT&T's CompTel Reply, p. 6 n.\*\*\*. AT&T has also investigated the anecdotal incidents referenced by some BOCs in their comments on CompTel's motion in CC Docket No. 91-115 and found that those reports to be incorrect or misleading. See, e.g., *id.*, p. 7 n.\*

\*\* AT&T's CompTel Opposition, pp. 19-20.

\*\*\* CompTel, p. 5; APCC, p. 5.

\*\*\*\* The FCC's report, which was issued at the same time AT&T was completing its CIID card migration program, showed that in September 1991, OSPs audibly identified themselves at the beginning of the call at 97% of the telephones surveyed (up from 94% in April 1991), while signage was correct at only 79% of those telephones (no change from April 1991). Interim Report of the Federal Communications Commission Pursuant to the Telephone Operator Consumer Services Improvement Act of 1990, dated November 14, 1991, pp. 16-17.

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case here, that concern could never justify the draconian "solution" proposed by the OSPs. Their proposal would only harm consumers by imposing upon them senseless, inconvenient and confusing dialing restrictions. The proposal would not, in contrast, affect the marketing messages it purports to address. In any event, if it were the case that customers were being confused, AT&T would be willing to consider ways to alleviate such confusion.

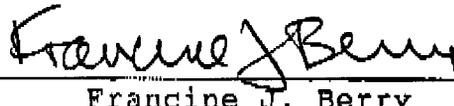
CONCLUSION

There is nothing about the OSPs' calling card proposal that is intended to create, or could create, any customer benefits. Indeed, the proposal would plainly harm consumers and disserve the public interest in effective competition. Their proposal should thus be rejected, and the interim relief described in the NPRM should not be adopted.

Respectfully submitted,

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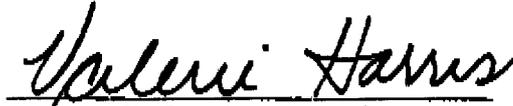
## Attachment A

### List of Commenters

Advanced Telecommunications Corporation, Americall Systems, Inc. and First Phone of New England ("Advanced")  
American Public Communications Council ("APCC")  
Ameritech Operating Companies ("Ameritech")  
American Telephone and Telegraph Company ("AT&T")  
Bell Atlantic Telephone Companies ("Bell Atlantic")  
BellSouth Telecommunications, Inc. ("BellSouth")  
Capital Network Systems ("CNS")  
Cleartel Communications, Inc. and ComSystems, Inc. ("Cleartel")  
Competitive Telecommunications Association ("CompTel")  
CompTel Computer Corporation ("CompTel Computer")  
GTE Service Corporation ("GTE")  
International Telecharge, Inc. ("ITI")  
LDDS Communications, Inc. ("LDDS")  
MCI Telecommunications, Inc. ("MCI")  
National Telephone Cooperative Association ("NTCA")  
New York Telephone Company and New England Telephone Company ("NYNEX")  
Northwest Pay Phone Association ("NPPA")  
Pacific Bell and Nevada Bell ("Pacific")  
PhoneTel Technologies, Inc. ("PhoneTel")  
Quest Communications Corporation ("Quest")  
SDN Users Association, Inc. ("SDN")  
Southwestern Bell Telephone Company ("SWBT")  
Sprint Communications Company, L.P. ("Sprint")  
US Long Distance, Inc. ("USLD")  
U S West Communications, Inc. ("U S West")  
United States Telephone Association ("USTA")  
Value-Added Communications, Inc. ("Value-Added")  
Zero Plus Dialing, Inc. ("ZPDI")

CERTIFICATE OF SERVICE

I, Valerie Harris, do hereby certify that on this 17th day of June, 1992, a copy of the foregoing AT&T's Reply has been served by first class mail, postage prepaid, upon the parties listed on the attached Service List.

  
Valerie Harris  
Valerie Harris

Attachment

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