



COMMONWEALTH OF PENNSYLVANIA  
 PENNSYLVANIA PUBLIC UTILITY COMMISSION  
 P.O. BOX 3265, HARRISBURG, PA 17105-3265  
 June 29, 1992

**ORIGINAL FILE**  
 IN REPLY PLEASE REFER TO OUR FILE

92-77

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Donna R. Searcy, Secretary  
 Federal Communications Commission  
 Room 222  
 1919 M Street, N.W.  
 Washington, D.C. 20554

FCC MAIL BRANCH

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

Dear Secretary Searcy:

Enclosed please find an original and eleven (11) copies of Motion for Leave to File Reply Comments Out of Time and Reply Comments of the Pennsylvania Public Utility Commission.

A copy has been provided for each of the Commissioners.

Sincerely,

Veronica A. Smith  
 Deputy Chief Counsel

For the Pennsylvania Public  
 Utility Commission

Enclosures

No. of Copies rec'd  
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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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

CC Docket No. 92-77

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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JUL 15 1992

MOTION FOR LEAVE TO FILE  
REPLY COMMENTS OUT OF TIME

FCC MAIL BRANCH

Pursuant to 47 C.F.R. Section 1.46, the Pennsylvania Public Utility Commission (PaPUC) requests leave to file Reply Comments in the above-captioned proceeding out of time. In support thereof, the PaPUC avers the following:

1. The PaPUC is the state agency responsible for the regulation of all public utilities, including telecommunications, within the Commonwealth of Pennsylvania. As such, it has a significant interest in the regulation of telecommunication services on the interstate as well as intrastate level.

2. In the present proceeding, the FCC issued an expedited comment cycle on limited issues primarily dealing with the availability of billing and verification data associated with AT&T's Card Issuer Identification (CIID) cards. Initial comments were due no later than June 2, 1992, while reply comments were due no later than June 17, 1992. The Order setting this comment cycle was released May 8, 1992.

3. The PaPUC learned of the pendency of this proceeding and the concomitant expedited comment cycle at the time that the initial comments were due. It then diligently commenced its review of the issues in the proceeding to determine whether there was a significant state concern that should be pursued in the context of the expedited comment cycle.

4. The PaPUC participates in FCC proceedings via its Federal Division of the Law Bureau. The Federal Division attorney assigned to FCC proceedings commenced maternity leave in May of this year and continues to be on maternity leave.

5. As a result of staff resource constraints, the PaPUC was unable to prepare its reply comments in accordance with the reply comment due date.

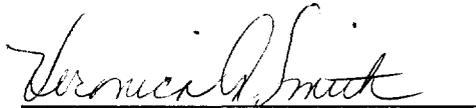
6. The PaPUC has several concerns of significant state impact that, if permitted to submit these reply comments, it urges the FCC to consider.

7. As set forth in its accompanying Reply Comments, the suggestion that 0+ dialing from public phones be declared to be in the public domain poses the serious threat of contributing to customer confusion that already exists with respect to public phone usage. Further, this proposal poses the serious threat of loss of intraLATA toll revenues for local exchange carriers that could

impede the goal of universal service.

**WHEREFORE**, in light of the foregoing reasons, the PaPUC respectfully moves that it be permitted to submit reply comments out of time in the above-captioned proceeding.

**Respectfully submitted,**



Veronica A. Smith  
Deputy Chief Counsel

John F. Povilaitis  
Chief Counsel

Counsel for Pennsylvania  
Public Utility Commission

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Dated: June 29, 1992