



THE TELTRONICS GROUP

FCC MAIL SECTION

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June 24, 1992

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M. Street, N.W. Room 222
Washington, DC 20554

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JUN 30 1992

Dear Ms. Searcy:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BILL PARTY PREFERENCE FOR 0+ INTERLATA CALLS CC DOCKET NO. 92-77

On behalf of the Teltronics Group of Companies, including ComCentral Corp., I would like to register our opinion and reactions on the subject of Bill Party Preference.

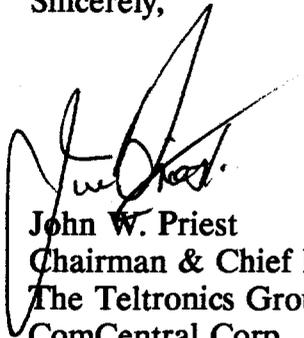
- * With the FCC mandate to unblock all public telephones, including COCOT phones, any consumer can access the carrier of their choice by dialing five simple digits (10XXX) followed by 0. This system is working and, therefore, in essence, we have Bill Party Preference.
- * The effect of Bill Party Preference on 0- calls ("live" operator calls) would be complicated and costly because it would require two operators to be involved to complete "live" operator assisted collect, third party, person-to-person, and calling card calls.
- * Bill Party Preference totally applied would substantially diminish competitive activities within the industry. AT&T, MCI, Sprint, and the LECs would control all long-distance calls from public facilities. Apart from a semi-monopoly condition, billions of dollars of investment in equipment, operator centers, and employment of people would be irreparably damaged.
- * If there is no incentive for the owners of premises to install payphones in rooms or facilities of universities and the health care and hospitality industries, there will be a dramatic decrease in access to public phones as compared with the current situation. The reduction in competition is usually followed by a reduction in consumer choices.
- * Bill Party Preference will increase the cost of automated and "live" operator calls by approximately 80%. This process will be much more complicated and costly to implement than equal access or other methods of achieving the same result.

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We strongly believe that a total implementation of Bill Party Preference would have a significant negative effect to the consumer and would severely damage the operator service industry. The only beneficiaries would appear to be the major carriers who would have far less competition.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Priest", is written over a large, stylized, handwritten letter "P" that serves as a graphic element.

John W. Priest
Chairman & Chief Executive Officer
The Teltronics Group
ComCentral Corp.