



UNIVERSAL TECHNOLOGY & COMMUNICATIONS CORPORATION

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July 1, 1992

Ms. Donna Searcy, Secretary
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W. Room 222
Washington, D.C. 20554

CC Docket No. 92-77

In the Matter of

Bill Party Preference
for 0+ InterLATA Calls

Dear Ms. Searcy:

This letter is in response to CC Docket No. 92-77 in the matter of Bill Party Preference for 0+ InterLATA Calls.

Our firm, Texustel, operates within the state of Texas which has a large percentage of calls that are InterLATA; we feel this new motion would be very damaging to our business.

Currently, callers have the option to dial the 10xxx number of the carrier of their choice followed by 0. This system is working and in essence we have Bill Party Preference today.

These changes would also increase our operating cost due to the fact that two live operators would be needed to handle third party, person to person and calling card calls. Only the big "Three"; AT&T, MCI and Sprint would be able to incur the cost. Therefore, eliminating the small operator service firms such as ourselves and creating a monopoly for these firms.

Sincerely,

Mark J. Angell
Vice President

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Federal Communications Commission
Office of the Secretary

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DIRECTOR OF AIRPORTS
Thomas P. Engel

COUNTY OF SACRAMENTO
DEPARTMENT OF AIRPORTS
6900 AIRPORT BOULEVARD
SACRAMENTO, CALIFORNIA 95837
(916) 929-5411

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June 30, 1992

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

Dear Ms. Searcy:

Subject: Docket No. 92-77, Billed Party Preference (BPP)

The Department of Airports, Sacramento County operates Sacramento Metro Airport, a medium hub airport serving approximately 5 million passengers in the July 1991 through June 1992 period.

We believe that a number of issues need to be resolved before permitting Billed Party Preference:

- Cost will be ongoing and run into the millions of dollars. These costs will be passed on to the end user, the traveling public, and with the current arrangement, will also result in a lower level of service.
- Although Department of Airports is obligated to dedicate space for phones, we will lose the commission revenues that will have to be made up someplace else to protect our break-even revenue stream.
- The problems generated by this change will confuse and frustrate the traveling public. For example, even commercial credit cards like Visa, Mastercard, etc. which now can be used, would not access the system. Also, passengers may experience a deterioration in service quality since call set-up will take longer.
- Foreign visitors would not be able to access the system without special cards.
- We support the position to give "unblocking" a chance to work before making the drastic Billed Party Preference change.

Thank you for giving us an opportunity to comment on this important issue to the airports and the traveling public.

Sincerely,

Thomas P. Engel
Director of Airports

TPE:sv

(WP51\DOCS\SEARCY.692)

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Federal Communications Commission
Office of the Secretary

July 2, 1992

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

RE: Docket No. 92-77 - Billed Party Preference

To Whom It May Concern:

As a University telephone service provider to our students in resident halls and public (pay and non-pay) telephones on the campus premises, along with visitors and guests to the campus, we are concerned about the proposal to implement Billed Party Preference (BPP). You requested comments about benefits and costs of the implementation of BPP, to which we are responding below.

Costs - The estimates you provided from RBOCS and others are extremely expensive solutions to make long distance dialing more "user-friendly" for the consumer. BPP really provides no additional service, as we are already required to implement unblocking and will implement 10XXX dialing when required to do so. The system allegedly makes it easier to access alternative long distance carriers, but those in place are already simplistic in nature. It would provide better public service to educate consumers regarding alternate carriers and access methodologies, to enhance the public infrastructure, or expand access to disabled individuals, rather than develop an expensive replacement to current services.

Providing Information Twice - It is absolutely unacceptable to require callers to give calling card numbers twice in a single call. That would be far poorer service than what is provided today. The solution, using signaling and automated billing services, must be at a terrific cost. Refer back to our comments above.

Access Times - Dialing five additional digits for the access code, or ten more digits for 800 or 950 service, becomes very automatic for callers who are educated about the need to dial this way. Waiting for operator service, and repeating services is not an improvement. Your solution is only to spend more money through signaling and automated billing. We already provide dialing instructions for all our resident students and it seems to work very well to dial the 800 or 950 number. Operator services are not always reliable, as I have found out personally

when trying to make calls from rural towns in Montana.

Competition for Pay Phones - The State of Montana bids out its pay phone equipment, local and long distance services in formal RFP processes. All vendors have the opportunity to compete for this business. We receive commissions from all the vendors to reimburse us for the costs of using our facilities for their equipment. This money is used to offset the costs of providing telephone services for the students and administrative parts of campus - cabling, trunking, building space modifications, etc. Elimination of these commissions would be very expensive, and would require us to cut back on services to the campus. We are dependent on these commissions for our basic operations, and with the poor economy and deficit state budget, we do not have the funds to substitute in for the management of our telephone system. No new technologically advanced services would be provided to the campus, such as voice mail, and touchtone registration. We are not a wealthy state or university.

We hope you will evaluate our comments carefully, and truly weigh the true costs with the benefits of such an expensive system. Thank you.

Sincerely,



Patricia A. Simmons
Telecommunications Officer

CC: Jim Efta, Director
Barb Hamblet, Telephone Services



CHEYENNE AIRPORT

P.O. BOX 2210 → 200 EAST 8TH AVE → CHEYENNE, WYOMING → 82003-2210 → (307) 634-7071 → FAX: (307) 632-1206

June 30, 1992

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

RE: Docket No. 92-77

Dear Ms. Searcy:

The Cheyenne Airport Board is requesting that you not continue with Docket No. 92-77, billed Party Preference Proposal.

This proposal is premature and will not improve long distance telephone service because of the following:

- * Customers have learned and accepted the unblocking 10XXX process to access the long distance carrier of choice.
- * A large investment in technology expense will be passed on to the customer.
- * Additional confusion in placing international calls.
- * Service quality will be effected as the call will take longer to connect.
- * Placement of credit card calls will be more difficult.

The telephone users have been forced to adjust to a large number of changes during the past several years. These Federally mandated changes have come about very quickly and have frequently been confusing to the users. Please allow the users of the long distance telephone system some consistency before changing the system again.

Good customer service is being offered through the 10XXX system and the costs of Billed Party Preference is not worth the expense.

Sincerely,

Gerald K. Olson, A.A.E.
Cheyenne Airport Manager

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Federal Communications Commission
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MIT Information Systems

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

Telecommunications
Systems

Re: CC Docket No. 92-77

Dear Ms. Searcy:

The purpose of this letter is to provide comment on the Federal Communications Commission's (Commission) Notice of Proposed Rule Making (NPRM) Docket No. 92-77.

The NPRM addressed two issues:

- Billed Party Preference (BPP)
- The use of proprietary cards with 0+ access.

I will restrict my comments to the first issue: BPP; and, shall attempt to be brief.

The Commission holds out that BPP is a concept that could benefit the users of operator services by implementing the billed party's choice of carrier. However, is the concept needed? Is it costly? Is it flawed?

Let me first turn to whether BPP is needed. As the Commission well knows, new federal law and regulations requiring the unblocking of 10XXX-0+ access codes and the availability of 1-800 or 950 access numbers are being adhered to by interested and concerned parties. Equal access to preferred carriers by users of payphones and PBX telephones operated by aggregators is increasingly becoming universally available; thus, eliminating the need for BPP, as unblocking accomplishes what BPP purports to do.

BPP has been largely held out as being applicable to payphones. However, the NPRM is exploring the extension of BPP to aggregator owned PBXs. MIT is an aggregator according to current Commission definition. Pending before the Commission is a petition filed by the National Association of College and University Business Officers, the Association of College and University Telecommunications Administrators, and the American Council on Education seeking clarification that colleges and universities are aggregators only with respect to payphones located on colleges and universities campuses. MIT is not a direct party in the action. We are in fact acting expeditiously to provide the unblocking of our institutionally owned PBX to enable compliance with the aforementioned

Morton Berlan
Director

Massachusetts
Institute of Technology
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access codes. On the other hand, we look with disfavor at any action that would eliminate long distance carrier assignment based on contractual arrangements for operator assisted calls whether they be from payphones or PBXs that are institutionally or aggregator owned and operated.

The Commission in its NPRM states that it has relatively little information about the costs of BPP. What information it does have suggests that implementing BPP would cost several hundreds of millions of dollars, if not billions. The FCC has gathered some data as to what those costs may be, but they are soft and seem to be questionable at best. The Commission cites the following implementation costs:

- \$150 million - Bell Atlantic, who holds out these costs as covering the costs of all operating companies
- \$50 million - Southwestern Bell, who holds out these costs for itself
- \$200 million - Pac Tel, who holds out these costs for itself
- \$560 million - AT&T, who holds out these costs for itself.

Based on the above, an arbitrary figure of \$1 billion for implementing BPP may be a reasonable estimate.

Is BPP costly? It may be. If I may say without intending to sound argumentative, \$1 billion is still a high figure even in these days of trillion dollar deficits for the Federal government. It should also be said that the aforementioned costs are for implementation alone. Software based systems generally have an annual operating maintenance cost of about 15% of original acquisition or implementation cost. Assuming \$1 billion in acquisition costs, operating maintenance costs would be \$150 million.

Ameritech in its January 28, 1992 ex parte statement to your office alluded to a Line Information Data Base (LIDB), which each Regional Bell Operating Company has installed for use on intraLATA operator assisted calls. These LIDBs would have to be interlinked for use with BPP interLATA calls. This suggests a dynamic, distributed computer database system that would have to be refreshed daily. I would submit, that in addition to the aforementioned annual operating maintenance costs there would be administrative costs for refreshing the LIDB system to enable BPP. These costs may represent an additional 15% or more (\$150 million or more) of original acquisition costs to the overall annual costs for BPP. Thus, the annual operating costs could be \$300 million or more.

In summary, it is reasonable to say that there would be significant up-front and recurring operating costs. Implementing BPP would result in increased cost of doing business by all operating telephone companies, aggregators, et. al. It is also reasonable to say that those costs of doing business shall result in increased costs to the consumers of telecommunications services. I did not see anywhere in the NPRM where consumers are asking for BPP. To the contrary, it is submitted that consumers would see their telecommunications costs rising due to BPP, and increased confusion as to how to place an operator assisted call.

In addition, aggregators would see the abrogation of contractual arrangements with operator service providers for 0+ calls from payphones and PBX phones; and, the erosion, if not total elimination, of revenues derived

from those arrangements. These revenues enable colleges and universities to maintain low internal telephone rate schedules to its consumers, among whom are students. Those persons will see increased telephone rates should BPP abrogate the aforementioned contractual agreements.

Is BPP flawed? Yes, it is. From our vantage point it is flawed for the following reasons:

- The cost of implementing BPP is excessive; possibly upwards of \$1 billion.
- The annual operating costs of BPP are significant; possibly upwards of \$300 million.
- Implementing BPP as well as on-going recurring annual costs will result in increased costs of doing business for the local exchange carriers as well as others. Those costs will be passed on to telephone service consumers; including aggregators. The end result will be that telecommunications services shall be more expensive as well as complicated.
- 10XXX-0 access codes and other forms of unblocking are being implemented. The need for BPP is diminished, if not eradicated, as unblocking access codes accomplishes the same thing without adding confusion to the telephone caller.
- BPP shall result in a loss of commission revenue to aggregators which will drive internal telephone rates upwards.
- There is a potential for a reduction in public coin telephones as premise owners will see a disincentive to have them as there will be a loss of commissions. The impact of a reduction in the presence of payphones shall be greater among economic depressed communities than in more affluent communities be they colleges and universities campuses or society as a whole.
- BPP does not appear to be consumer driven. The motives for it are questionable at best.

In closing, I would be pleased if you wish to ask me questions or wish further commentary.

Sincerely yours,



Morton Berlan

cc; J. D. Bruce
Telecomm.



Portland 76 Auto/Truck Plaza Inc.

21856 Bents Rd. NE • I-5, Exit 278 • Aurora, Oregon 97002
Phone 503/678-2111

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Federal Communications Commission
Office of the Secretary

July 2, 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 "M" St., N.W. Room 222
Washington, D.C. 20554
Docket No. 92-77

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Dear Ms. Searcy:

FCC MAIL BRAND

This letter is intended to be our brief commentary relative to recent FCC proposals described in Docket 92-77, Billed Party Preference.

We are a Unocal 76 interstate truck plaza with a 14-year history and have a high volume of tourist and trucking traffic. Public telephones are of utmost importance to us and our motoring customers, particularly those of interstate trucking who have a daily and constant need for fast, efficient, and equitable communication services.

Needless to say, the government intervention and subsequent deregulation of the telecommunications industry caused much confusion among our customers. In recent history, however, things have much-improved. The FCC unblocking rulings of 10XXX codes and toll free access numbers have allowed our customer base fair and equitable access to systems of choice. The current BPP proposal can only serve to re-initiate delays, increase costs, and again, add more confusion to an already edgy and skeptical customer base. Communications need to be more simplified and things are working well now. As a high profile, interstate-located business with high customer flow, we are very much in the communications business. We urge your efforts be channeled to negate this new proposal and maintain user access in its present form.

Yours truly,


G. A. Barron, Jr.
President/General Manager

Duke University

DURHAM
NORTH CAROLINA
27706

TELEPHONE SYSTEM

July 1, 1992

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Office of the Secretary

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Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554
Docket No. 92-77

FILE

Dear Ms. Searcy:

I would like to take this opportunity to comment on Docket No. 92-77 before the FCC concerning Billed Party Preference (BPP).

Duke University has worked very hard in the past several months to comply with the Operator Services Act of 1990 to allow equal access from our patient and student locations on campus, as we fall under the definition of aggregators under the Act. We have spent considerable time and effort to unblock these stations so that the persons using these instruments could reach carriers of their choice through our Equal Access Exchange through G.T.E. South. We do continue to presubscribe to a 0 + primary carrier for the purposes of a commission program. A similar effort has already been accomplished with G.T.E. South with our 85 paystations located throughout the Campus and Medical Center. These paystations are also fully unblocked for 10XXX+0.

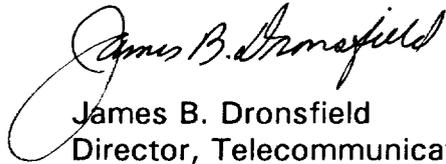
It is our position that with the 10XXX+0 unblocking available on our Campus and the availability of 1-800 and 950 access numbers, there is no need for BPP. Unblocking accomplishes the same objective without adding confusion for the end user. There are many advertising campaigns so that the general public has a much better grasp on 10XXX+0 dialing than ever before.

It is my understanding from the local exchange carrier that implementation of BPP would be very costly for them to be able to screen Bill Party Preference calling from their location. I am sure that these costs will be passed on to the end user and the end result will be a more expensive telecommunications service. For institutions of higher education, additional costs in these areas plus the potential loss of commission revenue would be a significant impact on our budget. Also, in our opinion, there is the potential for reduction in public phones for the public, especially in our Medical Center. The possibility of encouraging additional paystations to be

installed in these areas to take care of our increasing demand perhaps would not be there under this program.

We would hope that the FCC will very strongly examine the position of implementing this BPP program and balance the adverse effects on Duke University. Thank you very much for the opportunity to comment on Docket No. 92-77.

Sincerely,

A handwritten signature in black ink, appearing to read "James B. Dronsfield". The signature is fluid and cursive, with a large loop at the beginning of the first name.

James B. Dronsfield
Director, Telecommunications

JD/pj

CC: Thomas E. Dixon, Vice-President for Administration
Kate S. Hendricks, Office of University Counsel



American Jail Association

1000 Day Road, Suite 100
Hagerstown, MD 21740
Telephone: (301) 790-3930
FAX: (301) 790-2941

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Federal Communications Commission
Office of the Secretary

David M. Parrish
President
Tampa, Florida

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

Dr. Richard G. Kiekbusch
President-Elect
Manassas, Virginia

Re: "Billed Party Preference" Proposal,
CC Docket 92-77

Merry Gay McMackin
1st Vice President
Beaufort, South Carolina

Dear Ms. Searcy:

Calvin A. Lightfoot
2nd Vice President
Rockville, Maryland

It is my understanding that the Federal Communications Commission is now considering a proposal entitled "Billed Party Preference", CC Docket 92-77. It is my understanding that this proposal, if enacted, would change the way long distance carriers are selected on collect inmate calls from local jails. It is my more specific understanding that the enactment of this proposal would severely damage, and perhaps eliminate, the ability of competitive private companies to provide inmate telephone services and would require local jails to work exclusively with the large regional telephone companies in providing telephone services for their inmates.

Bud Kerr
3rd Vice President
West Palm Beach, Florida

Beverley Armstrong
Secretary
Ft. Lauderdale, Florida

Mark F. Fitzgibbons
Treasurer
Beaufort, South Carolina

Francis R. Ford
Executive Director
Hagerstown, Maryland

Norma Phillips Lammers
Immediate Past President
Sacramento, California

On behalf of the 6000 members of the American Jail Association, I have some serious concerns regarding this proposal if my preliminary understanding of it is, in fact, correct. My major concerns are these:

Past Presidents

Ray J. Coleman
Norman R. Cox
Larry Ard
James A. Gondles, Jr.
Thomas R. Barry
Samuel F. Saxton
Paul E. Bailey
James W. Painter

- 1) The reduction, and perhaps total elimination, of inmate telephone services in some local jails situated in geographic areas which are served by regional telephone companies that do not now provide those services. There are more than 3300 local jails in this country.
- 2) An increase in fraudulent inmate telephone calls from those local jails which are served by regional telephone companies that do not provide services specifically designed to prevent fraudulent inmate calling.

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Minneapolis, Minnesota - May 24 - 28, 1992
Portland, Oregon - May 16 - 20, 1993

July 1, 1992

- 3) A reduction in, and perhaps in some areas the loss of, the collect call commissions which many of us are putting to good use in these difficult economic times.

In light of the above, please send me the following:

- 1) A copy of the "Billed Party Preference" Proposal, CC Docket 92-77.
- 2) The procedure for public comment on this proposal.

I intend to discuss this matter with our Association's Executive Committee when we meet in San Antonio on the afternoon of August 1. Shortly thereafter, you may anticipate receiving formal comment from me. I can be reached at the following:

Dr. Richard G. Kiekbusch, Superintendent
Prince William-Manassas Regional
Adult Detention Center
9320 Lee Avenue
Manassas, Virginia 22110
(703) 792-6417

Sincerely,

Richard G. Kiekbusch
President

RGK:da

cc: James A. Gondles, Jr., Executive Director
American Correctional Association
Bud Meeks, Executive Director
National Sheriffs' Association
Board of Directors, American Jail Association
Paul J. Marino, Legal Counsel
American Jail Association
Stephen J. Ingley, Executive Director
American Jail Association



Monterey Peninsula Airport District

Post Office Box 550
Monterey, CA 93940
408-648-2000
408-673-2112 Fax

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June 30, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
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Federal Communications Commission
Office of the Secretary

Dear Ms. Searcy:

Subject: Docket No. 92-77, Billed Party Preference for 0+InterLATA Calls

Upon review of the NPRM related to the Billed Party Preference (BPP), on behalf of the Monterey Peninsula Airport District, I wish to express my concerns. Although the proposed BPP system could provide the end user the opportunity to select its billing preference, it appears that the infrastructure is not adequately designed and developed to accommodate the BPP system. The current design of the Line Information Data Base (LIDB) could result in customer dissatisfaction and confusion, when delays inevitably occur. Further development is required before the FCC implements a BPP system.

It is the Airport's opinion that the current equal access payphone plan with 10XXX-0+ unblocking is well recognized and utilized by many payphone users. Callers have been educated and are comfortable with the current system, a transition would result in disorientation.

Thank you for the opportunity to address my concerns, your consideration is appreciated.

Sincerely,

Laurie D. Morse
Property Manager, MPAD

LDM/s

BOARD

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DEEDEE CORRADINI, Mayor
LOUIS E. MILLER
Director of Airports

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FCC MAIL BRAND June 30, 1992

Federal Communications Commission
Office of the Secretary

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

Subject: Docket No. 92-77

Dear Ms. Searcy:

This letter is to provide the Salt Lake City Airport Authority's comments in response to the Federal Communication Commission's tentative decision to permit Billed Party Preference ("BPP").

It is our position that BPP, if implemented as proposed, will likely result in decreased service levels and opportunities for the Airport's passengers and other public telephone users. In contrast, the FCC's current unblocking equal access payphone plan treats all long distance carriers equally, and, more importantly, allows end users to reach their own preferred carrier. From a public agency perspective, we believe that the current equal access plan provides highest service to the traveling public.

For these reasons, we request that the FCC allow the current unblocking presubscription plan be allowed to work before making changes that will impact the marketplace.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Louis E. Miller'.

Louis E. Miller

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NCA
NATRONA COUNTY
INTERNATIONAL AIRPORT
8500 FULLER STREET
CASPER, WY 82604-1697
307/472-6688
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July 2, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington D.C. 20554
Docket No. 92-77

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Federal Communications Commission
Office of the Secretary

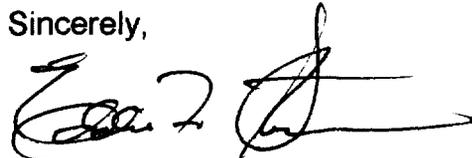
Dear Ms. Searcy:

I would like to take a moment of your time to convey my opposition to BPP. Longer delays in call set-up, fewer services to the consumer, decreased commissions to the aggregator, and undoubtedly higher long distance costs for the consumer are in neither the consumer or business' best interest.

I encourage you to please give the public more time to get to know and use the current equal access presubscription plan before you make a decision that could impact the market.

Thank you for your time.

Sincerely,



Eddie F. Storer
Airport Manager

EFS:bjg

FCC MAIL SECTION

SOUTHEAST CHAPTER

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American Association of Airport Executives

JUL - 6 1992

C.M. "Mike" Armour, AAE
President, 1992-93
Southwest Georgia Regional Airport
3905 Newton Road
Albany, Georgia 31707
July 2, 1992

Federal Communications Commission
Office of the Secretary

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

Dear Ms. Searcy:

RE: Docket No. 92-77

These remarks are drafted concerning the issue of Billed Party Preference (BPP) on behalf of the Southeast Chapter of the American Association of Airport Executives (SEC AAEE).

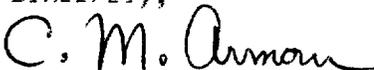
SEC AAEE believes there are serious concerns regarding this issue which should be considered prior to the implementation of BPP. As proposed, BPP will result in a loss of incentive for competitive bids for long distance services. Providers of public phones will be forced to pay for telecommunications equipment which will result in fewer phones being available to the consumer. Additionally, these expenses will seriously affect a provider's ability to upgrade their system to keep pace with technological advances in the industry. Initial and ongoing costs associated with BPP will ultimately be paid by the consumer, resulting in more expensive telecommunication services. The end result will be less service and more expense to the consumer.

The need for BPP can be eliminated through unblocking 10XXX,0+ codes and the availability of 1-800 or 950 access numbers. These actions provide the same objective of BPP without adding confusion and expense to the consumer.

SEC AAEE strongly urges the FCC to reconsider its position on BPP by reflecting upon the long term, adverse effects to the consumer.

Thank you for the opportunity to comment on this most important matter.

Sincerely,



C. M. Armour
President, SEC AAEE