

## North Carolina Department of Correction

214 West Jones Street • Raleigh, North Carolina 27603-1337

James G. Martin, Governor

V. L. Bounds, Secretary

July 10, 1992

The Honorable Alfred C. Sikes, Chairman  
Federal Communications Commission  
1919 M Street, N. W.  
Washington, D. C. 20554

ORIGINAL  
FILE

RECEIVED

JUL 17 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: Billed Party Preference (BPP) - CC Docket No. 92-77

Dear Mr. Sikes:

The North Carolina Department of Correction has been directed by the North Carolina General Assembly under General Statute 148-4 to manage nearly 20,000 felon and misdemeanor offenders housed in 91 correctional facilities throughout the state. The North Carolina Department of Correction maintains contracts with a number of telephone vendors who supply telephones for inmate use. The telephones which can be accessed by inmates must be managed in a manner that recognizes the security implications and fraud potential of telephone use by offenders.

We are currently reviewing the implications of the Billed Party Preference (BPP) issue identified as CC Docket No. 92-77. This proposal appears to have the effect of opening up the telephone network for excessive fraud, as well as eliminating the commissions that support the telephone system.

In the State of North Carolina, it is our understanding that only three telephone companies provide inmate call screening as an option. Regrettably, several of the long distance companies in North Carolina do not have the ability to offer inmate call screening.

As we examine the expansion of telephone access for offenders, it is important that we achieve a balance between the legitimate communication needs of the offender population and the available technology to limit the potential for fraud. Specialized services including blocking, phone number searches, and other services are vital to minimizing fraudulent activities.

The Honorable Alfred C. Sikes  
July 10, 1992  
Page Two

Based on our current experience with telephone service, it is our hope that the Federal Communication Commission will carefully consider the impact of the Billed Party Preference initiative and restore control of potential fraud by institutional offenders. For a number of reasons, public telephone service accessible to offenders in confinement facilities must be configured with security in mind. Direct local calling, credit card calls, third number charge calls must be blocked. Other calls requiring control include the following:

- . 1 + cent paid calls
- 0 + cent paid calls
- 0 - calls
- 00 - calls
- 800 calls
- 900 calls
- 976 calls
- 950 calls
- 10 XXX calls

The system should allow 0+ collect calls for local service, intralatta and interlatta calls.

These controls will enable the Department to manage institutional toll fraud more effectively.

Sincerely,



W. L. Kautzky  
Deputy Secretary

WLK:ps

cc: The Honorable Sherrie Marshall  
The Honorable Andrew C. Barrett  
The Honorable James H. Quello  
The Honorable Ervin S. Duggan  
Mr. Gary Phillips, Common Carrier Bureau  
Congressman Alex McMillan

# PLAZA AT LATHAM ASSOCIATES

P.O. Box 639  
800-19 New Loudon Road  
Latham, New York 12110  
Telephone (518) 785-6633

July 1, 1992

The Honorable Alfred C. Sikes, Chairman  
Federal Communications Commission  
1919 M. St., NW  
Washington, DC 20554

RECEIVED  
JUL 17 1992  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

ORIGINAL  
FILE

Dear Honorable Alfred C. Sikes,

I am writing to express my opposition to CC Docket 92-77,  
"Billed Party Preference."

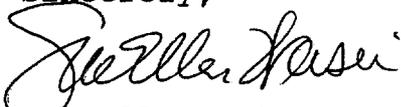
Not only would BPP eliminate my ability to ascertain which long distance carrier will be servicing the pay phones on my property, but also it will vanquish my right to earn commissions on all 0+ calls. Collect and credit card calls account for over half of my pay phone revenues, so I would essentially be splitting my commission checks with carriers who had no say in my putting a phone on my property.

I have taken the time to work with the architects to choose spots at my site where my customers would have the greatest access to pay phones. I have provided my customers with means for convenience and safety. I have contracted with a pay phone company to put in phones. I have arranged with Bell to put in lines. I have arranged with the electric company to run power. I make the calls for service when there is a coin jam.

In addition to all of these things, I monitor my phones regularly to make sure that they are clean and in proper working order, and I also apply a portion of the revenues that I earn from phone traffic towards increasing the availability of phones to my customers and providing them with new pay phone features and services. Don't you think my organization should receive commissions on more than half of the phone calls?

BPP would not enhance competition. It would cripple it because it would effectively eliminate the right to have any authority over what is going on inside my phones.

Sincerely,



Sue Ellen Weiser  
Director of Operations

SEW/wb

P.O. BOX 1000  
SUMTER, SOUTH CAROLINA  
29151-1000

**Y O U N G S**  
**FOOD STORES, INC.**

BUSINESS OFFICE  
447 NORTH MAIN STREET  
PHONE 803-775-5337

July 7, 1992

The Honorable Alfred C. Sikes  
Chairman, Federal Communications Commission  
1919 M. Street N. W.  
Washington, D. C. 20510

ORIGINAL  
FILE

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JUL 17 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: CC Docket No. 92-77 (Billed Party Preference)

Dear Sir:

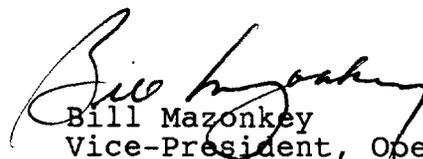
I am writing to you to express my deep concern on the matter of "Billed Party Preference", (BPP).

We operate 45 convenience food stores in central South Carolina. A little over a year ago we contracted with a "Private Payphone Provided" (PPO) to handle our pay telephone operations. Prior to that time, we were being provided pay telephone services from 3 different local exchange companies. At that time, 10 of our stores did not have any payphones, 6 payphones were not paying us any commissions, and overall 16% of these payphones did not even work. Since that time our locations have been replaced by our PPO. Our payphones now enhance our operations and provide necessary phone services to our customers who depend on them. We now have more payphones installed at our stores and the phones are kept maintained and clean for our customers. Commissions paid to us by our PPO exceed the amounts previously paid to us by the local exchange companies, and are listed on one statement that is not confusing.

I hope you will find that Billed Party Preference is not in the public interest. We would hate to think that we would have to go back to the previous way of doing business. We and our customers enjoy and depend on the payphone services we now have with our PPO.

A copy of this letter has been sent to the Honorables Alex McMillan, Strom Thurmond, Ernest F. Hollings, and John M. Spratt.

Sincerely,

  
Bill Mazonkey  
Vice-President, Operations

# Eastern Telephone Company, Inc.

*Serious about Service*  
881 North Mayo Trail  
Pikeville, KY 41502-1138  
(606)432-0043 (800)844-0043

JULY 6, 1992

Chr. Alfred Sikes  
Federal Communications Commission  
1919 M. Street, N.W., Room 814  
Washington D.C. 20554

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JUL 17 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Chairman Sikes:

RE: CC Docket 92-77

I am writing you to urge you to oppose an FCC regulation pending which concerns adoption of 'billed party preference' which will restructure the way long distance carriers are selected on collect, calling card and third number billed services.

As president of a company that owns pay telephones I find the proposed regulations will severely limit my choices in service. The bill will impose needless costs on consumers without giving them better access to services and it will certainly be inconvenient.

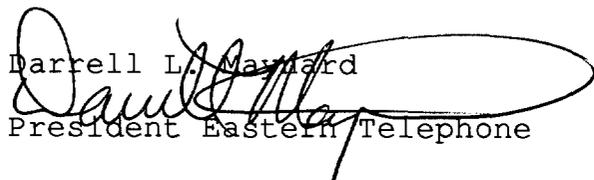
Billed party preference will prohibit if not totally strangle competition and innovation in the market.

The ultimate costs to consumers will be astronomical into the millions of dollars.

Competition among pay phone companies has resulted in innovation with tailoring of services and increased availability of facilities. Services such as call forwarding and smart phone automated services would be limited by the bottleneck of local telephone companies and will eliminate these services in many areas.

It runs counter to the federal ruling which allows competitive markets and enables the small local companies to establish monopolies in the market.

Please voice your opposition to this proposal.

Darrell L. Hayward  
  
President Eastern Telephone

cc: FCC members

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

COMMISSIONER OF STREETS AND PUBLIC IMPROVEMENTS  
Third Floor, City Hall  
Cedar Rapids, IA 52401  
(319) 398-5055

CEDAR  
RAPIDS

CITY OF FIVE SEASONS



ORIGINAL  
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JUL 17 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 6, 1992

Hon. Alfred C. Sikes, Chairman  
Federal Communications Commission  
1919 M Street NW  
Washington, D.C. 20554

Re: FCC Billed Party Preference  
CC Docket No. 92-77

Dear Hon. Alfred C. Sikes:

Commissions from our pay telephones are an important source of the revenue enabling us to provide vital services to the people we serve.

That's why we oppose "Billed Party Preference" and other efforts that would limit our freedom to manage this important asset and public service.

Wayne A. Murdock  
Commissioner of Streets  
& Public Improvements

WAM:nk

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JUL 17 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY  
JULY 6, 1992

Chr. Alfred Sikes  
Federal Communications Commission  
1919 M. Street, N.W., Room 814  
Washington D.C. 20554

ORIGINAL  
FILE

Chairman Sikes:

RE: CC Docket 92-77

I am writing you to urge you to oppose an FCC regulation pending which concerns adoption of 'billed party preference' which will restructure the way long distance carriers are selected on collect, calling card and third number billed services.

I find the proposed regulations will severely limit my choices in service. The bill will impose needless costs on consumers without giving them better access to services and it will certainly be inconvenient.

Billed party preference will prohibit if not totally strangle competition and innovation in the market.

The ultimate costs to consumers will be astronomical into the millions of dollars.

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It runs counter to the federal ruling which allows competitive markets and enables the small local companies to establish monopolies in the market.

Please voice your opposition to this proposal.

Leigh Ann Branham  
Eastern Telephone

*Leigh Ann Branham*

cc: FCC members

IN ORIGINAL COMPLAINTS  
BRANCH  
EMERGENCY DIVISION  
COMMUNICATIONS BUREAU

JUL 14 1 00 PM '92

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JUL 17 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

JULY 6, 1992

ORIGINAL  
FILE

Chr. Alfred Sikes  
Federal Communications Commission  
1919 M. Street, N.W., Room 814  
Washington D.C. 20554

Chairman Sikes:

RE: CC Docket 92-77

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It runs counter to the federal ruling which allows competitive markets and enables the small local companies to establish monopolies in the market.

Please voice your opposition to this proposal.

Brian K. Hatmaker  
Eastern Telephone



cc: FCC members

REC'D  
JUL 14 12 59 PM '92  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY



**CHARTER  
PINES HOSPITAL**

June 30, 1992  
The Honorable Alfred C. Sikes  
Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

92-77

RECEIVED  
JUL 14 4 55 PM '92

ORIGINAL  
FILE

RECEIVED

JUL 17 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Honorable Sikes,

I'd like to take just a moment of your time to express some concerns about the way a proposal (CC docket#92-77) now before the FCC will affect operations at Charter Pines Hospital. I ask for your support in opposing this proposal. Our hospital is a 60 bed private psychiatric facility with pay phones on the units for patient use. We presently own these phones and have a commission agreement with a state regulated operator services provider. This commission from long distance calls allows us to provide free local calling and offset the monthly line charges to provide the phone service. Our operator service provider allows the standard range of calling options plus acceptance of all major credit cards, providing great flexibility in placing calls for our patients. The callers can also access the carrier of their choice if they wish. The confusion caused by Billed Party Preference and the inability of most interstate carriers to handle the bulk of our traffic (which is intra LATA and intra state) would only serve to frustrate the very users this bill attempts to assist.

The loss of revenue caused by passage of the "Billed Party Preference" proposal would probably require installing coin operated phones to charge a quarter for each local call. This presents many problems related to security of patient valuables.

The greater threat to caller preference lies in the demise of these alternative service providers, and reversion by default to services provided by the local exchange companies at rates set without benefit of competition. Prior to the provision for alternative operator services and privately owned pay phones our local exchange company would provide only three coin phones in our facility, charged for all outgoing calls, and paid only a token commission on the revenues. The alternative ability to offer service allows us to provide five phones, with free local calling, and no coins needed.

Thank you for your consideration of this information.

Sincerely yours,

  
Glenn E. Hamilton  
Director of Plant Operations

- cc: The Honorable James H. Quello
- The Honorable Sherrie Marshall
- The Honorable Ervin S. Duggan
- The Honorable Andrew C. Barrett
- Mr. Gary Phillips, Common Carrier Bureau

✓ Congressman Alex McMillan  
3621 Randolph Road, Charlotte, NC 28211 (704) 365-5368

