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JUL 17 1992

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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Billed Party Preference )  
for 0+ Interlata Calls )  
\_\_\_\_\_ )

CC Docket 92-77

COMMENTS OF THE

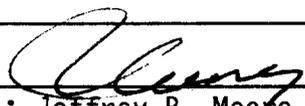
S. C. SHERIFFS' ASSOCIATION

COMES NOW, the S. C. SHERIFFS' ASSOCIATION (SCSA)

\_\_\_\_\_, by its Ex. Director, Jeffrey Moore, and respectfully  
submits these comments in response to the Notice of Proposed  
Rulemaking issued by the Federal Communications Commission in the  
above-captioned rulemaking matter.

We hereby concur and adopt by reference as our own the  
comments of the Arizona Department of Corrections and the South  
Carolina Jail Administrators Association to be included in the  
above referenced proceeding.

Respectfully Submitted

By:   
Name: Jeffrey B. Moore  
Title: Executive Director

Dated July 6, 1992

Organization: S.C. SHERIFFS' ASSOCIATION  
Address: P. O. Box 21418  
Columbia, S. C.  
Telephone: (803) 749-0265

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JUL 17 1992  
ORIGINAL  
FILE



**CITY OF  
MESA**

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 2, 1992

**ORIGINAL  
FILE**

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

Daniel Brewer  
Management Services Manager

DB-mg  
DB-1969

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JUL 17 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Call America**  
BUSINESS COMMUNICATIONS

FCC MAIL BRANCH

JUL 7 1992

July 1, 1992

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

Re: CC Docket No. 92-77  
In the Matter of  
Bill Party Preference for 0+ InterLata Calls

ORIGINAL  
FILE

Dear Ms. Searcy:

Call America Business Communications Inc. is a small regional IXC and Operator Service Provider located on the Central Coast of California. I am writing you at this time because no one in the Operator Service Industry can afford to remain silent on the issue of Billed Party Preference.

I am certain you will be inundated by the larger companies with detailed factual statistics, but I wanted to include some issues from a smaller perspective.

By definition alone, billed party preference will remove any incentive to premise owners to provide and upkeep public phones. By allowing a choice of provider and receipt of fair compensation, the consumer receives the best possible service available. Who will be able or willing to invest money into a service for which they receive no return?

The FCC has already mandated the unblocking of 10XXX dialing, which allows for billed party choice. There is no cost effective or even technically viable way to handle a caller without some input of information on their part. The public is being educated on their choices and how to make them, no one can expect it to be an easy or quick fix. There was no choice for so long that it is a completely new concept, and people are always adverse to change in the beginning no matter if it is in their best interest.

879 Morro Street  
San Luis Obispo, CA 93401  
805-541-6316, FAX 805-541-5826

Offices in San Luis Obispo, Salinas,  
Fresno, Bakersfield, Santa Maria  
and Santa Barbara

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ENFORCEMENT  
COMPLIANCE  
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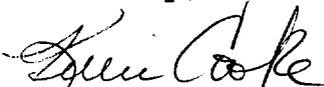
***call*America**  
**BUSINESS COMMUNICATIONS**

Another main fault of this particular plan is the handling of operator assisted calls. In an effort to make calling easier, the FCC is overlooking how complicated their solution will make live operator assisted calls. 0- or live operator calls would become extremely confusing. If branding and access dialing are considered too much of a burden on the consumer, what will live operators transferring customers to the "preferred" live operator accomplish?

Forcing the industry to open 0+ dialing without 10xxx from the consumer isn't the answer. Educating consumers and allowing them the freedom and knowledge of choice is the only way to prevent the return of a monopolized operator service industry.

If billed party preference is passed there will cease to be any business or competitive opportunities in the operator service industry for the small or regional carrier. All the hard work, investment, and job opportunities that resulted from divestiture will be lost. I do not believe that is what the FCC intends, but is what will be accomplished if billed party preference comes to pass.

Sincerely,



Kellie Cooke  
Call America Business Communications, Inc.  
Director of Operator Services

cc: Hon. Alfred C. Sikes, Chairman  
Hon. James H. Quello  
Hon. Sherrie Marshall  
Hon. Ervin S. Duggan  
Hon. Andrew C. Barrett  
Gary Phillips, Common Carrier Bureau

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

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY  
CC Docket No. 92-77

In the Matter of )  
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Billed Party Preference )  
for 0+ Interlata Calls )  
\_\_\_\_\_ )

ORIGINAL  
FILE

COMMENTS

OF THE

Utah Department of Corrections

Dated: July 6, 1992

Name: O. Lane McCotter  
Address: 6100 South 300 East  
Murray, Utah 84107  
Telephone: (801) 265-5517

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

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In the Matter of )  
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CC Docket 92-77

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COMMENTS OF THE

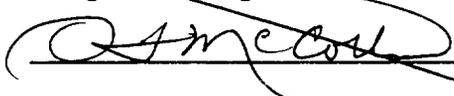
Utah Department of Corrections

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

COMES NOW, the Utah Department of Corrections  
\_\_\_\_\_, by its Exec. Director O. Lane McCotter, and respectfully  
submits these comments in response to the Notice of Proposed  
Rulemaking issued by the Federal Communications Commission in the  
above-captioned rulemaking matter.

We hereby concur and adopt by reference as our own the  
comments of the Arizona Department of Corrections and the South  
Carolina Jail Administrators Association to be included in the  
above referenced proceeding.

Respectfully Submitted

  
\_\_\_\_\_

By: O. Lane McCotter  
Name: Utah Department of Corrections  
Title: Executive Director

Dated July 6, 1992

Organization: Utah Department of Corrections  
Address: 6100 South 300 East  
Murray, Utah 84107  
Telephone: (801) 265-5517

**ELCOTEL INC.**

92-77  
ORIGINAL  
FILE  
TELECOMMUNICATIONS SYSTEMS

June 22, 1992

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JUL 17 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Hon. Alfred C. Sikes, Chairman  
Federal Communications Commission  
1919 M. Street, N.W. Room 222  
Washington, D.C. 20554

RE: CC Docket No. 92-77  
Bill Party Preference for O+ InterLATA Calls

Dear Mr. Chairman:

Elcotel, Inc. is a coin telephone manufacturer which also manufactures store and forward software sold to COCOT's. I would like to make a few comments regarding the issue of Bill Party Preference (BPP). I find the entire controversy of BPP to be redundant. When the FCC mandated unblocking of all public phones, including the COCOT phones, was this not for the purpose of equal access? Unblocking has allowed any consumer to access the carrier of their choice by dialing five simple digits (10XXX) followed by O. Why then for the need of BPP?

BPP would make O- calls ("live" operator calls) more complicated and costly. It would require two operators to be involved to complete "live" operator assisted collect, third party, person-to-person, and calling card calls. BPP will increase the cost of approximately 80% of automated and live operator calls. This process will be much more complicated and costly to implement than equal access or other major endeavors. If the consumer is to lazy to dial a 10XXX number, what makes the FCC believe that they would be willing to repeat the same information to two different operators?

It is not fair to expect the automated and live operator service providers to furnish equipment and personal for the benefit of transferring tolls and for the profitability of the LEC's, AT&T, MCI and Sprint.

After all the legislature, litigation, and confusion involving the deregulation of AT&T, I find it appalling that the FCC is attempting to remonopolize the entire operator service industry.

6428 Parkland Drive, Sarasota, Florida 34243

813-758-0389

• 800-ELCOTEL •

TELECOPIER 813-755-1085

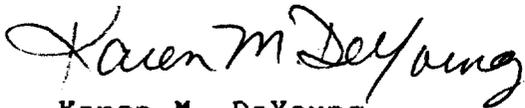
If BPP is being investigated simply for the benefit of the consumer, how will a decrease in public access to public phones be beneficial to the consumer? If there is no incentive for premise owners to install payphones or room phones in universities or in the health care and hospitality industries, why would the owner want to? No responsible business person is going to make a substantial investment in public phones without a goal of a substantial return. Reduction of competition ultimately means reduction in consumer choices.

BPP would undo the competitive force within the industry and leave only AT&T, MCI, Sprint, and the LECs to control long distance calls from public facilities. This would leave billions of dollars of investment, equipment, operator centers, and employment of people awry.

I do not believe that BPP would benefit the consumer, the phone owner or the economy in any way. I believe that BPP would only cause additional confusion with the consumer and chaos within the industry.

Sincerely,

ELCOTEL, INC.



Karen M. DeYoung  
PAOF Billing/Admin. Manager

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

# SUPERIOR ELECTRONICS

LOCATED AT INTERSECTION OF I-20 & US 401 • RT. 2, BOX 121-1 • TIMMONSVILLE, SC 29161 • 803-326-5421

June 30, 1992

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JUL 17 1992

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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

ORIGINAL  
FILE

Dear Mr. Sikes:

As the owner of a small private payphone business, I was very concerned when learning of some issues being discussed and debated within the FCC which could have a dramatic impact on my business.

I am referring to the issues of "Billed Party Preference & CILD Cards" mentioned in Docket 92-77 and "Dial Around Compensation", mentioned in Docket 91-35. Long Distance calling represents a large percentage of my revenue generation and an adverse ruling would cripple my business. I urge you to consider small businesses such as mine in your deliberations.

The private payphone sector has been a welcomed alternative by the public since the divestiture in the mid eighties. I am a member of the South Carolina Public Communications Association which is dedicated to serving the Public in an ethical and responsible manner. My clients are very pleased with the services they receive and I receive few complaints.

After viewing all sides, I am confident that the FCC will arrive at decisions on these issues that are fair and equitable to all parties concerned. Thank you for the opportunity to express my views.

Sincerely,

*David G. Carter*  
David G. Carter

# NTC

National Telephone Company

6-30-92

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

Dear Mr. Sikes:

Please do not let the F.C.C. approve Billed Party Preference in CC Docket 92-77.

It hardly makes sense or is in the public interest to expand the control of communications to corporations who not so long ago were involved in major violations of the anti-trust laws, and who even now engage in anti-competitive practices whenever the opportunity presents itself.

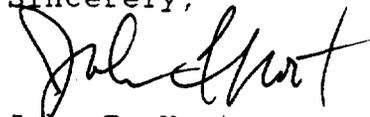
Existing equal access arrangements already allow consumers to reach their carrier of choice on the overwhelming majority of calls. The principal impact of the BPP proposal is not to the end user, but to small businesses such as payphone providers. BPP will deny my business a commission as the owner of the equipment being used to place the long distance calls. The Bell Companies win and the small payphone providers lose.

You may not realize that currently Bell is our supplier as well as our main competitor. Bell feels some divine right to control the payphone business from every aspect. They are still monopolizing this industry, and BPP is proof of their insatiable appetite to continue the monopoly.

I would like to invite you to visit our small business to learn first hand how we struggle against Bell to maintain and grow our business. This is an open invitation.

Thanks for your consideration, and I hope to hear from you soon.

Sincerely,



John F. Nort  
President

