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AUG 10 1992

GREENVILLE-SPARTANBURG AIRPORT COMMISSION FEDERAL COMMUNICATIONS COMMISSION

2000 GSP Drive, Suite 1, Greer, SC 29651-9202

OFFICE OF THE SECRETARY

Telephone (803) 877-7426 • Fax (803) 848-6225

Roger Milliken
Chairman

J. Garrett Jackson
Executive Director

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AUG 10 1992

MAIL BRANCH

August 5, 1992

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

RE: Docket No. 92-77 ✓

Dear Ms. Searcy:

As Executive Director of the Greenville-Spartanburg Airport, I wish to submit comments on behalf of our Commission concerning the above referenced docket.

The Greenville-Spartanburg Airport Commission is opposed to Billed Party Preference (BPP) as proposed in NPRM dated May 8, 1992, for the following reasons:

1. Our airport has recently undergone a \$50 million terminal renovation and expansion which included the installation of 72 public telephones. Special construction was carried out to prepare areas for these telephones. Special work desks with telephones were installed to accommodate travelers while awaiting flights. All this work was done at great expense to the Airport Commission with the understanding that we would continue to receive commissions from telephone usage. These telephone installations were expensive and we feel we are entitled to a return on our investment. If changes are made that would eliminate or greatly reduce commissions paid, this would certainly have an effect on the number and the quality of telephone stations provided at airports.
2. The use of public telephones is already so complicated that people come to our airport information counter and ask where they can find a "regular telephone". More features only tend to confuse users further.

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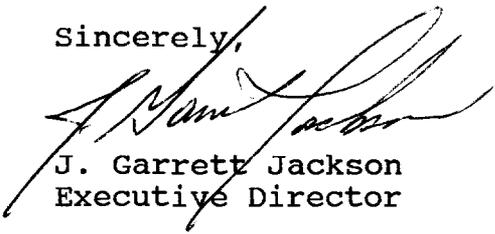
MAIL BRANCH

Ms. Donna R. Searcy
Page 2

3. BPP will be costly to implement and to maintain. The user has to pay for these costs and in the end, there will be no real net savings.
4. If we were to lose our commission revenue for the telephones, we would have to increase user fees in other areas of our airport operation to maintain our necessary stream of income. Then the telephone user has to pay both the cost of BPP and higher airport use fees.

In summary, while this may sound beneficial to public phone users, in our opinion this NPRM would only end up costing the user more, fewer telephones would be available and as an airport operator, we would have to increase revenues in other areas used by these same telephone customers. When all the ramifications of the NPRM are considered, we pray the FCC will find it to be inappropriate and unnecessary.

Sincerely,



J. Garrett Jackson
Executive Director

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Port of Seattle

August 3, 1992

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MAIL BRANCH

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

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Dear Ms. Searcy:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Notice of Proposed Rule Making (Docket No. 92-77)

The Port of Seattle is committed to provide the highest possible service to its customers, particularly those transiting Seattle-Tacoma International Airport. However, the concept of a billed party preference (BPP) appears to diminish the level of service which could be provided to our payphone users and which is of serious concern to us. We believe the current equal access public payphone system is fair and adequate as it already allows payphone users to reach the telephone carrier of their choice, and urge the Federal Communication Commission to refrain from implementing the BPP system for the following reasons:

The potential of a longer call set up time to connect a long distance call;

The potential of customers paying higher long distance call rates because of high cost of implementing BPP which is likely to be passed on to the consumers; and

The complexity and difficulty with completing international collect calls, and using commercial credit cards.

Thank you for giving respondents to this NPRM extra time to comment on BPP.

Sincerely,

Karl D. Myers
Director, Business & Property Management

9263R/ACG/dah

Seattle-Tacoma
International Airport
P.O. Box 68727
Seattle, WA 98168 U.S.A.
TELEX 703433
FAX (206) 431-5912

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**Ohio Department of
Administrative Services**
DIVISION OF COMPUTER SERVICES
30 EAST BROAD STREET
COLUMBUS, OHIO 43266-0409

GEORGE V. VOINOVICH, GOVERNOR

STEPHEN A. PERRY, DIRECTOR

August 3, 1992

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AUG 10 1992

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

Dear Ms. Searcy:

RE: CC Docket Number 97-77, Notice of Proposed Rulemaking,
Billed Party Preference for InterLATA 0+ Calls

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The State of Ohio, Department of Administrative Services, Division of Computer and Information System Services, Telecommunications Section supports comments filed in this docket by the states of Georgia, Tennessee, and South Carolina. The Department is responsible for superintending telecommunications services for the State of Ohio. We support the position that the effect of Billed Party Preference (BPP) is likely to be a reduction in service, especially inmate telephones in correctional institutions. The Ohio Department of Rehabilitation and Correction feels that inmate calls from prisons should be exempt from BPP so that the public will be protected from fraudulent calls and from personal harassment by inmates.

We ask that the Commission recognize that Billed Party Preference changes contemplated are not in the public interest, especially if applied to prisons.

Sincerely,

Timothy D. Steiner
Telecommunications Administrator

TDS/sp

cc: Lynn E. Shapiro, Esq.
John Melnick, ODRC

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EASTMAC
McDonald's #3736
R.D. #4, Box 247-A, Route 22
Huntingdon, PA 16652

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MAIL BRANCH

July 13, 1992

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

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AUG 10 1992

RE: Bill Party Preference CC Docket No. 92-77

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Searcy:

We as COCOT Commission Earners want to express our concerns about Bill Party Preference (BPP), for O+ InterLATA Calls (CC Docket NO. 92-77) in relation to COCOT phones. Today with the unblocking of all public phones, 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 in essence we have BPP now. This country was built on the free enterprise system and if Bill Party Preference occurs, the LECs, AT&T, MCI, and SPRINT will have simply remonopolized our entire operator service industry.

BPP would make O- calls ("live" operator calls) more 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.

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 to go away. If there is no incentive for premise owners to install payphones or room phones for universities, and health care and hospitality industries, there will be a dramatic decrease in public access to public phones as compared with today. Reduction of competition ultimately means reduction in consumer choices.

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 endeavors.

Sincerely,

John Eastman, Owner/oper.

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David Walters
Governor



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Gary D. Maynard
Director

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Oklahoma Department of Corrections

"Protecting You Is Our Mission"

July 23, 1992

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

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JUL 29 8 56 AM '92
INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

RE: CC Docket No. 92-77

Dear Chairman Sikes,

This is to inform you that the passage of the above listed proposal would drastically affect the operation of this prison in a negative manner. The ability to select a primary service provider for our inmate telephone program provides the facility revenue, which we desperately need to operate. The passage of this proposal would cause the elimination of these funds.

The current system also provides security features to our phone system which would be absent under this proposal. Currently inmates may only talk a specified number of minutes which allows each inmate access to the phones. A monitoring system is in place to add to the security of the prison. Also we tend to get better service with the competitive system which we have today.

I would ask that the passage of 92-77 be denied. With our already limited resources and a growing inmate population, passage would certainly hamper the safety and security of this and other prisons.

Best regards,


Jack Cowley, Warden

cc: Honorable James Quello
Honorable Sherrie Marshall
Honorable Ervin Duggan
Honorable Andrew Barrett
Gary Phillips, Common Carrier Bureau
File

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Joseph Harp Correctional Center

Box 548, Lexington, Oklahoma 73051
(405) 527-5593/FAX (405) 527-6721

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LARRY A. FIELDS
DIRECTOR



DAVID WALTERS
GOVERNOR

STATE OF OKLAHOMA
OKLAHOMA DEPARTMENT OF CORRECTIONS

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 1, 1992

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

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

INFORMAL COMPLAINTS
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ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

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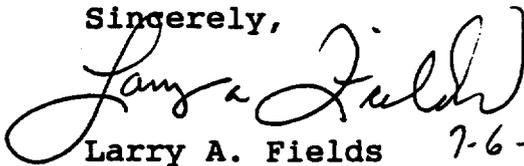
Dear Ms. Searcy:

The Oklahoma Department of Corrections is expressing concern over the impact Billed Party Preference could have on our inmate phone services. Our specific concerns are:

- 1) The ability to get service and/or the lack of special service options like call blocking, number searching and selective number monitoring, etc. For example several prisons are in areas where the local telephone company does not provide inmate phone service. Where the telephone company does provide inmate phone service, they do not provide the special service options.
- 2) Excessive telephone fraud will cause increased financial burden on the public and potential public relation problems for prisons.
- 3) The potential of losing the increased security and control created by inmate phone service.
- 4) Loss of revenue from the commissions. Prior to competition, commissions were either non-existent or very low.

We are requesting your consideration to exclude inmate phone services from Billed Party Preference.

Sincerely,


Larry A. Fields 7-6-92
Director

LAF:ls

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FRAUNCES TAVERN RESTAURANT
54 PEARL STREET
NEW YORK, N.Y. 10004
TEL: (212)269-0144

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ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

July 13th, 1992

The Honorable Alfred C. Sikes
Chairman
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, NW
Washington, DC 20554

RE: FCC BILLED PARTY PREFERENCE IN CC DOCKET 92-77

Dear Chairman Sikes,

I am the owner of a restaurant whose has public payphone on our premises. These phones were provided to us by a local COCOT (Customer Owned Coin Operator Telephone) service company. We are proud of the level of phone service we provide to the public from our payphones. These new "smart" payphones are technologically superior to the old public phones we had from NYNEX.

Our payphones allows consumers to access their carrier of choice as required by "TOCSIA" and therefore we do not see any need for Billed Party Preference. If BPP is approved at an expense of hundred of millions of dollars to the public to implement, it will only concentrate monopoly power to the local telephone companies and giant national inter exchange carriers. Our operator service Company utilized multi lingual operators, provides voice messaging, electronic mail boxes and accepts major credit cards. Since we cater to many out-of-town visitors, these service which NYNEX does not provide is needed. Additionally BPP would eliminate our commission that we rightfully earn. We would be unable to get a return that compensates us for our investment in equipment, space and management.

This proposal must be defeated because it will adversely affect our customers, ourselves, our payphone service Company and put the competitive operator service industry out of business.

Very truly yours,

FRAUNCES TAVERN RESTAURANT



Robert Norden
President

DN/al

- c.c. 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

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ASTOR RIVIERA RESTAURANT
454 LAFAYETTE STREET
NEW YORK, N.Y. 10002
TEL: (212)677-4461

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INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

July 13th, 1992

The Honorable Alfred C. Sikes
Chairman
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, NW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: FCC BILLED PARTY PREFERENCE IN CC DOCKET 92-77

Dear Chairman Sikes,

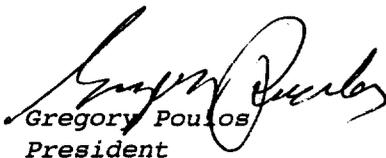
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This proposal must be defeated because it will adversely affect our customers, ourselves, our payphone service Company and put the competitive operator service industry out of business.

Very truly yours,

ASTOR RIVIERA RESTAURANT


Gregory Poulos
President

DN/al

c.c. 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

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OFFICE OF THE SECRETARY

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Workforce Development Cabinet

Department for the Blind

CHARLES W. McDOWELL
Executive Director

INFORMAL COMPLAINT
BRANCH
ENFORCEMENT DIVISION
COMMON BARRIER BUREAU
427 VERSAILLES ROAD
FRANKFORT, KENTUCKY 40601

FAX (502) 564-3976
(502) 564-4754

July 17, 1992

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

Dear Chairman Sikes:

RE: Docket #92-77; BPP

The Department for the Blind is the state licensing agency for the Federal Randolph-Sheppard Act. As such, the Surface Transportation Act of 1983 allows the Department to receive commissions from vending on Kentucky's interstates. We have also, by agreement with Kentucky's Transportation Cabinet, been given permission to oversee installation, etc., of pay phones at interstate rest areas and weigh stations and receive commissions from them. This letter is to inform you of the financial impact the adoption of the above referenced docket would cause on the Department for the Blind.

Since December 1986, the Department has received commissions totaling \$976,698 from the pay phones at Kentucky's interstate rest areas and weigh stations. Expenditures from these commissions must be made through the Department's Business Enterprises Program in accordance with the Transportation Act. Expenditures made through the Program are then eligible for Federal matching money. For Federal fiscal year 1991 monies spent from commissions were eligible for Federal matching funds at 77.7 percent. Matching funds received can then be used wherever needed in the Department to provide services for rehabilitation of blind and visually impaired Kentucky citizens in order to place them into employment. During 1991, 370 citizens were placed into employment. Commissions from interstate pay phones is very important to the Department.

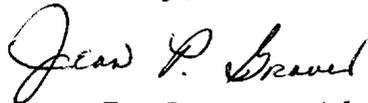
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Honorable Alfred C. Sikes
Federal Communications Commission
July 17, 1992
Page #2

As you can see, adoption of Billed Party Preference would cause loss of telephone commissions and would create a major financial impact on the Department for the Blind. I urge you to take the above into consideration and not approve pending Docket No. 92-77, Billed Party Preference.

Sincerely,



Jean P. Graves, Administrative Specialist
for Interstate Vending
Department for the Blind

David Walters
Governor



Oklahoma Department of Corrections

"Protecting You Is Our Mission"

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Gary D. Meynard
Director

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INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 21, 1992

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

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

Dear Sir:

On behalf of the Lexington Assessment and Reception Center (LARC), I would like to voice my opposition to the above-mentioned proposal.

Lexington Assessment and Reception Center (LARC) is a correctional facility which houses approximately 1,150 inmates. Security is of the utmost importance whether it be in our facility or in our telephone system. Currently, we have a private carrier who processes our inmate telephone calls. There are several advantages to this method; however, the two most important advantages are that the State of Oklahoma taxpayer is the ultimate beneficiary and that the private carrier's operators are trained with the security factor in mind. The current competition among different inmate telephone service providers has benefitted our facility and our inmates with better service, responsiveness, maintenance, equipment, etc. All of this is at no cost to the Oklahoma taxpayer.

It is my understanding the BPP proposal would dismantle the current ability to choose a primary operator service provider on operator-assisted 0+ (collect) calls processed by that carrier. Under BPP, all such calls would be carried by the carrier pre-selected by the billed number party. Since a multitude of carriers would then process calls originating from our inmate telephone system automatically in accordance with billed party preferences, the incentive to obtain exclusive rights to process our 0+ traffic would suddenly disappear. Since an exclusive to telephone service gives the service provider increased revenue which is shared with the facility in the form of a monthly commission, the BPP proposal would result in a significant loss of funds to our facility plus additional expenditures for telephone equipment.

Lexington Assessment and Reception Center

Box 260, Lexington, Oklahoma 73051
(405) 527-5676/FAX (405) 527-9892

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July 21, 1992
Page Two

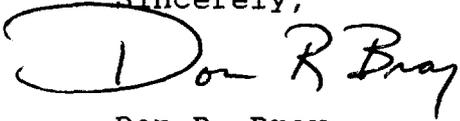
The Honorable Alfred C. Sikes, Chairman

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

With these facts in mind, you can readily see why I am voicing my opposition to the proposal "Billed Party Preference" (BPP) in CC Docket No. 92-77. I strongly feel the BPP proposal will affect the current arrangements concerning our Inmate Phone System.

Please feel free to contact me in the event you have any questions concerning the Inmate Phone System or if I can be of further assistance. Your assistance in this matter is appreciated.

Sincerely,



Don R. Bray
Business Manager
Lexington Assessment and Reception Center

DRB:sdb

cc: The Honorable David Boren
The Honorable Don Nichols
The Honorable Dave McCurdy
The Honorable James H. Quello
The Honorable Sherrie Marshall
The Honorable Ervin S. Duggan
The Honorable Andrew C. Barrett
Gary Phillips, Common Carrier Bureau
Brent Crouse, Warden



New Vision

Chemical Dependency Treatment Facility

TELEPHONE: (512) 268-0079
FACSIMILE: (512) 268-0366

WACKENHUT CORRECTIONS CORPORATION
701 SOUTH IH 35
KYLE, TEXAS 78640-1300

19 July 1992

Honorable 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 Chairman Sikes,

As you may be aware a number of Correctional Institutions throughout the United States allow inmates access to telephones, either due to requirements or as a source of generated revenues, this facility happens to be one of those Institutions.

The funds which are generated through the use of an inmate phone system allow for the provision of equipment and programs which normally are not or can not be funded within the current level of tax dollars in our State. We are under the understanding that currently before your commission is a proposal which would ultimately eliminate our ability to continue to receive revenues from this source. The elimination of this additional funding source deeply concerns those of us in the Corrections field who are working to provide cost effective rehabilitation programs to our prison populations.

We know if this elimination of revenue is allowed to occur we will experience additional operational costs at the state level in order to continue the current level of rehabilitative program. If we reduce the current level of programming due to a lack of funding, we will see a dramatic rise in the recidivism rates and crime rates within our communities. And as you are keenly aware Criminal Justice Agencies within our country are just barely keeping their heads above the crime rate now.

I can not stress enough the importance of allowing facilities such as this one a continuation of this revenue generating opportunity, and I hope that you will give serious consideration to continuation of the current process.

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COMMON CARRIER BUREAU

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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page 2
CC Docket No. 92 - 77

Taxes are high, the economy is bad and funding for prisons and programs are tough enough, please help us by not allowing the elimination of revenues from our inmate phone systems and by doing so you will assist us in providing economical and efficient means for providing rehabilitation for the prison population.

If I can assist you by providing any documented evidence or answer any questions which relate to the importance of this issue, please do not hesitate to contact my office at 512- 268 - 8879.

Sincerely yours,



John L. Bonner
Warden

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

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WASHINGTON SQUARE HOTEL
103 WAVERLY PLACE
NEW YORK, N.Y. 10011
TEL: (212) 777-9515

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BRANCH
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COMMON CARRIER BUREAU

July 13th, 1992

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Alfred C. Sikes
Chairman
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, NW
Washington, DC 20554

RE: FCC BILLED PARTY PREFERENCE IN CC DOCKET 92-77

Dear Chairman Sikes,

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This proposal must be defeated because it will adversely affect our customers, ourselves, our payphone service Company and put the competitive operator service industry out of business.

Very truly yours,

WASHINGTON SQUARE HOTEL



Dan Paul
President

DN/al

- c.c. 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

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GEORGIA DEPARTMENT OF CORRECTIONS

2 MLK Jr. Dr., SE; East Tower
Atlanta, Georgia 30334-4900

Bobby K. Whitworth
COMMISSIONER

July 8, 1992

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INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

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AUG 10 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Dear Chairman Sikes:

I was recently informed of a proposal being considered by the Federal Communications Commission in CC Docket 92-77 regarding Billed Party Preference (BPP). The Georgia Department of Administrative Services provides telephone services for all State agencies and will be making a formal reply on this subject. However, I am writing to express my concern on behalf of this agency.

We do not feel this proposal is in our best interest. The provision of inmate telephone service creates many security problems which can impact the operation of our facilities. The potential for abuse, as well as telephone fraud, are of great concern to us.

Billed Party Preference would impact the ability of the provider to control who carries the traffic resulting in commissions being lowered or eliminated. If the provider no longer generates revenue, most third party inmate telephone services would go out of business. This would eliminate competition and allow the local telephone company to set rates accordingly.

The Georgia Department of Corrections is in the early stages of implementing automated control equipment at our institutions that addresses both our operational needs and the potential for telephone fraud. The Billed Party Preference proposal could force the companies which provide this type equipment out of business.

Automated control equipment gives us the ability to address the following issues:

1. It provides special services such as: number blocking; control of call duration; time of day that service is available; restricting access to telephone numbers such

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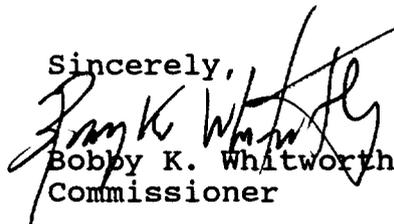
The Honorable Alfred C. Sikes
Page Two
July 8, 1992

as victims, public officials, and prison administrators. These services enable us to manage inmate telephone services with less staff supervision. This allows staff to perform more important duties.

2. We have better controls to reduce telephone fraud and protect private citizens from receiving unwanted telephone communications from inmates in our custody.
3. The automated control equipment we are installing allows our agency on-site system administration of the inmate telephones. Therefore, we have greater security, administrative controls and enjoy some manpower savings.

I trust this information will be useful in assessing the potential impact if the Billed Party Preference proposal is adopted. It can have great negative impact on corrections and warrants careful consideration. If I can provide additional information, please let me know. I can be reached at (404) 656-6002.

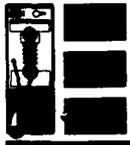
Sincerely,



Bobby K. Whitworth
Commissioner

BKW/MM/BSW/w

cc: Mr. Dennis G. Montgomery, Deputy Director Operations,
Georgia Department of Administrative Services



ASYCOIN Vending Corp.

Coin Operated Telephones • Sales, Leasing and Vending

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ENFORCEMENT DIVISION
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American Public Communications Council



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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 18, 1992

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

Re: CC Docket No. 92-77

Dear Chairman Sikes:

I am writing this letter to you regarding "Billed Party Preference" and how this would effect my business. I currently own 25 payphones from which I receive over \$1,000.00 per month from my operator services provider. Also note that my O.S.P. does give my customers faster and better service than the local exchange carrier. Since I pay commissions to the mostly small business owners where my payphones are located, by implementing BPP would completely wipe out any profit I currently make in this business and ultimately put me out of business! BPP which was initiated by the local telephone companies is a tool to reclaim their monopoly over payphone operator services. BPP will not give customers any more of an advantage to choose which carriers to use for these calls since Federal and State regulations currently guarantee them the right to dial the long distance carrier or operator services provider of their choice. Please give the small business owners a chance to compete in the public communications industry and not let a few large corporations expand their monopolies.

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Sincerely,

Steven M. Saffer
President



TOLL FREE: 1-800-334-5547
TELEPHONE: (803) 448-4311



1405 S. OCEAN BLVD.
P.O. BOX 1568
MYRTLE BEACH, SC 29578-1568

July 14, 1992

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Gentlemen,

I would like for you to take a closer look at CC Docket No. 92-77.
The end result of these "Billed Party Preference Calls" would be to
increase the cost of o+ calls by approximately 25%.

Seldom does a monopoly serve the public interest.

I have just switched to NTI and am very pleased. The problems can
be readily solved by local people. The old system routed problems to
Durham, NC and a bank of computers with few operators.

Sincerely,

W. D. Williams

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Sun Chasers
Tanning Salon
1900 Oak St.
Myrtle Beach
626-8703



Sun System II
Tanning Salon
6203 N. Kings Hwy.
Myrtle Beach
449-1441

Myrtle Beach
Thyppu

HEALTH SPA
6203 N. Kings Hwy.
Myrtle Beach
449-1441

June 7, 1992

Fax: 202-632-0942

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

Subject: Billed Party Preference
Docket CC 92-77

Dear Chairman Sikes:

We have had public payphones for a number of years and to date have been very satisfied with the arrangement with the independent carrier.

We are opposed to making any changes in Billed Party Preference, and see it as a move by the telephone companies to gain control of our location and our choices.

Please note, for the record, our opposition.

Our mailing address is:

1900 Oak Street
Myrtle Beach, South Carolina 29577

Thank you.

Sincerely,

K. M. Ohanesian
K. M. Ohanesian

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

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ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

JC Payphones
1152 - 65th Street
Brooklyn, New York 11219

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

I am a small payphone company owner who was just informed that there is a proposal that the FCC is going to review in CC Docket 92-77 on "Billed Party Preference". My payphone company consists of 25 phones. I am currently using a small long distance company, Cleartel, for my long distance service. The reason why I am using this company is because it provides me with the best commission from operator assisted calls on my telephones.

I understand that if the "Billing Party Preference" comes into effect, it will eliminate my ability to choose an operator service and eliminate the commissions paid to me for operator assisted calls.

As for my business, and a lot of other private payphone owners, a good amount of my income comes from the commission I earn from the long distance company of my choice.

I think that if this bill is passed through the FCC, it would be a great injustice. "Billing Party Preference" would wipe the competition in operator services offered by small carriers and virtually hand it over to local telephone companies who would then monopolize the long distance business.

Just as an owner of a grocery store chooses which company to buy his bread from, shouldn't the owner of a payphone business get to choose the long distance company of his choice?

On behalf of the private payphone owners, I am asking you to please veto the proposal sent to you in CC Docket 92-77 on "Billing Party Preference".

Thank you,

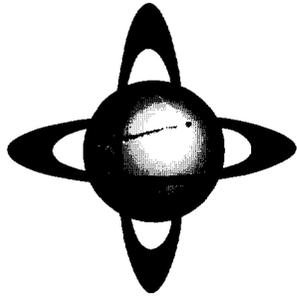
Jerry Castaldo

Jerry Castaldo
President

Mr. Sikes rec'd
BUREAU

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International Communications Systems
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

92-77

July 16, 1992

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

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BRANCH
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Dear Alfred:

The purpose of this letter is to express our opposition to a proposal now being considered by the Federal Communications Commissions in CC Docket 92-77. The proposal, referred to as "Billed Party Preference" (BPP), would change the way long distance carriers are selected on operator assisted calls, such as collect and calling card calls.

International Communications Systems ("ICS") is a corporation formed in 1991 to provide direct dial long distance, operator assisted long distance, equipment sales and service and consulting services for commercial clients throughout the country. In addition, we will be providing similar services to several state controlled correctional facilities.

We are an entrepreneurial company determined to be a force in the telecommunications industry. There are literally hundreds of entrepreneurial firms that have been created in the last eight years since Judge Green broke up AT&T and the Bell companies. The proposed regulation is a serious step backward to the old days. This proposed regulation would benefit only the Bell companies, and really would not benefit the consumer. I would like to know your position on this proposal, as it would adversely affect my business as well as that of many other similar companies.

Sincerely,

David E. Hughes
Chief Financial Officer

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 17, 1992

INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

Mr. Alfred C. Sikes, Chairman
Federal Communication Commission
1919 M Street, N.W.
Washington, DC 20554

Dear Mr. Sikes:

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

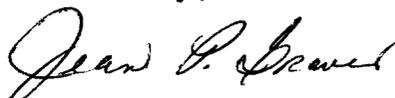
As a consumer of telephone services I would like to express my opinion on the above pending docket.

Kentucky has "equal access" for long distance carriers and from reading information about the above docket, I am at a loss as to how passage would help telephone customers in making 0+ calls.

In my opinion, passage would create an added expense for making a call. Time spent waiting for the LEC to make call connection to the customers long distance carrier is not free. Most people are familiar with 'dial around" and if they are not, most of Kentucky's pay phone have instructions printed on the phone. Also, the local exchange company is not likely to absorb itself the costs of providing services as outlined by Atlantic Bell. Eventually, customers will incur the expenses.

I would like to urge the Commission to not consider this for regulations. My philosophy is, "If it works fine, don't fix it".

Sincerely,


Jean P. Graves

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WETLANDS, INC.
161 HUDSON STREET
NEW YORK, N.Y. 10013
TEL: (212)966-4225

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INFORMAL COMPLAINTS
BRANCH
ENFORCEMENT DIVISION
COMMON CARRIER BUREAU

July 13th, 1992

The Honorable Alfred C. Sikes
Chairman
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, NW
Washington, DC 20554

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AUG 10 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: FCC BILLED PARTY PREFERENCE IN CC DOCKET 92-77

Dear Chairman Sikes,

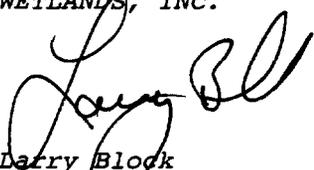
I am the owner of a restaurant whose has public payphone on our premises. These phones were provided to us by a local COCOT (Customer Owned Coin Operator Telephone) service company. We are proud of the level of phone service we provide to the public from our payphones. These new "smart" payphones are technologically superior to the old public phones we had from NYNEX.

Our payphones allows consumers to access their carrier of choice as required by "TOCSIA" and therefore we do not see any need for Billed Party Preference. If BPP is approved at an expense of hundred of millions of dollars to the public to implement, it will only concentrate monopoly power to the local telephone companies and giant national inter exchange carriers. Our operator service Company utilized multi lingual operators, provides voice messaging, electronic mail boxes and accepts major credit cards. Since we cater to many out-of-town visitors, these service which NYNEX does not provide is needed. Additionally BPP would eliminate our commission that we rightfully earn. We would be unable to get a return that compensates us for our investment in equipment, space and management.

This proposal must be defeated because it will adversely affect our customers, ourselves, our payphone service Company and put the competitive operator service industry out of business.

Very truly yours,

WETLANDS, INC.


Larry Block
President

DN/al

c.c. 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

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