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BRERETON C. JONES  
GOVERNOR

MARK A. LOVELY  
COMMISSIONER  
DEPARTMENT OF PARKS

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SECRETARY  
TOURISM CABINET

COMMONWEALTH OF KENTUCKY  
DEPARTMENT OF PARKS  
CAPITAL PLAZA TOWER  
500 MERO STREET 11TH FLOOR  
FRANKFORT KY 40601-1974

July 29, 1992

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

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INFORMATION COMPLAINTS  
ENFORCEMENT DIVISION  
COMMUNICATIONS BUREAU  
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Dear Chairman Sikes,

This letter serves to inform you of the position of the Kentucky Department of Parks on a case (cc Docket No. 92-77) pending before the Federal Communications Commission. This case involves Billed Party Preference (BPP) which would eliminate long distance carrier assignment based upon contractual arrangements for credit card and operator assisted calls.

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

At this time, the Department of Parks has approximately one hundred thirty (130) coin phones spread over thirty two (32) parks which potentially provide service to an estimated ten million visitors annually. In addition, we maintain almost twelve hundred lodge room and cottage accommodations which are open year around. We have contracts in place with a long distance carrier which pay us commissions on 0+ calls made from these locations.

If our visitors wish to access an alternate long distance carrier, they have the ability to make that decision by dialing the 10XXX access code of that carrier. The commission's approval of BPP would remove that decision from the customer and would place it in the hands of the local service provider. This not only denies the user the choice of his preferred carrier, it also would require the local provider to install very sophisticated equipment to accomplish this task. This equipment would also need to be able to distinguish valid credit cards from invalid ones. With twenty-eight (28) companies providing local service within Kentucky, this would, undoubtedly, cause many, if not all of them to raise their rates to help defray the cost of this equipment. This, obviously, does not benefit the user.

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Page Two  
July 29, 1992

Additionally, our commission contracts generate approximately four hundred thousand dollars (\$400,000) in revenue for our department. While our facilities are, to a large degree, self supporting, we do rely upon the Kentucky General Assembly to provide monetary support. The loss of our commission revenue would require us to either cut services to our large number of visitors or to become a bigger burden upon the taxpayers of our state.

In conclusion, it would be totally unnecessary to implement BPP on the grounds of increasing competition and enhancing consumer choice. Present equal access arrangements already accomplish this quite well. It would seem that the commission, if it approves BPP, would be running counter to the adage "if it ain't broke, don't fix it". I urge the Federal Communications Commission to consider the impact of BPP on the consumer as well as governmental agencies such as ours. Thank you for your consideration.

Sincerely,



Mark A. Lovely  
Commissioner



IDAHO SHERIFFS' ASSOCIATION

Box 1623  
Boise, Idaho 83701  
345-9126

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INFORMAL COMPLAINTS  
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COMMON CARRIER BUREAU

CC DO.  
92-77

ORIGINAL  
FILE

July 20, 1992

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AUG 14 1992

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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Mr. Sikes:

It has been brought to the attention of the Idaho Sheriffs Association that the Billed Party Preference Program (BPP) (Docket No. 92-77) would break down any arrangements that had been made which gave the ability to choose a primary operator service provider. This also removes the potential for commissions and thereby a loss of revenue to local governments. The Idaho Sheriffs Association is strongly opposed to this proposal.

With increased telephone fraud and the removal of number block, number searches and operator assistance, it would not be feasible for small counties to install inmate phones. This inmate screening is important, especially in small counties. Idaho is a rural state with small independent phone companies, all of which do not offer specialized services. This would mean that inmates would have to be moved once-a-day to a phone booth to make or receive phone calls. There could be potential problems by moving these prisoners including escape or injury. Sheriffs's departments would have to add additional staff which would increase budgets. In Idaho, this would mean that another office or mandated function would have to suffer. These are some of the reasons that counties have been or are looking at installing inmate phones.

Thank you for the opportunity to voice our concerns on this issue.

Sincerely,

Lewis Pratt, President  
Idaho Sheriffs Association

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6