

RECEIVED

AUG 27 1992

Federal Communications Commission  
Office of the Secretary

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

ORIGINAL  
FILE

In the Matter of	)	
	)	
Billed Party Preference	)	CC Docket No. 92-77
for 0+ InterLATA Calls	)	

AT&T'S REPLY COMMENTS

Francine J. Berry  
Robert J. McKee  
Peter H. Jacoby  
Richard H. Rubin

Attorneys for  
American Telephone  
and Telegraph Company  
Room 3244J1  
295 North Maple Avenue  
Basking Ridge, New Jersey 07920

August 27, 1992

No. of Copies rec'd 0 + 3  
LISTA BODE

TABLE OF CONTENTS

	<u>Page</u>
SUMMARY.....	i
I. MOST OF THE BENEFITS OF BILLED PARTY PREFERENCE ARE ALREADY AVAILABLE ON THE VAST MAJORITY OF OPERATOR SERVICES CALLS.....	2
II. THE COMMENTS CONFIRM THE COMMISSION'S CONCERN THAT BILLED PARTY PREFERENCE WILL BE EXTREMELY EXPENSIVE.....	4
III. THERE IS NO ASSURANCE THAT BILLED PARTY PREFERENCE COULD BE IMPLEMENTED UNIFORMLY, WHICH IS NECESSARY TO AVOID SERIOUS CUSTOMER CONFUSION.....	9
CONCLUSION.....	10

## SUMMARY

The comments confirm AT&T's concern that substantial questions remain about the benefits and costs of billed party preference. Actions by Congress and the Commission have already assured that most of the proposed benefits of this concept are available on the overwhelming majority of operator services calls. Moreover, simple informational requirements, such as "back end" branding on collect calls, can achieve most of the benefits of billed party preference on nearly all remaining operator services calls. Thus, the need for such a system is substantially less now than when the concept was first proposed, and it is more important than ever to balance the proposal's costs against the residual benefits it might provide.

There is no dispute among the commenters that the costs of implementing billed party preference will be high. The evidence in the record on costs is still incomplete, but the estimates that have been provided show that it will take at least one billion dollars in LEC investment, and substantial additional IXC investment, to make this technically complex (and still only partially developed) concept operational. In addition, there are many non-monetary costs which ought to be considered, including the proposal's impact on IXC competition and the possibility that implementation of billed party preference would reduce the number of public telephones available to consumers.

The comments also confirm the Commission's conclusion that billed party preference will not be effective unless it is uniformly applied in all LEC areas. However, the record casts doubt that such uniformity can be achieved, because many smaller LECs will not have the resources to acquire the systems needed to make billed party preference available in their serving areas. As a result, the implementation of billed party preference could increase, rather than reduce, inconvenience and confusion for customers.

Therefore, despite the Commission's laudable effort to obtain information on the billed party preference concept, the record is still incomplete on many crucial issues. The Commission should not require the industry to implement this concept until it has obtained complete and accurate information on the issues raised in the NPRM and can clearly demonstrate that the benefits outweigh the costs.

RECEIVED

AUG 27 1992

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

Federal Communications Commission  
Office of the Secretary

In the Matter of )  
 )  
Billed Party Preference ) CC Docket No. 92-77  
for 0+ InterLATA Calls )

AT&T'S REPLY COMMENTS

American Telephone and Telegraph Company ("AT&T") submits its reply to the comments on the Commission's May 8, 1992 Notice of Proposed Rulemaking concerning the implementation of an automated billed party preference system.<sup>1</sup>

The record demonstrates that it is premature for the Commission to require the implementation of a billed party preference system, because many important questions about its costs remain open. The comments also clearly show that most of the benefits of billed party preference have already been made available on operator services calls as a result of actions taken by customers, carriers, Congress and the Commission. Thus, it is critical for the Commission to have an accurate assessment of the costs that would be required to make the extremely limited additional benefits of billed party preference available to customers.

---

<sup>1</sup> A list of commenters and the abbreviations used to refer to each is appended as Attachment A.

I. MOST OF THE BENEFITS OF BILLED PARTY PREFERENCE ARE ALREADY AVAILABLE ON THE VAST MAJORITY OF OPERATOR SERVICES CALLS.

Numerous commenters<sup>2</sup> agree with AT&T (pp. 5-11) that most of the claimed benefits of billed party preference are already available on the vast majority of operator services calls.<sup>3</sup> These parties point out that legislative and regulatory actions taken by Congress and the Commission have made it possible for all callers to reach their chosen carrier by dialing "0+" at telephones presubscribed to that carrier and by dialing access codes at telephones that are not presubscribed. The requirements of TOCSIA<sup>4</sup> and the Commission's implementing rules have also provided customers with signage and branding information so that they can, in most instances, readily learn the identity of the presubscribed carrier for all telephones at aggregator

---

<sup>2</sup> E.g., BellSouth, pp. 4-5; NYNEX, p. 14 n25; Pilgrim, pp. 13-14; AH&MA, pp. 3-4; ITI, pp. 13-14; Intellicall, pp. 4-6.

<sup>3</sup> AT&T showed (p. 8) that billed party preference is available on almost 90 percent of operator services calls on its network. This percentage is derived based upon the distribution of call types on AT&T's network. It is not related to the fact that AT&T is the carrier preferred by most customers. (See, e.g. CompTel, pp. 12-13) Thus, any similar distribution of calling card, collect, billed-to-third-number, and other operator services calls on other carriers' networks would provide billed customers the same high degree of control over their choice of carrier.

<sup>4</sup> Telephone Operator Consumer Services Improvement Act of 1990 ("TOCSIA"), codified at 47 U.S.C. § 226.

locations.<sup>5</sup> These requirements, together with vigorous enforcement of the Commission's unblocking rules, will make it convenient for customers to access their chosen carriers from any telephone and will achieve the most important goals of billed party preference. Thus, as BellSouth (p. 5) states, "[i]n their totality, these measures represent a significant curative for the abuses . . . which [billed party preference] was intended to address." As a result, the practical need for billed party preference is more attenuated now than it was when the concept was first proposed to the FCC in 1987.

Furthermore, as Pilgrim (pp. 13-14) shows,<sup>6</sup> the carrier selection benefits of the current system could be improved by the addition of simple "back end" branding information on collect calls.<sup>7</sup> This information, which is already provided by a number of carriers today, would enable the called party to know in advance the carrier which is handling the call and give him the opportunity to ask about the carrier's rates before accepting the charges. Such a rule would provide collect customers (i.e., the billed parties)

---

<sup>5</sup> AT&T has advocated the adoption of additional standards for signage to provide customers with better opportunities to identify the presubscribed carrier before dialing their calls. Improved signage would eliminate much of the remaining customer confusion at public and aggregator telephones.

<sup>6</sup> See also AT&T, p. 7 fn.\*\*\*

<sup>7</sup> Collect calls represent a large majority of the calls on which the billed party does not yet have control over the choice of carrier. See, AT&T, p. 8 fn.\*.

with most of the benefits of billed party preference at virtually no incremental cost.<sup>8</sup>

In these circumstances, it is not necessary for the Commission to require the implementation of a complex billed party preference system in order to improve billed party control over the selection of a carrier. Rather, the Commission could make modest rules changes, such as those described above, and give the existing unblocking plan time to operate before it determines whether the incremental benefit of billed party preference is in fact necessary to serve the interests of customers.

II. THE COMMENTS CONFIRM THE COMMISSION'S CONCERN THAT BILLED PARTY PREFERENCE WILL BE EXTREMELY EXPENSIVE.

In the NPRM (¶ 25), the Commission recognized that the implementation of billed party preference could be very expensive, and that the cost data provided previously had varied considerably. The Commission therefore requested detailed information about the actual costs such a system would impose on carriers and customers.

The comments show that, while it is still too early to determine accurately the actual costs, billed party preference will require an enormous investment. The sum of the LEC implementation and capital costs provided by the LEC

---

<sup>8</sup> If the Commission deemed it appropriate, it could also consider adopting a rule which allows a party who rejects a collect call to inform the caller of the carrier he prefers for that call. See Pilgrim, p. 14.

commenters -- who concede that their information is incomplete and even speculative -- totals over \$800 million.<sup>9</sup> Such amounts do not even include the "significant" costs that would have to be incurred by over 1300 smaller LECs.<sup>10</sup> Thus, it is reasonable to assume that the LECs' total costs for implementing billed party preference will easily exceed \$1 billion, and could increase even more over the several years it would take to implement the proposal.<sup>11</sup>

These cost projections have led a majority of the BOCs to question seriously whether the possible incremental benefits of billed party preference are worth the expected price. SWBT (p. 22) states that it "cannot . . . predict that the . . . benefits of [billed party preference] can be realized in a cost-effective, affordable manner." U S West

---

<sup>9</sup> Pacific (p. 19) states that "estimating costs for deployment of a system not yet developed is speculative." Ameritech (p. 18) states that its cost estimates are based upon the "best available information" but acknowledges that the necessary software for end offices and OSSs to accommodate billed party preference "has not been developed or priced by the vendors." Bell Atlantic (Attachment A, pp. 1-2) recognizes that its actual costs could be "significantly different" from those presented, because of the lack of information from vendors and because many cost estimates are sensitive to demand. SWBT (p. 13) declines to provide any cost estimates because "[t]here is simply too much information not yet provided to SWBT to permit total costs and resulting analyses to be provided with reasonable confidence."

<sup>10</sup> USTA, p. 3.

<sup>11</sup> Even the proponents of billed party preference recognize that it could not be implemented until mid-1996 at the earliest. See Ameritech, p. 2; Bell Atlantic, p. 2.

(p. 2) echoes its earlier "circumspection" about the cost/benefit analysis underlying the implementation of billed party preference. BellSouth (p. 7) asserts that billed party preference "offers few competitive advantages in today's environment, while the costs of implementation would be significant." NYNEX (p. 16) is more blunt, concluding simply that "on balance, the cost of billed party preference outweighs the benefits."

The LECs' cost projections have also made it critical, as nearly all of them point out, to develop cost recovery mechanisms.<sup>12</sup> Some LECs, however, urge mechanisms that are clearly inappropriate. Bell Atlantic, for example, suggests (pp. 6-7) that 10XXX access code calls, which would "dial around" (and thus not use) billed party preference, should nevertheless be subjected to charges for billed party preference,<sup>13</sup> while USTA (p. 8) proposes that access code dialing could be prohibited altogether.<sup>14</sup> The former suggestion is flatly inconsistent with the Commission's cost-causation principles, and the latter is irreconcilable with the Commission's commitment to expand customer choice,

---

<sup>12</sup> See, e.g., Pacific, p. 23 ("cost recovery mechanisms are critical"); SWBT, p. 11 (cost recovery a "key concern"); SNET, pp. 1-2; USTA, p. 5; U S West, p. 19.

<sup>13</sup> See also GTE, p. 13.

<sup>14</sup> See also Bell Atlantic, p. 3.

which underlies its description of billed party preference in the NPRM.<sup>15</sup>

In addition to LEC costs, implementation of billed party preference would also require substantial expenditures by IXCs. AT&T (pp. 12-14) demonstrated that its network and other costs to implement billed party preference would likely exceed \$65 million. Costs for many other IXCs, particularly those who have not yet chosen to implement SS7 signaling in their networks, could be proportionally higher than AT&T's.

Moreover, the IXCs' ongoing costs of billed party preference would also be very high. Based upon AT&T's 1991 calling volumes and the expected access charges for billed party preference described in Ameritech's comments, AT&T expects it would face annual access cost increases of at least \$416 million annually. Even after accounting for cost reductions (e.g., in operator processing and commission expenses) due to the implementation of billed party preference, AT&T's annual costs could increase by more than \$236 million, based on these traffic volumes.

Finally, as described in AT&T's comments (pp. 15-16), there are additional costs to billed party preference. The implementation of this proposal would likely reduce IXCs' ability to compete through the offering of new and

---

<sup>15</sup> NPRM, ¶ 16 ("In addition, any caller would be able to 'dial around' billed party preference by dialing an OSP code.")

differentiated operator services, because the LECs' interception of all interLATA 0+ calls in their own operator systems would make it more difficult, if not impossible, for IXCs to develop attractive service enhancements or to create other uses for the 0+ dialing protocol. Other commenters claim that billed party preference could have a significant adverse competitive impact on smaller OSPs<sup>16</sup>, private payphone providers<sup>17</sup>, payphone manufacturers<sup>18</sup> and aggregators,<sup>19</sup> and could lead to a reduction in the number of public and aggregator telephones available to customers.<sup>20</sup>

In sum, the billion dollar price tag and other costs of billed party preference may be disproportionately high in relation to the limited incremental benefits this proposal could bring to customers. The Commission should not subject carriers and customers to such costs without a clear demonstration that the benefits are worth this large expense.

---

<sup>16</sup> See, e.g., ITI, pp. 8-13; RCI, pp. 3-5; Cleartel, pp. 19-23. AT&T has repeatedly warned against the abuses that have been foisted upon the calling public by some OSPs. However, to the extent such companies can abide by the requirements of TOCSIA and the Commission's regulations and are able to attract customers' patronage by offering prices or services that meet consumer needs, they can bring added benefits to the competitive marketplace.

<sup>17</sup> See, e.g., Value-Added, p. 3.

<sup>18</sup> See, e.g., Intellicall, p. ii; NATA, pp. 3-4.

<sup>19</sup> See, e.g., AACI-NA, pp. 11-13; AH&MA, pp. 6-9; NACS, pp. 5-8; Harvard, pp. 1-2.

<sup>20</sup> See, e.g., AACI-NA, p. 11-13.

III. THERE IS NO ASSURANCE THAT BILLED PARTY PREFERENCE  
COULD BE IMPLEMENTED UNIFORMLY, WHICH IS NECESSARY TO  
AVOID SERIOUS CUSTOMER CONFUSION.

Many proponents of billed party preference concur with the Commission's tentative conclusion (NPRM ¶31) that billed party preference would simplify customer dialing requirements "only . . . if dialing requirements were uniform around the country."<sup>21</sup> The need for uniformity arises from the fact that billed party preference will affect customers as they place calls while they travel around the United States. As a result, uniform implementation of the system is the only way customers could be assured that they could reach their desired carrier by dialing "0+", rather than an access code. Any significant lag in implementation would thus create substantial customer confusion over how to use the new system.

The comments indicate, however, that many smaller LECs may not be able to justify economically the implementation of SS7 and AABS for their operator systems,<sup>22</sup> and that others may prefer to use technology other than SS7 to implement the billed party preference interface.<sup>23</sup> Deployment of multiple interface requirements for billed party preference

---

<sup>21</sup> See, e.g. Ameritech, p. 7; Pacific, p. 13; Texas PUC, pp. 7-8; Illinois, Indiana, Ohio and Wisconsin, p. 12; Pennsylvania PUC, pp. 11-12.

<sup>22</sup> OPASTCO, p. 2 (billed party preference could be an "insurmountable investment" for many LECs).

<sup>23</sup> USIN, p. 2 (Commission should not mandate a single network solution for billed party preference).

could result in significantly increased expenses for IXCs,<sup>24</sup> and lack of AABS capabilities will force customers to experience serious service degradation, such as increased access time, call delays and the need for duplicative input of call information. This, in turn, would cause increased customer dissatisfaction and confusion with billed party preference despite its high costs. The Commission should thus seek detailed information from smaller LECs on their ability to participate in billed party preference before deciding whether to order its implementation.

#### CONCLUSION

The practical value of billed party preference is far from clear. Most of the benefits have already been achieved as a result of TOCSIA and Commission actions, and the proposal's incremental benefits can only be obtained at an extremely high, but as yet undetermined, price. There are also many implementation issues that have yet to be resolved. The Commission should not proceed with the billed party preference proposal until it has obtained complete information

---

<sup>24</sup> If AT&T were required to create an MF interface, in addition to an SS7 interface, to implement billed party preference, AT&T anticipates that its implementation costs would increase by approximately \$20 million. In addition, the increase in the call processing time resulting from use of an MF interface would create a need for additional trunking to meet the increased demand for network time.

- 11 -

on these issues and can clearly demonstrate that the benefits of billed party preference outweigh its substantial costs.

Respectfully submitted,

AMERICAN TELEPHONE AND TELEGRAPH COMPANY

By Francine J. Berry  
Francine J. Berry  
Robert J. McKee  
Peter H. Jacoby  
Richard H. Rubin

Its Attorneys  
Room 3244J1  
295 North Maple Avenue  
Basking Ridge, NJ 07920

August 27, 1992

BILLED PARTY PREFERENCE COMMENTERS

City of Abilene

Abloy Security

Advanced Payphone Systems, Inc. ("APSI")

Advanced Technologies Cellular Telecommunications, Inc. ("ATCT")

Airport

Airports Association Council International - North America  
("AACI-NA")

Allegheny County, Department of Aviation

Allnet Communications Services, Inc. ("Allnet")

Southeast Chapter of the American Association of Airport  
Executives ("SEC AAAE")

American Hotel and Motel Association ("AH&MA")

American Jail Association

American Public Communications Council Inmate Calling Services  
Providers Task Force ("ICSPTF")

American Telemanagement, Inc. ("ATI")

American Telephone and Telegraph Company ("AT&T")

Ameritech Operating Companies ("Ameritech")

Arizona Department of Corrections ("ADC")

Barkman Oil Company, Inc.

Bel Air Mall

Bell Atlantic

BellSouth Telecommunications, Inc. ("BellSouth")

City of Billings Aviation and Transit Department

Birmingham Airport Authority

California Department of Corrections

California Payphone Association ("CPA")  
Call America Business Communications, Inc.  
Capital Network System, Inc. ("CNS")  
Cedar Rapids Commissioner of Streets and Public Improvements  
Central Virginia Regional Jail  
Cheyene Airport Board  
Clark County, Nevada Department of Aviation ("Department")  
Cleartel Communications, Inc., Com Systems, Inc., International  
Pacific, Inc., and TelTrust Communications Services, Inc.  
("Cleartel")  
ComCentral Corp.  
Competitive Telecommunications Association ("CompTel")  
ComTel Computer Corporation ("ComTel")  
Consolidated Communications Operator Services, Inc., Illinois  
Consolidated Telephone Company, Consolidated Network Inc., and  
Consolidated Communications Public Services ("Consolidated")  
Country Fair, Inc.  
Cox Enterprises, Inc.  
Dallas/Fort Worth International Airport Board ("DFW Airport  
Board")  
D.C. Petroleum, Inc.  
District of Columbia Department of Corrections  
Duke University  
Eastern Telephone Company, Inc.  
Elcotel, Inc.  
Fayetteville Airport Division  
Firstel Systems, Inc. ("FSI")  
Florida Department of Corrections

Florida Public Service Commission ("FPSC")  
City of Fresno Department of Airports  
State of Georgia Telecommunications Division of the Department  
of Administrative Services ("DOAS")  
Great Falls International Airport Authority  
Greater Orlando Aviation Authority ("GOAA")  
Greenville-Spartanburg Airport Commission  
GTE Service Corporation ("GTE")  
Harvard University  
Hospitality Communications, Inc.  
Huntsville Madison County Airport Authority  
Idaho Sheriffs' Association  
Illinois Department of Central Management Services ("CMS"),  
Bureau of Communications & Computer Services ("BCCS")  
Illinois Commerce Commission, Indiana Utility Regulatory  
Commission, Public Utilities Commission of Ohio, and Public  
Service Commission of Wisconsin ("Illinois, Indiana, Ohio and  
Wisconsin")  
Independent Payphone Association of New York, Inc. ("IPANY")  
Independent Telecommunications Network, Inc. ("ITN")  
Indiana Office of Utility Consumer Counselor ("Indiana") and  
Pennsylvania Office of Consumer Advocate ("Pennsylvania")  
Intellicall, Inc. ("Intellicall")  
International Telecharge, Inc. ("IT")  
Iowa Department of Corrections  
City of Kansas City, Missouri Telecommunications  
Commonwealth of Kentucky Department of Parks  
Kern County Sheriff's Department  
County of Lehigh Department of Corrections

LinkUSA

LiTel Telecommunications Corporation d/b/a LCI International  
("LCI")

Little Rock Regional Airport

Louisville-Jefferson County, Kentucky Department of Disaster  
and Emergency Services

MasterCard International Incorporated ("MasterCard") and VISA  
U.S.A., Inc. ("VISA")

MCI Telecommunications Corporation ("MCI")

Memphis-Shelby County Airport Authority ("Authority")

City of Mesa Management Services

MessagePhone, Inc. ("MessagePhone")

Philip A. Messina

City of Miami, Florida

Michigan Public Service Commission Staff ("Staff")

Midwest Independent Coin Payphone Association ("Midwest")

Missouri Public Service Commission ("MoPSC")

MIT Information Systems ("MIT")

State of Montana Department of Administration

State of Montana Department of Corrections and Human Services

Montana State University

Monterey Peninsula Airport District

National Association of Convenience Stores ("NACS")

National Association of Regulatory Utility Commissioners  
("NARUC")

National Sheriffs' Association

National Telephone Company ("NTC")

Natrona County International Airport

State of New Jersey Board of Regulatory Commissioners

New York City Department of Telecommunications and Energy ("City  
of New York")

New York Telephone Company and New England Telephone and  
Telegraph Company ("NYNEX")

North American InTeleCom

North American Telecommunications Association ("NATA")

North Carolina Department of Correction

North Carolina Petroleum Marketers Association

Northwest Pay Phone Association ("NPPA")

Ohio Department of Administrative Services, Division of Computer  
and Information System Services, Telecommunications Section

Ohio Department of Rehabilitation and Correction

One Call Communications, Inc. d/b/a OPTICOM ("Opticom")

Orange County Government

Oregon Department of Corrections, Institutions Branch

Organization for the Protection and Advancement of Small  
Telephone Companies ("OPASTCO")

Pacific Bell and Nevada Bell ("Pacific Companies")

The Pantry, Inc.

Pay-Tel Corporation

Commonwealth of Pennsylvania

Pennsylvania Public Utility Commission ("PaPUC")

Petro PSC, L.P.

Petroleum Marketers Association of America ("PMAA")

Phone Home Enterprises

PhoneTel Technologies, Inc. ("PhoneTel")

Pilgrim Telephone, Inc. ("Pilgrim")

Plaza at Latham Associates  
Polar Communications Corporation  
Portland 76 Auto/Truck Plaza Inc.  
Quest Communications Corporation ("Quest")  
Quik Chek Food Stores  
County of Racine  
RCI Long Distance, Inc. ("RCI")  
Richfield Truck Stop, J-Arrow, Inc.  
Sacramento County, Department of Airports  
Salt Lake City Airport Authority  
San Diego Payphone Owners Association  
Port of Seattle  
National Brands, Inc. d/b/a Sharenet Communications Company  
("Sharenet")  
South Carolina Correctional Association ("SCCA")  
State of South Carolina Division of Information Resource  
Management ("DIRM")  
South Carolina Jail Administrators Association ("SCJAA")  
State of South Carolina Public Service Commission  
S.C. Sheriffs' Association  
The Southern New England Telephone Company ("SNET")  
The Southland Corporation  
Southwestern Bell Telephone Company ("SWBT")  
Sprint Corporation ("Sprint")  
Strategic Alliances Inc.  
Superior Electronics  
Telephone Operating Systems Inc.  
Teltronics Inc.

State of Tennessee Department of Finance and Administration  
Office for Information Resources ("OIR")

Public Utility Commission of Texas ("Texas PUC")

Tri-Ton, Inc.

Tulsa Airport Authority

U.S. Intelco Networks, Inc. ("USIN")

U.S. Long Distance, Inc. ("USLD")

U S WEST Communications, Inc. ("U S WEST")

United States Telephone Association ("USTA")

Universal Technology & Communications Corporation

Utah Department of Corrections

Valley International Airport

Value-Added Communications, Inc. ("Value-Added")

Virginia State Sheriffs' Association

State of Washington Department of Corrections ("DOC")

Washington State Jail Association

Wichita Airport Authority ("WAA")

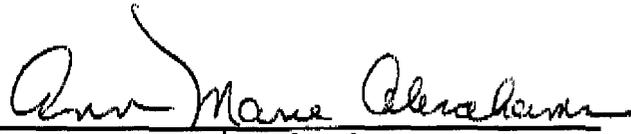
Wisconsin Department of Corrections

State of Wyoming Dept. of Administration and Information,  
Telecommunications Division

Youngs Food Stores, Inc.

CERTIFICATE OF SERVICE

I, Ann Marie Abrahamson, certify that on this 27th day of August, 1992, a true copy of the foregoing "AT&T Reply Comments" was served by first class mail, postage prepaid, upon the parties on the attached list.

  
Ann Marie Abrahamson

SERVICE LIST

Cheryl A. Tritt\*  
Chief, Common Carrier Bureau  
Federal Communications Commission  
1919 M St., N.W., Rm. 500  
Washington, D.C. 20554

Gregory J. Vogt\*  
Chief, Tariff Division  
Common Carrier Bureau  
Federal Communications Commission  
1919 M St., N.W., Rm. 518  
Washington, D.C. 20554

Colleen Boothby\*  
Deputy Chief, Tariff Division  
Federal Communications Commission  
1919 M St., N.W., Rm. 518  
Washington, D.C. 20554

Judy Nitsche\*  
Chief, Tariff Review Branch  
Federal Communications Commission  
1919 M St., N.W., Rm. 518  
Washington, D.C. 20554

Policy & Program Planning Division\*  
Common Carrier Bureau  
Federal Communications Commission  
1919 M St., N.W., Rm. 544  
Washington, D.C. 20554

Downtown Copy Center\*  
1919 M St., N.W., Rm. 246  
Washington, D.C. 20036

Jim C. Blagg  
City of Abilene  
P. O. Box 60  
Abilene, TX 79604

Charlie Armstrong  
Abloy Security Group  
P. O. Box 35406  
Dallas, TX 75235

Steve Schude  
Advanced Payphone Systems, Inc.  
535 W. Iron Avenue, Suite 122  
Mesa, AZ 85210

Sutherland, Asbill & Brennan  
1275 Pennsylvania Ave., N.W.  
Randolph J. May  
Elizabeth C. Buckingham  
Washington, D.C. 20004-2404  
Attorneys for Advanced Technologies  
Cellular Telecommunication, Inc.

Douglas F. Brent  
Advanced Telecommunications Corporation,  
Americall Systems, Inc., and First  
Phone of New England, Inc.  
10000 Shelbyville Road  
Louisville, KY 40223

Bern E. Case  
Airport  
Lubbock International Airport  
Route 3 Box 389  
Lubbock, TX 79401

Barney C. Parella  
Airports Association Council  
International - NA  
1220 19th St., N.W., Suite 200  
Washington, D.C. 20036

Ian D. Volner  
Cohn and Marks  
Suite 600  
1333 New Hampshire Ave., N.W.  
Washington, D.C. 20036  
Counsel for Airports Association  
Council International - NA

Perry O. Hooper, Jr.  
House of Representatives  
Dist. No. 78 Montgomery County  
Alabama State House  
Montgomery, AL 36100

\* Service by hand delivery.

Taylor F. Harper  
House of Representatives  
District No. 108 Mobile County  
Alabama State House  
Montgomery, AL 36100

Mary C. Kimball  
Alamo Rent A Car  
1401 S. Federal Highway  
P. O. Box 22776  
Fort Lauderdale, FL 33335

Scott R. O'Donnell  
Department of Aviation  
County of Allegheny  
Room M134, Terminal Bldg.  
Greater Pittsburgh International Airport  
Pittsburgh, PA 15231

Roy L. Morris  
Allnet Communication Services, Inc.  
1990 M. St., N.W., Suite 500  
Washington, D.C. 20036

C. M. Armour  
Southeast Chapter  
American Association of  
Airport Executives  
Southwest Georgia Regional Airport  
3905 Newton Road  
Albany, GA 31707

Brian J. Kinsella  
Thomas F. Youngblood  
American Hotel and Motel Assn.  
1201 New York Ave., N.W.  
Washington, D.C. 20005-3931

Richard G. Kiekbusch  
American Jail Association  
1000 Day Road, Suite 100  
Hagerstown, MD 21740

Albert H. Kramer  
Robert F. Aldrich  
Keck, Mahin & Cate  
Penthouse Suite  
1201 New York Ave., N.W.  
Washington, D.C. 20005-3919  
Attorneys for the American Public  
Communications Council

John F. Dodd  
Brad I. Pearson  
Smith, Gill, Fisher & Butts  
One Kansas City Place  
1200 Main St., 35th Floor  
Kansas City, MO 64105-2152  
Attorneys for American  
Telemanagement, Inc.

Floyd S. Keene  
Larry A. Peck  
Ameritech Operating Companies  
Room 4H86  
2000 West Ameritech Center Dr.  
Hoffman Estates, IL 60196-1025

Stanley F. Bates  
Arizona Department of Corrections  
1601 West Jefferson Street  
Phoenix, AZ 85007-3003

Arlan D. Barkman  
Barkman Oil Co., Inc.  
P. O. Box 175  
Woodbury, PA 16695-0175

Roy V. Taylor  
Bel Air Mall  
3299 Bel Air Mall  
Mobile, AL 36606-3202

John M. Goodman  
Charles H. Kennedy  
Bell Atlantic Telephone Companies  
1710 H Street, N.W.  
Washington, D.C. 20006

William B. Barfield  
Richard M. Sbaratta  
Helen A. Shockey  
BellSouth Telecommunications, Inc.  
1155 Peachtree Street, N.E., Suite 1800  
Atlanta, GA 30367-6000

J. Bruce Putnam  
City of Billings  
Aviation and Transit Dept.  
Room 216  
Billings Logan International Airport  
Billings, MT 59105-1996