

through new service treatment under price caps. However, several commentators raise concerns with new service treatment, fearing that a per-call charge for a new service would only serve as an incentive to OSPs to promote the use of access code dialing to avoid billed party preference charges, thereby increasing the unit cost still further, causing additional declines in demand for billed party preference, etc., thus creating a danger of stranded investment for the LEC industry. Numerous suggestions were made to solve this potential problem. NYNEX (at 19) proposed that the cost of billed party preference be recovered through an increase to the end user common line (EUCL) charge. Others suggested that the billed party preference charge be imposed on all operator assisted calls, regardless of whether those calls were dialed 0+ or with an access code.¹⁹

Sprint agrees that the potential for OSPs to refrain from participating in billed party preference in order to avoid billed party preference charges exists. One way to mitigate this problem would be to impose the billed party preference charge on all operator assisted calls, not just 0+ and 0- calls, but it is not clear that such a solution is technically feasible. If it is not, Sprint would instead join those commentators²⁰ proposing that billed party preference costs be treated as exogenous under price caps. Specifically, exogenous treatment would result in an adjustment to the price cap formula such that billed party

¹⁹ See, e.g., GTE at 13; and Bell Atlantic at 6.

²⁰ E.g., Ameritech at 20; Bell Atlantic at 5-6.

preference costs would be recovered through existing access rate elements. Although this could be viewed as a step in the opposite direction from other Commission initiatives to unbundle access into its component parts, exogenous treatment is worthy of consideration as the best means of achieving an operator services environment that serves the public interest.

Likewise, the separations effects of billed party preference need to be addressed. US West and others correctly conclude that billed party preference investment and expense will be subject to separations, and it is not clear at this time how separations will affect the LECs' opportunity to recover their implementation costs.

III. THE COMMISSION, ON THIS RECORD, SHOULD NOT REQUIRE COMPENSATION FOR PUBLIC PHONE PREMISES OWNERS.

Not surprisingly, the parties who benefit today from commissions paid by presubscribed operator service providers -- including airports, convenience stores, hotels and motels, and private payphone providers -- argue that if the Commission does implement billed party preference, it should require a form of compensation similar to the dial-around compensation it recently ordered in Docket 91-35.²¹ The basic claim that is made is that the amounts received in the form of commission payments from the presubscribed OSP are necessary to defray the costs of installing and

²¹Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation, 7 FCC Rcd 3251 (1992), which ordered interim compensation of \$6.00 per line per month to private payphone providers for calls using access codes to dial around the presubscribed operator service provider.

maintaining the telephone equipment, and/or to compensate the premises owner for the value of the space devoted to the phones, and without these compensation payments, the availability of public phones is likely to diminish, and/or the costs of providing such phones would have to be absorbed by other goods or services sold by the premises owners.

The possible payment of compensation to public phone premises owners under billed party preference poses a number of complex issues which have not been fully addressed by the proponents of such compensation. First, while there is some disagreement on the issue in the record, the preponderant view is that only nominal commission payments were made in the pre-divestiture era.²² Thus, the revenue streams here in question reflect in large measure the market power of the premises owners. Furthermore, many premises owners install public phones for the convenience of their patrons and would find it difficult to attract customers if they did not do so. A phone in a hotel room, for example, is as much a standard fixture as a television set or a bedside lamp. And in many locations, public phones do not occupy space that is likely to be devoted to other uses. In airports, payphones are often located along concourse corridors, in baggage claim side areas, or near passenger gates -- areas that would likely remain idle if the phones were not there. In short, there

²² Compare National Association of Convenience Stores at 13 and Intellicall at 16-17 (predivestiture commission levels were very low), with AHMA at 12 (predivestiture commissions were 15% of revenues).

is no evidentiary basis -- on this record -- for a finding that compensation from OSPs would be necessary as a general rule to assure continued availability of public phones.

Sprint does not contend that public phones are cost-free, and does not dispute the need to provide economic incentives so that payphones are available at all locations where such availability would serve the public interest. However, it does not follow that a Commission-mandated system of compensation from OSPs is needed to accomplish this goal. Premises owners and private payphone providers should have the right to charge the public directly for the use of their equipment, for example, by requiring a coin deposit for every long-distance call from payphones or, in the case of hotel phones, merely by continuing the common practice today of adding a per-call fee on the customer's room bill. Recovering such charges up front from the consumer has a distinct public policy advantage: the consumer knows, in advance, what he or she would have to pay to use the public phone in question and thus can make a conscious decision whether to utilize that phone or instead to place the call from another location. Under the current system of presubscription, the commission payments premises owners impose are folded into the OSP's charges, and the surcharges some premises owners impose are not disclosed until the call is billed -- long after the user may have left the premises. Thus, there is little direct incentive for the premises owners to keep their surcharges at a moderate level -- indeed, the opposite incentive exists. Premises owners are more likely to seek to extract monopoly profits if they can use middlemen, such as OSPs, to hide those

profits in the rates charged to the end user, than if the premises owners charged the users directly and up-front themselves. With all the turmoil and public doubt caused by the exorbitant rates charged by many alternative operator service providers, the public would probably rather pay a modest up-front charge for the use of a public phone than to be unpleasantly surprised weeks later when they are billed for the call.

Furthermore, none of the proponents of compensation for premises owners or private payphone providers has addressed the Commission's jurisdiction to require such compensation. What is involved here is the provision of CPE to end users to enable them to access operator service providers. The provision of CPE, of course, is a nonregulated, non-common-carrier activity outside the scope of the Commission's Title II jurisdiction. In making their equipment available for interstate calls, the public phone premises owners and private payphone providers are not providing a common-carrier transmission service, and thus are not entitled to receive compensation in the form of either tariffed charges under Section 203 of the Act or divisions of tolls under Section 201. While the provisions in Section 226 arguably provide the Commission with jurisdiction to award dial-around compensation to private payphone providers, there are no analogous provisions in the statute directing or authorizing the Commission to examine compensation to equipment owners in any other context. To prescribe compensation in other than the dial-around context would be a significant stretch of the Commission's jurisdiction -- not unlike having the Commission determine the amount of

compensation payable to employees or provisioners of other goods and services to the interexchange carriers.

Any such compensation scheme would also place the Commission in the quagmire of attempting to determine on what basis to set the compensation. To attempt to maintain the current level of compensation, as many proponents of compensation advocate, would not only be very difficult to accomplish, since the level of compensation may well vary from one premises owner to the next, but would also permanently build into the operator services rate structure commission levels that have never been scrutinized by the Commission nor determined to be consistent with the public interest. One of the basic premises underlying billed party preference is the belief that the present system of public phone presubscription has resulted in burdening the public with commission payments to premises owners that are simply excessive and ultimately anticompetitive. To incorporate those commission levels into a compensation scheme for premises owners, on top of the not inconsiderable costs of making the necessary network modifications to implement billed party preference, could affect the calculus of whether billed party preference is in the public interest.

IV. BILLED PARTY PREFERENCE SHOULD BE IMPLEMENTED UNIVERSALLY AND FOR AS WIDE A VARIETY OF ALTERNATE BILLING ARRANGEMENTS AS IS FEASIBLE.

The weight of the record in this proceeding demonstrates that billed party preference can be implemented both in equal

access areas and non-equal access areas.²³ As Sprint discussed in its initial comments, Sprint believes that billed party preference should be implemented, on a flash-cut, nationwide basis from all phones including public phones and ordinary business and residential phones, although somewhat different technical standards may be appropriate for some period of time for independent LECs because of the cost to them of offering a state-of-the-art, user-friendly system of billed party preference. Without this plenary implementation of billed party preference, one of the chief purposes of billed party preference -- simple, easy to use dialing procedures for consumers -- will be defeated, if consumers have to use one different dialing patterns from different types of phones or phones in different areas.

However, after reviewing the comments of other parties, Sprint believes an exception can be legitimately made in the case of inmate-only phones from correctional institutions. A number of parties representing correctional institutions have argued in some detail that they need to be able to work with a predetermined operator service provider in order to assure adequate security measures and restrictions on the identity of persons whom they permit their inmates to call. Sprint believes that the increasing trend in the industry is towards debit-type systems for inmate-only phones, in which case the use of multiple OSPs

²³ See, e.g., Ameritech, n. 21 at 7, GTE at 10, and Southwestern Bell at 18.

from any particular phone should never occur. However, because of the unique circumstances of the correctional institutions and the inmate population, Sprint would not object to exempting these phones from billed party preference.

Sprint also urges the Commission to include as wide a variety of cards within the billed party preference system as is reasonably feasible. In particular, the Commission should order the LECs to modify their LIDBs to permit 14-digit screening, so that IXC's can continue to issue proprietary line-number based cards with their own unique PINs. It is self-evident that line numbering for calling cards is the most convenient and consumer-friendly numbering system, and there is no reason why all carriers should not have an opportunity to employ this convenient numbering plan if they wish. Ameritech (at 12) concedes that 14-digit screening is technically feasible, and BellSouth (at 7) estimates the cost of the necessary software at a modest \$720,000, which could be spread over all LIDB owners.

Both carriers, however, claim that there are numerous administrative issues in allowing multiple 14-digit line-number based cards for a particular customer. One of these tasks is the need to avoid duplicate number assignments. Assuming random generation of the 14-digit PIN, an IXC and a LEC will issue the same PIN once every 9,999 cards. There are a variety of ways that this problem could be surmounted. One would be simply to let the end users pick the PINs for each line-number based card, and clearly instruct the end user to avoid duplication. Another way to avoid difficulties would be a "first-come-first-served approach," in which the first carrier to issue a line-number

based card (whether the carrier is the LEC or the IXC) would load its PIN into the LEC LIDB. Each subsequent carrier issuing a card would merely have to check with the LIDB owner to ascertain whether the PIN it has tentatively assigned is already in use; if it is, the carrier could assign a different PIN.

Another issue raised is the need to determine under what criteria and by whom a card would be removed from service. The LEC, as the owner of the LIDB, would be in a better position to monitor high usage thresholds that signify potential for fraudulent use of a calling card number, but there is no reason why adequate, real-time channels of communication could not be established between the LECs and the IXCs who load their cards into the LEC database to determine when a particular card should be pulled from the database. In short, while there undoubtedly would be administrative details to be worked out between the IXCs and the LECs, none of these problems is insurmountable, and clearly these minor administrative matters should not stand in the way of making line numbered cards available to all carriers that wish to issue them.

Sprint also supports, to the extent feasible, the inclusion of commercial credit cards in the initial implementation of billed party preference. Certain parties claim that commercial credit cards raise technical issues which are best left to resolve in a later phase of implementation. One such problem is that commercial calling cards are of variable length. However, it appears from the comments of MasterCard and Visa (at 8) that the technical modifications to the LECs' software to permit acceptance of variable length credit cards are feasible.

Moreover, they assert (n. 12 at 8) that their card numbering plans are consistent with the ISO/ANSI plan that the "891" numbering system is based on, which should make the identity of the card issuer ascertainable. Therefore, as long as the card issuers maintain a database that is accessible by normal industry standards and procedures, and are willing to accept reasonable fraud control measures, Sprint would welcome the inclusion of these cards in billed party preference. As the Airports Association Council International points out (at 10), this would greatly convenience those travellers who choose not to carry LEC-issued or OSP-issued calling cards.

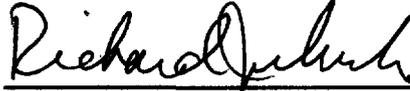
V. CONCLUSION.

While there is need for further exploration of the costs of billed party preference, the record fully supports a decision to move forward with ubiquitous deployment, albeit with service standards that differ, at least initially, as between the RBOCs and other LECs, as recommended in Sprint's initial comments. In order to gain a more thorough understanding of implementation costs and to decide how those costs should be recovered, the Commission should direct the parties to discuss and resolve service design issues and require the LECs to submit detailed information on implementation costs (including the extent to

which those costs would have been incurred in any event) in light of that resolution.

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