

James M. Smith
President

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September 29, 1992

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

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SEP 29 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte Statement
CC Docket No. 92-77

Dear Ms. Searcy:

On September 28, 1992, the Competitive Telecommunications Association (CompTel), represented by Gregory M. Casey, Senior Vice President, International Telecharge, Inc. d/b/a/ Oncor Communications; Brad Mutschelknaus, Wiley Rein & Fielding; and the undersigned, met with Commissioner Andrew C. Barrett and Madelon Kuchera to discuss CompTel's position in the above-referenced proceeding. The attached document was used during the presentation.

Kindly address any questions concerning this correspondence to the undersigned.

Sincerely,

James M. Smith
James M. Smith

cc: Commissioner Barrett
Ms. Kuchera

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List A B C D E

CIID CARD POLICIES

I. An Open Validation Database Has Many Public Benefits

- A. Consumers can complete all 0+ dialed calls
- B. Consumers can choose AT&T through 10288
- C. With a "rate cap," consumers always get their expected rate
- D. Anti-competitive leveraging of dominant power is removed

II. Consumer Education Alone Is Likely To Be Inadequate

- A. 10288 Dialing instructions will have only a temporary effect
- B. AT&T has no incentive to educate consumers
- C. Consumers have little incentive to use 10288

III. Consumer Confusion and Frustration Can Be Eliminated

- A. An open validation database would
 - end 0+ call blocking
 - give AT&T proper incentives
 - protect competition
 - allow consumers to complete all 0+ calls from every phone
- B. AT&T "rate cap" would ensure against overcharges

IV. 0+ in the Public Domain Is Technically and Legally Feasible

- A. Technical arrangements already exist for LECs, others
- B. No proprietary information need be disclosed
- C. Title II dominant carrier regulation applies, but exercise of Title I should be adequate