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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY



CONQUEST OPERATOR SERVICES CORP.

September 30, 1992

**BY HAND DELIVERY**

Ms. Cheryl Tritt  
Chief, Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W., Room 500  
Washington, D.C. 20554

Re: Written Ex Parte Statement in CC Docket 92-77  
Supporting 0+ in the Public Domain

Dear Ms. Tritt:

Conquest Operator Services Corp. ("Conquest") hereby submits this written ex parte statement pursuant to Section 1.1206(a)(1) of the Commission's Rules, 47 C.F.R. § 1.1206(a)(1), to urge the Commission to adopt a policy of "0+ in the public domain," as recently advocated by the Competitive Telecommunications Association ("CompTel") and numerous operator service companies in a letter filed in this docket on September 18, 1992 ("CompTel Letter").

Conquest is an interexchange carrier ("IXC") based in Dublin, Ohio, which provides interstate operator services to users at aggregator locations presubscribed to Conquest, such as pay telephones and hotels. End users obtain access to Conquest's services using a 0+ dialing sequence (i.e., 0+ area code and number).

Conquest shares the significant interest of numerous IXC commenters in the FCC's proceeding to consider rules addressing the competitive problems AT&T's Card Issuer Identifier ("CIID") calling cards have created in the 0+ marketplace. Conquest agrees with many other OSPs participating in this docket that, to preserve operator services competition, the Commission should order AT&T -- the dominant carrier -- to permit other IXCs access to validation and billing for its CIID cards used on a 0+ basis at call aggregator locations.

We further agree with the CompTel Letter that, if the Commission deems it necessary and appropriate, the Commission could specify that the availability of the validation and billing information for the AT&T CIID cards will be conditioned upon a requirement that 0+ calls billed to the cards by other IXCs must

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*Handwritten initials/signature*

Ms. Cheryl Tritt  
September 30, 1992  
Page 2

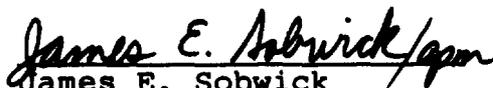
be charged at rates not exceeding AT&T's standard tariffed rates. Although this condition ignores that competitive IXCs in the operator service market lack AT&T's cost advantages and economies of scale, Conquest would accept this condition if the Commission determines that it will promote the effective implementation of a 0+ public domain policy and serve the public interest.

The record in this proceeding is replete with evidence that AT&T's CIID cards used with 0+ access at locations not presubscribed to IXCs is destroying competition, raising the costs of AT&T's competitors, and frustrating consumers. This situation demands a prompt solution. At its April, 1992 open meeting, the Commission pledged to address expeditiously this serious competitive problem.

Conquest agrees with the numerous parties to the CompTel Letter that a Commission policy of 0+ in the public domain is a proper solution. We agree with the CompTel Letter's specific recommendations for ensuring that this policy is effectively enforced, and that its technical implementation proceeds smoothly. See CompTel Letter at 4-5.

As required by the FCC's rules, two copies of this letter have been filed with the Commission Secretary's office. Should you have any questions about Conquest's views, or if we may be of assistance to the Commission with respect to consideration of the AT&T CIID card issues in this proceeding, please do not hesitate to contact the undersigned.

Respectfully submitted,

  
James E. Sobwick  
President

cc: Charla M. Rath  
Lauren J. Belvin  
Kathleen Q. Abernathy  
Madelon A. Kuchera  
Linda L. Oliver  
Marianne A. Townsend, Director of Administrative  
and Regulatory Affairs, Conquest Operator Services Corp.