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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 SUPPLEMENTAL COMMENTS

American Telephone and Telegraph Company ("AT&T") submits this response to the Commission's request for further comment on potential methods for compensating operator service providers ("OSPs") who wish to transfer to the network of the card issuer 0+ dialed calls that customers wish to charge to proprietary calling cards.¹

The issue which these comments address is an interim one that will likely be of short duration. Implementation of the Commission's unblocking requirements, together with the multi-million dollar educational campaign AT&T will shortly undertake, will substantially reduce the number of instances in which proprietary calling card holders inadvertently reach the wrong carrier. Most holders of IXC-issued proprietary cards already know how to use appropriate access codes. Therefore, as those customers

¹ In the Matter of Billed Party Preference for 0+ InterLATA Calls, Report and Order and Request for Supplemental Comment, CC Docket No. 92-77 Phase I, released November 6, 1992 ("Order"), ¶ 64.

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become accustomed to checking the signs at aggregator telephones before dialing their calls, the number of misdirected calls should slow significantly within a relatively short time.²

AT&T has recently reviewed a number of possible technical mechanisms that might be used to accomplish the type of transfers referenced by the Commission. None of these mechanisms appears to offer a technically simple and cost-effective solution that is convenient for customers and will work universally. Moreover, the application of a transfer mechanism does not encourage customers to learn and use the correct dialing protocols when placing calling card calls.

From a technical perspective, the only efficient type of transfer would appear to be one that allows the receiving OSP to receive calls directly from the originating telephone at the operator center from which it serves that telephone. This type of transfer enables the receiving carrier to handle the call using its standard operating procedures and does not require the original OSP's network

² The impact of even the best educational campaign will be muted if TOCSIA's mandatory signage requirements are not met. However, signage still remains a problem at approximately one-sixth (14%) of all aggregator telephones. Final Report of the Federal Communications Commission Pursuant to the Telephone Operator Consumer Services Act of 1990, November 13, 1992, p. 15. It is therefore imperative that the Commission continue aggressively to enforce TOCSIA's signage requirements and the Commission's own unblocking rules.

to remain in the call path for the entire call. Even this type of transfer, however, has two major drawbacks in the current technical environment. First, existing mechanisms which allow for such transfers could impair the quality of service provided to the customer, because calls dialed on a 0+ basis may be transferred to the receiving carrier as "0-" calls, thus requiring the caller to provide the called number and/or card number twice.³ Second, even this reduced form of service can only be provided at a minority of aggregator telephones, because transfers of this type can only occur when the call is originated at a "smart" public telephone or a telephone served by a PBX that can receive and process a signal from the transferring OSP to drop the original call and re-dial a call to the receiving carrier's operator center.⁴

All other types of currently available transfer mechanisms known to AT&T have even greater cost and technical disadvantages. These mechanisms do not connect the originating telephone directly with the receiving carrier's operator center. As a result, the original OSP's

³ The Commission expressed concern about similar problems in its inquiries about billed party preference in the other phase of this docket. See NPRM ¶26.

⁴ The intelligence required for such transfers is unavailable in "ordinary" public telephones, including virtually all of the 1.5 million LEC payphones. It is also unavailable to telephones served by PBXs, except those that are specially equipped with software to process the "triggering" signal from the original OSP.

network must remain in the call path for the entire duration of the conversation. Thus, each single transferred call requires two carriers to use their network facilities and, in many cases, to pay duplicative access charges.⁵

Transfers which avoid duplicative access charges require the establishment of direct trunking or inter-networking between OSPs. This, in turn, raises the need for additional expense and/or capital investment to establish such facilities. It also significantly increases the technical complexities of call transfers, creating the potential for impaired service quality due, e.g., to network incompatibilities between the carriers' operator systems, or to the substantial additional mileage that may be involved in routing a transferred call. Moreover, many types of transfers will require labor-intensive dialog between an operator and the customer that will result in even higher costs.

In addition, such indirect transfers do not allow the receiving carrier to exercise end-to-end control over the entire call. This prohibits the carrier from assuring

⁵ Per a typical "splashed" call transferred through LEC facilities at a distant operator location, the original OSP would pay originating access charges at the originating location and terminating access at its operator location. The receiving carrier would pay originating access at its operator center and terminating access at the terminating end of the customer-dialed call. At an average cost of \$.035/minute for access, this adds an average of up to \$.07 per minute for every transferred call, in addition to the network expense of the original OSP.

that the call will meet its own standards (and the customer's expectations) for service quality, and it does not allow the carrier to minimize its internal costs by using the most efficient facilities to carry the call. Moreover, such transfers do not necessarily assure that the receiving carrier will get Automatic Number Identification ("ANI") for the originating telephone⁶ or the other identification digits necessary to provide adequate screening functions. Failure to receive such information in a usable form would make it difficult, if not impossible, for the carrier to bill the call appropriately or to protect against fraud. Thus, there is a serious question whether transfer of 0+ proprietary card calls will serve the interests of either carriers or customers.⁷

⁶ AT&T's operator centers are not able to process and bill calls that present ANI for an originating location that is not served by that specific operator center. Thus, for example, AT&T's Dallas, Texas OSPS cannot process the ANI of an originating telephone in Chicago.

⁷ AT&T opposes the imposition of through route arrangements for all of the reasons stated above, as well as the additional arguments discussed in AT&T's opposition to National Telephone Services' November 15, 1988 proposal to require the establishment of mandatory through rates. See Opposition of American Telephone and Telegraph Company, ENF-89-2, dated February 3, 1989 ("AT&T Opposition"); and Reply of American Telephone and Telegraph Company, ENF-89-2, dated February 13, 1989, attached as Exhibits A and B hereto. The concept of a "through route" requires that two carriers hold themselves out to the public as participating in a joint endeavor. (AT&T Opposition, p. 6n***) This is inherently inconsistent with the transfer mechanism described in the Order, which would allow one OSP to exercise its sole discretion to transfer (and receive

(footnote continued on following page)

In any event, call transfers will not advance the Commission's principal objective of assuring that customers dial the appropriate access codes to reach their carrier of choice. Indeed, transfers of 0+ proprietary card calls could encourage customers to disregard the educational campaign which the Commission found (Order, ¶56) was the best way to serve the interests of the public in effective competition for operator services. Thus, transfers could well be counterproductive to the Commission's own stated goals.

AT&T therefore recommends that the Commission focus on an educational alternative to call transfers and require all OSPs to provide customers with the information they need to complete their calls directly to their carrier of choice. Thus, when presented with a 0+ call charged to a proprietary card, OSPs should instruct the customer to hang up and dial the access code(s) provided on the customer's card.⁸ This will interact effectively with the already-planned educational efforts and will effectively

(footnote continued from previous page)

compensation for) 0+ proprietary card calls that have been unintentionally misdialed by customers.

⁸ OSPs could, if they choose, provide specific access codes of identified carriers.

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train customers on the proper dialing behavior, thus helping to eradicate the incidence of misdialed 0+ calls even more quickly.

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I, Valerie Harris, hereby certify that on this 14th day of December, 1992, a true copy of the foregoing "AT&T's Supplemental Comments" was served by first class mail, postage prepaid, upon the parties on the attached list.

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