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

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

ORIGINAL FILE

REPLY COMMENTS OF
ROCK HILL TELEPHONE COMPANY

Rock Hill Telephone Company ("Rock Hill") hereby submits its reply comments in the captioned proceeding. In its Comments to the issue of compensation methods for operator service providers ("OSPs") who continue to receive 0+ interLATA dialed calls,[2] Rock Hill stated that a need exists for a call transfer service offering and advocated that OSPs be compensated by the interexchange carrier ("IXC") for costs incurred in transferring such calls. Those costs include operator work time and network expense in transferring calls. Rock Hill also advocated that OSPs should be able to provide transfer service by either contract or tariff. Rock Hill would like to respond to a number of the comments made by various parties in their comments.

First, Pacific Bell and Nevada Bell ("Pacific Companies") stated that the solution to problems being addressed in this proceeding is billed party preference ("BPP").[3] While BPP may ultimately solve this problem, at least partially, Rock Hill

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[2]See paragraph 64 of the Report and Order and Request for Supplemental Comment, CC Docket No. 92-77, Phase I, FCC 92-465, released November 6, 1992.

[3]Comments of Pacific Bell and Nevada Bell, p. 2.

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believes that postponing a decision on implementation of an operator transfer service, as well as the authorization for compensation thereof, is inappropriate. The Commission has yet to make a ruling on the issue of BPP. Even if the Commission were to rule in favor of BPP, there is no guarantee that it would immediately become effective. In all probability, it would take quite some time to implement. In view of the period of time in which OSPs have been providing and will continue to provide a form of transfer service for card issuers, and therefore, have been incurring and will continue to incur an expense for which they receive no compensation, Rock Hill advocates that a cost recovery mechanism should be implemented immediately.

Second, AT&T maintained that its educational campaign instructing proprietary card users on correct dialing instructions "will substantially reduce the number of instances in which proprietary calling card holders inadvertently reach the wrong carrier."[4] While Rock Hill is hopeful that AT&T is successful in its educational campaign, it still believes there is a great likelihood that calls of this nature will continue to be received. For this reason, Rock Hill believes the provision of a compensation mechanism is necessary. Furthermore, Rock Hill believes that it is due compensation for any and every call for which it provides an operator transfer (including the provision of alternative dialing instructions). Should the Commission find in this proceeding that

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[4]Supplemental Comments of AT&T, p. 1.

compensation is appropriate, and AT&T is correct in its assessment of its educational campaign, then the subject of compensation should not concern AT&T due to the fact that its proprietary card callers would rarely be accessing an alternative OSP.

AT&T further states that "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."[5] Rock Hill agrees that such efforts will serve to reinforce the AT&T educational campaign. However, if they are technically able to do so without splashing the call, OSPs should not be precluded from directly transferring the caller to AT&T. Before making the transfer, Rock Hill would not be opposed to instructing the customer to dial the access code in future call attempts. In Rock Hill's opinion, this will help reduce customer frustration and educate the customer on how to properly use the proprietary card.

Third, Southwestern Bell Telephone Company ("SWBT") stated that it has no objection to transfer arrangements between OSPs and IXC card issuers, "but does not believe LECs can or should be involved."[6] Rock Hill agrees that the introduction of the LEC as a third operator is not necessary and that OSP to OSP transfer would better serve the public interest. However, the Commission should not preclude LECs from providing 0+ transfer service when

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[5] Id. at 6.

[6] Comments of Southwestern Bell Telephone Company, p. 3.

they are acting as an OSP on behalf of an IXC.

In conclusion, Rock Hill contends that the record in this proceeding continues to support the need for and adoption of adequate compensation for call transfer service. Furthermore, for the reasons stated above, Rock Hill does not believe that either implementation of billed party preference, as advocated by the Pacific Companies, or AT&T's educational campaign can be relied upon as an immediate or adequate substitute for call transfer service. Also, Rock Hill supports allowing OSPs to directly transfer 0+ proprietary card calls to the appropriate IXC if call splashing can be avoided. Finally, Rock Hill urges the Commission to recognize that LECs should not be precluded from providing 0+ transfer service when they act as an OSP on behalf of an IXC.

Respectfully submitted,

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January 6, 1992

CERTIFICATE OF SERVICE

I, Shannon G. Eubanks, hereby certify that a copy of the foregoing Reply Comments of the Rock Hill Telephone Company was mailed, postage prepaid, first-class United States mail, this sixth day of January, 1993, to the parties on the attached list.

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