

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Billed Party Preference
for 0+ InterLATA Calls

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CC Docket No. 92-77
Phase I

ORIGINAL
FILE

REPLY COMMENTS OF GTE

GTE Service Corporation and its affiliated domestic telephone operating companies ("GTE") offer their reply to comments filed in response to the Commission's Report and Order and Request for Supplemental Comment in the above referenced proceeding, released November 6, 1992. In this proceeding, the Commission seeks "further comment on methods for compensating operator service providers who continue to receive 0+ dialed proprietary card calls and who wish to transfer those calls to the card issuer for completion."¹

Introduction

In this phase of the docket, the Commission has decided that "the interests of AT&T cardholders and the public in effective competition for operator services are best served through prompt imposition of comprehensive education requirements on AT&T."² The Order proposes a practical course of action towards the 0+ public

¹ Report and Order and Request for Supplemental Comment ("Order"), CC Docket No. 92-77, released November 6, 1992 at ¶64.

² Id. at ¶56.

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domain issue. GTE concurs with the Southwestern Bell Telephone Company ("SWBT") comments supporting the decision.³ GTE maintains that the 0+ public domain issue is one of many issues within this docket that cannot be adequately addressed by a series of interim fixes. The Commission can best resolve the problems it has identified in this docket by moving expeditiously to what GTE believes to be the only viable long term solution -- billed party preference.

AT&T Education Material Should Address 0+ IntraLATA Calls

GTE concurs with comments suggesting that educational material prepared by AT&T for its proprietary card holders should advise users that local and intraLATA calls can continue to be made on a 0+ basis from virtually every phone in the nation.⁴ The local exchange carriers' ("LEC") equipment is capable of handling 0+ dialed proprietary card calls if the calls are within the carrier's local or long distance serving areas. GTE asserts that including 0+ intraLATA calling information in AT&T's educational material to its cardholders would prevent disruption of existing dialing habits and would assure that the public is advised of this easy to use dialing pattern.

³ SWBT at 1.

⁴ SWBT at 2.

LECs Should Be Excluded From Interexchange Carrier ("IXC") and Operator Service Provider ("OSP") Transfer Arrangements

GTE concurs with comments stating that local exchange carriers should not or cannot be involved in transfer arrangements between and among IXCs.⁵ Commenting parties cite several cost and efficiency factors which support limiting LEC involvement. These factors include: 1) the lack of existing LEC technology to facilitate this sort of 0+ transfer,⁶ 2) the potential involvement of three operators (when only two are necessary) to transfer a call, 3) the lack of national, uniform provision of 0- transfer services by LECs, 4) the lack of a universal, efficient and economical technical solution that addresses issues resulting from transfers done on a "call splashing" basis, 5) the increased call processing times and inefficient use of LEC network resources and 6) the combined cost recovery requirements that could make such a service "cost prohibitive."⁷ These technical and administrative costs of implementation would far outweigh any short term benefits realized from an interim transfer service solution.

Additionally, even if an efficient and cost effective transfer service solution were available, the GTE Consent Decree restricts involvement by the GTOCs in any such arrangement requiring inter-LATA transport.

⁵ SWBT at 3, Pacific Bell and Nevada Bell ("Pacific Companies") at 1.

⁶ Pacific Companies at 1.

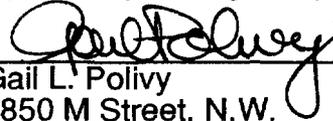
⁷ SWBT at 4,5.

Conclusion

For the reasons discussed above, GTE urges the Commission to require AT&T to advise its cardholders that local and intraLATA calls billed to its proprietary card can continue to be made on a 0+ basis. GTE also urges the Commission not to involve local exchange carriers in the transferring of proprietary card calls from an IXC OSP to the card issuer.

Respectfully submitted,

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January 6, 1993

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Certificate of Service

I, Ann D. Berkowitz, hereby certify that copies of the foregoing "Reply Comments of GTE" have been mailed by first class United States mail, postage prepaid, on this 6th day of January, 1993 to all parties on the attached list.


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