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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Billed Party Preference)
for 0+ InterLATA Calls)

~~EXHIBITS~~
~~FILE~~
CC Docket No. 92-77
Phase I

ORIGINAL
FILE

REPLY COMMENTS

The Chester Telephone Company ("Chester") hereby submits its reply comments with regard to the issues that the Commission set forth in paragraph 64 of the Report and Order and Request for Supplemental Comments, in the captioned proceeding, FCC 92-465, released November 6, 1992 ("Order"). Chester provides local exchange service in its certificated area of South Carolina and provides operator services to its customers and to customers of certain other carriers. As such, Chester will be directly affected by the issue of compensation methods raised by this phase of the proceeding.

A number of parties responded to the Commission's request for comment on possible methods of compensating operator service providers ("OSPs") who receive 0+ interLATA dialed calls for which the OSP has no means to validate or bill. Rock Hill Telephone Company specified that it incurs costs in handling these proprietary card calls in operator work time and network expense in transferring such calls and that recovery of such costs by the OSP is both appropriate and necessary.¹ Other parties also

¹Comments of Rock Hill Telephone Company, p. 2.

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acknowledged that costs are incurred and should be recovered by the OSPs handling such calls.² Chester agrees with Rock Hill and the other parties' assessment of costs incurred and the need for recovery of those costs, and urges the Commission to require that interexchange carriers ("IXCs") be required to compensate OSPs for costs incurred in handling proprietary card calls.

The Commission also sought comment on whether the appropriate vehicle for offering transfer service would be by tariff or contract. A significant number of parties advocated allowing OSPs the flexibility of providing such service by either tariff or contract.³ Chester believes that adequate legal justification has been set forth in the Comments for allowing the use of either tariffs or contracts for this purpose and advocates that OSPs be given the flexibility to use either vehicle for transfer service. Chester also finds considerable merit in the suggestion that model tariffs and agreements be developed.⁴

Finally, the issue of bill verification has been raised. Rock Hill proposes to provide the date, NPA-NXX of the calling number,

²Comments of MCI, p. 2, Intellicall, Inc., pp. 2, 9, Competitive Telecommunications Association, pp. 3-19, LDDs Communication, Inc., pp. 3-6, Phonetel Technologies, pp. 3-6, Cleartel Communications, Inc. et al., pp. 5-6, International Telecharge, Inc., p. 4-6.

³Comments of Rock Hill, pp. 3-4, Intellicall, pp. 10-11, Competitive Telecommunications Association, p. 3, Sprint Corporation, pp. 4-6, Opticom, pp. 4-6, International Telecharge, p. 7.

⁴Comments of Rock Hill, pp. 3-4.

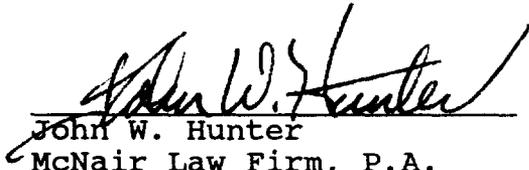
and the calling card number when available.⁵ Chester believes that this is a reasonable approach to the bill verification problem.

WHEREFORE, The Chester Telephone Company submits its reply comments in this proceeding for consideration by the Commission.

Respectfully submitted,

THE CHESTER TELEPHONE COMPANY

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January 6, 1992

⁵Id. at 4.

CERTIFICATE OF SERVICE

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

A handwritten signature in cursive script, reading "Shannon G. Eubanks", is written over a horizontal line.

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