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Cincinnati Bell Telephone

R. E. Sigmon
Vice President - Regulatory Affairs

201 E. Fourth St., 102 - 320
P. O. Box 2301
Cincinnati, Ohio 45201
Phone (513) 397-1280

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 19, 1993

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

In the Matter of:	)	
	)	
Policies and Rules Implementing	)	CC Docket No. 93-22
the Telephone disclosure and	)	RM-7990
Dispute Resolution Act	)	

Dear Ms. Searcy:

Enclosed for filing are the original and four copies of Cincinnati Bell Telephone Company's Comments in the Notice of Proposed Rulemaking CC Docket No. 93-22.

Also provided is a duplicate of this letter and the enclosures. Please date stamp and return this duplicate as acknowledgement of its receipt. Questions should be directed to Mrs. Debbie Davidson at (513) 397-1333.

Sincerely,

RE Sigmon

Enclosures

No. of Copies rec'd 0+4
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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
) CC Docket 93-22

services.[1] CBT strongly believes it is in the best interests of the consumer to prohibit any pay-per-call charges using 800 or other toll-free numbers.

III. Billing and Collection.

The Commission, however, invites comment on whether to prohibit carrier billing for collect audiotext calls, and whether such a prohibition is technically feasible.[2] While CBT favors a prohibition on carrier billing for collect audiotext calls, it is unable at the present time to distinguish between unregulated collect audiotext calls and regulated collect calls. Because CBT's current technology cannot distinguish between collect audiotext calls and legitimate collect calls, it may unknowingly disconnect a customer's regulated service for non-payment of charges for what in fact is unregulated 900 service. This problem would be exacerbated by a federal prohibition on disconnection of a subscriber's telephone service for nonpayment of charges for such calls[3] unless such calls can be distinguished from regulated collect calls.

Because it is the local exchange carrier ("LEC") which is perceived by its subscriber as the provider of the pay-per-call service and thus bears the brunt of complaints,

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1/ NPRM, para. 29.

2/ NPRM, footnote 15 and para. 36.

3/ See NPRM, footnote 15.

CBT favors a carrier's right to terminate billing for pay-per-call services for failure to comply with the TDDRA or relevant regulations thereunder.[4/] Any mandated notice

subscriber would not want to have access. In many cases, this would require expansion of switch memory to accommodate all of the line class codes that would be required, and CBT's current switches have the capability to screen only on 6-digits (NPA-NXX), not 10-digits (NPA-NXX-XXXX).

The second alternative would require intelligent network (AIN) capabilities. It would then be possible to do 10-digit lookup, similar to 800 Data Base Service. This would require the billing entity to insure a per query charge. However, CBT

VI. Conclusion.

CBT welcomes the establishment of rules to constrain the use of 800 numbers for pay-per-call purposes and to otherwise protect consumers against pay-per-call service abuse. In some cases, however, proposed rules will require new technology and in all cases the cost of protection should be borne by the pay-per-call information provider and not by the legal or long

VI. Conclusion.

CBT welcomes the establishment of rules to constrain the use of 800 numbers for pay-per-call purposes and to otherwise protect consumers against pay-per-call service abuse. In some cases, however, proposed rules will require new technology and in all cases the cost of protection should be borne by the pay-per-call information provider and not by the local or long distance ratepayer.