

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

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DEC - 8 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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

**REPLY OF SOUTHWESTERN BELL TELEPHONE COMPANY**

On September 24, 1993, Southwestern Bell Telephone Company (SWBT) filed a Petition for Reconsideration (PFR) concerning the Commission's Order requiring SWBT to offer 900 blocking to business and residence customers via the interstate access tariff, even though SWBT already offers such blocking in its state general exchange tariffs.<sup>1</sup> AT&T has filed an Opposition to SWBT's PFR, and SWBT now files this Reply to AT&T's Opposition.

The 900 blocking service ordered by the Commission will be used primarily by residence customers and secondarily by business customers. Both customers, however, purchase service from the general exchange tariffs of the five states which SWBT serves. SWBT's federal access tariff customers are interexchange carriers (IXCs) which will not use 900 blocking, because 900 traffic is good business for IXCs. This is SWBT's point. Requiring 900 blocking to be placed in the federal access tariff is a waste of time and resources, because no federal access customers will use the service.

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<sup>1</sup> Report and Order, CC Docket No. 93-22, released August 13, 1993, paras. 60-63 (Order).

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AT&T states: "TDDRA requires local exchange carriers ("LECs") to offer their subscribers 900 call blocking services, to allow those customers to avoid incurring pay-per-call charges."<sup>2</sup> SWBT not only supports this requirement but has already implemented it in the general exchange tariffs of the five states in which SWBT provides service. SWBT's residence and business customers already can subscribe to 900 call blocking services. Offering that service out of the federal access tariff is unnecessary, because SWBT's "subscribers"--residence and business customers--do not purchase service out of that tariff.<sup>3</sup>

AT&T also asserts that SWBT has failed to show how federal tariffing of 900 blocking would be unduly burdensome.<sup>4</sup> If SWBT must offer 900 call blocking services in its interstate access tariff, different USOCs (Uniform Service Order Codes) will be required. Customer Service Representatives will require training and instruction that the service which SWBT currently provides via the general exchange tariff will now be duplicated in the interstate access tariff--a tariff with which Service Representatives are unfamiliar, because residence and business customers do not order out of it. The Service Representatives will be obliged to inform customers that 900 blocking is available out

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<sup>2</sup>AT&T Opposition at 4.

<sup>3</sup>Thus the Commission's stated rationale for requiring 900 blocking to be offered out of SWBT's federal access tariff--that it will "enhance our ability to enforce the requirements of the TDDRA [Order, para. 61]"--is inconsistent with the facts. Indeed, SWBT believes that residence and business customers could not order 900 blocking out of the federal tariff even if the customers wanted to, because those customers are not purchasing access.

<sup>4</sup>Opposition of AT&T at 5.

of two different tariffs, even though the customers are not purchasing access and thus are probably not even entitled to purchase interstate 900 blocking. This is a recipe for confusion.

SWBT will also be forced to develop new methods and procedures to accommodate the 900 call blocking services offered out of the interstate tariff, even though no end user customer will ever order the service. New billing and accounting procedures also will have to be developed, because SWBT's current access billing system, for the reasons discussed above, is not equipped to bill residence and business end users.

SWBT's goal is the same as the Commission's--to follow the requirements of the TDDRA by offering 900 call blocking services to end users. SWBT already does this in its state tariffs. Requiring that this service also be offered out of SWBT's federal tariff is an unnecessary "make work" project. SWBT's customers would receive no benefit from such a filing, and SWBT would be burdened with pointless work when limited resources could be used in areas which truly benefit consumers.

For the reasons discussed above, SWBT requests that its PFR be granted, and that SWBT not be required to offer 900 blocking services out of its federal access tariff.

Respectfully submitted,

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December 8, 1993

CERTIFICATE OF SERVICE

I, Liz Jensen, hereby certify that the foregoing Reply of Southwestern Bell Telephone Company, in Docket No. 93-22, has been served this 8th day of December, 1993 to the Parties of Record.

  
\_\_\_\_\_  
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