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July 20, 1994

Mr. W. Caton
Acting Secretary
Federal Communications Commission
1919 "M" Street, N.W., Room 222
Washington, D.C. 20554

Subject: Docket No. 92-77

Dear Mr. Caton:

The Salt Lake City Airport Authority is opposed to the proposal to implement Billed Party Preference currently under consideration by the Federal Communications Commission.

Implementing BPP will significantly impact public telephone revenues at the Salt Lake City International Airport. Because of that impact, revenues which would otherwise be re-invested in Airport and telecommunication facilities will not be available from public payphones consequently requiring that revenues from other sources be used to maintain high levels of public service and convenience. Whenever airport revenues are lost, that lost amount must be recovered either through passing along costs to the traveling public or in decreasing service levels. Implementing BPP will consequently result in decreased revenues to the Airport and consequently decreased ability to provide appropriate service levels.

Thank you for your consideration.

Sincerely,

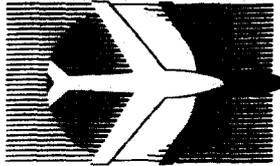
John Wheat
Executive Deputy Director

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McCARRAN INTERNATIONAL AIRPORT

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Department of Aviation

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Robert N. Broadbent
DIRECTOR OF AVIATION

Postal Box 11005
Las Vegas, NV 89111-1005

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Fax (702) 798-6591
or (702) 597-9553

July 22, 1994

The Honorable Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

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RE: Docket No. 92-77

Dear Mr. Caton:

As the operators of a sizeable public facility with approximately 300 public-use pay telephones, we at McCarran International Airport in Las Vegas have been following with great interest the proceedings of the Federal Communications Commission regarding Billed Party Preference (BPP). I would like to take this opportunity to comment in response to the Further Notice of Proposed Rulemaking (FNPRM) related to the above-referenced Docket.

While our apprehension regarding this issue is multi-faceted, we are very deeply concerned with the threatened loss of commission revenues posed by the BPP proposal. As you probably know, the Inspector General's office of the U.S. Department of Transportation recently performed a number of well-publicized audits of major airports (including McCarran International). These audits focused on the maximization of airport revenues and the retention of those revenues for airport use, in accordance with Federal Grant Assurances. As airport operators, we are obligated to obtain appropriate fees from those profiting from the activity generated at our public facility.

In short, the establishment of rates and charges at airports is based on the capital improvement and operations and maintenance requirements of the facility. The inability to generate revenue from any particular aspect of airport business would necessarily result in an increase in other concession-related fees and/or higher costs to the resident air carriers—all costs which would inevitably be passed on to the passengers. There is simply no free lunch, economically speaking, at least insofar as purported BPP savings to airport pay telephone customers are concerned. In fact, as prudent managers, we would almost certainly have little

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Jay Bingham, Chairman • Don Schlesinger, Vice Chairman

Paul J. Christensen • Thalia M. Dondero • Yvonne Atkinson Gates • Karen Hayes • Bruce L. Woodbury
Donald L. "Pat" Shalmy, County Manager

William F. Caton

July 22, 1994

Page Two

choice but to consider alternate forms of concession structure as it relates to pay telephone service in the BPP environment, which could include such things as the rental of space for phone sites, etc.

While I will leave to others the task of an extensive cost-benefit analysis of the BPP program, I am gravely concerned that, as stated in the FNPRM, "...cost estimates for technologies that have not yet been fully developed are inherently inexact..." (Page 20, @ #37) As noted in FCC Commissioner James H. Quello's separate statement, "Conservative financial data estimate that BPP will cost over one billion dollars to implement and millions more annually to maintain." I find it nothing short of shocking that action of this extent, which will likely diminish service quality, is being contemplated absent firm, validated analysis related to the anticipated costs of implementation.

I must finally state my skepticism of the purported benefits related to the BPP environment. As the manager of a facility which will process more than 26 million passengers this calendar year (plus many more "meeters and greeters," etc.), I am unable to locate any complaints related to our pay telephone service. This is not surprising to me; quite the opposite, given our level of attentiveness to this aspect of business. Those using the pay telephones in our facility are able to easily access their chosen interLATA carrier. I am concerned that the additional call set-up time and additional data processing certain to be associated with BPP will significantly derogate service quality, representing little more than a sizeable source of confusion and difficulty to those attempting to utilize the system.

In conclusion, I urge, in the strongest terms possible, that the Commission not attempt a costly fix to a system that does not, on close examination, appear to be broken.

Thank you for your consideration of my comments regarding this matter.

Sincerely,



ROBERT N. BROADBENT
Director of Aviation

RNB/si

cc: FCC Commissioners (9)

Student Life
Colorado School of Mines
Golden, CO 80401-1887
303/273-3350
FAX: 303/273-3278

GOLDEN, COLORADO 80401-1887

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MR. W. CATON
ACTING SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
1919 M. STREET N.W.
ROOM 222
WASHINGTON, DC 20554
DOCKET NO. 92-77

Dear Mr. Caton,

In reference to Docket No. 92-77, I write this letter for several reasons. The first and foremost being the fact that if this docket is supposed to be consumer related - it is far from it.

As a Government employee in a position of trust to make decisions in the best interest of the State of Colorado at an institution of higher education in a time of severe budge scrutinization, I stand to lose, from my operations budget, approximately \$15,000-\$20,000 per year from this action. I seriously doubt that any entity could stand to lose that kind of income at any given time.

The second largest ticket item is the fact that the information about Docket 92-77 came to me as a surprise and if it is consumer related, I feel that the consumer, in this case residents and users of our campus, should have by rights, the opportunity to review the issues. I certainly don't feel informed about the issues and therefore probably will not be making a very educated decision based on lack of information, and degree of impact of these types of decisions.

At this time, if a decision is made for a single phone consumer rate or billing to change, there is low impact where conversely the impact for our institution constitutes not only a financial loss but a nightmare of changes that involve peoples jobs, billing scrutiny, and major changes to the residents of our campus. The six year history of trying to streamline our administrative process while helping boost our budget to make ends meet with commission checks will all be lost.



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At this point, I plead you and the powers that be to at least give institutions of higher education, such as myself, the opportunity to scrutinize the severe impact this type of decision may have on our operations. I don't know what the proper protocol is for this type of decision but might I suggest that all consumers large and small at least be notified properly of the issues.

Again, the possible decision as stated in the first eight pages of the docket would be financially devastating to our operation as well as I'm sure many other educational institutions.

I strongly encourage this action not be taken. If you have any questions or further information to share please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Bob Francisco". The signature is written in a cursive style with a large, stylized "B" and "F".

Bob Francisco
Director Of Student Life
1600 Maple Street
Golden, CO 80401



DEEDEE CORRADINI, Mayor
LOUIS E. MILLER, Executive Director

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July 20, 1994

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Washington, D.C. 20554

Subject: Docket No. 92-77

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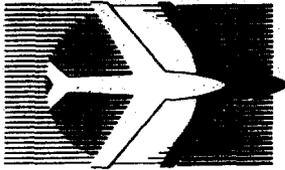
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John Wheat
Executive Deputy Director

JW/RP/tlb

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Department of Aviation

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DIRECTOR OF AVIATION

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William F. Caton
July 22, 1994
Page Two

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Thank you for your consideration of my comments regarding this matter.

Sincerely,



ROBERT N. BROADBENT
Director of Aviation

RNB/si

cc: FCC Commissioners (9)

Call America
BUSINESS COMMUNICATIONS

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PLAN

Handwritten initials: *cy* and *MP*

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July 20, 1994

Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

RE: CC Docket No. 92-77 -- Billed Party Preference for 0+ InterLATA Calls

Dear Sirs:

Call America Business Communications is a small regional IXC/OSP on the central coast of California. We have been in business since the break up of the Bell system in 1984. Over the last 10 years we have grown to employ over 150 people in the San Luis Obispo, Salinas, Fresno, Bakersfield and Santa Barbara areas.

We began selling 1+ long distance and have added additional products as the people in our geographic areas have needed them. An example is voice mail. We are the largest provider of voice mail in San Luis Obispo County. Pacific Bell does not offer voice mail here, we're too small in population for it to be "viable".

We are also working in partnership with California Polytechnic University as a provider of Internet access for businesses and residential consumers. This will be an important connection to the information superhighway in this area.

We started in the operator service business in October of 1988. We employ many of the students from California Polytechnic University as operators. The flexible scheduling of a 24 hour operator center allows them to work while attending college. In our operator service department alone we employ over 40 people.

All of this will change with the introduction of a Billed Party Preference system. BPP will have such a detrimental impact on our business, we will not be able to continue to offer the variety and quality of services we have been for the last 10 years.

Call America has received less than a dozen complaints over the entire time we have been in the operator service market. We employ polite, intelligent people who provide above and beyond the call customer service to a multitude of consumers. If the true basis of instituting a BPP system is for the consumer, than I employ you to look at who it really benefits and harms.

TOCSIA addressed all the start up concerns that accompanied the opening of the operator service market. The people who call into our operator center are now educated, they know they have choices and they know how to exercise them. The few that do not are assisted, so that in the future they can choose for themselves. We do not want to return to a time where people are encouraged not to think, or know how to utilize their communication choices.

4251 South Higuera
San Luis Obispo, CA 93401
805-541-6316, FAX 805-547-6464

Offices in San Luis Obispo, Salinas,
Fresno, Bakersfield, Santa Maria
and Santa Barbara

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These were the mandates that we embraced from the beginning which make BPP obsolete:

- 1). We have been diligent in ensuring that all premise owners we provide service to unblock all 10XXX and 800 access. People can and do access their carriers of choice.
- 2). We always double brand our calls. Callers always know, whether the call is automated or handled by a live operator, who we are. There are no surprises.
- 3). We also always assist callers on how to access whomever their long distance carrier of choice may be. The 800 access numbers for ATT, MCI and Sprint are most commonly needed, and readily available. We went so far as to sign an agreement with ATT during their education period for their CHID callers to provide customers who needed the 800 access or 10288 instructions with the help that they needed to place their calls.
- 4). We provide rate quotes for every call, before any charges are incurred. If a customer gets a bill they do not understand we research it. That was how we began assisting our customers with the new wave of 800/works like 900 fraud that is becoming rampant everywhere.
- 5). If someone is having trouble dialing directly, they just have to dial 00 and an operator will troubleshoot the problem and test the call themselves. If they cannot help, they will personally transfer the caller to their 1+ customer service department. We provide the operator services for many of the small IXC's throughout the state of California who cannot afford to setup and run an operator center for themselves. These small IXC's still want their customers to have all the benefits of a customer service oriented 24 hour a day operator center, and we provide that for them.

BPP is too expensive and too late. The OSP industry was given the challenge to clean itself up and we have lived up to that challenge. Do not take away our ability to contribute to the communication needs of the people we serve. The hundreds of small regional companies that have been given the opportunity to grow and offer true value to their communities will vanish.

Please take the time to look again at what it is you are trying to accomplish. If it is to ensure that the few poorly run OSP's still operating out there are unable to hurt consumers, let's find an affordable way to address those concerns. If it's rates, let's consider a cost justified capped rate to work under. But whatever else, please do not force consumers to bare the brunt of this incredibly costly and messy BPP system. Ironically they will suffer the most.

Sincerely,

A handwritten signature in cursive script that reads "Kellie Phillips".

Kellie Phillips
Director of Operator Services

4251 South Higuera
San Luis Obispo, CA 93401
805-541-6316, FAX 805-547-6464

Offices in San Luis Obispo, Salinas,
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