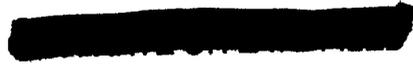


Warner-Lambert Company  
201 Tabor Road  
Morris Plains, New Jersey 07954

201 640 2000  
Cable Address: WARNLAM MORRISPLAINS  
Telex: 136424 (WARNERLAM)

0093-22

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**WARNER  
LAMBERT**

September 16, 1994

Mr. W. Caton  
Federal Communications Commission  
1919 M Street NW  
Room 222  
Washington, DC 20554

Dear Mr. Caton:

On behalf of Warner-Lambert Co. and as an individual user of 800 service I urge you to take the necessary action resulting in the correction to a loophole being exploited in the 1992 Telephone Disclosure and Dispute Resolution Act (TDDRA) - the use of "800" pay-per-call services.

As you may be aware, most users of 800 service expect toll free calls as costs for the 800 service is picked up by the subscriber. Certain "information providers" have discovered a loophole within the TDDRA resulting in the caller being charged without any advance notification. I'm sure this was not the intent of the Act.

I'm sure you are in agreement that telephone subscribers should be given greater protection from fraudulent and deceptive practices by taking corrective action.

Sincerely,

Robert J. Jenny  
Manager, Telecommunications

INFORMAL COMPLAINTS  
BRANCH  
ENFORCEMENT DIVISION  
COMMON CARRIER BUREAU

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**GEICO**

Washington, DC

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GEICO Plaza ■ Washington, D.C. 20076-0001

SEP 22 1994

September 19, 1994

FCC MAIL ROOM

Mr. W. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M. Street NW, Room 222  
Washington, DC 20554

Dear Mr. Caton:

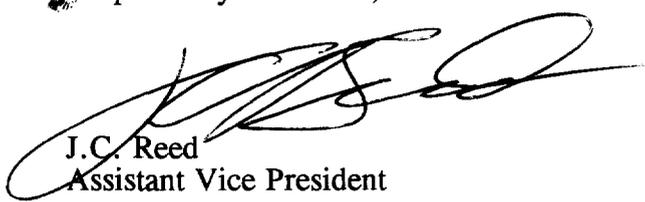
On behalf of GEICO, please be aware of our position regarding the use of 800 pay per call services. These services are difficult to manage and receive retribution from when abuses occur. It is our contention that 800 pay per call should be restricted.

Historically, and still today, there has been a perception in the end user community that an 800 call is a "free" call. Telemarketing is how we do business. This marketing approach provides an easy no cost method for our customers to reach us. As 800 pay per call expands, the historical affinity of 800 free calls to customers will reduce and have an adverse effect on our customer's perception when calling our 800 numbers. We petition you to eliminate 800 pay per call as a product offering from all common carrier providers due to the adverse impact we believe it has on truly free 800 calls.

Should elimination of 800 pay per call not be feasible, a second alternative would be absolutely necessary. A suggested alternative would be to have a written presubscribed agreement signed by individuals affirming proper authorization for both parties.

Please carefully consider elimination of 800 pay per call.

Respectively submitted,

  
J.C. Reed  
Assistant Vice President