

EX PARTE OR LATE FILED



**Darlene P. Richeson**  
International Regulatory Director

Suite 1000  
1120 20th Street, NW  
Washington, DC 20036  
202 457-3117  
FAX 202 457-2305  
ATTMAIL lricheson

**ERRATUM**

October 12, 1995

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

RECEIVED

OCT 13 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: Ex Parte Presentation  
CC Docket No. 94-129  
Policy and Rules Concerning Unauthorized Changes of Consumer's  
Long Distance Carriers

Dear Mr. Caton:

On October 12, 1995, Jim Spurlock, Bob Castellano and I, all of AT&T, met with Mary Beth Richards, Deputy Chief of the FCC's Common Carrier Bureau to discuss the above-referenced docket item and petition for reconsideration.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

A handwritten signature in cursive script that reads "Darlene P. Richeson".

cc: Bob Castellano  
Mary Beth Richards  
Jim Spurlock

No. of Copies rec'd  
List ABCDE

Handwritten initials "ORZ" in a stylized, cursive font.



**Darlene P. Richeson**  
International Regulatory Director

Suite 1000  
1120 20th Street, NW  
Washington, DC 20036  
202 457-3117  
FAX 202 457-2305  
ATTMAIL 'richeson

September 1, 1995

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

RECEIVED

OCT 12 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: Ex Parte Presentation  
CC Docket No. 94-129  
Policy and Rules Concerning Unauthorized Changes of Consumer's  
Long Distance Carriers

Dear Mr. Caton:

On October 12, 1995, Jim Spurlock, Bob Castellano and I, all of AT&T, met with Mary Beth Richards, Deputy Chief of the FCC's Common Carrier Bureau to discuss the above-referenced docket item and petition for reconsideration.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

cc: Bob Castellano  
Mary Beth Richards  
Jim Spurlock

10/12/95

DISCUSSION POINTS- CC DOCKET 94-129

Issue: Application of Inbound PIC Verification Procedures To Customer Initiated Calls

- \* 6 Companies filed Petitions of Reconsideration in opposition of rule concerning extending inbound PIC verification procedures to customer initiated calls.
- \* Companies included AT&T, MCI, Sprint, COMPTTEL, General Communications, Inc., GTE, and Airtouch.
- \* No factual basis to support decision that inbound calling poses threat to consumers.
- \* Rule as a preventative measure targeted at unscrupulous IXCs in actuality harms honest IXCs and consumers.
- \* Estimates of AT&T's costs to implement rule range from \$1.2M - \$3.3M in start-up expenditures and \$ 17.3M- \$36.6M in annual expenses depending upon the method of verification chosen. Annual revenue losses could exceed \$65M. Customers would lose discounts in the range of \$26M.
- \* MCI estimates that their costs will be approximately \$2.5M in start-up expenditures and \$7.4M in annual expenses.
- \* Sprint estimates that their costs will be approximately \$1.2M in start-up expenditures and \$8.9M in annual expenses.

10/12/95

## OPTIONS

- A. As part of the ITM fulfillment package, all IXCs would be required to add a section that provides the customer with the carrier's 800 number to call in the event they feel they have been switched without authorization. Customers would then be switched back without charge. Also, a tracking and monitoring system could be developed to implement corrective action if the number of complaints exceed a predetermined level.
  
- B. Amend inbound PIC verification rules to apply only to instances where customers initiate calls based on contest or sweepstakes entries.