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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

NOV 20 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of the Commission's)
Rules and Policies to Increase) CC Docket No. 95-115
Subscribership and Usage of the)
Public Switched Network)

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REPLY COMMENTS OF AT&T CORP.

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November 20, 1995

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SUMMARY

There is a strong consensus among commenters from all segments of the industry that the Commission's universal service policies have been highly successful in increasing telephone subscribership and that the adoption of additional rules is unlikely to further increase subscribership levels.

There is overwhelming opposition to any additional federal regulation that would prohibit denial of local service for nonpayment of jurisdictionally interstate long distance charges. The record confirms that the issues involved in local service denial are better suited to resolution by State Commissions, which are more familiar with local social and economic conditions and the technical capabilities of the individual LECs who must implement local denial. Also, the record shows that most LECs currently lack the technical capability to block only interstate calls and that prohibiting local denial would not necessarily increase subscribership, but would sharply increase costs and uncollectibles.

The commenters are also in substantial agreement that the need for call control services and services for low income, highly mobile people can best be met by the competitive marketplace. The record shows that there are already a myriad of equipment, service and billing options available to meet the needs of such customers and that marketplace competition and technological advances are the best means to assure the continued availability of telecommunications services that meet the needs of all segments of the public.

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REPLY COMMENTS OF AT&T CORP.

The comments submitted in this proceeding¹ show a remarkable consensus among all segments of the industry on virtually all of the significant issues. First, there is substantial agreement that the Commission's universal service policies have been highly successful, as evidenced by the national telephone subscribership rate of nearly 94 percent.² There is also broad agreement that this success is due in large part to the Commission's policies favoring reduced regulation and fair and open marketplace

¹ Amendment of the Commission's Rules and Policies to Increase Subscribership and Usage of the Public Switched Network, CC Docket No. 95-115, Notice of Proposed Rulemaking, FCC No. 95-281, released July 20, 1995 ("NPRM").

² See, e.g., Ameritech, p. 1; Bell Atlantic, pp. 1-2; GSA, p. 1; NECA, p. 2; Opastco, p. 2; PacBell, p. 2; SWB, p. 2; Mid-Rivers, p. 1.

competition.³ Also, most commenters emphasize that a collaborative effort between the states and the Commission which builds on existing state initiatives is the most effective approach to increasing telephone subscribership.⁴ Thus, there is broad consensus that there is no need for the Commission to adopt new rules as suggested in the NPRM. Rather, the Commission should continue its policies favoring reduced regulation and fair marketplace competition, while carefully targeting existing universal service initiatives, such as Lifeline and Link-Up Assistance, in cooperation with the states, to address remaining pockets of below-average subscribership.⁵

ARGUMENT

I. Local Service Denial Should Continue to Be Treated As a Matter of State Regulation

The comments overwhelmingly oppose any additional federal regulation that would prohibit denial of local service for nonpayment of jurisdictionally interstate long-

³ See, e.g., ITAA, p. 2; MCI, p. 4; MFS, p. 1; TCG, p. 1; NYNEX, p. 2; PacBell, p. 3; SWB, p. 6; United Utilities, p. 1; CBT, p. 1.

⁴ See, e.g., NARUC, pp. 1-2; NTCA, p. 8; NYSDPS, pp. 2-3; Pennsylvania, pp. 2-7; BellSouth, p. 2; IUB, pp. 1-2.

⁵ See, e.g., Comptel, p. 3; CBI, pp. 5-8; FPSC, p. 5; GTE, p. 45; IUB, pp. 2-5; NARUC, p. 7; NECA, pp. 4-5; NTCA, pp. 12-15; PacBell, pp. 26-29.

distance charges.⁶ The clear consensus among all segments of the industry is that local service denial should continue to be handled at the state level, as the Commission determined it should be more than ten years ago.⁷ As the Commission then found, and as remains true today, the issues raised by local service denial are better suited to state resolution because state commissions have more information about the particular social and economic conditions in each state and the technical capabilities of the various LECs who must implement each state's service denial policy.

The comments establish several compelling reasons to continue the existing practice. First, it appears that most LECs currently do not have the technical capability to block only jurisdictionally interstate long distance calling, as the Commission's proposal would require, and that developing such a capability would be unduly expensive. For example, Rochester (p. 6) states that it, "has no means of blocking interstate toll separately from other services,

⁶ See, e.g., Ameritech, p. 3; Bell Atlantic, pp. 8-10; BellSouth, p. 2; CompTel, pp. 2-6; GTE, p. 29; IUB, p. 3; LDDS, pp. 4-8; MCI, pp. 13-18; NECA, p. 4; PacBell, pp. 13-19; Rochester, pp. 3-4; Sprint, pp. 5-11; TDS, pp. 8-10; TRA, p. 7; Pennsylvania, pp. 5-7; USTA, p. 2.

⁷ See Detariffing of Billing and Collection Services, 102 F.C.C. 2d 1150, 1152; recon. denied, 1 FCC Rcd. 445 (1986).

including intrastate toll," and that it would be "exceedingly difficult and costly" to develop such capability. Numerous other LECs echo these comments.⁸

Several commenters also correctly point out that a rule which addresses only interstate charges is likely to be ineffective because consumers do not distinguish between jurisdictions when placing calls, and they typically incur both state and interstate long distance charges.⁹ Unlike the scheme proposed in the NPRM, most state local denial rules apply to all long distance charges, regardless of jurisdiction. Thus, even assuming that the denial of local service would increase subscribership (and nothing in the record shows that this is the case), state rules would necessarily be more effective than the proposed interstate only rule. It would thus be particularly wasteful and futile to require LECs to develop blocking capability that is limited only to interstate calls for no other reason than to reflect the limits of the Commission's jurisdiction.

A number of commenters point out the many adverse consequences that would result from a nation-wide prohibition of local service denial. PacBell (p. 18)

⁸ See, e.g., TEC, pp. 4-5; GTE, pp. 25-27; USTA, p. 2; PacBell pp. 16-18.

⁹ ATA, p. 2; CompTel, pp. 7-8; GTE, pp. 25-27; LDDS, p. 6.

estimates that if local denial were prohibited, PacBell alone would experience an additional \$75 million in bad debt in connection with its IXC billing services. Other commenters note that uncollectibles rose astronomically in certain states after those states prohibited local service denial. Bell Atlantic (p. 4) indicates that its uncollectibles in Pennsylvania increased nearly 400 percent after that state adopted its rules prohibiting local denial. Bell Atlantic also notes that the Pennsylvania program is "complex and expensive to administer, resulting in a \$24 million increase in administrative costs. Id. GTE's experience has been similar. Uncollectibles have tripled, while cumbersome new regulations have sharply increased its costs.¹⁰ Those few commenters who favor adoption of the proposed local cut-off rule appear unaware of, or unconcerned with, the substantial technical and operational problems and the expense that would be entailed in implementing the rule.¹¹ They also fail to recognize that the proposed rule is likely to be ineffective because it addresses only interstate calling and that it would have unintended adverse consequences, such as possibly causing rate increases.

¹⁰ GTE, pp. 33-36. See also USTA, p. 7.

¹¹ See, e.g., CA, p. 3; PULP, pp. 4-8; GSA, p. 4.

In support of its tentative conclusion that prohibiting local service denial would increase subscribership, the NPRM (§ 11) relies heavily on the experience of the Commonwealth of Pennsylvania, which supposedly had the highest telephone subscribership in the nation as of November 1994, and which adopted rules prohibiting local denial in 1985. The NPRM presumes that the high subscribership is attributable to Pennsylvania's local denial policy. However, as several commenters show, the NPRM ascribes far too much significance to the sparse data it cites. Pennsylvania's own comments (pp. 6-7) acknowledge that its relatively high subscribership is not attributable primarily to its local denial policy, but to other local factors, such as historically high penetration levels.¹²

PacBell points out that by March 1995, only four months after Pennsylvania's number one ranking, that jurisdiction had fallen back to seventh highest subscribership nationwide, where it ranked nearly a decade ago when it adopted its local denial rules.¹³ Also,

¹² Indeed, Pennsylvania (p. 6) opposes a federally mandated local cut-off policy and favors a continuation of the existing practice of deferring to state authorities.

¹³ PacBell, p. 16. See Belinfante, "Telephone Subscribership in the United States", p. 14, Industry Analysis Division, FCC, released August 1995.

Rochester (p. 2) notes that New York State implemented a rule prohibiting local service denial in 1992, but subscribership in that state actually decreased over the following two years. Hence, there is no plausible evidence that prohibiting local cut-off will necessarily increase subscribership.

Indeed, of the ten states that experienced the highest increases in subscribership between 1984 and 1994, none prohibited disconnection of local service.¹⁴ Further, the Pennsylvania local denial policy has substantially increased the cost of providing service in that state. Both of the major LECs in Pennsylvania sharply criticize its rules and GTE characterizes the Pennsylvania plan as "a dismal failure."¹⁵

II. The Record Demonstrates That The Need For Call Control Services And Services For Low Income, Highly Mobile Customers Can Best Be Met By Assuring Fair Marketplace Competition.

The NPRM (¶ 18) sought comment on whether the Commission should require all LECs subject to Title II of the Communications Act to provide interstate long distance blocking or restriction services at reasonable rates. Also, the NPRM (¶ 39) invited comment on how the telephone service

¹⁴ MCI, p. 17. See also Bell Atlantic, pp. 4-5; USTA, p. 7.

¹⁵ GTE, p. 33; Bell Atlantic, p. 3.

needs of low-income, mobile Americans could best be met. The comments demonstrate compellingly that these service needs can best be met by allowing marketplace forces to work to provide maximum consumer choice, not by imposing additional regulations.¹⁶

LECs are already beginning to offer the types of call control services contemplated by the NPRM, either in response to state regulatory initiatives or as a matter of business judgment in order to reduce uncollectibles and bad debt. Virtually all of the LEC commenters indicate that they already offer or are conducting market trials of services which allow customers to order LEC central office blocking for some or all types of long distance calls.¹⁷ Typically, these services include a "menu" of blocking

¹⁶ The NPRM (§ 36) also sought comment on "whether the Lifeline program should be extended to certain multi-line entities such as schools and libraries". In its Comments (pp. 11-12) AT&T urged that Lifeline assistance was not the appropriate vehicle to address these needs and that it should continue to focus on low income residential subscribers. AT&T recently announced a plan that would address such needs by a \$150 million program to wire to the information superhighway by the year 2000 all primary and secondary schools, public and private, as part of the new AT&T Learning Network. This program will make available at no charge AT&T's newest services in support of education including access to the Internet and some voice mail messaging services.

¹⁷ See, e.g., Ameritech, p. 5; BellSouth, pp. 6-8; CBT, pp. 9-10; GTE, pp. 19-20; ICTC, pp. 2-3; NTCA, p. 10; Pac Bell, pp. 23-25; SWB pp. 17-18; TDS, pp. 5-6; USTA, pp. 9-11; U S WEST, pp. 6-7.

options which allow customers to block "1+", 900 service and other sent-paid calls, while allowing 800 service calls and outgoing calls that are alternatively billed (e.g., third number billed, collect or card).¹⁸ Rates for such features appear to range from as little as \$1.10 per month, to \$5.00 per month or slightly more.¹⁹ Hence, it appears that long distance call blocking is broadly available at reasonable rates and that there is no need for a federal rule that would mandate interstate-only call blocking, even if such a restriction were feasible to implement.

None of the commenters appears to have the present capability to offer the more sophisticated long distance "restriction services" which limit long distance calling based on minutes of use, time-of-day, or a dollar threshold.²⁰ All of the parties commenting on this proposal indicate that the development of such services would present significant technical and operation problems and would entail substantial development costs. Providing such service on a "real-time" basis, as would be necessary to

¹⁸ See, e.g., BellSouth, p. 7.

¹⁹ See BellSouth, p. 6; GTE, p. 19. PacBell (pp. 23-24) indicates it is planning to offer its "Toll Restriction" service at no charge to selected customers who have had prior payment problems.

²⁰ See NPRM, ¶ 20.

strictly enforce a minutes-of-use or dollar limit, is even less feasible and would require massive operational changes in the way billing is performed today.²¹ As TDS explains (p. 6), a dollar limit on calling would require LECs to obtain continually updated information about IXC rates and discount plans, and even then a dollar threshold could not be calculated accurately until the end of a billing cycle, because IXC discount plans often provide discounts based on total monthly usage. AT&T thus agrees with MFS (p. 1) that "[v]igorous competition among telecommunications service providers spurs the development of innovative approaches" which best meet the needs of all telecommunications customers.

The marketplace is likewise making available an array of offerings to meet the needs of low-income, highly mobile people. The comments confirm that products and services such as voice messaging, debit cards, pagers, cellular phones and public phones are being offered by numerous companies today. Several carriers are offering or conducting trials of voice mail message services to provide transients or persons without home telephones the ability to use public phones to meet their telecommunications needs.²²

²¹ See, e.g., TDS, p. 6; ICTC, p. 3.

²² See, e.g., Ameritech p. 10; CBT, p. 10; GTE, p. 7, n.6; ICTC, p. 4; MFS, p. 4; PacBell, pp. 30-34; TW Comm p. 11.

Numerous commenters note the ready availability of prepaid cards, which provide an inexpensive, alternative payment mechanism from public phones and which also can be used as an effective means to control the dollar volume of long distance calls placed from a subscriber's own line.²³

Pagers and mobile phone rentals are being used as still further novel approaches to meeting the needs of this segment of the public.²⁴

(footnote continued from previous page)

TW Comm also indicates it is "currently investigating the development of high-volume, centralized message centers."
Id.

²³ See, e.g., Earthcall, pp. 2-5; ICTC, p. 4; NTCA, p. 16; PacBell, p. 33; SWB, p. 21.

²⁴ See PacBell, p. 33; MFS, p. 6.

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CONCLUSION

For all of the foregoing reasons, the Commission should continue to monitor subscribership trends in close cooperation with state regulators but should not adopt any amendments to its rules or policies at this time.

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November 20, 1995*

* Reply Comments in this proceeding were due to be filed on November 14, 1995, but because of the Commission's shutdown, became due on November 20, 1995, the day the Commission reopened. See F.C.C. Public Notice, November 13, 1995.

LIST OF COMMENTERS

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AMSC Subsidiary Corporation ("AMSC")

Bell Atlantic Telephone Companies ("Bell Atlantic")

BellSouth Telecommunications, Inc. ("BellSouth")

Cincinnati Bell Telephone ("CBT")

Colorado Public Utilities Commission Staff ("CPUCS")

Commonwealth of the Northern Mariana Islands
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Competitive Telecommunications Association ("CompTel")

Consortium for School Networking, et al. ("Consortium")

Consumer Action ("CA")

Earthcall Communications Corporation ("ECC")

Florida Public Service Commission ("FPSC")

Gateway Technologies, Inc. ("Gateway")

General Services Administration ("GSA")

GTE Service Corporation ("GTE")

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Information Technology Association of America ("ITAA")
InterDigital Communications Corporation ("InterDigital")
Iowa Utilities Board ("IUB")
LDDS Worldcom ("LDDS")
Maine Public Utilities Commission ("Maine")
MCI Telecommunications Corporation ("MCI")
MFS Communications Company, Inc. ("MFS")
Mid-Rivers Telephone Cooperative, Inc. ("MRTC")
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National Exchange Carrier Association, Inc. ("NECA")
National Telephone Cooperative Association ("NTCA")
New York State Department of Public Service ("NYSDPS")
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Organization for the Protection and Advancement of Small
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Pacific Bell and Nevada Bell ("PacBell")
Pennsylvania Public Utility Commission ("Pennsylvania
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Public Utilities Commission of the State of California
("CPUC")

Public Utilities Commission of Ohio ("PUCO")

Public Utility Commission of Texas ("PUCT")

Public Utility Law Project of New York, Inc. ("PULP")

Puerto Rico Telephone Company ("PRTC")

Rochester Telephone Corp. ("Rochester")

Southwestern Bell Telephone Company ("SWB")

Sprint Corporation ("SPRINT")

State Consumer Advocates of Delaware, Florida, Maine, and
Missouri ("SCA")

TDS Telecommunications Corp. ("TDS Telecom")

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Telephone Association of Maine ("TAM")

Telephone Electronics Corporation ("TEC")

Teleport Communications Group, Inc. ("TCG")

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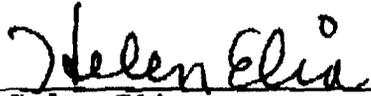
United States Telephone Association ("USTA")

United Utilities, Inc. ("United")

U S WEST Communications, Inc. ("U S WEST")

CERTIFICATE OF SERVICE

I, Helen Elia, do hereby certify that on this 20th day of November, 1995, a copy of the foregoing "Reply Comments of AT&T Corp." was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached Service List.


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