



April 24, 1996

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FCC MAIL ROOM

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

Re: **Policy and Rules Concerning the Interstate  
Interexchange Marketplace, CC Docket No. 96-91**

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

I am writing to express concern about the FCC's proposal to eliminate the tariff filing requirements for interstate, interexchange carriers in the proceeding referenced above. MOSCOM Corporation is a small business that provides customized call accounting and telemanagement systems. Call accounting systems give businesses, governments and not for profit organizations easy access to complete information on telephone usage including the dialed number, calling extension, call duration, time of day, destination, trunk line and most importantly, an accurate cost of each call

Call accounting systems are used for traffic analysis to determine an optimal number of trunks and best long distance carrier configuration, allocating telephone expense to specific cost centers or clients based on actual use, and producing revenues by reselling phone services to clients or hotel guests. To make these uses possible, MOSCOM produces customized rate tables for the interexchange carriers selected by our customers. Based upon the carrier tariffs as filed with the FCC. Without public access to rates, the cost of obtaining rate schedules for individual customers would be prohibitively high for all but the largest customers. As a result, the FCC proposal would significantly adversely impact MOSCOM's call accounting business and prevent many of our customers, particularly our smaller customers, from benefiting from the use of call accounting systems.

Although the FCC proposes to eliminate the tariff filing requirements for interstate, interexchange carriers, the FCC tentatively recommends that interexchange telephone companies be required to maintain pricing information for use by the FCC upon request. I strongly urge the FCC to require that such information also be available to the public upon request. This could be done cheaply, efficiently, and with a minimum of administrative burden to either the FCC or to the interexchange carriers. The possible mechanisms for the provision of such information could include some sort of central clearinghouse, on-line availability or physical availability at designated carrier locations.

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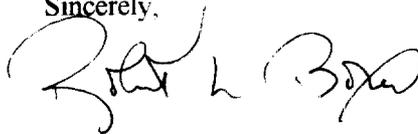


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Such information will enable decision making by consumers - particularly small businesses that do not have the resources to obtain this information absent a public availability requirement. Such access to rate information will also enable the call accounting industry to continue to supply the products which are in wide use today helping businesses and other organizations manage their telephone expenses.

In a robustly competitive market such as that for interstate, interexchange telecommunications services, the availability of pricing information will only further foster that competitiveness. Pricing information could assist resellers in determining the financial feasibility of market entry, which can further increase the competitiveness of the market. By extension, it will increase the competitiveness of small businesses that are able to readily minimize their communications costs. I, therefore, strongly urge the FCC to require interexchange telephone companies to make their pricing information available to the public in some fashion.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. Boxer". The signature is fluid and cursive, with the first name "Robert" being the most prominent part.

Robert L. Boxer  
Vice President  
Corporate Counsel