

SCHERAGA AND SHELDON ASSOCIATES

UTILITY AUDIT REFUND SPECIALISTS

April 19, 1996

RECEIVED
APR 29 1996
FCC MAIL ROOM

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

Re: Policy and Rules Concerning the Interstate,
Interexchange Marketplace, CC Docket No. 96-61

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. Scheraga and Sheldon Associates is an auditor of telephone bills for small and medium size businesses. Scheraga and Sheldon Associates has depended upon the information previously available in public tariff filings to AT&T, Sprint, and MCI. Without such information, there is no way for us to verify the accuracy of our clients' bills.

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.

Such information will enable informed decisionmaking by consumers - particularly small businesses that do not have the resources to obtain this information absent a public availability requirement. This information will also more readily enable consumers to determine if interexchange carriers are pricing in a non-discriminatory manner. Even if the tariff filing requirement is eliminated, other provisions of the Communications Act require that carriers provide service in a non-discriminatory manner. Absent some mechanism for customers to determine carriers' pricing, however, it is hard to tell if carriers are complying with this statutory requirement.

In a robustly competitive market such as that for interstate, interexchange telecommunications services, the availability of pricing information will only further foster that competitiveness. For example, 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,

Mark Scheraga

Mark A. Scheraga
Senior Auditor

No. of Copies rec'd
List ABCDE

0211