

operators should be compensated for the use of their facilities, but not without thought to the consuming public and the small carrier community. TRA submits that given such a balancing of interests, the \$0.25 per-call charge which AT&T and Sprint are currently paying is overstated.

**5. The Commission Should Minimize the Direct  
Subscriber Impact Of Its Payphone Compensation  
Scheme (¶¶ 24 - 28)**

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Two proposals touched upon in the Notice would have direct adverse impacts on subscribers and hence should be summarily rejected. First, the Notice mentions, but does not propose to adopt, a mechanism by which subscribers would pay the per-call assessment by depositing coins in the pay telephone.<sup>47</sup> Such an approach would seriously undermine the convenience of both traditional calling and prepaid callings cards. Moreover, it would unduly burden the prime customers of debit cards -- the low income, transient population. The promotional market with respect to the latter would be effectively destroyed. Second, the Notice discusses, but does not recommend, a "set use fee" by which IXCs would bill and collect the per-call payphone fees from end users.<sup>48</sup> TRA agrees that such a scheme creates more transactional costs, is less equitable and reduces carrier flexibility and should be rejected for all these reasons.

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<sup>47</sup> Id. at ¶ 27.

<sup>48</sup> Id. at ¶ 26.

**III.**

**CONCLUSION**

By reason of the foregoing, the Telecommunications Resellers Association urges the Commission to adopt rules and policies in this docket consistent with these comments.

Respectfully submitted,

**TELECOMMUNICATIONS  
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