

# GREYHOUND LINES, INC.

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FEDERAL COMMUNICATIONS COMMISSION

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Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

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**RE:** Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996

Greyhound Lines, Inc. provides pay telephone space to all of the Regional Bell Operating Companies, Local Exchange Companies and some Private Payphone Providers in our terminals all across the United States. Pay telephones are an essential service provided for our customers.

Through years of experience, Greyhound recognizes what our customers want and expect of the payphone service provided in our terminals. With this knowledge, our greatest concern pertains to our right to continue to select the InterLATA and IntraLATA service providers for the payphones in our terminals.

Since the passing of the new Telecommunications Bill, Greyhound has already experienced being pressured by a Local Exchange Company who selected themselves as the InterLATA carrier during the process of negotiating a beneficial agreement. Allowing the RBOC or the LEC the right to determine who will provide the InterLATA and IntraLATA service on their payphones will permit them to behave anticompetitively in the payphone market. This will also give all the advantages to the LECs and RBOCs and none to the space provider.

It is imperative that competition is extended to all facets of the payphone market, including competition for the 0+ interLATA from the RBOC payphones. The FCC needs to insure that the space provider will have a full range of viable options and retain ultimate control over the selection of the InterLATA carrier serving the RBOC and LEC payphones and possibly the IntraLATA service as well

Thank you for your consideration.

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Christi Nelson, Sr. Communications Analyst  
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& Chief Information Officer  
Joyce Laux, Manager Communications

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