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GARY J. WESTON
Executive Director

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FCC MAIL ROOM

DEC 26 1996

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December 20, 1996

Office of the Secretary
Federal Communication Commission
Washington, D.C. 20554

Dear Madam/Sir:

Please substitute the enclosed corrected "Comments of the Edgemont Neighborhood Coalition" for the Comments filed with you on December 19, 1996.

The originally filed comments contained several spelling errors which are corrected here.

Yours,

Ellis Jacobs
Attorney at Law

EJ:bt

Enclosure

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DEC 26 1996

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BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
Federal-State Joint) CC DOCKET NO. 96-45
Board on Universal)
Service)

COMMENTS OF THE EDMONT NEIGHBORHOOD
COALITION ON THE RECOMMENDED DECISION
OF THE JOINT BOARD

The Edgemont Neighborhood Coalition (Edgemont) is made up of residents of the Edgemont Neighborhood in Dayton, Ohio. Edgemont is a low income primarily African-American neighborhood. The Coalition works to further the economic, educational, and community development of the neighborhood. Edgemont has long been concerned with ensuring access to telecommunications and information technology for low-income citizens, has intervened in many cases involving such issues before the Public Utilities Commission of Ohio, and has filed Initial and Reply Comments in this docket.

The Edgemont Neighborhood Coalition is pleased to provide comments on the Recommended Decision on Universal Service adopted by the Federal-State Joint Board on November 7, 1996.

Edgemont's comments are limited to the topic of Support for Low Income Customers. The failure to comment on other aspects of the Recommended Decision should neither be taken as a waiver of

the right to comment on these sections as later opportunities may allow or as an endorsement of those sections.

SUPPORT FOR LOW - INCOME CONSUMERS

Edgemont applauds the Board's Recommendations that carriers receiving universal source support be prohibited from disconnection local lifeline service for non-payment of toll charges, paragraph 387, that service connection charges be reduced, paragraph 427, and that deposits be eliminated in certain conditions, paragraph 429.

Penetration rates, however, will be furthest advanced if service connection charges and deposits are completely eliminated, with no conditions, by the Lifeline/Link-up program. In the alternative, states should be given an incentive to eliminate the remaining charges and deposits.

Further, our experience with the Lifeline program established in the Ameritech-Ohio service territory, the Universal Service Assistance Program (USA), indicates that the low income recommendations will need some elaboration and clarification in order to capture their promise.¹

Many of the people who will be eligible for Lifeline/Link-up will have had their phone service disconnected at some point in

¹The Universal Assistance Program (USA) was established in the Ameritech Advantage Ohio Order, Exhibit G, PUCO Case No. 93-487-TP-ALT. Counsel for Edgemont presently chairs the USA Advisory Committee established by that Order. The Committee provides advice on and evaluates the performance of the USA program.

the past for failure to pay bills. It will not be unusual for their arrearages to be between 500 and 1,000 dollars, most of it attributable to long distance service. These people will not be able to take advantage of the Lifeline/Link-up programs if companies are allowed to make unrealistic arrearage repayment demands, before reconnecting service.

The rules should explicitly state that:

(1) Companies offering local service may only look to repayment of their own local arrearage for customers seeking to reestablish local service. This is a corollary of the unbundling of local and long distance disconnection.

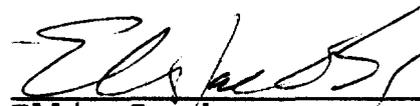
(2) Companies must make reasonable repayment arrangements for both local and toll arrearages. For instance, in the USA program applicants are asked for \$50 or 10% of the arrearage, whichever is less, as a down payment with the remainder to be paid over 18 months.

Without a clear policy on arrearage repayment a great many people who should benefit from these programs will not be able to. They will continue to be blocked by large up front charges. The Joint Board has already recognized that such charges are barriers which need to be overcome in order to increase penetration.

These modifications will not only allow low income customers to reconnect to the system but it will allow companies to collect

on arrearages which they would otherwise never have collected upon.

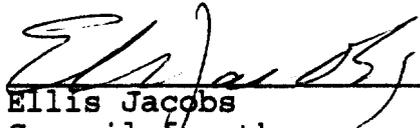
Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Comments of the Edgemont Neighborhood Coalition has been served upon each of the parties listed on the attached pages by regular U.S. Mail, postage prepaid, on December 19, 1996.



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