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EX PARTE OR LATE FILED

Alan S. Cort
Director, Federal Regulatory Matters

NYNEX

March 19, 1997

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Ex Parte

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

Federal Communications Commission

RE: NYNEX Telephone Companies Comparably Efficient
Interconnection Plan For Payphone Services:
Docket No. 96-128/and CC Docket No. 91-35

Dear Mr. Caton:

As requested, the following are NYNEX's responses to questions from the Competitive Pricing Division of the Common Carrier Bureau relating to the tariffing of NYNEX's network services used to provide affiliated and non-affiliated payphone services.

Questions regarding this matter should be directed to me at the above noted address or telephone number.

Sincerely,

Alan S. Cort

cc: Mr. Richard Welch
Mr. Craig Brown
Mr. Jim Schlichting
Mr. Jim Lichford

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The attached matrix (Attachment A) is provided in response to your series of questions relating to the tariffing of NYNEX's network services used to provide affiliated and non-affiliated payphone services. Notwithstanding the information provided in the attached, as described in a separate Ex Parte, it is NYNEX's opinion that it is in full compliance with the Commission's Payphone Orders as NYNEX's deregulated payphone services provider (PSP) does not need nor plan to use any network-based, payphone specific state tariffed features and functions beyond the four underlying Public Access Line service offerings identified in our Comparably Efficient Interconnection (CEI) Plan.¹

The matrix is provided as a reference document and provides a list by state of all the optional, tariffed and non-tariffed features and functions that are: (a) generally available on payphone related and most all non-payphone related exchange services (identified as "Non-Payphone Specific"), and (b) generally only available on payphone related exchange services (identified as "Payphone Specific"). The features and functions are further identified as Network-based and Non-Network-based related features and functions. Non-Network related features and functions would encompass features and functions which do not involve an underlying technical capability of the network, e.g., Statewide Billing Summary. Federally tariffed services are all identified. Those features and functions that are subscribed to by NYNEX's PSP are also identified. Attachment B provides service descriptions for: (a) the four new Public Access Line services that will be used by NYNEX PSPs and will be available to all PSPs on a nondiscriminatory tariffed basis; and, (b) the existing PAL services currently used by non-affiliated PSPs.

¹ Which were identified as: One-Way Basic Coin Access Line; Two-Way Basic Coin Access Line; Inmate Public Access Line; and Charge-A-Call Public Access Line.

FEATURES AND FUNCTIONS

MASSACHUSETTS

	network based	non-network based
payphone specific	operator screening direct dial screening terminating number screening	**PAL credit
non-payphone specific	**touch tone international direct dial blocking ¹ Custom Calling Features Phone Smart Blocking Phone Smart Features 900 blocking ²	business link **statewide summary billing³

Notes:

- line side answer supervision not available in Massachusetts
- subscriber activated call blocking not available in Massachusetts
- terminating number screening is built into the class of service
- Custom Calling Features include: Call Forwarding, Call Waiting, 3-Way Calling, Speed Dialing, Call Forward Busy, Call Forward DA and Call Forward Busy/DA
- Phone Smart Blocking features include: Call Trace Denial, Repeat Dialing Denial, Call Return Denial and All Call Blocking
- Phone Smart Features include: Repeat Dialing, Caller ID, Call Return, Call Trace (per activation), Call Waiting ID
- All services state tariffed except where noted in *italics*

**** Subscribed to by NYNEX's Payphone Services Provider**

¹ Federally tariffed, see FCC No. 1, Section 13.3.3 (C) (1), 4th Revised Page 13-12.2

² Federally tariffed, see FCC No. 1, Section 13.3.3 (E), Original Page 13-12.3

³ statewide summary billing is offered under contractual agreement

FEATURES AND FUNCTIONS

Maine

	network based	non-network based
payphone specific	operator number screening	**PAL credit
non-payphone specific	**touch tone international direct dial blocking ¹ Custom Calling Features Phone Smart Blocking Phone Smart Features 900 blocking ²	business link <i>**statewide summary billing³</i>

Notes:

- line side answer supervision not available in Maine
- subscriber activated call blocking not available in Maine
- direct dialed screening not available in Maine
- terminating number screening is built into the class of service
- basic wire maintenance plan not available in Maine
- Custom Calling Features include: Call Forwarding, Call Waiting, 3-Way Calling, Speed Dialing, Call Forward Busy, Call Forward DA and Call Forward Busy/DA
- Phone Smart Blocking features include: Call Trace Denial, Repeat Dialing Denial, Call Return Denial and All Call Blocking
- Phone Smart Features include: Repeat Dialing, Caller ID, Call Return, Call Trace (per activation), Call Waiting ID
- All services state tariffed except where noted in *italics*
- ** Subscribed to by NYNEX's Payphone Services Provider**
- ¹ Federally tariffed, see FCC No. 1, Section 13.3.3 (C) (1), 4th Revised Page 13-12.2
- ² Federally tariffed, see FCC No. 1, Section 13.3.3 (E), Original Page 13-12.3
- ³ statewide summary billing is offered under contractual agreement

FEATURES AND FUNCTIONS

New Hampshire

	network based	non-network based
payphone specific	operator number screening terminating number screening	**PAL credit
non-payphone specific	**touch tone international direct dial blocking ¹ Custom Calling Features Phone Smart Blocking Phone Smart Features 900 blocking ²	** <i>statewide summary billing</i> ³

Notes:

- line side answer supervision not available in New Hampshire
- subscriber activated call blocking not available in New Hampshire
- direct dialed screening not available in New Hampshire
- basic wire maintenance plan not available in New Hampshire
- business link not available in New Hampshire
- local usage discount plan not available in New Hampshire
- large volume discount plan not available in New Hampshire
- Custom Calling Features include: Call Forwarding, Call Waiting, 3-Way Calling, Speed Dialing, Call Forward Busy, Call Forward DA and Call Forward Busy/DA
- Phone Smart Blocking features include: Call Trace Denial, Repeat Dialing Denial, Call Return Denial and All Call Blocking
- Phone Smart Features include: Repeat Dialing, Caller ID, Call Return, Call Trace (per activation), Call Waiting ID
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³ statewide summary billing is offered under contractual agreement

FEATURES AND FUNCTIONS

Rhode Island

	network based	non-network based
payphone specific	operator number screening direct dialed screening	**PAL credit
non-payphone specific	**touch tone international direct dial blocking ¹ Custom Calling Features Phone Smart Blocking Phone Smart Features 900 blocking ²	** <i>statewide summary billing</i> ³

Notes:

- line side answer supervision not available in Rhode Island
- subscriber activated call blocking not available in Rhode Island
- terminating number screening built is into the class of service
- basic wire maintenance plan not available in Rhode Island
- business link not available in Rhode Island
- local usage discount plan not available in Rhode Island
- large volume discount plan not available in Rhode Island
- Custom Calling Features include: Call Forwarding, Call Waiting, 3-Way Calling, Speed Dialing, Call Forward Busy, Call Forward DA and Call Forward Busy/DA
- Phone Smart Blocking features include: Call Trace Denial, Repeat Dialing Denial, Call Return Denial and All Call Blocking
- Phone Smart Features include: Repeat Dialing, Caller ID, Call Return, Call Trace (per activation), Call Waiting ID
- All services state tariffed except where noted in *italics*

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² Federally tariffed, see FCC No. 1, Section 13.3.3 (E), Original Page 13-12.3

³ statewide summary billing is offered under contractual agreement

FEATURES AND FUNCTIONS

Vermont

	network based	non-network based
payphone specific	operator number screening direct dialed screening terminating number screening	**PAL credit
non-payphone specific	**touch tone international direct dial blocking ¹ Custom Calling Features Phone Smart Blocking Phone Smart Features 900 blocking ²	** <i>statewide summary billing</i> ³

Notes:

- line side answer supervision not available in Vermont
- subscriber activated call blocking not available in Vermont
- basic wire maintenance plan not available in Vermont
- business link not available in Vermont
- local usage discount plan not available in Vermont
- large volume discount plan not available in Vermont
- Custom Calling Features include: Call Forwarding, Call Waiting, 3-Way Calling, Speed Dialing, Call Forward Busy, Call Forward DA and Call Forward Busy/DA
- Phone Smart Blocking features include: Call Trace Denial, Repeat Dialing Denial, Call Return Denial and All Call Blocking
- Phone Smart Features include: Repeat Dialing, Caller ID, Call Return, Call Trace (per activation), Call Waiting ID
- All services state tariffed except where noted in *italics*

**** Subscribed to by NYNEX's Payphone Services Provider**

¹Federally tariffed, see FCC No. 1, Section 13.3.3 (C) (1), 4th Revised Page 13-12.2

²Federally tariffed, see FCC No. 1, Section 13.3.3 (E), Original Page 13-12.3

³statewide summary billing is offered under contractual agreement

FEATURES AND FUNCTIONS

New York

	network based	non-network based
payphone specific	line side answer supervision billed number screening	
non-payphone specific	**touch tone <i>subscriber activated call blocking</i> ¹ billed number screening international direct dial blocking ² Custom Calling Features Phone Smart Blocking Phone Smart Features 900 blocking ³	** <i>basic wire maintenance plan</i> ^{4,5} **local usage discount plan **large volume discount plan business link ** <i>statewide summary billing</i> ⁵

Notes:

- operator number screening not available in New York
- direct dialed screening not available in New York
- PAL credit not available in New York
- Custom Calling Features include: Call Forwarding, Call Waiting, 3-Way Calling, Speed Dialing, Call Forward Busy, Call Forward DA and Call Forward Busy/DA
- Phone Smart Blocking features include: Call Trace Denial, Repeat Dialing Denial, Call Return Denial and All Call Blocking
- Phone Smart Features include: Repeat Dialing, Caller ID, Call Return, Call Trace (per activation), Call Waiting ID

-All services state tariffed except where noted in *italics*

**** Subscribed to by NYNEX's Payphone Services Provider**

¹ SACB is used in extreme cases where fraud has been demonstrated, and is initiated by the Telephone Company to protect against further instances and losses.

² Federally tariffed, see FCC No. 1, Section 13.3.3 (C) (1), 4th Revised Page 13-12.2

³ Federally tariffed, see FCC No. 1, Section 13.3.3 (E), Original Page 13-12.3

⁴ Inside wire was previously de-tariffed in New York

⁵ Summary billing was previously detariffed in New York, and is offered under contractual agreement.

FEATURES AND FUNCTIONS

Connecticut

	network based	non-network based
payphone specific	billed number screening	
non-payphone specific	**touch tone international direct dial blocking ¹ Custom Calling Features Phone Smart Blocking Phone Smart Features 900 blocking ²	** <i>basic wire maintenance plan</i> ³

Notes:

- operator number screening not available in CT
- direct dialed screening not available in CT
- PAL credit not available in CT
- statewide summary billing is not available in CT
- Custom Calling Features include: Call Forwarding, Call Waiting, 3-Way Calling, Speed Dialing, Call Forward Busy, Call Forward DA and Call Forward Busy/DA
- Phone Smart Blocking features include: Call Trace Denial, Repeat Dialing Denial, Call Return Denial and All Call Blocking
- Phone Smart Features include: Repeat Dialing, Caller ID, Call Return, Call Trace (per activation), Call Waiting ID
- All services state tariffed except where noted in *italics*

**** Subscribed to by NYNEX's Payphone Services Provider**

¹ Federally tariffed, see FCC No. 1, Section 13.3.3 (C) (1), 4th Revised Page 13-12.2

² Federally tariffed, see FCC No. 1, Section 13.3.3 (E), Original Page 13-12.3

³ basic wire maintenance plan was previously detariffed in CT

Feature Definitions (Federal)

1. **International Direct Dial Blocking Service (IDDB)** is an arrangement that prevents the use of certain line-side exchange services for the completion of international direct dialed calls. This arrangement recognizes and blocks, by routing such calls to a recorded announcement, any attempt to dial international direct dialed sequences of 011+, 10XXX 011+, and 101XXX 011+.

2. **900 Pay-Per-Call Blocking Service** is an arrangement that allows end users to prevent use of their telephone lines for the completion of calls to a customer's interstate or intrastate 900 Access Service. When an end user requests this service, it will be provided using certain blocking options which are provided under the state exchange tariffs. Based on the state in which the end user orders exchange service, the arrangement may also block other services (e.g., vendor-operated, entertainment-related teleconferencing services provided by Group Bridging Service (GBS) in the 550 exchange).

**Service Descriptions For The Four New PAL Services
(available in all NYNEX States)**

1. *One-Way Basic Coin Access Line* is a message service with outgoing-only call capabilities. The following network functionality is provided:

- Blocks operator assisted calls from being charged to the originating number/line.;
- Blocks incoming collect and third party calls from being billed to a payphone line when originating within the 48 continental United States;
- Blocking of pay-per call services, except 976 in NY;
- Routing of 011+ calls to the international operator;
- Answer supervision;
- Coin functionality, which includes dial tone first, call rating, automated local coin overtime, coin collect/coin return, return of initial coin deposit on calls beyond local calling area, operator system control to process 0+ and 0- calls, and standard recorded announcements.

2. *Two-Way Basic Coin Access Line* is a message service with incoming and outgoing call capabilities. The following network functionality is provided:

- Blocks operator assisted calls from being charged to the originating number/line.;
- Blocks incoming collect and third party calls from being billed to a payphone line when originating within the 48 continental United States;
- Blocking of pay-per call services, except 976 in NY;
- Routing of 011+ calls to the international operator;
- Answer supervision;
- Coin functionality, which includes dial tone first, call rating, automated local coin overtime, coin collect/coin return, return of initial coin deposit on calls beyond local calling area, operator system control to process 0+ and 0- calls, and standard recorded announcements.

3. *Inmate Public Access Line* is a one-way, outgoing only service restricted for 0+ collect calls only. The following network functionality is provided:

- Blocks operator assisted calls from being charged to the originating number/line;
- Blocks incoming collect and third party calls from being billed to a payphone line when originating within the 48 continental United States;
- Blocking of all pay-per call services;
- Blocking of direct dialed international 011 calls;
- No 1+ dialing.

4. *Charge-A-Call Public Access Line* is a one-way, outgoing only service which allows 0+ calling to be billed to a calling card, collect to the called number, or to a third party. The following network functionality is provided:

- Blocks operator assisted calls from being charged to the originating number/line;
- Blocks incoming collect and third party calls from being billed to a payphone line when originating within the 48 continental United States;

- Blocking of all pay-per call services;
- Blocking of direct dialed international 011 calls.

Service Descriptions For Existing PAL Services*

New York:

1. One-Way Basic Public Access Lines are measured service lines arranged for outgoing-only calling. Service specific optional feature: Line Side Answer Supervision (LSAS). General options include Billed Number Screening (BNS) which prevents collect or third party charges to the service), Touch-Tone, and Subscriber Activated Call Blocking (SACB).

2. One-Way Basic Public Access Lines with Outward Call Screening (OCS) are measured service lines arranged for outgoing-only calling. OCS blocks operator assisted calls placed from a payphone from being charged to that line. Service specific optional feature: LSAS. General options include Billed Number Screening (BNS), Touch-Tone, blocking of pay-per-call services, blocking of international direct dialed calls (IDDB), and Subscriber Activated Call Blocking (SACB).

3. Two-Way Basic Public Access Lines are measured service lines arranged for incoming and outgoing calling. Service specific optional feature: LSAS. General options include BNS, Touch-Tone, and SACB.

4. Two-Way Basic Public Access Lines with Outward Call Screening (OCS) are measured service lines arranged for incoming and outgoing calling. OCS blocks operator assisted calls placed from a payphone from being charged to that line. Service specific optional feature: LSAS. General options include BNS, Touch-Tone, blocking of pay-per-call services, IDDB, and SACB.

5. One-Way Enhanced Basic Public Access Lines are measured service lines arranged for outgoing-only calling. . Service specific optional feature: LSAS. General options include BNS, Touch-Tone, blocking of pay-per-call services except 976, and SACB.

6. Two-Way Enhanced Basic Public Access Lines are measured service lines arranged for incoming and outgoing calling. Service specific optional feature: LSAS. General options include BNS, Touch-Tone, blocking of pay-per-call services except 976, and SACB.

7. One-Way Enhanced Basic Public Access Lines with Outward Call Screening (OCS) are measured service lines arranged for outgoing-only calling. OCS blocks operator assisted calls placed from a payphone from being charged to that line. Service specific optional feature: LSAS. General options include BNS, Touch-Tone, blocking of pay-per-call services except 976, IDDB, and SACB.

8. Two-Way Enhanced Basic Public Access Lines with Outward Call Screening (OCS) are measured service lines arranged for incoming and outgoing calling. OCS blocks operator assisted calls placed from a payphone from being charged to that line. Service specific optional feature: LSAS. General options include BNS, Touch-Tone, blocking of pay-per-call services except 976, IDDB, and SACB.

* See Glossary of Feature Definitions below.

Service Descriptions For Existing PAL Services

9. One-Way Limited InterLATA Dialing Public Access Lines with Outward Call Screening (OCS) are measured service lines arranged for outgoing-only calling. OCS blocks operator assisted calls placed from a payphone from being charged to that line. The Limited InterLATA Dialing (LID) restriction limits interLATA dialing to 0+ calling through the carrier's operator service provider. This service also includes IDDB and blocking of pay-per call services. Service specific optional feature: LSAS. General options include BNS, Touch-Tone, and SACB.

10. Two-Way Limited InterLATA Dialing Public Access Lines with Outward Call Screening (OCS) are measured service lines arranged for incoming and outgoing calling. OCS blocks operator assisted calls placed from a payphone from being charged to that line. The Limited InterLATA Dialing (LID) restriction limits interLATA dialing to 0+ calling through the carrier's operator service provider. This service also includes IDDB and blocking of pay-per call services. Service specific optional feature: LSAS. General options include BNS, Touch-Tone, and SACB.

11. One-Way Enhanced Limited InterLATA Dialing Public Access Lines with Outward Call Screening (OCS) are measured service lines arranged for outgoing-only calling. OCS blocks operator assisted calls placed from a payphone from being charged to that line. The Limited InterLATA Dialing (LID) restriction limits interLATA dialing to 0+ calling through the carrier's operator service provider. This service also includes IDDB and blocking of pay-per call services, except 976. Service specific optional feature: LSAS. General options include BNS, Touch-Tone, and SACB.

12. Two-Way Enhanced Limited InterLATA Dialing Public Access Lines with Outward Call Screening (OCS) are measured service lines arranged for incoming and outgoing calling. OCS blocks operator assisted calls placed from a payphone from being charged to that line. The Limited InterLATA Dialing (LID) restriction limits interLATA dialing to 0+ calling through the carrier's operator service provider. This service also includes IDDB and blocking of pay-per call services, except 976. Service specific optional feature: LSAS. General options include BNS, Touch-Tone, and SACB.

13. Coin Compatible Public Access Line (grandfathered) is a standard dial tone first coin line for private payphone providers. Standard features include two-way measured service, OCS, BNS, coin rating, automated local coin overtime, coin signaling (coin collect and coin return), and standard recorded announcements, blocking of pay-per call services, LSAS functionality, and IDDB. General options include Touch Tone.

Service Descriptions For Existing PAL Services

Massachusetts:

1. Public Access Line, measured rate, includes as general optional features the following: Originating Number Screening (ONS, which is the equivalent of OCS in NY), Terminating Number Screening (TNS, which is the equivalent of BNS in NY), Touch Tone, and blocking of pay-per call services.

2. Public Access Line, flat rate, includes as general optional features the following: Originating Number Screening (ONS, which is the equivalent of OCS in NY), Terminating Number Screening (TNS, which is the equivalent of BNS in NY), Touch Tone, and blocking of pay-per call services.

Rhode Island:

The **Public Access Line** is a measured service, which includes Touch Tone service. General optional features include ONS, TNS, and blocking of pay-per call services.

New Hampshire:

The **Public Access Line** is a measured service, which includes Touch Tone service. General optional features include ONS, TNS, and blocking of pay-per call services.

Maine:

The **Public Access Line** is a measured service, with the following general optional features: Touch Tone, ONS, TNS, and blocking of pay-per call services.

Vermont:

The **Public Access Line** is a measured service, with the following general optional features: Touch Tone, ONS, TNS, and blocking of pay-per call services.

Federal Services - Feature Definitions

1. **International Direct Dial Blocking Service (IDDB)** is an arrangement that prevents the use of certain line-side exchange services for the completion of international direct dialed calls. This arrangement recognizes and blocks, by routing such calls to a recorded announcement, any attempt to dial international direct dialed sequences of 011+, 10XXX 011+, and 101XXX 011+.

2. **900 Pay-Per-Call Blocking Service** is an arrangement that allows end users to prevent use of their telephone lines for the completion of calls to a customer's interstate or intrastate 900 Access Service. When an end user requests this service, it will be provided using certain blocking options which are provided under the state exchange tariffs. Based on the state in which the end user orders exchange service, the arrangement may also block other services (e.g., vendor-operated, entertainment-related teleconferencing services provided by Group Bridging Service (GBS) in the 550 exchange).

Glossary of Feature Definitions

Measured Service: Calls are timed and rated for initial and overtime periods according to standard NYNEX rate schedules.

Outward Call Screening (OCS/NY)/Originating Number Screening (ONS/NE): Blocks operator assisted calls from being charged to the originating number/line.

Billed Number Screening (BNS/NY)/Terminating Number Screening (TNS/NE): Blocks incoming collect and third party calls from being billed to a payphone line when originating within the 48 continental United States.

Limited InterLATA Dialing (LID): InterLATA calling is restricted to operator assisted alternate bill calls.

Tier Blocking (NY)/Selective Blocking (SB/NE): Blocks access to pay-per call NXXs, such as 394, 540, 550, 970, etc., & NPAs, such as 700 and 900.

International Direct Dialed Blocking (IDDB): Blocks international direct dial calls but allows for completion of direct dial domestic calls.

Line Side Answer Supervision (LSAS): An “off-hook” supervisory signal is sent to the IPP line when the called party answers the call. When a called party disconnects, an “on-hook” signal is detected and the reverse battery signal is returned to normal. LSAS improves the accuracy of IPPs’ timing of sent paid calls.

Subscriber Activated Call Blocking (SACB): Prevents unauthorized use of a telephone by requiring a person to dial a PIN before a call can be completed. This service is only available when there is demonstrated fraud on the line and bill.

Coin Signaling (Coin collect and Coin Return): Coin collect is used when a call has been completed. Coin return is used if a no answer or busy condition is encountered. Also includes “hand-offs” to IXC’s and Operator Services TOPS switches on sent paid calls.