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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
MCI Telecommunications Corporation)
)
Billing and Collection Services Provided)
By Local Exchange Carriers for)
Non-Subscribed Interexchange Service)

RM 9108

GTE's REPLY COMMENTS

GTE Service Corporation and its affiliated domestic telephone operating companies ("GTE") hereby submit these comments with reference to the subject petition of MCI Telecommunications Corporation ("MCI") and comments filed thereon as follows:

1. GTE urges the Commission to deny the MCI petition.

GTE joins such parties as Ameritech and Bell Atlantic/NYNEX in maintaining MCI has made no showing that there is any need for a rulemaking on this subject. GTE continues to provide the service in question, as, it appears, does the industry generally. MCI's dispute seems to be with a single Incumbent Local Exchange Carrier ("ILEC"). Instead of seeking a cooperative resolution of the dispute, or alternatively filing a complaint against that ILEC, MCI characteristically seeks to inflate the matter into a rulemaking directed at applying the equivalent of common carrier regulation to what is not regulated today.

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Years ago, the Commission reached the firm conclusion that billing and collection ("B&C") service is not a common carrier service. Nothing presented in this proceeding challenges that conclusion. Further, the direction of the Telecommunications Act of 1996 (the "1996 Act") is that the Commission should be reducing, not increasing, the scope and burdens of regulation.

Accordingly: GTE urges the Commission to deny MCI's petition.

2. GTE urges the FCC to reject arguments that would prevent ILECs offering B&C service from protecting their end users from abuses.

OAN Services, Inc. and Integretel, Incorporated, two of GTE's B&C customers, have dragged into this matter questions involving action of GTE to terminate B&C contracts where end user complaints allege abusive practices. These firms also argue for what amounts to bringing B&C service back under common carrier regulation -- which would expand the scope and increase the burdens of regulation in violation of the mandate of the 1996 Act.

Indeed, these firms would use the FCC as a means to delay or prevent action by ILECs seeking to protect their customers from deceptive and abusive practices. Given the massive problem that such practices have caused -- including generation of such great numbers of complaints filed with federal and state agencies as to exceed normal processing capacity -- this request must be considered devoid of all merit and indeed outlandish. ILECs must be free to take appropriate legal action with regard to an unregulated service, especially when the action is designed to protect end users from fraud and abuse.

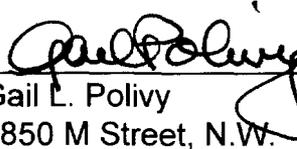
Accordingly: The Commission should reject these proposals of OAN and Integretel.

Respectfully submitted,

GTE Service Corporation and its affiliated domestic telephone operating companies

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August 14, 1997

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Certificate of Service

I, Ann D. Berkowitz, hereby certify that copies of the foregoing "GTE's Reply Comments" have been mailed by first class United States mail, postage prepaid, on August 14, 1997 to all parties on the attached list.



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