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AT&T

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October 9, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

RE: Ex Parte Presentation, CC Docket No. 96-128

Dear Mr. Caton:

On October 8, 1997 Rick Bailey, Bob Castellano and I, representing AT&T, met with Richard Metzger and John Muleta of the FCC's Common Carrier Bureau to discuss the grant of USTA's September 30, 1997 Petition for Waiver in above-captioned docket. The attached material was provided, and formed the basis of the discussion.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules. Because the meeting was held late in the day this is being filed on the next business day.

Sincerely,

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attachment

copy to: R. Metzger
J. Muleta

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Excerpts from AT&T 9/15 97 letter to Kellogg letter of 9/10:

As we understand it, your proposal would require AT&T and other carriers to operate at least <u>four</u> separate tracking mechanisms over the next 12 months, including two we have made no preparation for: an OLNS/LIDB-based per-call mechanism and <u>a short-term per-call mechanism which would be based on an after-the-fact use of LEC ANI payphones lists. From a sheer administrative standpoint, this is not acceptable</u>. Thus, even if your proposal were practicable (which it is not), we could not support your request that we accept these additional burdens, simply because your clients choose not to make Flex ANI available [from page 3-4, emphasis added]

Your proposal also ignores the substantial additional burdens and costs that would result from the suggested six-month transition period. Based on initial internal estimates and input from the Cincinnati Bell clearinghouse, we expect that AT&T's additional administrative costs for this process alone would exceed $16 million. Moreover, we believe that it would take almost a year for us to be ready to implement such a system. Thus, in sharp contrast to the brief time it should take for your clients and other equal access LECs to implement the Flex ANI capabilities required of them last fall, your interim proposal could not even begin until at least 3Q98. [from page 5]

Excerpt from AT&T 9/29/97 response to Kellogg letter of 9/22:

AT&T also does not believe that its estimates regarding the time and cost for Cincinnati Bell to perform a database comparison for your proposed interim period are unreasonable. Therefore, there is no reason to adopt your suggestion that we obtain another vendor to perform this work. In this context, we note that in the second quarter of 1997, AT&T experienced its highest conflict rate ever with respect to multiple claims and name and address mismatches for individual payphones. This is clearly a complex process that could not be readily handed off to another supplier. [from p. 4]

Excerpt from AT&T 10/7/98 opposition to USTA waiver petition:

In addition, AT&T showed [in its September 15 and September 29 expartes] that it cannot practically implement a per-call compensation mechanism based on "matching" LEC ANI lists and call records bearing a "07" code until late 1998.

Process for payment of $.25 per call Dial-Around compensation for 1 800 CALL ATT

The diagram below depicts the network configuration used to process and bill Dial-Around compensation for Operator-Handled calls, paid at the $.25 per call rate prior to October 7, 1997. These calls were processed separately at the No.5ESS, as opposed to "subscriber 800" calls, which are handled by the No. 4ESS. The primary difference is the ability of the 5ESS to deal with calls that have the code "07" attached to them; as discussed in numerous cites in the record, the 5E currently has no such ability.

1. A customer dials 1 800 CALL ATT

2. The call is routed to the AT&T 4E; the 4E recognizes this as a special 800 code, and routes it to the 5E for further processing.

3. The call will typically have an "07" ANI code attached to it, identifying the call as originating from a restricted line that requires special handling.

4. The Originating Line Screening (OLS) data base is then consulted, to determine what type of line the call originated from (e.g., payphone, hotel, hospital, etc.) so that an appropriate billing record can be generated.