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November 5, 1997

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

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: Written *Ex parte* - CC Docket No. 96-45

Dear Mr. Caton:

The United States Telephone Association (USTA) respectfully submits additional information on the Commission's requirement to provide lifeline customers with toll-limitation services.

In the original Order in CC Docket No. 96-45 released May 8, 1997, the Commission defined toll-limitation services as both toll blocking and toll control.<sup>1</sup> In its Petition for Reconsideration filed on July 17, 1997, and in an *ex parte* meeting held on September 18, 1997 with Commission staff, USTA discussed the problems associated with providing toll-limitation services and suggested that the Commission modify its rules to require the provision of either toll blocking or toll control.

On September 4, 1997, the Commission released a Second Further Notice of Proposed Rulemaking in CC Docket 96-45, Federal-State Joint Board on Universal Service; and CC Docket Nos. 96-262, 94-1, 91-213 and 95-72, Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure and Pricing, End User Common Line Charge, where the Commission defined toll-limitation services as either voluntary toll blocking, which allows customers to block toll calls, or toll control, which allows customers to limit their toll usage per month or billing cycle in advance.<sup>2</sup> USTA supports this Commission definition.

<sup>1</sup> §54.400(a)(4)

<sup>2</sup> ¶ 1

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USTA cannot support any requirement to provide toll control services due to the fact that the majority of local exchange carriers cannot provide such services. These services would include any services that have the characteristic of a preset spending or usage limit. Local exchange carriers commonly offer toll blocking that only includes any calls beginning with 1+, 0+, 0-, and 10XXX.<sup>3</sup> These toll blocking services do not differentiate between interstate, intrastate, or international.

Toll control is also dependent upon receipt of "real-time billing" data from interexchange carriers. Currently, only a few interexchange carriers' systems allow for such timely billing data. For example, credit card calling in a region of the country may not be instantly counted in the requested toll-limitation in another region of the country.

In sum, USTA reiterates its recommendation that the Commission modify § 54 of its rules to define toll-limitation as either toll blocking or toll control.

Respectfully submitted,



Porter E. Childers  
Executive Director  
Legal and Regulatory Affairs

cc: Ken Moran  
Tim Peterson  
Lisa Gelb  
Lori Wright

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<sup>3</sup> These services do not include 1-800 or 1-888. Many, but not all, local exchange carriers have the capability to block collect calls. However, most exchange carriers are not able to block incoming collect calls.