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EX PARTE OR LATE FILED

December 20, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Re: Federal-State Joint Board on
Universal Service
CC Docket No. 96-45
Written Ex Parte Presentation

Dear Ms. Salas:

This office is counsel to the Boston Communications Group, Inc.

Pursuant to Section 1.1206 of the Commission's Rules, we are today making a written ex parte filing in the above-referenced rulemaking proceeding pending before the Commission. A written ex parte filing is permissible as this is a permit-but-disclose proceeding.

In compliance with the terms of Section 1.1206(b)(1), we are transmitting herewith two copies of the ex parte submission we are making.

Should there be any questions in regard hereto, please communicate with the undersigned.

Very truly yours,

Barry A. Friedman

Enclosures
cc: Alan J. Bouffard, Esq.

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

EX PARTE OR LATE FILED

In the Matter of	)	
FEDERAL-STATE JOINT BOARD ON UNIVERSAL SERVICE	)	CC Docket No. 96-45
	)	

To: The Commission

EX PARTE SUBMISSION OF THE BOSTON COMMUNICATIONS GROUP, INC.

The Boston Communications Group, Inc. ("BCG"), by its attorneys, and pursuant to Section 1.1206(a)(1) of the Commission's Rules, hereby submits a statement in regard to the subject of toll limitation service which are now being considered by the Commission in connection with Petitions for Reconsideration submitted by parties to the Report and Order in CC Docket No. 96-45, FCC 97-157, released May 8, 1997 ("Report and Order"). In support thereof, BCG states as follows.

1. BCG is a corporation which specializes in providing products and services to the telecommunications industry. The bulk of its customers are facilities-based carriers that provide local, toll and interexchange services. One of BCG's operating subsidiaries, BCG Systems Division, located in Tulsa, Oklahoma, is a provider of enhanced service telecommunications products such as voicemail systems, fax mail, CLASS announcers, and prepaid calling cards. These products, which are marketed by BCG under the trade name BCG VISION, are in the form of a platform

that allows local exchange carriers to offer some or all of the products to customers. Among the offerings historically included in the platform was a feature allowing for limitations on toll calling.

2. As indicated by the attached Statement, the BCG VISION Platform is a product that is presently on the market and allows LECs to offer toll limitation services on an economical basis. Operating under a V and H Table Coordinate basis for processing interexchange calls, the BCG VISION permits the LECs to enter their own charges for toll calls and access charges.

3. As for interexchange rates, the BCG VISION platform is constructed so that it can do credit monitoring on a real time basis while calls are in progress so that both the LEC and the customer is aware of where the customer stands in regard to any toll limit. As a real time system, BCG VISION provides a service that is as accurate as the interexchange carriers' own records.

4. Considering the availability of this product, BCG is troubled by statements contained in some of the Petitions for Reconsideration in this proceeding, as well as announcements and publications in other forums, asserting the supposed difficulties in securing technology to implement toll limitation services. These parties have questioned the ability of LECs to provide toll limitation services due to the claimed absence of products and services to perform this function. For example, the United States

Telephone Association argued in its Petition for Reconsideration that a requirement to "offer toll control in addition to toll blocking places an enormous and unnecessary burden on local exchange carriers (LECs)." BCG respectfully disagrees with such assertions.

5. Contrary to the claims that made their way into the argument of toll limitation services, there should be no dispute over available technology. BCG, for one, stands ready, willing and able to deliver a product to LECs that will do the toll limitation job and more. This product is now available and BCG is prepared to meet the needs of the LEC community. In fact, BCG submits that the pricing of its product is competitive and the financial benefits of the service to the LECs should offset the costs they will incur. Thus, if there is to be a debate over toll limitation services it should be over the merits of the proposal, not the ability of the carriers to implement it in a timely and fiscally prudent manner.

6. In adopting the toll limitation service provisions, the Commission was addressing the concerns of Congress as expressed in the Telecommunications Act of 1996. Section 254(b)(3) of the Communications Act, added by the Telecommunications Act of 1996, requires the Commission to make available to low-income consumers access to telecommunications and information services. The Commission, in the Report and Order, has agreed with the Joint

Board and correctly concluded that "Lifeline consumers also should receive, without charge, toll-limitation services." Id. at ¶ 385.

7. BCG submits that there is absolutely no reason for the Commission to retreat from the findings of the Joint Board and the Report and Order. Toll limitation services will allow low-income households to benefit from the many and varied changes in the telecommunications and information industries. In that BCG and, in all likelihood other parties, can offer LECs the products necessary to implement toll limitation services on a prompt and economical basis, reconsideration of this part of the Report and Order is neither necessary nor proper. Rather, the toll limitation requirements should be affirmed as soon as possible.

8. In sum, the Commission has taken a valuable action to serve the public interest by mandating toll limitation service. The record fails to contain a substantial basis for this action to be altered, let alone reversed. Absent such a record,

reconsideration is not warranted at this time.

Respectfully submitted,

BOSTON COMMUNICATIONS GROUP, INC.

By: _____

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Its Counsel

Dated: December 22, 1997

BCG VISION-TLS™ Platform
General Notes

Introduction

The FCC universal services requirements highlighted in FCC Document 97-157stipulate a requirement for local exchange carriers to provide universal services which incorporate a method of toll limitation for low-income or credit unworthy subscribers so that they may benefit from having toll services but on a limited financial exposure to local telephone company and/or the long distance toll provider. The comment brought to the FCC has been that there is no technology available to perform this service and offer this service to subscribers on an economical basis.

Boston Communications Group has both the technology and the economics of deploying technology that will make it financially attractive for telephone exchange carriers, serving very small to very large subscriber base's to afford the technology to provide the toll limitation services as described in the FCC docket.

What is the Technology?

The BCG VISION Platform is an enhanced services platform. It offers a variety of features that can be extended by the local exchange carrier to its subscribers, whether they are a standard residential business subscriber or subscribers requiring service under the universal service offerings such as TLS™.

The basic BCG platform extends to these carriers toll limitation services, the availability of voice mail, fax mail, and prepaid local calling cards as part of the basic platform set.

The platform operates under a V and H Table Coordinate basis for processing long distance calls and will enable the LEC to enter the rate tables for either, their equal access toll provider on their own rates for toll offering or flat rate toll services offered to the subscribers requiring the TLS™ type service.

The only cooperative factor required for the LEC is that those carriers providing toll services to subscribers falling under the TLS™ requirement provide updated and routinely updated rate tables to the telephone company and/or Boston Communications Group for insertion into the telephone companies VISION Platform.

The platform at the point of receiving a telephone call will mirror image the toll billing that is being recorded on the appropriate CAMA/LAMA tape and do the actual credit monitoring on a real time basis while calls are in progress to the point that it will provide TLS™ subscribers with warnings as they approach their TLS™ credit limit even during placing a call.

The package is very sophisticated in its ability to monitor, track, and advise both the subscriber and the LEC of the TLS™ subscribers status.

Although not actually utilizing the billing tape, or the long distance providers actual billing mechanism, the accuracy of the TLS™ internal real time tracking system will be as accurate as the long distance carriers records.

Summary

The technology is available now. BCG's Systems Division through its wide diversity of implementing prepaid and credit limit solutions to the cellular, wireless, and wire line industries, is prepared to provide this product to telephone companies throughout the United States requiring deployments beginning January 1998 and beyond.