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March 6, 1998

SENT VIA FEDERAL EXPRESS

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Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: *Petition for Waiver filed by US WEST Communications, Inc.*
CC Docket No. 97-149
CCB/CPD 98-7

Dear Secretary:

This firm represents the Arizona Payphone Association ("APA"). This letter shall constitute APA's comments to the Petition for Waiver filed by US WEST Communications, Inc. ("US WEST"), CC Docket No. 97-149 (the "Petition"). For the reasons stated below, APA opposes the Petition.

The Arizona Payphone Association is an Arizona nonprofit corporation comprised of independent payphone providers ("IPPs") who own and operate pay telephones in Arizona, other US West territories and throughout the country. APA's members are mostly small businesses that have joined together to protect their common interests and rights.

The Petition proposes that end users bear the burden US WEST's obligations. As a result of US West's mistake, it now owes a refund obligation to long-distance carriers. Rather than bear the burden of its own mistake, however, US WEST would pass through the refund obligation to individual end users. This is neither fair nor authorized by F.C.C. rules.

The burden on payphone owners is not insignificant. IPP's make their money one coin at a time. Although the proposed additional charge for a single line may be relatively small, the aggregate charge on dozens or hundreds of payphones is a substantial burden on the business of the small IPP's APA represents. The additional charges will come directly out of already-thin profits.

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For these reasons, the Arizona Payphone Association opposes US WEST's
Petition for Waiver.

Should you have any question, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Randall H. Warner". The signature is fluid and cursive, with a large initial "R" and "W".

Randall H. Warner
For the Firm

RHW/md

cc: Raymond S. Heyman, Esq.
Gary Joseph President of APA

heyman/apa/letters/Fcc05.doc