

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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MAY 18 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In The Matter of)
)
Billed Party Preference) CC Dkt. No. 92-77
for InterLata 0+ Calls)

**REPLY TO RESPONSES TO
PETITIONS FOR RECONSIDERATION**

One Call Communications, Inc., d/b/a OPTICOM ("Opticom"), by its attorney and pursuant to Section 1.429 of the Commissions rules,¹ hereby submits this reply to comments filed in response to petitions for reconsideration filed in the above captioned proceeding.² Specifically, Opticom supports those commenters requesting that the Commission extend its July 1, 1998 implementation deadline for on-demand rate branding for collect calls, and also supports MCI's opposition to the petition of the Citizens United for Rehabilitation of Errants ("CURE") calling for operator service providers ("OSPs") to provide copies of informational tariffs to prison officials and non-called parties upon request.

Opticom has supported the Commission's efforts to require the disclosure of specific rate information to a called party prior to call completion.³ In its Petition, Opticom stated that it may not be able to provide rate branded information to the called party of a collect call by

¹ 47 C.F.R. § 1.429.

² In the Matter of Billed Party Preference for InterLATA 0+ Calls, Second Report and Order and Order on Reconsideration, CC Dkt. No. 92-77, 1998 WL 31845 ("Second Report and Order").

³ See Comments of One Call Communications, Inc. d/b/a OPTICOM, CC Dkt. No. 92-77, submitted July 17, 1996 ("Comments"); Further Comments of One Call Communications, Inc. d/b/a OPTICOM, CC Dkt. No. 92-77, submitted November 13, 1996 ("Further Comments"); Reply Comments of One Call Communications, Inc. d/b/a OPTICOM, CC Dkt. No. 92-77, submitted December 3, 1996 ("Reply Comments").

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July 1, 1998. As explained by Opticom in its Petition, the rate disclosure for a collect call would occur at the terminating end of the call, and providing rate information this far into the call will require technology upgrades that Opticom does not believe are yet available to the OSP industry.

Opticom's position is supported by many commenters in this proceeding. For instance, MCI, LCI, Cleartel, Operator Service Company, Teletrust Communications Services, and AT&T have all stated that they will not be able to comply with the July 1, 1998 deadline. In addition, both AT&T and MCI state that it will be necessary to file a waiver if the Commission does not extend the July 1 deadline. As stated in its Petition, Opticom will also find it necessary to file a request for waiver of the July 1 deadline if its Petition is not granted.

Opticom respectfully requests that the Commission reconsider its decision to require compliance with the on-demand rate branding requirement for collect calls by July 1, 1998. As noted in its Petition, Opticom estimated in its Further Comments that it would take a team of at least two people working between eight and eighteen months to implement such an on-demand system.⁴ Therefore, Opticom respectfully requests that the Commission extend the date by which all OSPs are required to comply with the rate disclosure requirements until October, 1999.

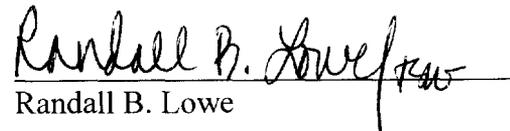
In addition, Opticom supports MCI's opposition to the CURE Petition requiring OSPs to provide informational tariffs to prison officials and other non-called parties upon request. As stated by MCI, informational tariffs are already filed with the Commission, and are made publicly available to any interested parties. Providing rate information to the calling party of a collect call will only increase the overall costs of an OSP's service, and will not further any public interest goals.

⁴ Further Comments at 6.

Based on the forgoing, Opticom respectfully requests that the Commission postpone the instant rules as they apply to collect calls until October, 1999, and that the Commission deny CURE's request to require OSPs to provide non-called parties with informational tariffs.

Respectfully Submitted,

One Call Communications, Inc. d/b/a
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