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July 24, 1998

BY OVERNIGHT MAIL

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

Re: CC Docket No. 96-128

Dear Ms. Salas:

Enclosed for filing, please find an original plus four (4) copies of the Reply Comments of Frontier Corporation in the above-docketed proceeding.

To acknowledge receipt, please affix an appropriate notation to the copy of this letter provided herewith for that purpose and return same to the undersigned in the enclosed, self-addressed envelope.

Very truly yours,

Michael J. Shortley, III

cc: Chief, Enforcement Division (2)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996	)	CC Docket No. 96-128

REPLY COMMENTS OF FRONTIER CORPORATION

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July 24, 1998

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Summary

Frontier submits this reply to comments received on the Commission's notice on remand. Underlying the payphone providers' market-based approach are, as the D.C. Circuit has recognized, at least two fundamental prerequisites: (1) the markets for coin and coinless calls are comparable; and (2) the price for a local coin call approximates the costs of a local coin call. Unless these two prerequisites are met, there is no rational grounds upon which the Commission may rely to re-adopt its market-based approach. The record does not justify either such conclusion. The Coalition's noted economists *assume* that both conditions are met, but they make no attempt to demonstrate that, in fact, they have been met. As such, the conclusions that they draw provide no basis for the Commission to make any reasoned policy decision. In fact, APCC's economists contradict the Coalition's economist in one critical respect -- they effectively concede that the markets for coin and coinless calls are largely independent. Equally as important, despite being afforded yet a third opportunity to do so, the Coalition fails to produce any evidence regarding the costs that they incur to handle coin -- much less coinless -- traffic and the record demonstrates that costs and rates do not converge.

As the remaining issues have been briefed and argued time again, Frontier will confine its reply comments to these two issues.

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REPLY COMMENTS OF FRONTIER CORPORATION

Introduction

Frontier Corporation ("Frontier") submits this reply to comments received on the Commission's notice on remand.[1] Predictably, the payphone service providers -- particularly the RBOC/GTE/SNET Payphone Coalition ("Coalition") and the American Public Communications Council ("APCC") -- continue to press their claims for even more exorbitant compensation than the Commission itself has unsuccessfully tried twice to impose.[2] The Commission should ignore these pleas. This time around, the Commission should recognize that its market-based approach is fundamentally flawed and adopt a fair, cost-based payphone compensation plan.

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1 Public Notice, Mimeo 84032, *Pleading Cycle Established for Comments on Remand in the Payphone Proceeding,* DA 98-1198 (July 10, 1998).

2 *See Illinois Public Telecommunications Ass'n v. FCC,* 117 F.3d 555 (D.C. Cir. 1997); *MCI Telecommunications Corp. v. FCC* No. 97-1675, slip op. (D.C. Cir. May 15, 1998).

Underlying the payphone providers' approach are, as the D.C. Circuit has recognized, at least two fundamental prerequisites: (1) the markets for coin and coinless calls are comparable; and (2) the price for a local coin call approximates the costs of a local coin call.[3] Unless these two prerequisites are met, there is no rational grounds upon which the Commission may rely to re-adopt its market-based approach.[4] The record does not justify either such conclusion. The Coalition's noted economists *assume* that both conditions are met, but they make no attempt to demonstrate that, in fact, they have been met. As such, the conclusions that they draw provide no basis for the Commission to make any reasoned policy decision. In fact, APCC's economists contradict the Coalition's economist in one critical respect -- they effectively concede that the markets for coin and coinless calls are largely independent. Equally as important, despite being afforded yet a third opportunity to do so. the Coalition fails to produce any evidence regarding the costs that they incur to handle coin -- much less coinless -- traffic and the record demonstrates that costs and rates do not converge.

As the remaining issues have been briefed and argued time again, Frontier will confine its reply comments to these two issues.

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3 *MCI, supra*, slip op. at 6.

4 The Coalition's assertions that the D.C. Circuit essentially endorsed the Commission's market-based approach (Coalition at 1) are simply wrong. The Court merely observed that a market-based approach could satisfy section's 276 requirement that the Commission provide "fair compensation" for payphone owners. *MCI, supra*, slip op. at 6. Such statements say nothing about whether the record would permit the Commission to justify such an approach. The major reason that the Commission has failed thus far to do so is because it cannot.

Argument

I. THE MARKET FOR COIN AND COINLESS CALLS ARE NOT COMPARABLE.

For the Commission's market-based approach to work, it must be able to demonstrate that the markets for coin and coinless calls are comparable. Otherwise, the Commission's approach is truly comparing apples to oranges.[5]

The two markets, however, are not comparable, because the buyers are fundamentally different, at least in the Commission's view of the world. In the coin world, the parties to the transaction are self-evident -- the payphone provider and the caller who places coins in the instrument. Both parties understand the terms of the transaction prior to its being consummated and are able to agree upon those terms, as witnessed by the transaction being completed.

The same is not true of coinless calls. For access code calls, the Commission has forced an involuntary middleman -- the interexchange carrier -- into the picture. As Frontier explained in its comments,[6] the imposition of this middleman distorts the competitive process as the ultimate buyer does not know -- at the point of transaction -- what the cost of that transaction will be. Absent such knowledge, the market cannot be said to function efficiently or effectively. The same is basically true for subscriber 800 calls. Here, however, there are two

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5 *MCI, supra,* slip op. at 6.

If the market participants were the same, then arguably the two markets could be considered comparable. This would require the Commission to adopt a calling-party-pays approach to payphone compensation. *See* Frontier at 9-10.

6 *Id.* at 3-5.

middlemen -- the interexchange carrier and the 800 subscriber. The ultimate payor will still likely be the end user, but the end user will not know that he or she is expected to pay for the call – or how much – until a long distance bill is delivered later. The market dynamics and players fundamentally differ between the markets for coin and coinless calls on the demand side, and neither the Coalition nor AFCC attempt to address this fundamental problem with the Commission's market-based approach.

The Coalition implicitly recognizes this by not contesting it. However, it contends that the markets are comparable on the supply side because the same instrument is used for all types of calls.[7]

While this observation is undoubtedly true, it ignores several factors. *First*, it ignores the demand side of the equation, as Professor Kahn acknowledges.[8] To use an analogy, because steel is an input to both automobile manufacturing and aircraft carrier production, the market for steel is clearly affected by the relative demands of both the automobile and naval defense industries. Similarly, the market for payphone placement -- in which the participants are location owners (not end users) and payphone providers -- is affected by the relative demands for coin and coinless callers. This, however, is a distinct market from those that are downstream -- the markets for different types of payphone calls.

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7 Coalition at 13.

8 Kahn Decl. at 4.

To continue the analogy, no one would seriously contend that the markets for automobiles and aircraft carriers are comparable simply because they both use steel as an input. With respect to pay telephones, the purchasers of coin and coinless calls are basically searching for different goods, *i.e.,* the *output* markets are different even if they share a common input. The biggest distinction is that coin callers are typically making local calls, while coinless callers are typically making long distance calls. From the demand side, the two outputs are largely not substitutable. That is, a local coin call within the Rochester area is not substitutable for a call from Rochester to Washington The Coalition confuses input with output markets.

Second, even from the supply side, the two markets have different inputs, apart from the instrument. For example, to process a local coin call, the payphone service provider must incur local line charges, coin collection costs and the like which are totally avoided in the context of coinless calls.[9]

Finally, APCC's own economists effectively admit that the two markets are independent. In discussing the inverse elasticity rule, they write:

> The inverse elasticity rule applies so long as demands for the various products are independent. In the instant context, demands for coin calls and

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9 The Coalition suggests -- in discussing cost offsets -- that cost differences between the two types of calls tend toward zero, and cite Flex ANI as an example. Coalition at 31-32. In addition to the fact that this example confuses input and output markets, the example is silly. Exchange carriers offer Flex ANI in order to enable them to collect payphone compensation *and then* offer Flex ANI service to interexchange carriers for a charge (for delivery of the digits) to afford them the privilege of *paying* payphone compensation. Without belaboring the point, there is something seriously wrong with this picture.

> coinless calls would appear to be largely although not completely independent.[10]

This independence destroys the comparability of the markets.[11]

As such, the proponents of the market-based approach have failed to satisfy one prerequisite of that approach as a regulatory prescription tool -- the comparability of the two markets that the Commission relentlessly seeks to compare.

II. THE COSTS AND PRICES OF LOCAL COIN CALLS DO NOT CONVERGE.

The Coalition's experts agree with the D.C. Circuit that another prerequisite to the Commission's market-based approach is that rates and costs converge.[12] Yet, the Coalition blatantly ducks this issue. Despite having a third bite at the apple, the Coalition absolutely refuses to produce evidence showing their costs of processing coin -- much less coinless -- calls. Moreover, the Coalition's experts merely *assume* -- but do not demonstrate -- that competitive conditions will produce rates that approximate costs.[13]

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[10] Haring and Rohlfs Decl., ¶ 16.

[11] Frontier does not dispute the economic rationality of Ramsay pricing. There are, however, two objections to the use of Ramsay pricing as a regulatory tool in this context. *First*, it assumes that the ultimate consumer for the particular service or product in question will know the transaction cost at the time of the transaction. As Frontier has demonstrated, with respect to compensable calls, at least in the Commission's model, that circumstance does not prevail. *Second*, it assumes that the initial payor -- the interexchange carrier, in this case -- can avoid the transaction *ab initio*. As the record in this protracted proceeding demonstrates, this is also not the case.

[12] *E.g.*, Kahn Decl. at 3.

[13] *E.g.*, Becker Decl., ¶ 26 ("note that the $0.35 rate for local coin calls [ ] predominates *in what the FCC agrees is a competitive marketplace....*") (emphasis added); Kahn Decl. at 2 ("I have not myself conducted a study of the payphone market sufficient to permit me to conclude that it is indeed effectively

The record, however, conclusively demonstrates that the cost of a local coin call is sixteen cents or less and the cost of a coinless call is less than that.[14] With the record in the state that it is, it is particularly telling that the Coalition again chooses not to submit cost data.[15] The Commission, at this point, should take this omission as a conclusive admission that the data in the record concerning exchange carrier payphone costs is accurate.[16]

The Coalition trumpets the fact that the deregulated local coin rate of thirty-five cents now exists in the vast majority of locations.[17] What the Coalition conspicuously fails to mention is that this rate is over *twice* the cost of a local coin call. This is not an example of a competitive market, but an example of the exercise of market power.

The Coalition's and APCC's justifications for this state of affairs are no less availing. *First*, the claim that the price of a local coin call and the payphone compensation rate must cover fixed costs is a red herring. The cost evidence in the record -- by capitalizing and depreciating capital costs, for example -- is

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competitive."); Geppert Decl. at 2 (merely noting that the prevailing local coin rate is $0.35). Only Professor Hausman asserts that the local coin market is competitive (Hausman Decl., ¶ 2). Professor Hausman, however, provides absolutely no support for this assertion.

14 Frontier at 5-6.

If the costs and rates for coin calls do not even closely converge, the extent to which cost offsets exist (or not) (*see* Coalition at 29-33) becomes irrelevant.

15 That APCC has done so in the past is also irrelevant. As has been explained at length in past comments (*see, e.g.*, Frontier at 6), the Commission has no duty to see to the survival of the least efficient competitors.

16 Nor can the Commission continue to hide behind the assertion that such data is not representative. *See id.*

17 Coalition at 9-10.

designed to replicate a long-run margin cost model in which no costs are fixed. In a long-run marginal cost model, capital costs can be reduced to variable units. Pricing decisions, moreover, are based on long-run, not short-run, marginal costs.

Second, even if fixed costs were an issue, there is no credible evidence in the record that a price for a local coin call or a roughly comparable dial-around rate approximating *twice* the cost of even a local coin call is necessary to recover fixed costs.

Third, the fixed-cost argument totally ignores the economic decision-making in deploying a payphone. As the private payphone operators have admitted,[18] the decision to deploy a payphone is based upon the *coin* revenues expected to be generated from the instrument. Anything else is gravy, and the fair compensation standard of section 276 does not require interexchange carriers to contribute gravy to payphone service providers.[19]

Fourth, the claim that the payphone market is competitive resulting from low barriers to entry[20] is meaningless because it confuses the markets. Location owners and payphone providers -- the participants in the markets to determine the location of payphones -- determine the rents to be retained by

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18 *See* Frontier at 7 n.16.

19 For this reason, the private payphone operators' fixation on the notion that the number of payphones may decline unless the Commission imposes exorbitant payphone compensation rates (Harding and Rohlfs Decl., ¶¶ 4-5) may be safely dismissed. Even if it were true, the Commission need only "encourage" the "widespread" deployment of payphones. 47 U.S.C. § 276. The statute says nothing about mandating the overdeployment of payphones.

20 *E.g.*, Harding and Rohlfs Decl., ¶ 4.

location owners for extending the privilege of placing payphones. That says nothing about the distinct markets for coinless calls placed (and ultimately paid for) by end users. The ability for location owners to extract locational rents simply does not address the competitive choices facing end users.

In short, the payphone owners cannot demonstrate that the second prerequisite necessary to sustain the Commission's market-based approach can be justified.

Conclusion

At this stage in the proceeding, as set forth in Frontier's comments, the Commission faces two realistic choices of being sustained on appeal: (1) adopt a cost-based payphone compensation rate on the order of ten cents per call; or (2) adopt a calling-party-pays approach to payphone compensation.

Respectfully submitted,

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July 24, 1998

Certificate of Service

I hereby certify that, on this 24th day of July, 1998, copies of the foregoing Reply Comments of Frontier Corporation were served by first-class mail, postage prepaid, upon the parties on the attached service list.

Michael J. Shortley, III

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