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

In the Matter of )  
 )  
Calling Party Pays Service Offering in the ) WT Docket No. 97-207  
Commercial Mobile Radio Services )

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**REPLY COMMENTS OF SBC COMMUNICATIONS INC.**

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October 18, 1999

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## SUMMARY

SBC believes that Calling Party Pays (CPP) should not be mandated for Commercial Mobile Radio Service (CMRS). CPP is an answer in search of a problem. CMRS subscribership is booming in the U.S. without CPP. Competition for incumbent local exchange carrier (ILEC) wireline service in the U.S. is flourishing without CMRS-provided CPP. The market should decide whether or not CPP is implemented for CMRS.

ILEC-provided billing and collection for CPP should be permitted, but cannot and should not be mandated or required. Nor should ILECs have to subsidize the decisions of CMRS providers to offer CPP. ILECs do not have the capability or the information to bill and collect for all incoming calls to CMRS subscribers with CPP. Currently 20 percent of CMRS incoming traffic is non-ILEC originated. As more and more competitive local exchange carriers (CLECs) and other wireless providers originate calls to wireless service subscribers, the amount of such unbillable CPP traffic can be expected to increase. Third party clearinghouse billing and collection is available and growing, and may be the only realistic billing option for CPP.

If the Commission decides to intervene in this market, SBC supports the Commission's proposed rate notification requirements for CMRS-provided CPP. One-plus dialing and/or different service area codes for CPP are not adequate substitutes for CMRS-provided rate notification, and the use of those methods raises certain issues. If the Commission decides to implement those methods, they should be the responsibility of the CMRS provider, not the ILEC.

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SBC Communications Inc. (SBC) submits these reply comments on behalf of its wireline telephone and wireless company subsidiaries on Calling Party Pays (CPP) for Commercial Mobile Radio Services (CMRS).<sup>1</sup>

**I. CPP Should Not Be Made Mandatory For CMRS.**

The Personal Communications Industry Association (PCIA) suggests that calling party pays should be made mandatory for CMRS.<sup>2</sup> In SBC's view, CPP is an answer in search of a problem, and should be implemented (if at all) at the discretion of the CMRS provider based upon market conditions. CMRS subscribership is booming in the United States without CPP.<sup>3</sup> Competition for incumbent local exchange carrier (ILEC) wireline services in the United States is also flourishing at an escalating pace and is doing so

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<sup>1</sup> In addition to the wireline telephone and wireless company subsidiaries identified in SBC's initial comments, SBC submits this reply on behalf of the newly acquired Ameritech wireline telephone and wireless company subsidiaries.

<sup>2</sup> PCIA, pp. 14, 18, 21 ["The international experience...demonstrates that when CPP is a preferred or non-optional service offered that is billed by the fixed service provider, it has been successfully implemented..."]. PCIA suggests that the Commission should consider the significance of implementing a service different [optional] from the international [non-optional] service model. PCIA, p. 23. Others similarly suggest that CPP should be a seamless and/or a nationwide service offering. American One, p. 1.

<sup>3</sup> Wireless subscribership in the United States is approaching 70 million users. Joint Consumer Advocates, pp. 6-8; Ohio PUC, p. 5. No "kick start" is needed, and there is no evidence of real market demand for CPP. Florida PSC, p. 2; NTCA, p. 7; see also n. 10, *infra*.

without CMRS-provided CPP.<sup>4</sup> If there is a need for CMRS-provided CPP in the U.S., it clearly has not been demonstrated.

Perhaps more important, most CMRS providers and many CMRS subscribers do *not* want mandatory CPP.<sup>5</sup> For example, CPP is not desired by many business subscribers of CMRS.<sup>6</sup> Like businesses with 800 numbers, those customers are willing to pay for most, if not all, of their incoming calls. In this regard, lest there be any doubt why mandatory CPP is opposed by some business customers, the results of a 1998 Yankee Group survey showed that 77% of consumers would either be “not at all willing” or “not very willing” to pay for calls to a wireless phone or pager.<sup>7</sup> Mandatory CPP would likely hurt, not help, those business customers because it would be likely to decrease their incoming calls.<sup>8</sup>

Mandatory CPP for CMRS would hit hardest those wireline customers who do not have and may not want wireless phones. They would be required to subsidize increased CMRS subscribership and usage by now paying for wireline-originated calls to wireless phone numbers; calls that were previously included in their flat rate for local exchange service and with mandatory CPP would now be billed on a usage-sensitive basis. The elderly and shut-ins on fixed incomes, among others, are likely to be among those most adversely impacted by mandatory CPP. CPP and the related charges would also

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<sup>4</sup> For example, there are at least 41 competitive local exchange carriers (CLECs) providing facilities-based service in Texas and more than 100 carriers reselling Southwestern Bell Telephone Company’s (SWBT) service. CLECs operate in 299 of SWBT’s 300 local calling areas in Texas. SWBT has processed 2.6 million CLEC orders in Texas, and CLECs service 17.8 percent of all business lines in Texas and more than a quarter of a million residential lines.

<sup>5</sup> Cellular Telecommunications Industry Association (CTIA), p. 3; AirTouch, p. 37 n. 84.

<sup>6</sup> Global Wireless Consumers Alliance, p.2; Cable & Wireless USA, p. 2. Examples are traveling salespersons and construction supervisors who conduct business and schedule appointments while on the road.

<sup>7</sup> SBC, p. 5.

<sup>8</sup> BellSouth, pp. 22-23; U S West, p. 8-9 & n. 15.

adversely impact middle or low-income consumers who have wireline service, but do not have or want wireless phones.<sup>9</sup>

Moreover, even when offered on an *optional* basis, CPP for CMRS in the U.S. has been a tremendous failure causing many CMRS providers to either discontinue, curtail, and/or to grandfather their existing or trialed CPP service offerings.<sup>10</sup> Simply stated, no case has been or can be made for mandating CPP for CMRS.

## **II. ILEC – Provided Billing And Collection For CPP Should Be Permitted, But Cannot And Should Not Be Mandated.**

Some commenters suggest that ILEC billing and collection is necessary and, in fact, required for the successful implementation of CMRS-provided CPP.<sup>11</sup> The CTIA, SBC, and the Competition Policy Institute (CPI), among numerous others, disagree with this position.<sup>12</sup>

Illuminet, a third party provider of billing and collection services, makes the case that alternatives to ILEC billing and collection for CPP are out there and growing.<sup>13</sup>

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<sup>9</sup> BellSouth, pp. ii, 23-24. This shift of the burden from CMRS providers and their customers to captive wireline service customers has caused some state commissions to question and oppose parts of the CPP proposal. Ohio PUC, p. 4; California PUC, pp. 6-8, 14; Florida PUC, p. 2; *see also* National Telephone Cooperative Association (NTCA), pp. 4, 7.

<sup>10</sup> SBC's wireless affiliate in Chicago, Cellular One, experienced significant problems with leakage and cancelled its CPP service offerings for new CMRS subscribers in Chicago. SBC, pp. 10-11. BellSouth Cellular offered CPP for three years in Honolulu but pulled the plug saying there wasn't enough customer support to justify it. AirTouch had the service commercially available in nine states, but reportedly only about 5 percent of its customer base signed on to use it. CNET, Monday, September 27, 1999; *see also* Leap Wireless, p. 11. AT&T's CPP test in Minnesota was superseded by its Digital One-Rate plan. BellSouth, p. 12.

<sup>11</sup> AirTouch, p. 10; Pilgrim, pp. 22-23.

<sup>12</sup> CTIA, p. 38; SBC, pp. 7-10; CPI, p. 9; *accord*: Leap Wireless, p. 13; Ohio PUC, p. 15; and California PUC, p. 14.

<sup>13</sup> Illuminet, pp. 2, 6-8. [...the telecommunications billing, collection and customer care industry is a thriving business in its own right, growing worldwide from roughly \$10 billion in 1997 to an estimated \$14 billion by 2000, generating a compound annual growth rate of 13 percent. The third-party service provider segment of the billing, collection and customer care industry is expected to grow even faster at a compound annual growth rate of 30 percent during the same period.]. For a discussion of the various alternatives to ILEC billing and collection, see Cincinnati Bell, pp. 5-6;

Some State Commissions object to ILEC-mandated billing and collection because of the anticompetitive effect it would have on third party provision of billing and collection services.<sup>14</sup>

Beyond the lack of general support for ILEC-mandated billing and collection for CPP is the problem of leakage and the fact that ILECs simply do not have the capability or the information to bill and collect for all CMRS, CLEC, IXC, payphone, and/or other ILEC originated calls to CMRS subscribers with CPP service.<sup>15</sup> The problem of leakage (calls that cannot be billed nor revenues collected) has caused some U.S. CMRS companies to abandon the CPP option, even with ILEC-provided billing.<sup>16</sup> Also, in the U.S., unlike other countries, the leakage problem can be expected only to increase as more and more calls are originated by *non-ILEC* local exchange service and other wireless service customers.<sup>17</sup>

Given the large number of local wireline providers (*e.g.*, 41 facility-based CLEC providers in Texas alone) and others whose customers can be expected to originate calls to CMRS subscribers with CPP, third party clearinghouse provision of billing and

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BellSouth, pp. 14-17; USTA, pp. 6-7; and NevadaCom, pp. 2-3. Cincinnati Bell and BellSouth also provide excellent discussions of why ILEC billing and collection for CMRS-provided CPP cannot and should not be required. Cincinnati Bell, pp. 8-11; BellSouth, pp. 2-20.

<sup>14</sup> Washington Utilities & Transportation Commission, pp. 4-5; *see also* Illuminet, p. 7. [“...regulatory mandates for all LECs to provide CPP billing and collection service may actually have an unintended anti-competitive impact by curtailing market activity that could result in the emergence of other non-LEC based billing options.”]

<sup>15</sup> U S West, p. 25 & n. 62; BellSouth, p. 3-4. Although AirTouch downplays the CPP leakage problem as small, its own figures show non-ILEC originated calls to wireless phone numbers to be around 20 percent of incoming CMRS traffic. AirTouch, p. 12.

<sup>16</sup> SBC, pp. 10-11.

<sup>17</sup> Leap Wireless, p. 5 [“The rapidly expanding multiplicity of wireless and wireline carriers in the U.S. necessarily means that CPP implementation will entail a degree of additional and technical billing complexity that simply is not present elsewhere in the world.”]; BellSouth, p. 3 [“With the growth of CLECs and wireless carriers, an increasing percentage of calls to wireless phone potentially subject to CPP can be expected to originate through such non-LEC carriers.”] See also n. 4, *supra*.

collection may be the only realistic option for CPP.<sup>18</sup> Such aggregated billing for multiple carriers will reduce the unwelcome possibility of parties receiving multiple bills from a number of different carriers. The clearinghouse option may also be the best way to avoid controversy about prohibited disconnection of basic local exchange service for nonpayment of CPP charges, and about customer confusion on whose charges they really are. While ILEC billing and collection for CPP should be permitted, it raises issues not associated with other billing options.<sup>19</sup>

ILECs and their wireline customers should not be expected to subsidize, underwrite, or fund all of the systems and administrative changes necessary to accommodate the requested CMRS billings for CPP.<sup>20</sup> SBC agrees with the Wisconsin Commission that “the cost of developing and maintaining ILEC billing and collection for CPP may not be justified by the possible benefits of the service.”<sup>21</sup> SBC also agrees that the ILECs should not be forced to “bill and collect for CMRS providers who have the clear choice to collect charges for CMRS airtime from their subscribers instead of calling parties.”<sup>22</sup> Indeed, as Qwest, the NTCA, and others point out, the CMRS provider is the entity receiving the benefits (including the revenues) from providing the CPP service and, thus, it is the CMRS provider who should bear the associated burdens and costs and who should negotiate and decide among the available billing and collection service options.<sup>23</sup>

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<sup>18</sup> U S West, pp. 20-21 & n. 50 [“ ‘[N]ationwide billing arrangements can easily be secured through the billing aggregators that have grown up in the area of IXC billing for smaller carriers.’ ”]. Cincinnati Bell, pp. 5-7, 10 & n. 19 [noting the efforts of the National Calling Party Pays Forum to establish a national commercial clearinghouse for the billing and collection of CPP charges]; Nextel, p. 12 & n. 14 [recognizing the use of clearinghouses to obviate the need for wireless carriers to enter into a separate billing and collection agreement with every LEC, thereby facilitating the economic introduction of CPP].

<sup>19</sup> Washington Utilities Commission, pp. 2-5 [on the potential effect of ILEC-mandated billing];

<sup>20</sup> BellSouth, p. 20; NTCA, p. 4.

<sup>21</sup> Wisconsin PSC, p. 5; *see also* NCTA, p. 4 and OPASTCO, p. 2. SBC likewise agrees with the Ohio Commission that ILEC billing will result in consumers paying more for CPP than for traditional cellular calling. Ohio PUC, p. 7.

<sup>22</sup> National Telephone Cooperative Association, p. 5; *accord*: Cincinnati Bell, p. 7.

<sup>23</sup> Qwest, p. 5; NTCA, p. 4; U S West, pp. ii-iii, 1-7, 11-19, 26-29.

AirTouch criticizes a California Commission decision which refused to compel Pacific Bell to provide billing and collection for an AirTouch CPP market trial in California.<sup>24</sup> Pacific Bell's decision not to participate in the trial was based upon unreasonable demands made by AirTouch, including that it receive billing and collection from a tariff that was not designed to and would not have recovered the costs of Pacific Bell providing billing and collection for CPP. There were also issues concerning notice to the calling party of the charges, and who should provide such notice, as well as issues concerning customer confusion, "leakage" and uncollectibles, and loss of goodwill. Moreover, the fact that Pacific Bell decided not to and was not ordered to participate in the trial<sup>25</sup> is irrelevant since AirTouch was free at all times to do its own billing or to contract out that service to other providers. Hence, as Bell Atlantic notes, the California decision did not "have the effect of prohibiting the ability" of AirTouch to provide CPP and did not constitute state entry regulation inconsistent with Section 332.<sup>26</sup>

### **III. SBC Supports The Commission's Proposed Notification Requirements for CMRS-Provided CPP.**

Some commenters oppose the Commission's proposed CMRS notification requirements for CPP.<sup>27</sup> If the Commission decides to intervene in this market and to authorize CPP as an option, SBC supports the notification requirements proposed by the Commission.

PCIA suggests that rate information need not be included or disclosed in the notification.<sup>28</sup> SBC respectfully disagrees with PCIA. Because the CMRS provider of CPP likely will have no existing or pre-existing contractual (*i.e.*, presubscribed) relationship with the calling party, SBC agrees with the California Commission that rate notification is required to create the relationship which would permit CMRS providers to

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<sup>24</sup> AirTouch, pp. 32-36.

<sup>25</sup> D.97-06-109 (June 30, 1998).

<sup>26</sup> Bell Atlantic, p. 9.

<sup>27</sup> PCIA, pp. 28-30, 47-48; CTIA, pp. 22-26, 30.

<sup>28</sup> PCIA, pp. 28-30.

collect charges from the calling party.<sup>29</sup> SBC also agrees with the Federal Trade Commission (FTC) that CPP presents a situation in which pay-per-call like abuses could arise. The danger of such abuses increases significantly without a CPP rate notification requirement.<sup>30</sup>

Although some commenters suggest one-plus dialing or different service area codes (SACs) as viable and less onerous alternatives to the Commission's proposed rate notification requirements,<sup>31</sup> SBC does not believe those alternatives to be desirable, or adequate. One-plus dialing means different things in different jurisdictions depending upon the jurisdiction's particular dialing patterns and requirements, and not all one-plus calls are subject to a separate or toll dialing charge.<sup>32</sup> Also, there is no guarantee that one-plus dialing for toll services and one-plus dialing for CMRS-provided CPP will involve anything approaching the same or even similar rates.<sup>33</sup>

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<sup>29</sup> California PUC, p. 4 & n. 3, p. 10. ["Customer liability for CPP charges if rate information is not included in the uniform notice would be in doubt, as an implied contract between the calling party and the CMRS provider would not be created if the calling party does not receive notice of the charges to be imposed."].

<sup>30</sup> FTC, pp. 9-11, 14, 23-28; Wisconsin PSC, p. 3. The potential for abuse exists because the calling party may not have a relationship with the CMRS provider and will have little or no influence on that provider's CPP rates. The situation is different in some European countries where the ILEC or PTT sets the terminating rates, PCIA, p. 59; a practice which some argue is prohibited in the United States. AirTouch, p. 50; PCIA, pp. 25-27, 31-33.

<sup>31</sup> PCIA (one-plus), p. 49; Ad Hoc Telecommunications Users Committee (SACs), pp. 3, 16-23.

<sup>32</sup> Bell Atlantic, p. 4 ["1+ dialing of CPP calls will not give the caller notification that he will have to pay extra for the call, because there are many areas in which local calls are dialed 1+."].

<sup>33</sup> As the NTCA and Nextel note, the rate structures for CMRS and long distance are different and are likely to involve different charges. NTCA, p. 4; Nextel p. 5 & n. 4. Thus, using a 1+ dialing pattern for CPP in lieu of rate notification is not likely to inform or provide the calling party any inkling of the specific charges involved. To the contrary, some commenters estimate a charge of 20 cents to 40 cents per minute for CPP compared to a long distance charge under certain calling plans as low as 5 cents or 10 cents a minute. PCIA, p. 37, 42-43; SBC, Attachment, pp. 33-36.

The use of separate service area codes (SACs) also presents rate notification and contractual relationship problems.<sup>34</sup> Moreover, creating and assigning separate SACs will only exacerbate existing number conservation and exhaust problems through the assignment of separate NXX codes for a CMRS billing option – namely, CPP.<sup>35</sup> It will also raise number portability issues that do not exist in the European system.<sup>36</sup> SBC agrees with U S West and others that the use of one-plus dialing, SACs, etc. are CMRS provider issues and would be caused by the CMRS provider's decision to offer CPP. As such, the ILECs should not be required to subsidize or underwrite those offerings.<sup>37</sup>

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<sup>34</sup> Special numbering codes provide no protection against unreasonable or excessive charges for CPP. Washington Utilities Commission, p. 4. They also would not create the contractual relationship referenced by the California Commission. See n. 29, *supra*.

<sup>35</sup> PCIA, p. 49 & n. 113; CTIA, p. 21; Ohio PUC, p. 13.

<sup>36</sup> NTCA, p. 4; Florida PSC, p. 3. Optional CPP with distinctive SACs requires U.S. CMRS subscribers to change phone numbers to select another CMRS provider, *e.g.*, a CMRS provider without a CPP plan. In Europe, where CPP is non-optional, no such change is required. Nextel, pp. 6-7, n. 5 & n. 7; BellSouth, p. 25.

<sup>37</sup> U S West, pp. ii-iii, 2-8; BellSouth, p. 20; USTA, p. i, 6, 13.

#### **IV. Conclusion.**

CPP is not necessary for the implementation and widespread deployment of CMRS in the United States either as a stand alone service or as an alternative to ILEC wireline service. CPP for CMRS should not be mandatory in the U.S., and ILEC billing and collection for CMRS-provided CPP should not be mandated or required. Calling party notification requirements should be adopted if the Commission decides to intervene in the market and to authorize a CPP option for CMRS. ILECs should not be required to subsidize or underwrite CMRS providers' decisions to offer CPP.

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October 18, 1999

**CERTIFICATE OF SERVICE**

On this 18<sup>th</sup> day of October 1999, I, Mary Ann Morris, hereby certify that the Reply Comments of SBC Communications Inc. in WT Docket No. 97-207 have been served upon the parties listed in the Service List attached to the Reply Comments of SBC Communications Inc.

/s/ Mary Ann Morris

October 18, 1999

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