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PRESIDENT

Harlem Consumer Education Council, Inc.

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YOUTH CONSUMERS EDUCATIONAL COUNCIL

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

December 2, 1999

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-B-204
Washington, DC

RE: Dockets 96-262, 94-1, 89-249, 96-45, Reply Comments

Dear Ms. Salas:

On behalf of the Harlem Consumers Council and the Columbia Consumer Education Council, Inc., we wanted to offer comments in response to a proposal submitted by the Coalition for Affordable Local and Long Distance Service (CALLS) to reform interstate access charges and Universal service. CALLS members include Bell Atlantic, AT&T, BellSouth, SBC and Sprint. I know it seems impossible that these groups are working together, but they are.

We are not experts in telecommunications and access reform, but both of our groups do know that something has to change in the telephone marketplace. We are members of the Alliance for Public Technology, and have seen their comments and Consumer Welfare study on access reform.

According to APT and the study, the plan will simplify telephone bills, reduce the amount local companies charge long-distance providers for access and set aside a \$650 million universal service fund.

We like that the plan suggests a single flat rated subscriber line charge, created by consolidating the existing SLC with current charges related to the presubscribed interexchange carrier charge. This translates into a greater portion of the bill being covered by Lifeline. That means poor consumers will have more of their bill paid for.

We were also encouraged by the study findings that Lifeline customers with annual incomes below \$10,000 could receive almost 3 percent in annual welfare gains. People with incomes between \$10,000 and \$20,000 could obtain added benefit worth about 2.6 percent per year.

The companies are predicting lower long-distance rates for consumers if the plan is approved. As APT said in their original comments, their study "assumes that long distance price reductions are commensurate with changes in per minute switched access charges." We agree with APT and urge the commission to pressure the companies so they cut long distance rates in a manner that maximizes the consumer welfare benefits.

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Thanks for your efforts to help all consumers get good, affordable phone service.

Sincerely,

Florence Rice
President, Harlem Consumers Council

Dorothy Garrick
Columbia Consumer
Education Council, Inc.

CC: Chairman William E. Kennard
Commissioner Susan Ness
Commissioner Michael Powell
Commissioner Gloria Tristani
Commissioner Harold Furchtgott-Roth

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