

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

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In the Matter of

Domestic, Interexchange Carrier)
Detariffing Order Takes Effect;)
Common Carrier Bureau Implements)
Nine-Month Transition Period;)
Comment Sought on Modifications to)
Transition Plan)

CC Docket No. 96-61

COMMENTS OF ECONOBILL CORPORATION

In response to the Commission's Public Notice dated May 9, 2000, Econobill Corporation ("Econobill") respectfully submits the following comments pertaining to the detariffing transition plan.

I. PERMISSIVE TARIFFING OF BUNDLED SERVICES SHOULD BE PERMITTED

Econobill supports permissive tariffing of bundled domestic and international service plans throughout the nine month transition period because it will be very difficult for interexchange carriers ("IXCs") to offer such arrangements any other way. Service agreements between IXCs and their customers are primarily dependent on customer commitments¹, which invariably consist of both domestic and international usage. In addition, discounts offered by IXCs often apply to the full range of services, both domestic and international. Bundled domestic and international service plans are typically integrated

¹Commitments are expressed financially as minimum gross eligible usage, a dollar amount, which usually does not reflect a division between domestic and international components.

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offerings which cannot be realistically segregated. Requiring carriers to do so would cause needless confusion and increased consumer costs.²

In short, the detariffing transition plan should minimize consumer burden by permitting bundled service arrangements.

II. THE WEB POSTING REQUIREMENT SHOULD BE CLARIFIED

The website posting requirement as it applies during the transition period should be clarified.

First, the website posting requirement should be imposed immediately—by July 1, 2000. The requirement should apply as of this date regardless of whether an IXC has detariffed its domestic offerings or not. In this manner, consumers will have meaningful, immediate and uniform access to all carrier website postings, not staggered, delayed access (which would be confusing) as IXCs detariff.

Second, the Commission should clarify that the mere posting on websites of tariffs withdrawn under detariffing will not satisfy the posting requirement, 47 C.F.R. 42.10.(b). Existing IXC tariffs as filed with the Commission are essentially legal submissions governing the IXC/end user relationship and are not presented in “an easy to understand format” from the consumer’s perspective. IXCs should instead post basic plan and rate information which consumers will find useful, and not be allowed to post actual detariffed “tariffs” to satisfy the posting requirement.

²Costs would necessarily increase as consumers would be required to incur the added expense of reviewing at least two fundamentally different service plans, one covering international tariffed offerings and another covering non-tariffed domestic arrangements.

Finally, the website posting itself should supply an address where public disclosure information, made available under Section 42.10(a) of the Commission's Rules, can be obtained.³

III. CONCLUSION

Econobill urges the Commission to take the instant Comments into account in finalizing its transition plan requirements.

Respectfully submitted,



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³It is worth noting that the Commission has concluded that individually-negotiated service arrangements as well as mass market offerings are subject to the disclosure requirement. See In the Matter of Policy and Rules Concerning the Interstate, Interexchange Marketplace, Second Order on Reconsideration and Erratum, 14 FCC Rcd 6004, 6014, n. 60 (1999).