

V. The FCC Must Enforce its Mandate for Cost Based Payphone Interconnection Rates (cont'd)

B. The FCC must explain and enforce the standard

- States have followed widely varying interpretations
 - In South Carolina the PSC ruled that the cost based monthly rate level is \$25.49 (the pre-existing average monthly BellSouth rate was \$64.09)
 - In North Carolina the PSC summarily concluded that the existing \$51.60 average monthly rate is “reasonable”
- Common Carrier Bureau efforts to explain the scope of the requirement have been perverted by ILECs
- Request for FCC ruling has been pending for 2 1/2 years
- Chairman Kennard has stressed: “If you write a rule, you have to muster the resources and the will to enforce it.” *Defining Vision* (July 15, 1999)

- V. The FCC Must Enforce its Mandate for Cost Based Payphone Interconnection Rates (cont'd)**
- C. FCC has mandated “cost based” ILEC interconnection rates for both payphones and wireless service, but so far cost based rates have been implemented only for wireless**
- PSPs and wireless providers compete to sell interconnected minutes on ILECs wireline networks
 - ILEC network usage rates for PSPs are frequently 5-6 times as high as rates for wireless providers
 - Skewed implementation of “cost-based” rates is arbitrarily picking “winners” and “losers” in payphone-wireless competition
 - “We must continue to ensure that the momentum toward competitive markets moves forward on a technology-neutral basis...” Chairman Kennard’s *Draft Strategic Plan for the 21st Century* (August 12, 1999)

V. The FCC Must Enforce its Mandate for Cost Based Payphone Interconnection Rates (cont'd)

D. Payphone interconnection charges are often 20-25% of payphone costs. Eliminating the disparity between wireless and payphone interconnection rates would remove one of the largest barriers to retention and deployment of payphones

E. The primary vehicle for a solution is the pending proceeding on Wisconsin payphone interconnection rates

- The FCC must provide a fully articulated decision setting forth for state commissions how to apply the federal new services test to achieve cost based rates
- The Federal new services test applies to every element of payphone line service, including local usage
- PSPs are competitors of the ILEC payphone divisions, not business users. As competitors, PSPs are entitled to cost based rates, without excessive overheads that subsidize other ILEC services

VI. Conclusion

- The Commission should clarify that existing dial-around compensation rules require facilities based carriers to identify the responsible payer for every call
- The Commission should commit to quickly amending the dial-around compensation rules to require the “first-switch” carrier to pay the compensation
- Promptly issue definitive guidance to State PSCs on the application of the Federal cost based rate requirement to all elements of payphone interconnection rates

Community Agencies Speak on the Value of Payphone

The Travelers Aid Society of Philadelphia proudly announces the introduction here of Community Voice Mail™, a system that enables homeless and phoneless poor people to have timely contact with potential employers, landlords, human services providers and family.

This is a very exciting program to bring to Philadelphia. By providing people with a reasonable solution to phone service, one that is dignified and humane, we are assisting people in getting back on track.

The system works like a telephone answering machine giving callers a personal greeting and asking them to leave a message. On a touch tone phone, within minutes a case manager at any of the participating agencies such as Project Hope, Gateway and Casa Del-Carmen can enroll a client on voice mail, providing them with a telephone number to give potential employers, landlords and others. Voice mail box recipients can check their messages toll free from any **PUBLIC PAY PHONE**.

- Ted Weerts
Executive Director
Traveler's Aid Society
Philadelphia, Pennsylvania

Victims of domestic violence and sexual assault often run away quickly, without a chance to phone for help beforehand. They depend on the availability of a public phone, especially after hours, when all businesses are closed.

- Jo Sanders
Executive Director
Family Violence & Rape Crises Services

[W]e serve many clients that use public payphones as a ready resource to communicate. many alcoholics and drug addicts . . . can no longer pay to have phone in their home. To access our detoxification services they call us from pay phones and we must frequently return their calls to pay phones.

- Chuck Fortune
Executive Director
Alcohol and Drug Services

[W]e serve a large number of citizens that have a need for public payphones for low-income people and people away from home.

- Dare Stromer
Executive Director
Blue Ridge Opportunity Commission, Inc.

As a sexual assault response and . . . child advocacy center, many of our clients are low income and cannot afford phone service in their homes. Pay phones are vital to them to stay connected and to feel safe.

- Terri Wallace
Executive Director
The Healing Place

The removal of . . . payphones is a big inconvenience to our tourists in the North Carolina Mountains where cellular service does not work. Moreover, all our Tribal members rely on these payphones when they are away from home to keep in touch with friends and relatives as well as conduct business on these payphones. We also have a great number of Tribal members who [do] not have a telephone in their home and must rely on payphones to contact family and emergency services. **Nowhere are payphones more critical than on rural Tribal lands.**

- The Honorable Leon D. Jones, Principal Chief
The Honorable Carroll J. Crowe, Vice-Chief
The Eastern Band of Cherokee Indians

[W]e serve a large number of citizens that have a need for public payphones. This morning a mother called needing information to help her daughter escape an abusive relationship. The mother explained to us that her daughter had to use a payphone for all calls because he monitored all her calls. In addition, she does not know her own telephone number; he controls all business within the home. Without a payphone being assessable she would completely be isolated from the resources she needs to help assist with escaping the abuse.

- Renée McGill-Cox
Residential Services Director
Domestic Violence
Shelter and Services, Inc.

COMMUNITY TECHNOLOGY INSTITUTE *NEWSFLASH*

OCTOBER 1999

CTI'S BARD RICHMOND IS THE FIRST CORPORATE EXECUTIVE TO RECEIVE THE PRESIDENTIAL SERVICE AWARD

In a ceremony held at the White House on Friday, October 15, Robert "Bard" Richmond was honored for "outstanding effort and commitment to bettering the lives of tens of thousands of poor and homeless people." Richmond, who is chairman of the Seattle-based Active Voice Corporation and co-founder of the non-profit organization, Community Technology Institute, helped establish Community Voice Mail, which now operates in 28 U.S. cities. Three more sites are slated for installation before the end of the year.

Mr. Richmond became involved with Community Voice Mail (CVM) in 1992 when the Seattle Worker Center sought ways to increase the cost effectiveness of the program and serve the growing needs of poor people. He led the effort to customize his company's product for CVM, establishing user-friendly prompts and a reset feature that increases the efficiency of client enrollment.

"We've learned from case managers and CVM users that you can't be a human being without a phone or voicemail. Once you get them, you can pull yourself back up into society. And, any company, like our software company, can find a way to use its talents and its people to help give back to society. It's more than money."

"Now we're on a mission to expand this much, much more—all across the US. We've barely scratched the surface with what we can do."

*Bard Richmond, from his comments at the
Presidential Service Award ceremony.*

Active Voice Corporation has since donated more than 25 voice-processing systems and helped leverage hardware donations from other US manufacturers. Bard also dedicates ongoing staff technical support to Community Voice Mail, most recently ensuring Y2K compliance.

AMERITECH RATES CHARGED TO PSPs

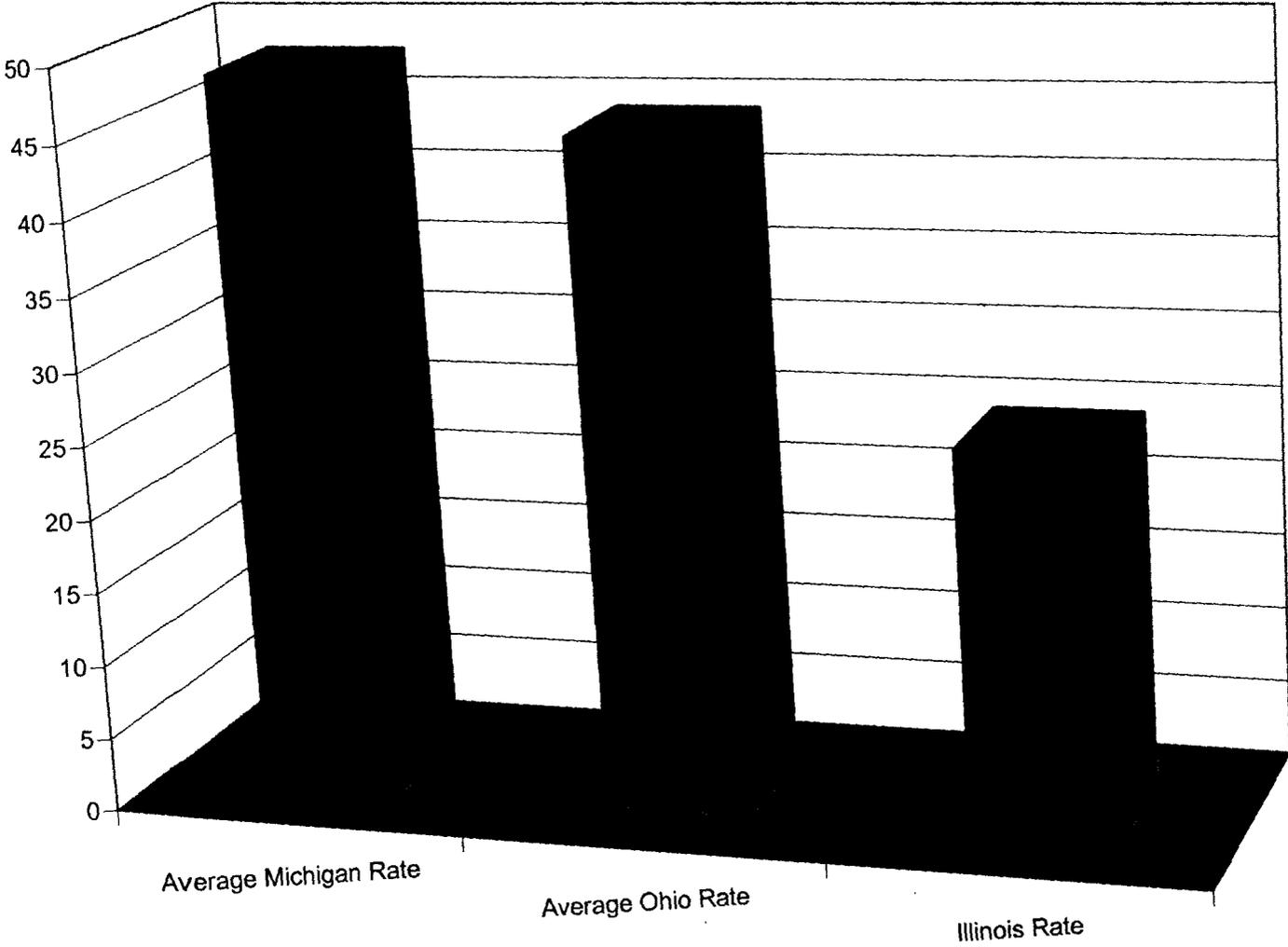


TABLE OF CONTENTS

	Tab No.
Closing the Demographic Divide in Our National Telephone Service	1
The Importance of Payphones in Providing Access to Social Services	2
Letters from Community Agencies on the Need for Payphones	3
Davel's Payphone Base	4
Payphone Usage Trends	5
Congressional Letters Requesting Action In Payphone Dockets	6

Closing the Demographic Divide in our National Telephone Service: Expanding Services for the Underserved through Payphones

I. INTRODUCTION

The United States has the most extensive and accessible telecommunications system in the world. About 94% of all American households have a telephone. Yet, there remain significant segments of the populations that do not have easy access to basic telephone service. Our national policy in recent years has been to support the greater availability of wireless service, which disproportionately is used by middle and upper-middle income individuals. Ironically, however, we have failed to support the availability of public payphones, which are the source of basic telephone service for many poor, rural, and minority households.

The trends in the payphone industry should be pointing in the opposite direction—toward increased deployment of payphones throughout all areas of the country as well as enhanced services. Today in Europe, many consumers have access to information kiosks, Internet portals, and video services, all based on a payphone platform. Under the right regulatory framework, these services will also be widely available in the United States.

Congress codified the goal of expanding the deployment of payphones in section 276 of the Telecommunications Act of 1996. Over the past few years, however, almost 300,000 payphone lines have been disconnected. Many of these disconnections have occurred in rural areas and low income neighborhoods in urban areas. (See Attachment 1.) Part of the explanation is the greater use of wireless phones. To the extent that this shift is due to fair competition and market forces, our regulatory policies are not to blame. Another major reason, however, is that the FCC has failed to resolve two important regulatory issues: (1) the costs that independent payphone providers must pay for access to the local exchange network; and (2) the compensation that all payphone providers receive when consumers make non-coin calls. We discuss these issues below.

II. AVAILABILITY OF TELEPHONE SERVICE

As indicated by the table below, the percentage of households with telephones is much lower for poor Americans and racial minorities.¹

American Households with Telephones				
<u>Household Income</u>	<u>ALL</u>	<u>White Households</u>	<u>Black Households</u>	<u>Hispanic Households</u>
ALL	94.6	95.4	89.7	90.6
Under \$5K	80.3	84.4	71.4	81.1
\$5K-7.49K	83.5	83.6	82.8	80.6
\$7.5K-9.9K	88.1	89.7	82.9	89.2

¹ Data are taken from Telephone Subscribership in the United States, Federal Communications Commission, June 2000. These data are based on a March 2000 survey by the U.S. Census Bureau.

Other categories of households also have particularly low rates of home telephone access. A report by the National Telecommunications and Information Administration (NTIA) identified a number of additional demographic groups with low levels of telephone subscribership.²

<u>Category</u>	<u>Households with Telephones</u>
Male-headed households in central cities	85.9
Female-headed households in rural areas	86.8
Rural poor (incomes under \$5K)	76.7
Native Americans, Eskimos and Aleuts w/ incomes under \$15K	72.3

III. THE NEED FOR PUBLIC PAY TELEPHONES

Public pay telephones play a critical role in the nation's telephone system. Throughout the twentieth century, they primarily have been used in three ways: (1) for convenience when persons are outside the home or office; (2) for emergencies; and (3) for basic service by persons who do not have a telephone in the home.

A. Cellular Telephone Ownership

Many Americans now use wireless phones for convenience and emergencies. As indicated by the table below, however, ownership of cellular phones is greater among suburban and upper income persons. Most rural and poor households do not own cellular telephones, and some areas of the country do not have wireless telephone service readily accessible to anyone. Consequently, millions of Americans continue to rely on public pay telephones for convenience, for emergencies, and even for basic service. Particularly in some special cases—calls to domestic abuse hotlines, calls to rape crisis centers, and “911” emergency calls—public pay telephones are critical for ensuring the public safety.

THE DEMOGRAPHICS OF CELLULAR PHONE OWNERSHIP³	
<u>Category</u>	<u>Percent of Persons Owning Cellular Phones</u>
Household Income over \$75K	52.8
Household Incomes \$10K-20K	12.7
Household Incomes under \$5K	7.8
Urban	31.7
Suburban	54.4
Rural	14.0

² Data are taken from Falling Through the Net: Defining the Digital, U.S. Department of Commerce, National Telecommunications and Information Administration, Released July 1999, Revised November 1999. Data are based on a U.S. Census Bureau December 1998 Current Population Survey.

³ Cellular Phone Owner Demographic Trend Analysis, usdata.com (2000).

B. Disconnection of Payphones in Poor and Minority Areas

The current regulatory policies that are encouraging the disconnection of payphones has a disproportionate impact on poor and minority households. The table below is based on a sampling of independent pay telephones disconnected between January 1998 and July 2000 in four representative states -- Illinois, Maryland, Michigan, and South Carolina. It shows that the percentage of disconnected payphones in zip codes with relatively high percentages of poor and minority households is usually significantly higher than the percentage of the population in those zip codes.⁴

Statewide Independent Payphone Disconnections				
Demographic Group	IL	MD	MI	SC
Percentage of Population in High Minority Zip Codes	18%	24%	13%	20%
Percentage of State Disconnections	21%	40%	27%	32%
Percentage of Population in High Poverty Zip Codes	53%	27%	61%	77%
Percentage of State Disconnections	67%	53%	70%	80%

In some cases, this disparity is striking. For example, the high minority zip codes in Maryland and Michigan have experienced roughly double the proportion of disconnected payphones compared to the proportion of the state's population. Similarly, the proportions of disconnected phones in the low income and minority zip codes of Illinois and South Carolina are greater than those of the proportions of the population, while in Maryland, the proportion of disconnected phones in low-income zip codes rate again is nearly double the proportion of the population. A more complete analysis of nine states shows a similar pattern with respect to low income zip codes, zip codes with a high African-American population, and zip codes with a high minority population. (See Attachments 3-5.) In short, payphone disconnections are disproportionately harming the groups that rely most on access to them.

IV. CURRENT POLICY ISSUES

The FCC has failed to complete two important regulatory tasks involving the payphone industry: (1) developing detailed guidance for state regulatory commissions regarding the rates that independent payphone service providers (PSPs) must pay for access to the local exchange network; and (2) devising rules to ensure that PSPs are compensated for "dial around" calls, i.e., "800" and other calls that do not require consumers to deposit coins in the payphone.

⁴ "High minority" zip codes are those in which greater than 50% of the population identify themselves as Black, Hispanic, or Asian. "High poverty" zip codes are those in which greater than 20% of the population earn annual incomes of less than \$25,000.

Excessive Line Rates

PSPs must pay line rates to local exchange carriers (LECs) for access to the local exchange network. One of the goals of Section 276 was to ensure that these rates are based on the LEC's costs. The FCC delegated to the states the task of setting line rates and provided general guidance about how to implement this standard. However, the FCC has never provided detailed guidance regarding the appropriate way to calculate cost-based rates. As a result, there are widespread differences among state public utility commissions in calculating these rates. The inaction of the FCC in this area contrasts with its vigorous efforts to ensure that wireless carriers and competitive local exchange carriers pay only cost-based rates to incumbent local exchange carriers for interconnection with their networks.

The failure of the FCC to provide definitive guidance regarding cost-based rates has meant that many PSPs pay line rates far in excess of cost. This is particularly harmful to the segment of the industry made up of independent PSPs, those that are not owned by a local exchange carrier. Currently, many independent PSPs pay \$50 to \$65 per month for payphone lines when actual cost-based rates should average \$15 to \$25 per month. This difference frequently determines the viability of individual payphones and sometimes entire companies. In contrast, wireless carriers pay interconnection rates that are far less than payphone providers pay for the comparable usage based element of the rate. (See Attachment 2.)

Uncollectible Dial Around Compensation

Section 276 specifically mandates that "payphone service providers [be] fairly compensated for each and every...call." This provision responds to the problem faced by PSPs when non-coin calls, such as "1-800" or "10-xxx" access code calls, are made from their payphone. A typical dial around call may involve a series of interexchange carriers (IXCs), including resellers, before the call reaches the final destination. Because a series of carriers is involved, it is essential to implement a system that reliably identifies the carrier responsible for paying compensation to the PSP. Under the FCC's current rule, "a carrier is required to pay compensation and provide per-call tracking for the calls originated by payphones if the carrier maintains its own switching capabilities." In practical terms, this means that the last switch-based carrier must pay the dial around compensation.

The current compensation system is a failure. The unwillingness or inability of some IXCs to provide detailed accounting of calls means it is frequently impossible to determine who is responsible for paying compensation. As a result, many resellers, including pre-paid calling card companies, avoid paying dial around compensation despite the fact that the consumer pays the cost. We estimate that PSPs receive only about two-thirds of the compensation that is due. Despite the importance of this issue for the continued viability of the payphone industry, requests to the FCC to re-examine the current compensation system have languished at the FCC for almost two years with no response. Since the petition was filed, PSPs have been unable to collect more than \$200 million, forcing many companies to disconnect payphones or to go out of business. The FCC should promptly investigate the current compensation system and develop alternative approaches that are more workable and effective.

V. CONCLUSION

Public pay telephones are a crucial component of our national telephone system. However, our regulatory policies have failed to provide a framework for expanded deployment and enhanced services, as envisioned by Congress when it passed the Telecommunications Act of 1996. The FCC should quickly issue final, detailed guidance regarding the application of the cost-based rate standard for line rates and it should devise a workable system for payphone providers to receive compensation for dial around calls. Each month that goes by without FCC action on these issues forces more payphone lines to be disconnected. PSPs who might be inclined to upgrade the payphone platform to include Internet or other services do not have the resources or the financial incentive to do so. Ultimately, the greatest harm falls on American consumers who rely on payphones for convenience, for emergencies, and—as often is the case in rural and low-income areas—for basic telephone service.

**ATTACHMENT 1. DISCONNECTED PAYPHONES IN NORTH CAROLINA
JANUARY 1, 1998 TO PRESENT**

<u>Area</u>	<u>Number</u>	<u>Percentage</u>
Towns with Less than 20,000 Population	1338	52%
Low Income Areas in North Carolina Cities	271	11%
North Carolina Cities	943	37%

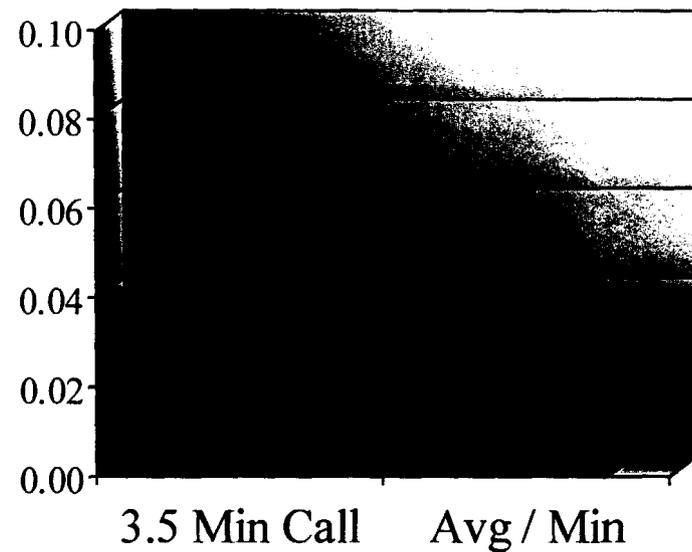
ATTACHMENT 2

**COMPARISON OF INTERCONNECTION RATES FOR WIRELESS
AND PAYPHONE SERVICES**

Ameritech Michigan

Payphone vs. Wireless Usage Rates

	<u>3.5 Min Call</u>	<u>Avg per Min</u>
Pay Phone Usage	0.08700	0.02486
Wireless Interconnection	0.01369	0.00391

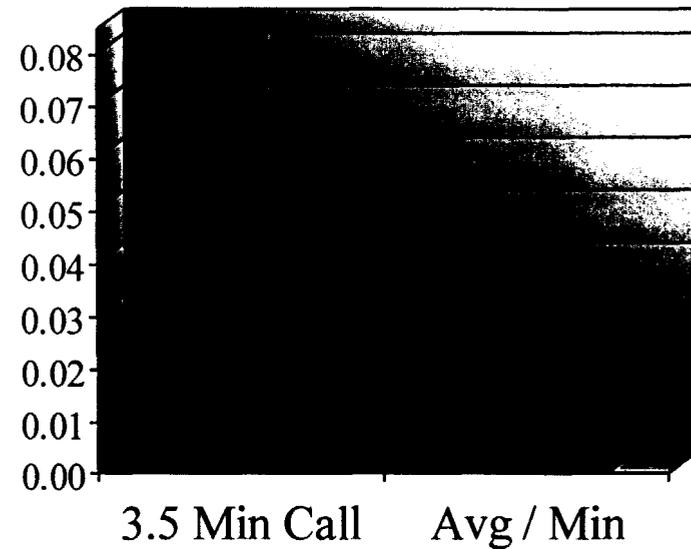


■ Payphone Usage ■ Wireless Interconnection

Ameritech Ohio

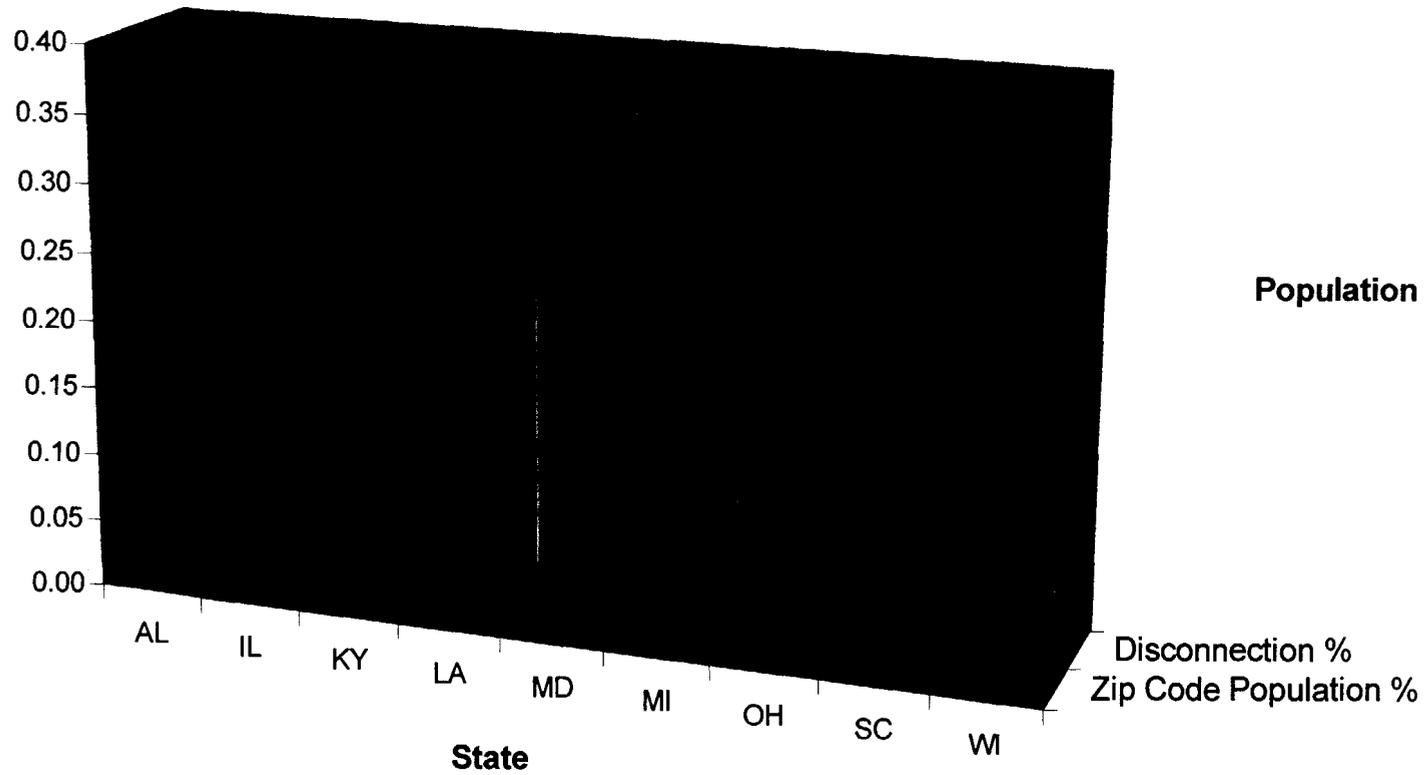
Payphone vs. Wireless Usage Rates

	<u>3.5 Min Call</u>	<u>Avg per Min</u>
Pay Phone Usage	0.08208	0.02345
Wireless Interconnection	0.01642	0.00469



■ Payphone Usage ■ Wireless Interconnection

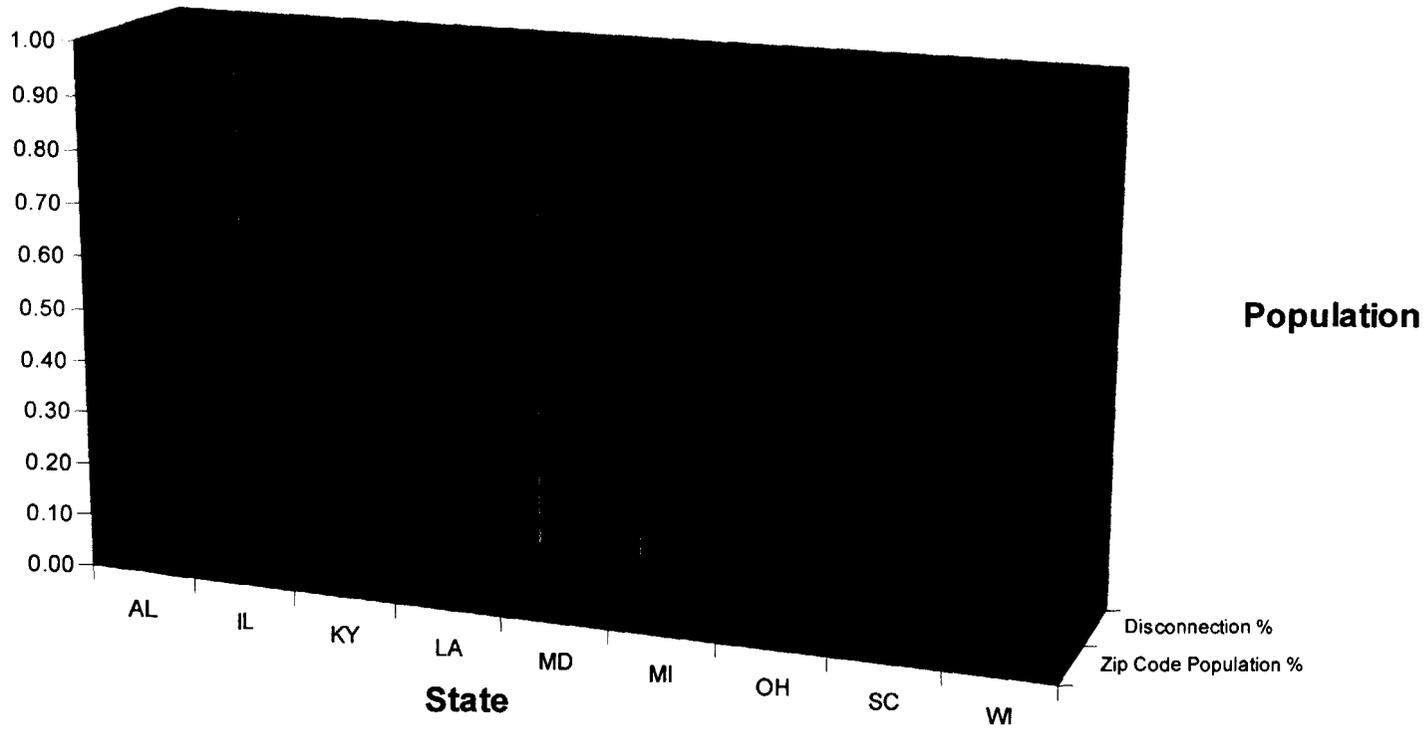
Attachment 3: High Minority Zip Codes*



Zip Code Population %
 Disconnection %

*Aggregate minority population of zip code is greater than 50%

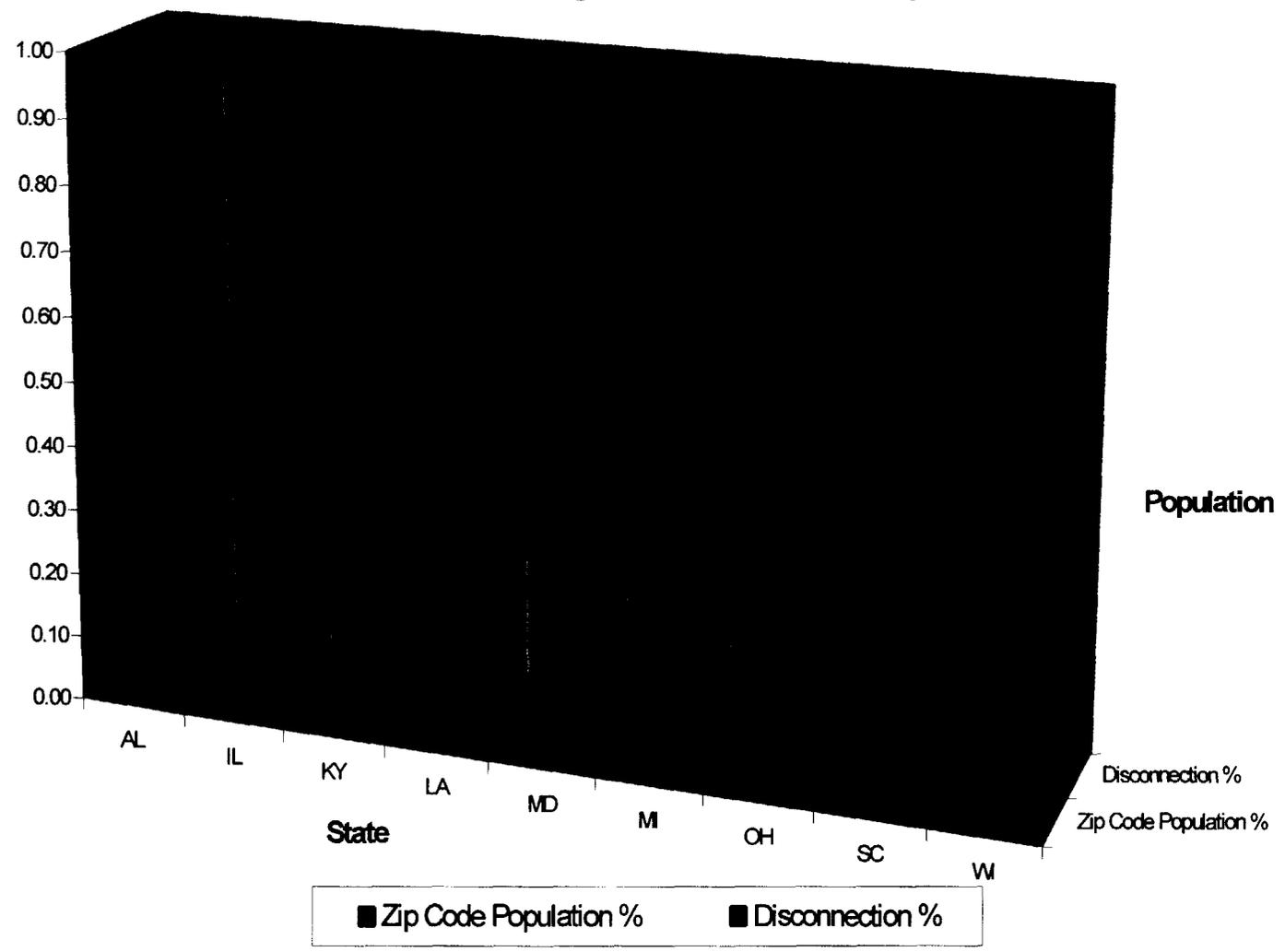
Attachment 4: Low Income Zip Codes*



Zip Code Population %
 Disconnection %

* More than 20% of households in zip code have annual incomes below \$25,000

Attachment 5: High African-American Zip Codes*



* Population of African-Americans in zip code is greater than 30%

THE IMPORTANCE OF PAYPHONES IN PROVIDING ACCESS TO SOCIAL SERVICES: A CASE STUDY IN CHICAGO

INTRODUCTION

Payphones play a critical role in providing access to social services to low income persons. About 94.6% of all American households have a telephone. Yet, there remain significant segments of the populations that do not have easy access to basic telephone service. For example, 82.9% of black households with incomes under \$10,000 and 89.2% of Hispanic households with incomes under \$10,000 have telephones in their home. Only 76.7% of rural poor households and 72.3% of poor Native American, Eskimo and Aleut households have telephones. Moreover, these same groups have lower rates of use of wireless telephones. Consequently, these groups tend to rely on payphones to obtain access to social services, such as state assistance programs and local health services.

PAYPHONE USE IN THE CHICAGO AREA

National data on payphone use for social service calls are not readily available. However, some data for certain metropolitan areas are available. The table below shows frequently called "800" numbers originating from telephones of a major independent pay telephone company in the Chicago area. During a twelve month period, the company had an average of approximately 1,350 payphones distributed widely throughout the Chicago metropolitan area. While this is a significant network, it represents less than 2% of payphones in Illinois.

Table I shows that large numbers of "800" calls to social service agencies are made from pay telephones. In fact, the fourth more frequently called "800" number was the Illinois "Link" Help-Desk, which furnishes information about food stamps, income assistance and related services. Over 47,000 "800" calls were made to this number. The table also shows other frequently called "800" numbers to social service agencies.

Table I confirms that payphones perform an important role in providing access to these agencies. Moreover, calls to "800" numbers represent only a portion of calls made at pay telephones. (For this network during the relevant time period, "800" calls represented about 39% of total calls.) Thousands of other calls are made to social service agencies by placing coins in the payphone.

Table II shows the "800" numbers that were called from the same network of pay telephones during the same time period that offered services in a language other than English.

Table I
"800" Social Service Calls From One Chicago Area Payphone Network
July 1999 to June 2000

<u>Party Called</u>	<u>Purpose</u>	<u>Number of 800 Calls</u>
Illinois "Link" Help Desk	Food Stamps, Income Assistance, etc.	47342
Illinois Dept of Human Services	Social Services	3537
Social Security	Information on Social Security Programs	3051
Illinois Department of Corrections	Weekly Check-Ins, etc.	1908
Cook County Inmate Information Center	Information	829
CTA Para-Transit Operations	Disabled Services, Bus Schedules	574
Illinois Dept. of Human Services	Social Services	514
Bureau of Child Support-Help Line	Cook County Inquiries	479
Illinois Dept. of Public Aid, Child Support Enforcement Help Line	Obtaining Support Payments in Springfield Region	304
Illinois Dept. of Human Services	Illinois Relay Service	285
Illinois Dept Of Revenue	Taxpayer Assistance	259
Veterans Benefits	Information and Claims Assistance	229
DCFS-Dept of Children & Family Services	Information	144
Illinois Dept. of Public Aid, Bureau of Kid Care	Information	106
Homeless Hotline	Assistance with Shelter	101
Illinois Dept of Health & Human Services	Hotline	74
Illinois Dept. Human Services	Illinois Relay Service	58
Illinois Dept of Public Health	Central Complaint Registry	57

Aids Hotline	Information	39
Drug Hotlines	Information	37
Social Security Administration, Illinois	Information	30
Illinois Poison Control Center	Emergency Information	14
Illinois Dept. of Public Aid, Child Support Enforcement Help Line	Obtaining Support Payments in Marion Region	14
Illinois Dept. of Public Health	WIC Help Line (Women, Infants, and Children) Nutrition	12
HIV / Aids / Testing – Confidential	Information	12
Illinois Dept of Health & Human Services	Domestic Violence Hotline	11

Table II.
“800” Numbers From One Chicago Area Payphone Network
Offering Non-English Service
July 1999 to June 2000

<u>Party Called</u>	<u>Number</u>	<u>Language Offered</u>	<u>Number of Calls</u>
Prepaid Card	1-800-515-9472	English and Spanish	33,974
Prepaid Card	1-800-240-4212	Spanish and English	32,528
AT&T Prepaid	1-800-506-9511	English and Spanish	25,251
AT&T Prepaid	1-800-487-7646	English and Spanish	16,988
Prepaid and Collect Connected by MCI	1-800-226-2727	Spanish	15,942
Prepaid Card	1-800-816-5136	Spanish and English	15,254
Prepaid Card	1-800-216-4008	Spanish and English	13,628
AT&T Prepaid Card	1-800-506-9513	English and Spanish	11,427
Prepaid Card	1-800-719-9589	Spanish	11,007
Prepaid	1-800-562-3612	Spanish	10,515
Walgreens Phone Card Plus	1-877-217-8246	English and Spanish	9,081
Prepaid Card	1-888-246-5951	English and Spanish	7,080
Prepaid Card	1-800-795-8808	Spanish	6,944
Prepaid Card	1-877-671-9053	English and Spanish	5,896
Prepaid Card	1-800-497-1954	Spanish	5,587
Prepaid Card	1-800-569-6973	English and Spanish	5,341
Prepaid Card	1-800-529-1373	English, Spanish, French	3,848
Prepaid Card	1-888-382-3094	English and Spanish	3,762
Prepaid Card	1-888-212-9335	Spanish and English	3,659

<u>Party Called</u>	<u>Number</u>	<u>Language Offered</u>	<u>Number of Calls</u>
Prepaid Card	1-800-240-1039	Spanish	3,194
Prepaid Card	1-800-833-4058	English, Spanish, French	3,168
Target Communications	1-800-625-3044	English and Spanish	3,041
Prepaid Card	1-800-635-5264	Spanish	3,039
K-mart Prepaid Calling Card Sprint	1-800-394-1971	English and Spanish	3,025
Prepaid Card	1-800-323-6269	Spanish	2,531
Teleserve Illinois Dept. of Employment Services Unemployment	1-888-337-7234	English and Spanish	2,453
Prepaid Card	1-800-441-9383	Spanish	2,419
TCS Express Phone Card System	1-888-506-8410	English and Spanish	2,377
AT&T	1-800-981-8331	English and Spanish	1,753
Prepaid Card	1-800-968-9504	Spanish and English	1,584
TCS Express Phone Card System	1-888-508-5658	English and Spanish	1,579
Prepaid Card	1-800-326-3888	Spanish	1,549
Prepaid Card	1-800-827-3132	Spanish	1,505
Prepaid Card / Exclusive Illinois Card	1-800-788-5346	Spanish	1,502
Ameritech	1-800-851-1320	Spanish	1,399
Prepaid Card	1-800-497-1953	English and Spanish	882
Prepaid and Collect	1-800-522-2020	English and Spanish	522
Prepaid Card	1-877-372-1886	English and Spanish	469
Prepaid Card	1-888-321-9287	Spanish	325
AT&T Wireless Services	1-800-888-7600	English and Spanish	228

EXCERPTS FROM COMMUNITY AGENCIES' LETTERS ON THE NEED FOR PAYPHONES

We are a small non-profit agency that assists low-income families in the rural areas in Wisconsin. Many of our clients are unable to afford phones and rely on use of public phones to make all their calls (be it an emergency, business, or pleasure).

Jerard Mageland, Housing Specialist
Rural Housing, Inc.
Madison, Wisconsin

If a child were out on the street and needed help, they would more than likely use a public payphone to call 911 or our 24-hour number to summon help. Taking away access to public payphones is leaving our children without a means of getting help in a time of crisis.

Carrie Phelps, Director
YMCA Youth Shelter
Sarasota, Florida

People, whether adults or children, who must leave their homes under emergency circumstances, such as threat of bodily harm, must have access to phones to summon help. Public pay phones have always been conveniently accessible in emergency situations.

Nancy Moore, Executive Director
Child Abuse Prevention Coalition
Christiansburg, Virginia

Payphones are a critical lifeline service, - the "last line of defense" for many low-income people. Citizens who cannot afford to have a phone in their home must have payphones available to access 911 emergency services...

The Georgia Sheriffs' Association
The North Carolina Sheriffs' Association

Many alcoholics and drug addicts have used their monetary resources to feed their addictions. They can no longer pay to have a phone in their homes. To access our detoxification services, they call us from payphones and we must frequently return their calls to payphones.

Chuck Fortune, Executive Director
Alcohol and Drug Services
High Point, North Carolina

We see and experience the importance of the public telephone system since our toll-free 800 number is displayed in many telephone booths in the state where people of all ages have access to our service in obtaining help with drug abuse, domestic violence, school violence, and suicides. We are able to help many people who would not have access to the 800 number other than through a public telephone booth.

Fred Davis, President and Executive Director
Parents Against Teen Suicide
Clyde, North Carolina

Without payphones on rural Cherokee Tribal Lands in North Carolina most of our Tribal member will be without access to phone service when away from home and many will still be without any telephone service at all.

Leon Jones, Principal Chief
Eastern Band of Cherokee Indians
Cherokee, North Carolina

Victims who are running for their lives often have no other way of communicating to law enforcement or to the shelters except by payphones. Public access to payphones really is a matter of life or death.

Becky Sims, Director
Domestic Abuse Family Shelter, Inc.
Laurel, Massachusetts

Part of universal service is having payphones available to people who don't have phones at home or phones they carry with them.

Martin Cohen, Executive Director
Citizens Utility Board
Chicago, Illinois

September 20, 2000

Honorable William E. Kennard, Chairman
Federal Communications Commission
445 Twelfth Street, SW Suite 8-B201
Washington, DC 20554

RE: CCB/CPD No. 00-1, CCB/CPD No. 99-27, CCB/CPD No. 99-35

Dear Chairman Kennard,

As Director of the Wisconsin Coalition Against Domestic Violence, we serve a large number of organizations that provide services to victims of domestic violence and their children. This population has a need for public payphones. Victims of domestic violence and their children find themselves in situations, fleeing their homes, seeking emergency assistance, seeking temporary safe housing and services, notifying family and friends of their location, etc. that demand the anonymity and availability of public payphones.

Although many individuals now have cell phones, victims of domestic violence may want to avoid use of their cell phone if their whereabouts can be traced by their abusers' examination of a cell phone bill. While many victims and their children may have access to cell phones, many do not. For a great number of victims and their children, public pay phones represent the difference between reaching someone who can help them and having no way to seek assistance.

I have a concern that more and more telephones companies are removing public payphones. I have been advised that these payphones are not profitable due to a dwindling number of local calls and the cost of operating the payphone. It is my understanding that the largest component of the cost incurred by the payphone providers is the cost of the telephone line.

I understand there are three proceedings before the FCC to make sure payphone line rates are reasonably price so more payphones will be available to the public. It is my desire that these initiatives be passed so that the citizens we serve will have a payphone when they need one.

Chairman Kennard, please take whatever action is necessary to make sure payphones are available for everyone.

Sincerely,

Mary R. Lauby
Executive Director

Cc: Congresswoman Tammy Baldwin, 2nd District
Senator Herb Kohl
Senator Russell Feingold
American Public Communications Council, Inc./Tara West, Fax: 202-659-8287



Youth Shelter Care of North Central Iowa, Inc.

301 Avenue M West • Fort Dodge, Iowa 50501-5623 • 515-955-4222

Honorable William E. Kennard, Chairman
Federal Communications Commission
445 Twelfth Street, SW Suite 8-B201
Washington, DC 20554

RE: CCB/CPD No. 00-1, CCB/CPD No. 99-27, CCB/CPD No. 99-35

Dear Chairman Kennard,

As Executive Director of Youth Shelter Care of North Central Iowa, Inc. (YSC), we serve a large number of youth that have a need for public payphones. YSC is a shelter that is open 7 days a week, 24 hours a day. We are available to answer crisis calls from youth that are runaways, have been abandoned, abused, seeking drug and alcohol counseling, date raped, or pregnancy counseling.

I have a concern that more and more telephone companies are removing public payphones. I have been advised that these payphones are not profitable due to a dwindling number of local calls and the cost of operating the payphone. It is my understanding that the largest component of the cost incurred by the payphone providers is the cost of the telephone line.

I understand that there are three proceedings before the FCC to make sure payphone line rates are reasonable priced so more payphones will be available to the public. It is my desire that these initiatives be passed so that the citizens we serve will have a payphone when they need one.

Chairman Kennard, please take whatever action is necessary to make sure payphones are available for everyone.

Sincerely,

Geyl Higginbotham
Geyl Higginbotham
Executive Director

Cc: Congressman Tom Latham, 5th District
Senator Charles Grassley
Senator Tom Harkin
Commissioner Susan Ness, FCC
Commissioner Harold W. Furchtgott-Roth, FCC
Commissioner Michael K. Powell, FCC
Commissioner Gloria Tristani, FCC
Dorothy Atwood, Common Carrier Bureau

... Providing temporary shelter care and counseling services for young people ...



The Eastern Band of Cherokee Indians

The Honorable Leon D. Jones, Principal Chief
The Honorable Carroll J. Crowe, Vice-Chief

September 27, 2000

Dan McCoy

Chairman

Birdtown Township

Alan B. Ensley

Vice-Chairman

Yellowhill Township

Tribal Council Members

Teresa Bradley McCoy

Big Cove Township

Mary Welch Thompson

Big Cove Township

Jim Owle

Birdtown Township

Marie L. Junaluska

Painttown Township

Tommye Saunooke

Painttown Township

Glenda Sanders

*Snowbird &
Cherokee Co. Township*

Brenda L. Norville

*Snowbird &
Cherokee Co. Township*

Larry Blythe

Wolfetown Township

Carroll Parker

Wolfetown Township

Bob Blankenship

Yellowhill Township

The Honorable William Kennard
Chairman, Federal Communication Commission
445 12th Street Southwest
Washington, DC 20554

Dear Chairman Kennard:

Thank you for all your efforts to bring telephone service to Tribal families. The FCC is to be commended for establishing programs to help all families on Tribal lands have a phone in their home. The FCC has also established incentives for wireless carriers to serve Tribal lands. But there is still a long way to go. Tribal lands are rural and our homeland is in the North Carolina Mountains where cellular service will **never** reach everyone.

I am writing to alert you to a disturbing development with respect to this issue. This summer Verizon has removed payphones at an alarming rate on our Reservation. We are a seasonal area for tourism, but our Tribal members live here year-round. The removal of these payphones is a big inconvenience to our tourists in the North Carolina Mountains where cellular service does not work. Moreover, all our Tribal members rely on these payphones when they are away from home to keep in touch with friends and relatives as well as conduct business on these payphones. We also have a great number of Tribal members who not have a telephone in their home and must rely on payphones to contact family and emergency services. **Nowhere are payphones more critical than on rural Tribal lands.**

We have a Tribal member who operates a limited number of payphones on the reservation, but he informs me that his ability to install more payphones is severely limited by the high rates his company must pay Verizon for the payphone line.

It is my understanding the North Carolina Utilities Commission has refused **twice** to require payphone line rates to be reasonable priced so more payphones could be available in rural and low-income areas of North Carolina. It is my further understanding that there is a North Carolina petition before the FCC now requesting that the FCC make the telephone companies charge reasonable rates that don't subsidize other services.

Qualla Boundary • P.O. Box 455 • Cherokee, N.C. 28719

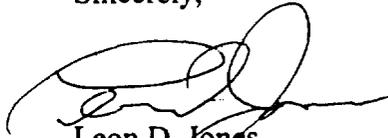
Telephone: (828) 497-2771 or 497-4771

Telefax: (828) 497-2052

Mr. Kennard, you must see that the FCC grants this petition. Without payphones on rural Cherokee Tribal lands in North Carolina most of our Tribal members will be without access to phone service when away from home and many will still be without any telephone service at all. Our only hope is for the FCC to make payphone line rates reasonable so payphone providers can afford to install payphones not only on Tribal Lands, but in all rural and low income areas in North Carolina. This is not just our problem; this is a problem everywhere you have poor people who do not have a phone in their home or people who do not own a cellular phone.

Thank you again for all you've done to help us. Please do not leave office without finishing the great work you have started.

Sincerely,

A handwritten signature in black ink, appearing to read 'Leon D. Jones', with a large, looping flourish at the end.

Leon D. Jones
Principal Chief

cc: Commissioner Susan Ness
Commissioner Harold W. Furchgoti-Roth
Commissioner Michael K. Powell
Commissioner Gloria Tristani
Magalie R. Salas, Esq.
Dorothy Attwood, Chief, Common Carrier Bureau



Greensboro Housing Coalition

122 N. Elm Street Suite 602
(336) 691-9521 phone

Greensboro NC 27401
(336) 691-9046 fax

July 7, 2000

Honorable William F. Kennard, Chairman
Federal Communications Commission
445 Twelfth Street S.W.
Washington DC 20554

Re: CCB/CPD No. 00-1

Dear Chairman Kennard:

I urge you to make payphones available to the public. The Greensboro Housing Coalition operates a Housing Hotline and many of our callers are homeless, without their own telephone to call us for information about finding housing. When we ask if there is a way to call them back, some callers cannot give a number because they have called from a payphone.

The mission of the Greensboro Housing Coalition is to advocate for decent affordable housing for low and moderate income people and those with special needs. We work hard, with small staff and limited funds, to be ready to receive calls from people with desperate needs for housing. Without an adequate number of payphones, strategically distributed throughout the community, those in need of housing may not be able to call us. When those potential callers are victims of domestic violence or mothers with young children or disabled people, being able to call us for referrals and then being able to call the appropriate agency may be a matter of life or death.

Again, I ask you to do what you can to protect the safety of people with housing needs by ensuring that they can make those crucial telephone calls to get help in finding safe, decent, and affordable housing.

Sincerely,

Beth McKee-Huger

Gillette Abuse Refuge Foundation

(307) 686-8071 • 910 E Third • Suite 1 • Courtyard • P.O. Box 3110 • Gillette, Wyoming 82717-3110

September 26, 2000

Honorable William E. Kennard, Chairman
Federal Communication Commission
445 Twelfth Street, S.W. Suite 8-B201
Washington, D.C. 20554

Re: CCB/CPD No. 00-1, CCB/ CPD No. 99-27, CCB/CPD No. 99-35

Dear Chairman Kennard:

The Gillette Abuse Refuge Foundation is a non-profit organization which provides assistance and shelter for victims of domestic violence and sexual assault. I am a crisisworker who has daily contact with our victims. I know their problems. G.A.R.F. has become aware that many public pay phones are being taken out of service due to economic pressure on the providers. We believe the removal of public phones will be a disaster for present and future victims of domestic violence.

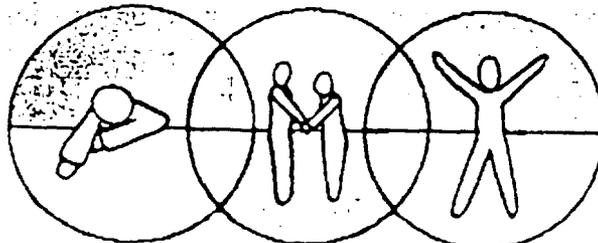
One of the early steps taken by a controlling spouse is to isolate the victim. This isolation starts with destruction and other prohibitions against using the home phone. Often the public telephone is the only resource available to the victim to make contact with a friend or family member or with our organization.

The more isolated the population, the more critical is the access to a public phone! City dwellers may have businesses or neighbors where phones are available, but in rural America the public phone is the victim's only resource.

Please consider the public phone issues before your commission and place a high priority upon the preservation of the public telephone. When line rates for public phones are addressed, insure that the rates are low enough, or subsidized, to preserve and encourage expansion of the availability of public telephones.

Sincerely,
Carol Sue Hansen
Carol Sue Hansen, GARF Crisisworker

cc: Congresswoman Barbara Cubin
Senator Craig Thomas
Senator Michael Enzi
American Public Communications Council, Inc.





**YMCA
CHILDREN, YOUTH AND
FAMILY SERVICES, INC.**

Sarasota Family YMCA, Inc.

25 North School Avenue, Sarasota, Florida 34237-6001 (941) 366-3881 Fax: (941) 366-3658

**CHILDREN'S
SERVICES**

Primary Office
192 N. Lime Avenue
Sarasota, FL 34237
1-800-377-4600
(941) 963-8624

819 N. Mills, Suite E
Arcadia, FL 34266
(863) 889-8737

Community Care
and Service Center
of Charlotte County
10500 Toledo Blade Blvd.
Suite 97
Port Charlotte, FL 33948
(941) 613-1422

HIPPY
2300 Jessie Fox Drive
Sarasota, FL 34234
(941) 366-0056

HIPPY DeSoto
P.O. Box 2020
Arcadia, FL 34266
(863) 884-4737

**YOUTH & FAMILY
SERVICES**

Family Mgmt. Services
25 N. School Avenue
Sarasota, FL 34237
(941) 965-6594

Youth Shelter
1106 S. Briggs Avenue
Sarasota, FL 34237
(941) 366-7779

TRIAD (North)
Alternative Ed.
4409 Sawyer Road
Sarasota, FL 34233
(941) 361-6752

TRIAD (South)
Alternative Ed.
1130 Indian Hills Blvd.
Venice, FL 34293
(941) 480-3131

CYO Project
4409 Sawyer Road
Sarasota, FL 34233
(941) 922-5126

Transitional Living
1084 S. Briggs Avenue
Sarasota, FL 34237
(941) 965-3161

Character House
41 N. School Avenue
Sarasota, FL 34237
(941) 366-2525

**FOSTER CARE
SERVICES**

Sarasota County
Coalition for
Families & Children
4680 17th Street
Sarasota, FL 34235
(941) 371-4799

September 21, 2000

Honorable William E. Kennard, Chairman
Federal Communications Commission
445 Twelfth Street, SW Suite 8-B201
Washington, DC 20554

RE: CCB/CPD No. 00-1, CCB/CPD No. 99-27, CCB/CPD No. 99-35

Dear Chairman Kennard,

As Director of the YMCA Youth Shelter, I am writing to inform you that we serve a large number of citizens that have a need for public payphones. Our services are geared toward 10 to 17 year olds and their families. In serving this population it is of the up most importance that they would have access to public payphones. For instance, if a child were out on the street and needed help they would more than likely use a public payphone to call 911 or our 24 hour number to summon help. Taking away access to public payphones is leaving our children without a means of getting help in a time of crisis.

I have a concern that more and more telephone companies are removing public payphones. I have been advised that these payphones are not profitable due to a dwindling number of local calls and the cost of operating the payphones. It is my understanding that the largest component of the cost incurred by the payphone providers is the cost of the telephone line.

I understand there are three proceedings before the FCC to make sure payphone line rates are reasonably priced so more payphones will be available to the public. It is my desire that these initiatives be passed so that the citizens we serve will have a payphone when they need one.

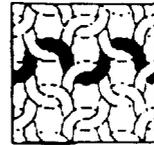
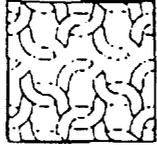
Chairman Kennard, please take whatever action is necessary to make sure public payphones are available for everyone.

Sincerely,

Carrie Phelps, Director
YMCA Youth Shelter

Cc: Congressman Dan Miller, Senator Bob Graham, Senator Connie Mack,
American Public Communications Council, Inc.





United
Family
Services

Honorable William E. Kennard, Chairman
Federal Communications Commission
445 Twelfth Street, S. W.
Washington, D. C. 20554
Fax: 336-854-0496

RE: CCB/CPD No. 00-1

Dear Chairman Kennard,

As Coordinator of United Family Services, we serve a large number of citizens that have a need for public payphones.

- Many low-income people
- Victims of domestic violence
- Crime Stoppers™ program
- Teens seeking drug counseling
- People away from home with no cell phone

I have a concern that more and more telephone companies are moving public payphones. *I have been advised that these payphones are not profitable due to low volume of calls but more importantly due to the cost of operation of the telephone.* It is my understanding that a large component of the cost incurred by the payphone providers is the cost of the telephone line.

I understand that there is a proceeding (CCB/CPD No. 00-1) before the FCC to make sure payphone line rates are reasonably priced so more payphones, will be available to the public. It is my desire that this initiative be passed so that the citizens we serve will have a payphone when they need one.

Chairman Kennard, please take whatever action is necessary to make sure payphones are available for everyone.

Sincerely,


Pamela B. Caskey, Coordinator
United Family Services

Cc:
Senator Aaron Plyler
Representative Max Melton
American Public Communications Council

Georgia Sheriffs' Association



Resolution

*SUPPORT FCC ACTION TO ENSURE WIDESPREAD DEPLOYMENT OF PAYPHONES;
and for other purposes.*

WHEREAS, Georgia Sheriffs' Executive Committee recommends the Georgia Sheriffs' Association support FCC action to make sure that payphone line rates are reasonably priced so payphones will be available for the public; and

WHEREAS, Sheriffs are the highest elected Law Enforcement Officer on the local level with the responsibility to provide for the safety of all citizens; and

WHEREAS, citizens rely on the availability of payphones for emergencies and for use away from home; and

WHEREAS, payphones are a critical lifeline service – the "last line of defense" for many low-income people; and

WHEREAS, today telephone companies are removing a significant number of payphones due to the increased use of wireless services; and

WHEREAS, citizens who cannot afford to have a phone in their home must have payphones available to access 911 emergency services; and

WHEREAS, citizens who are away from home and have no wireless service must have payphones available to access 911 emergency services; and

WHEREAS, Congress enacted Section 276 of the Telecommunications Act of 1996 "to promote the widespread deployment of payphone services to the benefit of the general public."

THEREFORE, BE IT RESOLVED the Georgia Sheriffs' Association urges the FCC to make sure payphone line rates are reasonably priced so payphones will be available for the public.

SIGNED:


Al St. Lawrence, President

ATTESTED TO:


Scott Chitwood, Secretary-Treasurer