

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>The Pay Telephone Reclassification and Compensation Provisions of The Telecommunications Act of 1996</b>	)	<b>CC Docket No. 96-128</b>
	)	
<b>RBOC/GTE/SNET Payphone Coalition Petition for Clarification</b>	)	<b>NSD File No. L-99-34</b>
	)	

**WORLDCOM, INC.  
OPPOSITION**

In response to the Commission’s Second Order on Reconsideration, WorldCom, Inc., (“WorldCom”), AT&T, and Global Crossing petitioned the Commission to clarify its definition of a completed dial-around payphone call.<sup>1</sup> All three companies correctly contend that underlying carriers do not have the capability of accurately tracking calls to completion unless the calls terminate on their networks. All three companies therefore conclude that the Commission should adopt an unambiguous definition of a completed call in order to improve the efficiency of tracking, reporting, and compensation. WorldCom and AT&T request the Commission define a completed call as one that is either completed on the underlying carrier’s network, or is routed to

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<sup>1</sup> WorldCom Petition at 4; AT&T Petition at 6; Global Crossing Petition at 6.

the switch-based reseller's platform. Global Crossing proposes a timing surrogate of 25 seconds from the originating switch to determine whether a call is completed.

WorldCom opposes the use of timing surrogates to determine whether a call is completed. WorldCom has expended millions of dollars and considerable time and effort to build its payphone compensation system. It would take significant additional expense to modify our payphone compensation system to measure payphone calls according to duration. WorldCom agrees with Global Crossing that an unambiguous definition of completed call is required, but contends that it would be far more efficient and equitable to build upon existing tracking systems, systems which carriers put in place in order to comply with the Commission's original payphone compensation requirements.

Sincerely,

**Larry Fenster**

Larry Fenster  
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## Statement of Verification

I have read the foregoing and, to the best of my knowledge, information and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on June 8, 2001

Fenster

Larry

Larry Fenster

## Service List

WorldCom's Opposition was delivered electronically, this day, June 8, 2001 to the following parties:

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