

November 13, 2001
Magalie Roman-Salas
Secretary
Federal Communications Commission
445 12 St., S.W.
Washington, D.C. 20554

Re: Ex Parte, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128.

Dear Ms Salas:

On November 9, 2001, Larry Fenster and Mary Brown from WorldCom, Dick Juhnke and Jeb Benedict from Sprint, Richard Rubin and Mike Del Casino from AT&T, Michael Shortley from Global Crossing, and Gina Keeney from Lawler, Metzger & Milkman, met with Chris Libertelli from the Common Carrier Bureau to discuss issues associated with the implementation of the Second Order on Reconsideration in the above-captioned proceeding.

At the meeting, we discussed the multitude of technical and administrative difficulties that interexchange carriers have faced as they have attempted to implement the new payphone compensation rules relating to the payment of payphone compensation on behalf of switch-based resellers. In particular, we discussed the interexchange carriers' inability to determine whether a called party has answered a call that is re-originated from a platform provider's switch. We also advised the Commission that if its new rule becomes effective in its current form on November 23, it would likely lead to substantial disputes among resellers, payphone providers and interexchange carriers.

We then discussed various options the Commission might adopt to ameliorate these problems, including a technical solution, direct payment between resellers and payphone providers, and a call completion factor solution.

Sincerely,

Larry Fenster

Larry Fenster
202-736-6513

cc: Chris Libertelli