

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

In the Matter of

Billed Party Preference for
InterLATA 0+ Calls

CC Docket No. 92-77

COMMENT OF VERIZON

Verizon¹ supports the petition filed by T-NETIX for a transitional waiver of the Commission's recently amended operator rate disclosure rules for inmate services provided through certain T-NETIX equipment that is used by Verizon and other carriers. That petition explains that "[p]resent compliance with Amended Rule 64.710 is technically infeasible" because the equipment used cannot "provide real-time exact per-minute quotes."² It goes on to describe the equipment upgrades that T-NETIX proposes in order to make its equipment compliant with the new rules and commits T-NETIX to an expeditious schedule for completing those upgrades.³ Finally, it demonstrates that this waiver would advance the public interest, in allowing this equipment to be kept in service while the upgrades are being made. As T-NETIX indicates, the denial of a waiver "would imperil the inmate services that" T-NETIX, Verizon and others provide.⁴

¹ The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc., listed in Attachment A.

² Petition at 10.

³ Petition at 10-11.

⁴ Petition at 11.

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.