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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Request to Update Default Compensation Rate For Dial-Around Calls from Payphones	)	**RM No. 10568**
	)	
Petition for Rulemaking to Establish a Revised Per-Call Payphone Compensation Rate	)	
	)	

REPLY COMMENTS OF SPRINT CORPORATION

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November 14, 2002

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Introduction & Summary

Eleven parties submitted responses[1] to the Commission's public notice (DA 02-2381) soliciting comment on whether it should undertake a rulemaking proceeding as requested by the Petitioners.[2] They included the Attorney General of the State of Texas, large and small interexchange carriers ("IXCs"), resellers, competitive local exchange carriers, and, in Sprint's case, a long distance, wireless, and local carrier that also operates a successful payphone business.

[1] These parties include the Attorney General of the State of Texas; AT&T Corp.; Global Crossing North America, Inc.; IDT Corp.; Sprint Corp.; Telstar International, Inc.; WorldCom, Inc.; and jointly ATX Communications, Inc., Business Telecom, Inc., and US LEC Corp. (all filed Oct. 30, 2002) (collectively, "commenters"). In addition, Michelle Hamilton of Arlington, Washington opposed an increase in default compensation, explaining that it would hurt toll-free crisis help lines and those who depend upon them (dated Oct. 7,2002).

[2] The Petitioners are the American Public Communications Council ("APCC") and the RBOC Payphone Coalition.

The commenters unanimously agree that the requests for rulemaking should be denied. They do so not merely because the petitions are seriously flawed, but also because they are counterproductive and manifestly contrary to the public interest. The coinmenters also agree generally with Sprint that if any Commission action is taken, it should be a notice of inquiry to examine the state of the payphone industry, to explore the manner in which the public and the public interest are best served under Section 276(b)(1) (47 U.S.C. § 276(b)(1)), and to re-evaluate the Commission's policy approach to payphone compensation, including the legality and efficiency of a "caller-pays" system.

I. <u>Granting the Petitions Would be Contrary to the Public Interest</u>.

A. The Payphone Industry Must Face Market Reality.

The coinmenters all recognize that the telecommunications marketplace "is significantly different today than it was at the time of the *Third Report and Order.*" AT&T at 5. Thanks to new technologies and increased competition, consumers have more choices. If payphone call volumes are declining, it is because consumers are voting with their pocketbooks in favor of other competitive options. Consumers simply do not nerd and do not want payphones at the levels rhat the Petitioners seek to provide. Sprint at 3. Wireless substitution is a healthy reflection of "competitive forces" at work. Telstar at 2.

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[3] <u>Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996</u>, *Third Report and Order, and Order on Reconsideration of the Second Report and Order*, 14 FCC Rcd 2545 (1999) (subsequent history omitted) *("Third Report and Order")*.

"[T]he fact that payphones have lost market share" does not mean there is "a need to increase – *let alone double* – the per-call compensation rate." Id. at 2. Although the Petitioners contend that the number of payphones has declined, "neither has demonstrated that such removal has *actually harmed the public,* particularly the populations most in need of access to payphones" (ATX at 5, emphasis added), nor shown that anyone really "has been denied the ability to make a call from **a** payphone." WorldCom at 1. See also Telstar at *3;* Sprint at 3. The petitions wrongly assume that Section 276 requires "the Commission to freeze in place policies designed to ensure the profitability of an arbitrary number of payphones regardless of changes in market conditions." AT&T at 7. But with consumers embracing other, affordable alternatives **to** payphones, including wireless services, maintaining the number of payphones at their peak 1998 level is unnecessary and inappropriate. "Obviously, the Commission should view 'widespread deployment' in the context of the changes in technology and in market conditions, as requiring a reasonable level of payphone service so as to actually *render a benefit to thepublic* as required in the statutory language of Section 276." ATX at 5 (emphasis added). See also AT&T at 7.

The Petitioners want the Commission to exempt them from the "economic reality" that all other market players face. Sprint at 3-4. Nevertheless, Section 276(b)(1) does not protect payphone service providers ("PSPs") from market change, any more than it guarantees that any given payphone will remain profitable. AT&T at 13. In seeking to substantially increase the cost of payphone use (and with no improvement whatsoever in service), the Petitioners "ignore fundamental economic precepts." Global Crossing at 7. All of the commenters recognize that "increasing the default rate for dial-around calls could only be expected to further deflate the demand for payphone calls." Id. at 6. See also AT&T at 2; WorldCom at i; Telstar at 3; ATX at 2; Sprint at 4-5.

B. Granting the Petitions Would Undermine the Payphone Industry and Harm the Public Interest.

An increase in the payphone compensation rate would also be "counterproductive" (Global Crossing at 3) and "accelerate the decline" of payphones (WorldCom at i) by discouraging the necessary removal of redundant, unneeded phones. Sprint at 4. The Commission should recognize that "[e]fficient removal of underutilized or unnecessary and redundant facilities might actually be in favor of the public interest" (ATX at 2), because "when a payphone is removed from service, the remaining payphones will continue to provide service and will benefit from higher call volumes and increased profitability." WorldCom at 5; see also AT&T at 10; Texas AG at 3-4; Sprint at 5. APCC argues that nearly every payphone is essential, suggesting that there may be no other payphones for miles around. Its focus on a decline in payphones per square mile is patently misleading, because "[p]ayphones obviously have not been distributed evenly" but are concentrated precisely where there are people and other payphones. WorldCom at 5. There simply is no need or justification for a payphone at every gasoline station or convenience store, any more than there is a "need for nine [rather than the current five] payphones in the lobby of the FCC." IDT at 8.

Increasing the default compensation rate would also harm the public interest in other ways. It would saddle customers with higher costs, especially "hurt[ing] the low-income people whose interests APCC purports to champion" (AT&T at 2) and who would likely "shoulder[] much of the doubled dial-around rate." Id. at 7. At the same time, the Commission's policy would do nothing to ensure retention of payphones that serve low-income callers or provide any other public interest benefit. The bulk of the subsidy would continue to go to payphones that do not need such support, without regard to their location or the public interest, and uneconomic payphones would continue to be removed from service. Sprint at 9. And the Petitioners would be back at the Commission seeking a further increase in just "a year or two." Telstar at **4;** WorldCom at 2; Sprint at 7.

Even with declining overall demand, payphones can **be** profitable. Certainly a great many payphones remain so. The petitions convey the false impression that most payphones are uneconomic, and indeed by focusing on a theoretical "marginal payphone," the Commission's current methodology encourages people to overlook the fact that most payphones continue to perform adequately. **As** the Texas Attorney General points out, there are payphone owners thriving even in today's market, which shows "that an increase in per call compensation is not justifiable." Texas AG at 1. The keys are monitoring the market, controlling costs, removing redundant phones, and deploying where there is sufficient market demand for a phone's service. That has been Sprint's business strategy in this market. Sadly, the petitions show that some payphone owners would rather base their business plans on regulatory favoritism and statistical sleight of hand.

II. <u>The Commission Should Reiect the Petitions Because Their Assumptions and Data are Flawed</u>.

The Commission's Public Notice sought comment only on whether it should issue a notice of proposed rulemaking, and commenters did not need **to** detail the many flaws ofthe petitions and their cost studies. Sprint at 2. Many commenters nevertheless could not help but highlight some of the critical deficiencies in the petitions. Reviewing some of those flaws merely underscores, as the Texas Attorney General concluded, that "the petitions for rulemaking [should] be denied in their entirety." Texas **AG** at 4.

A. The Petitions Fail to Meet Standards Set in the *Third Report and Order.*

To begin with, the petitions fail to show they meet the conditions set by the *Third Report and Order* for any revisit of the default payphone compensation rate. After all, "[a] petition is not permissible simply because it is filed after January I, 2002." IDT at 4. "The Commission clearly provided that any request for modifications to the compensation rate would be based on a complete review of all factors, developments, and outcomes, for the marketplace as a whole, not simply a request for a rate change by individual parties." **ATX** at ***3;*** <u>see also</u> *Third Report and **Order*** ¶ 18. Even apart from this shortcoming, however, the petitions are "misleading and the analysis of the data defective." ATX at I. While the Petitioners profess to be following the methodology outlined in the *Third Report and Order*, in reality they have made material changes *to* generate a grossly inflated and illegitimate rate. <u>See</u> ATX at 8; AT&T at 10-11; IDT at 14; Sprint at 2. It is no wonder, then, that the Texas Attorney General "take[s] issue with the methodology used by the petitioners to support their claims." Texas AG at 3.

B. The Petitions' Call Volume Data are Flawed and Unreliable.

Several commenters show that the Petitioners' call volume "data" cannot be relied upon. APCC's figure is "based on a survey that is fundamentally flawed" (AT&T at 11 & Decl pp. 4-5) and "obviously biased' by selective reporting. Texas AG at 3.[4] See also ATX at 3. The RBOC Coalition's data are likewise "based on isolated samplings." ATX at 9. The Petitioners have also manipulated the definition of a "marginal payphone." The *Third **Report** and Order* (at ¶ 139) includes two criteria: (1) that the payphone owner is "unable to make payments to the location owner,'' and (2) that "the payphone owner is able just to recoup its costs, including earning a normal rate **of** return." But the Petitioners redefined marginal payphones simply as those that pay no site commissions.[5] Removing that second criterion "improperly fails to exclude the unprofitable payphones" and therefore "does not accurately reflect call volumes associated with marginal payphones as contemplated by the ***Third** Report and Order.*" AT&T at 13 & Bell Decl. p. 12. The Commission's methodology was "not designed to make every payphone profitable," and fails to account for the fact that "[p]ayphones with sufficiently low call

[4] **The** Texas AG (at 3) rightly adds that the Commission should not assume a decline in call volumes without undertaking "some type of independent statistical sampling of call volumes."

[5] The RBOC Coalition, however, also improperly includes in its estimates some payphones for which location rents are paid, after reducing the call volume for those "costs." AT&T at 16-17 n. 15.

volumes or sufficiently high costs will not be profitable, regardless of the compensation amount." *Third Report and Order* at ¶ 79.

AT&T also notes how APCC manipulated volume figures further by "utilizing only paid dial-around calls in determining the call volumes generated **at** a marginal phone," even though the Commission expressly held – and the D.C. Circuit affirmed – that bad debt is "irrelevant" and adjusting for it creates "double-recovery." AT&T at 15. See *Third Report and Order* at ¶ 162, affirmed by APCC v. FCC, 215 F.3d 51, 55-56 (D.C. Cir. 2000). Sprint agrees with AT&T that "APCC's improper efforts to inject its bad debt estimates into its volume analysis without any acknowledgement or explanation that 'bad debt' has been deemed irrelevant underscores the lack of credibility of APCC's entire methodology." AT&T at 15.

The RBOC Coalition's volume figures have other problems, too. For example, "it appears that the RBOCs used the daily revenues in the earlier commission analysis due to internal practices to pay location rents based on payphone revenues, not just monthly call volumes,'' but "now proposes a recalculation using only call counts rather than daily revenues." ATX at 10-11. The RBOC Coalition's calculation is also based on just a single month, with no evidence that the sample is reliable. Id. at 11. **As** AT&T concludes (at 16), "Simply put, the Coalition cannot argue that the Commission should adhere to the 'marginal' payphone approach adopted in the *Third Report and Order,* but then propose a methodology for determining 'marginal' payphone calling volume that undermines the *Third Report and Order.*"

C. The Petitions' **Cost** Data are Flawed and Unreliable.

Commenters also show how the Petitioners have attempted to pad **an** already outdated and inflated cost model for the theoretical "marginal payphone," even though "PSPs concede that per-payphone costs have decreased." Telstar at I

The Petitioners add a self-serving estimate for "bad debt," again despite the *Third Report and Order's* recognition – expressly upheld by the D.C. Circuit – that "such estimates are ultimately unsupportable and do not predict reliably future bad debt." ATX at 15; see also AT&T at 17. Including an element for bad debt is also unlawful "because it would require some IXCs to pay the debts of other IXCs" (AT&T at 18), despite the Commission's and the **D.C.** Circuit's findings that Section 276 prohibits "requir[ing] one cotnpany to bear another one's expenses."[6]

The Petitioners also add a component for collection and litigation costs, which is also impermissible. The Commission previously explained "that the collection costs of dial around compensation are fairly represented by the SG&A portion of Joint and Common Costs." ATX at 13, citing *Third Report and Order* at ¶ 178 and APCC v. FCC, 215 F.3d at 57 ("[O]verhead presupposes that some details of costs will be submerged in the greater item of calculation."). The petitions also incorporate an inflated I 1.25% interest rate, ignoring the Commission's adoption of IRS overpayment rates as the proper measure *for* "the time value *of* money." AT&T at 19-20, quoting *Fifth Order on Recon.* at ¶ 100

[6] *Fifth Order on Reconsideration and Order on Remand,* FCC 02-292 (rel. Oct. 23, 2002) at ¶ 83, citing Illinois Pub. Telecomm. Ass'n v. FCC, 117 F.3d 555 (D.C. Cir. 1997), clarified on reh'g , I23 F.3d 693 (D.C. Cir.1997), cert. denied sub nom. Virginia State Corp. Comm'n v. FCC, 523 **U.S.** 1046 (1998).

Further, the Petitioners' costs studies rely not on current costs, but on surrogate cost estimates dating from 1998, particularly costs of Davel Corporation. Yet Davel's public financial reports show that per-payphone costs have fallen drastically since the ***Third Report and Order*** and are no longer realistic. WorldCom at 15-16 & Att. ***6***. Capital costs have fallen, because equipment has been almost fully depreciated (AT&T at 20-21); equipment and contracting service costs are significantly lower (WorldCom at 15), and line charges are lower and likely to drop further (RBOC Coalition at 8 n.23).[7] Several commenters also point out that PSPs have other revenue sources omitted from the Petitioners' purported cost studies. These may include increased coin revenues from today's higher rates (WorldCom at 12; IDT at 12) and revenues from advertising on payphone enclosures. Telstar at 5-6 & Att. A; WorldCom at 11-12 & Att. **4;** IDT at **16**

The impact of the Petitioners' manipulation of the data and methodology is dramatic. In the ***Third Report and Order*** (at ¶¶ 192-193), the Commission used a "top-down" analysis to check the reasonableness of its "bottom-up" default rate. As AT&T demonstrates, "[a]pplication of this same analysis here makes clear that Petitioners' proposals are grossly excessive and will result in windfall profits to payphone providers that must be borne by IXCs and their consumers." AT&T at 21.[8]

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7 There are proceedings currently underway in states throughout the country that are likely to significantly reduce PSPs' line charges, as the RBOCs are compelled to implement the "new services test" adopted in Wisconsin **Pub.** Serv. Comm'n, 15 FCC Rcd 9978 (2000). Some states may also order refunds to PSPs for prior years.

8 AT&T demonstrates that a top-down approach yields a per call rate for coinless calls of $0.279 using average call volumes, and just $0.25 using marginal call volumes – little different from the current rate. Id. at 22-23.

111. <u>**The** Payphone Industry's Problems are in Large Part Self-created.</u>

The other commenters also agree with Sprint that the payphone industry's decline is partly self-inflicted. Not only have many PSPs been slow to adapt to competition and market changes by redeploying or removing redundant payphones, but they have also earned a reputation for poor service and excessive rates. Sprint at **4;** IDT at 10-13; WorldCom at 8, 11.

Most of the commenters call on the Commission to investigate the impact of poor and deteriorating service on payphonc call volumes, because clearly too many PSPs have ignored their responsibility for the quality of their services. "Payphone owners could increase the volume of calls by making repairs more quickly, keeping their payphones cleaner, keeping them well lit, and keeping rate and complaint contact information more visible and current." WorldCom Comments at 11 & Att. **3.**

PSPs also have surely hurt their industry by sticking consumers with "rates [that] are outrageously high." IDT at 1**1.** Certainly, the increase in payphone rates has significantly suppressed payphone usage, both for coin and non-coin calling, and the Commission should investigate the impact of deregulated payphone rates on consumers' distaste for payphone service. As for APCC's purported "concern for the most needy members of society," its members' "treatment of these consumers" (and their often "predatory pricing policies") contradict their self-serving public interest claims. IDT at 12-13. Indeed, an industry article submitted by WorldCom argues that the "payphone business killed itself." WorldCom at 11 & Att. 2.[9]

[9] It concludes, "[i]f [PSPs] had more respect for customers and actually took care of customers instead of abusing them, perhaps they'd still be a viable communications alternative, instead of the choice of last resort." <u>Id.</u> at Att. 2 p. 2.

Sprint believes that the current payphone compensation policy has contributed to the payphone industry's decline. By exempting payphones from competitive market forces, current policy has discouraged innovation, improvements in service and rates, and the timely removal of uneconomic and redundant payphones. Sprint at 5.

IV. If the Commission Takes Any Action, It Should Issue a Notice of Inquiry and Rethink Current Policy.

All of the commenters agree that the Commission cannot reasonably increase payphone compensation rates in the current payphone compensation regime. The commenters also generally agree that, if the Commission is to do anything, it should issue a notice of inquiry under Section 1.430 of its rules to explore payphone issues thoroughly and to re-evaluate its policy approach in order to better promote the public interest

A. The Commission Should Thoroughly Examine Changes in the Payphone Market and in the Public's Needs.

Commenters volunteered many sensible items for the inquiry. An NOI would allow the Commission to investigate the "changes in market conditions and their impact on the public's demand for payphone services." AT&T at 8. It could examine actual payphone deployment and the level appropriate to meet the goals of Section 276(b)(1) IDT at 7. It could evaluate the market-distorting effects of discouraging removal of uneconomic payphones and the continued infeasibility of targeted call blocking. Sprint at 3, 5 & n.7. It could investigate changing technologies and market alternatives to payphones (WorldCom at 10-11 & Att. 1), how payphones are deployed and where they are being removed (Telstar at 4), how the public continues to have reasonable access to payphones (Texas AG at 2 & Att.), and whether removal of redundant and unneeded payphones may be in the best interests of the public and the industry (ATX at 2; AT&T at 10; WorldCom at 5; Sprint at 5). It could solicit information from state commissions regarding their experience with payphone complaints, their observations on payphone deployment, and their experiences with public interest payphone programs. AT&T at 9; WorldCom at 6-7; Telstar at 5. It could examine the growing problem of payphone fraud that the current payphone compensation system promotes (ATX at 6-7; WorldCom at 13-14). The Commission also could explore the quality of payphone services (IDT at 10) and ways that PSPs could innovate and improve services and rates, so as to increase volumes. WorldCom at 11. The Commission should also examine the ways in which its default compensation policy may be contributing to the industry's decline. Sprint at 5; Global Crossing at 2.

B. The Commission Should Rethink Current Policy.

Most important, "[t]he Commission can and should reassess its regulatory policy regarding the proper means to satisfy the public interest and the goals underlying Section 276 in light of changing market conditions." AT&T at **4.** It "should re-examine the methodology adopted for determining the appropriate compensation rate" (Telstar at 5), explore whether the public interest and the goals of Section 276(b)(1) are well-served by the current default compensation regime, and consider the likely efficiencies and public interest benefits of other policy alternatives.

The Petitioners presume that the Commission should adhere to its current policy indefinitely. However, "the issues raised by the Petitioners implicate the design and purpose of the dial around compensation methodology as much as the economic inputs of the Commission's existing methodology," which show that "[t]he Commission should consider alternate ways to ensure fair compensation and widespread [deployment]." IDT at I, 9. After all, "the *Third Report and* ***Order*** makes clear that the Commission is not obligated to adhere to an approach that can only significantly diminish consumer demand for payphone services." AT&T at 8.

One approach that should not be considered in an NOI is IDT's suggestion that wireless carriers could be required to contribute to a fund that would be distributed to PSPs to compensate them for the loss of customers to wireless competition. IDT at 5-6. IDT contends this may not be "unreasonable," since the three RBOC Coalition members own wireless carriers accounting for some 40% of the wireless market and a large majority of the nation's payphones. Id. at *6.* Of course, that approach would be patently unlawful and utterly unsound as a matter ofpolicy. There is no statutory basis for such an approach, and even if there were, it would be counterproductive to tax one service provider to compensate a competitor for providing a better and more popular service.

Other, better alternatives to current policy, however, are available. In particular, the Commission should revisit the legality, the efficiency, and the public benefits of a market-based, caller-pays system, as Sprint has advocated. Sprint at 5-8 & Att. In combination with a targeted public interest payphone program under Section 276(b)(2), a caller-pays system offers the most efficient, sustainable means of fulfilling the goals of Section 276(b)(1). **A** caller-pays system would give PSPs added incentive to improve and modernize their services, optimize rates for consumers, and deploy payphones in an economically efficient way. It could also ultimately arrest the industry's decline, by rewarding quality service providers and encouraging a realistic, sustainable deployment based on market-signals, rather than a guaranteed recovery based on an artificial surrogate that, Sprint believes, serves the public interest poorly.

Conclusion

Every commenter recognizes that Commission should deny the petitions for rulemaking. If the Commission believes any action may be necessary, then it should issue a notice of inquiry. After conducting a thorough review of the marketplace, the industry, and the effects of the current compensation regime, the Commission should consider a new policy approach. That review should include revisiting the legality and efficiency of a market-based, caller-pays alternative, together with a targeted public interest payphone program under Section 276(b)(2).

Respectfully submitted,

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CERTIFICATE OF SERVICE

1 hereby certify that a copy of the foregoing Reply to Comments of Sprint Corporation in RM No. 10568 was sent by U.S. First Class Mail, Postage Prepaid, or electronic mail to the parties below on this 14th day of November 2002.

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