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May 21, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W., TW-A325
Washington, DC 20554

EX PARTE
COMMUNICATION

Re: Request to Update Default Compensation Rate For Dial-Around Calls from Payphones, WC Docket No. 03-225

Dear Ms. Dortch:

At the request of the Wireline Competition Bureau staff, the American Public Communications Council ("APCC") submits the following clarification of a point in APCC's Reply Comments, filed January 22, 2004. In its Reply Comments, APCC explained that, since APCC collected the data used in its 2002 cost study, APCC has collected additional payments of dial-around compensation for the period for which the data were collected. As a result, there has been a 7% increase in the paid dial-around call volume for that period. APCC calculated that this change translates into a \$.008 reduction in APCC's proposed dial-around compensation rate, lowering the rate from \$.484 to \$.476. APCC Reply Comments at 33 and Exh. 1, Declaration of Don J. Wood, ¶41.

This adjustment was calculated as follows. APCC's cost study found that the average "marginal" payphone had 55.9 paid dial-around calls per month. See American Public Communications Council, Request that the Commission Issue a Notice of Proposed Rulemaking (Or in the Alternative, Petition for Rulemaking) to Update Dial-Around Compensation Rate, filed August 30, 2002, Attachment 1, Per-Call Cost study for Dial-Around Calls, prepared by Wood & Wood Consulting, Inc., D.5.6. A 7% increase in paid dial-around calls would increase the monthly dial-around calls at a marginal payphone by 3.9 calls ($.07 * 55.9 = 3.9$), bringing the total dial-around calls at a marginal payphone to 59.8 calls per month. Increasing the number of dial-around calls by 3.9 calls also increases the total number of calls at a marginal payphone from 233.9 to 237.8 calls per month.

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The revised count for monthly total calls at a marginal payphone were then plugged into the calculation of per-call costs. *See Id.*, E.1.0. In that calculation, the total joint and common costs of a marginal payphone were \$107.32 per month. Dividing \$107.32 by 237.8 yields per-call joint and common costs of \$.451 per call, a decrease of \$.008 from the previous calculation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert F. Aldrich". The signature is written in a cursive, somewhat stylized font.

Robert F. Aldrich

cc: Tamara Preiss
Jon Stover
Carol Canteen