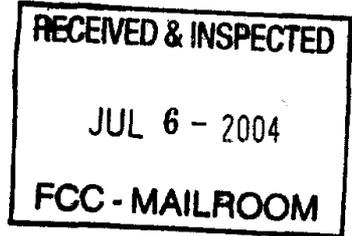




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Phone  
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June 30, 2004

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20544

Re: In the Matter of The Pay Telephone Reclassification and  
Compensation Provisions of the Telecommunications Act of 1996,  
CC Docket 96-128

Dear Ms. Dortch:

Al-Call, Inc. ("Al-Call"), providing interexchange telecommunications services, submits this letter and accompanying certification as record that Al-Call is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")<sup>1</sup>, released on October 3, 2003, respecting the obligations of Completing Carriers to provide certain compensation and reporting to payphone service providers (PSPs), replacing the Commission's interim compensation rules effective July 1, 2004.

As Al-Call is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to PSPs, Al-Call is not subject to such requirements at this time. If Al-Call operations are altered to the extent that Al-Call necessarily becomes a Completing Carrier, Al-Call intends to fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,

Greg Davis  
Vice President of Operations  
Al-Call, Inc.

cc: Ms. Ruth Jaeger, President  
APCC Services, Inc.  
625 Slater Lane, Suite 104  
Alexandria, Virginia 22314

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<sup>1</sup> *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996*, CC Docket No. 96-128, Report and Order, (2003) (Order).

**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION  
OF AL-CALL, INC**

**RECEIVED & INSPECTED**  
JUL 6 - 2004  
**FCC - MAILROOM**

1. My name is Greg Davis. I currently serve as the Vice President of Operations of Al-Call, Inc., (Al-Call) a provider of interstate interexchange telecommunications services, as a toll reseller in the state of Georgia. In this capacity, I have become familiar with the network operations of Al-Call and its practices associated with the completion of calls originated from Pay Telephones.
2. Al-Call is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. With respect to coinless access code calls, Al-Call is a switchless reseller. Al-Call contracts with US Carrier for completion of calls originated by access code.
4. With respect to subscriber toll-free payphone calls, Al-Call is a switchless reseller. Al-Call contracts with US Carrier for completion subscriber toll-free calls.
5. Al-Call does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.
6. Al-Call does not create call detail records for either access code calls or subscriber toll-free payphone calls. Al-Call, Inc's action with respect to call detail records is limited to rating and billing.
7. Al-Call compensates US Carrier for the wholesale cost of the call.
8. Al-Call has confirmed with US Carrier that any calls purchased by Al-Call are included in the respective call tracking systems and compensation remittance process of US Carrier.
9. In consideration of the aforementioned facts, Al-Call is not subject to the compensation or reporting requirements related to the Commission's Report and Order<sup>1</sup> and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 30, 2004.

  
\_\_\_\_\_  
*Greg Davis*  
*Vice President of Operations*  
*Al-Call, Inc.*  
*101 Mercer Street*  
*Alma, Georgia 31510*

<sup>1</sup> *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).*