



**NOTICE OF *EX PARTE*
PRESENTATION**

January 14, 2005

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWA325
Washington, DC 20554

**Re: AT&T Corp. Petition for Declaratory Ruling Regarding Enhanced
Prepaid Calling Card Services, WC Docket No. 03-133**

Dear Ms. Dortch:

The attached written *Ex Parte* Presentation was sent to each commissioner by SureWest Communications on January 14, 2005. In accordance with FCC Rule 1.1206(b)(1), this Notice of *Ex Parte* Presentation and a copy of the *Ex Parte* Presentation are being filed with you electronically for inclusion in the public record for this proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Strom", written in a cursive style.

Brian Strom
President - CEO



January 14, 2005

**EX PARTE PRESENTATION
Via E-mail**

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW, Room 8 B201
Washington, DC 20554

The Honorable Michael Copps
Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8 A302
Washington, DC 20554

The Honorable Kathleen Q. Abernathy
Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8 B115
Washington, DC 20554

The Honorable Jonathan Adelstein
Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8 C302
Washington, DC 20554

The Honorable Kevin Martin
Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8 A204
Washington, DC 20554

**Re: AT&T Corp. Petition for Declaratory Ruling Regarding Enhanced
Prepaid Calling Card Services, WC Docket No. 03-133**

Dear Commissioners:

SureWest Communications wishes to go on the record as opposing the AT&T Petition for Declaratory Ruling Regarding Enhanced Prepaid Calling Card Services, WC Docket No. 03-133. Unlike other filings in this proceeding, SureWest wishes to focus in on some unique issues.

Calling card services have, without exception, historically been viewed only as a vehicle for obtaining telecommunications services. Indeed, when AT&T originally began to offer calling cards near the time of divestiture, it went out of its way to differentiate these cards as telecommunications cards -- so as to make clear that they existed for telecommunications services, and so it could remove them from Regulation Z of the Federal Trade Commission. The Commission's records would show this clearly.

Regardless of the trappings of the AT&T card, when a customer obtains a "calling card", prepaid or otherwise, the customer is interested only purchasing the ability to place a telecommunications call between two points -- the caller's location and

the called party's location. The card is not the service. It only facilitates the service. The customer's intent is to be able to make telecommunications calls.

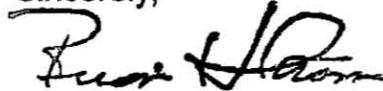
And a recorded announcement injected by the carrier no more makes this service an information service than a printed advertisement on the card itself would. The customer clearly is not purchasing the opportunity to receive a recorded announcement. The customer is using the card for telecommunications.

This is a big issue. To condone what AT&T is doing will invite others to "decorate" what is clearly a telecommunications service with irrelevant peripheral items so as to avoid their core universal service responsibilities. And customers would not be served in the process.

We request that you deny the AT&T Petition. We also urge the Commission to declare that AT&T must make 100% of the access charge payments that would be due on calls made by using the card in question. Otherwise, AT&T will still profit – because it will still leverage its size and ability to withhold money to negotiate smaller settlements with small ILECs. This will provide incentives for AT&T to replicate its action in other ways in the future.

We also urge the Commission to impose penalties where appropriate for AT&T's failure to make USF contributions.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Strom". The signature is written in a cursive, flowing style with a large initial "B".

Brian Strom
President - CEO