

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

In the Matter of

Truth-in-Billing and Billing Format)	CC Docket No. 98-170
)	
National Association of State Utility)	CG Docket No. 04-208
Consumer Advocates' Petition for)	
Declaratory Ruling Regarding)	
Truth-in Billing)	

REPLY COMMENTS OF ONSTAR CORPORATION

OnStar Corporation hereby submits these Reply Comments in response to the Commission's Second Report and Order, Declaratory Ruling, and Second Further Notice of Proposed Rulemaking released March 18, 2005 in the above captioned matter.

OnStar's service offerings include optional, hands-free, prepaid, wireless interconnected calling. OnStar fully supports fair and timely disclosure of pricing information to its subscribers. As the Commission develops its order in this matter, OnStar urges the Commission to distinguish between the post-paid billing environment and the prepaid environment where there is no bill. Of particular note, in the prepaid environment, the total price and duration of the prepaid calling capability is fully known prior to completion of the transaction.

As an in-vehicle service, OnStar supports a flexible regulatory framework that avoids rigid rules. For example, with the OnStar service, it is expected that a significant majority of prepaid minute purchases will be transacted while the subscriber is driving a vehicle. As such, minimizing driver distraction while assuring fair and timely disclosure is essential. Therefore, OnStar would urge the Commission not to require a specific method for itemizing charges.

OnStar appreciates consideration of its views in this matter.

Respectfully submitted,

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