

The FCC's February 14, 2008 Order makes clear that LECs did not have a clear basis upon which to begin assessing these overcharges.

- \* Payphone providers have had no choice but to pay these overcharges since April 1, 2003 when LECs began to assess them.

- \* Though payphone providers acted timely to seek redress, FCC took five years to act during which time payphone providers have been forced to pay these overcharges. Payphone providers should not be required to absorb the cost of this delay.

- \* Payphone business is consistently declining and margins are slim. Literally every dollar of revenue and every customer is significant. The industry has no ability to absorb these overpayments.

- \* Without clarification, the refunds will not be forthcoming. JLR Communications has sought refunds from the seven LECs that provide our payphones lines. 6 (Navigator,Embarq,Verizon,Cincinnati Bell, Windstream, Frontier) have ignored us. North State has stated that they " intend on charging you the approved USF charges as of May 14" but "you will not receive any credit for retroactive amounts from North State barring clarification from the FCC that their intent was for local exchange carriers to provide retroactive credits."

Thank you for your consideration of this comment

JLR Communications, Inc

Jack Ray