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Federal Communications Commission
Wireline Competition Bureau
Competition Policy Division
445 12th Street SW
Washington, DC 20554
Fax: (202) 418 – 1413
RE: WC Docket No. 10-114 and Comp. Pol. File No. 933
Attention: Carmell Weathers

Dear Policy Division Staff,

This letter is to object to the Paragraph/Article 63.71 Application of Verizon Long Distance LLC requesting your approval to discontinue “Smart Touch” international long distance service. This is a prepaid long distance service that is automatically prepaid directly from a credit card whenever the users plan balance drops below a predetermined amount. There is no monthly service fee for this international phone service as it is prepaid and Verizon is instantly compensated for services rendered.

There is no monthly statement provided to “Smart Touch” users since they can view their account activity on line. The “Smart Touch” user’s credit card statement shows when funds have been automatically transferred to his “Smart Touch” plan account to prepay for calls.

The “Smart Touch” cost per minute of call time is the same as for Verizon plans that have a monthly service fee but aren’t prepaid. With these monthly fee plans Verizon has to wait over a month to get paid for the international long distance service provided (Verizon is paid instantly with “Smart Touch” and doesn’t have to deal with billing and monthly statements).

I don’t make frequent long distance calls, and don’t think its fair for me to have to pay Verizon a monthly fee for months when I’m not using their long distance service (with “Smart Touch” Verizon has my unused prepaid funds during this period). I can find no other long distance service for my home phone that has costs and features similar to Verizon’s “Smart Touch” international long distance service. Therefore, I respectfully request that you **not** approve Verizon’s request to discontinue their “Smart Touch” international long distance service.

Very Truly Yours

Richard Umgelter