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February 7, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, DC 20554

**NOTICE OF EX PARTE
CONTACT**

Re: WC Docket Nos. 11-42, 03-109, 96-45, 12-23, 6-122, 96-128; and GN Docket. Nos. 09-151 and 13-5

Dear Ms. Dortch:

On February 5, 2013, Randy Nichols, President and General Counsel of the American Public Communications Council (“APCC”) and the undersigned, as counsel for APCC met with the following members of the Wireline Competition Bureau Staff: Julie Veach, Chief of the Bureau, Travis Litman, Legal Advisor to the chief of the Bureau, Lisa Gelb, Deputy Chief of the Bureau, William Dever and Denise Coca of the Competition Policy Division of the Bureau, Victoria Goldberg and Garnet Hanly of the Telecommunications Access Policy Division of the Bureau, and Pamela Arluk and Lynne Engledow of the the Competition Pricing Division. The substance of the discussion is summarized in the attached presentation, Preserving The Lifeline in the Broadband Age, Payphones –the Communications Infrastructure of Last Resort.

In addition, there was some discussion of calling patterns from payphones. In response to questions, the APCC representatives estimated that somewhere around 700,000,000 calls “plus” a year are made from payphones. Various estimates of the amount of dial-around and coin-calling were mentioned, as were estimates of the amount of calling to social services agencies and 911 calling, with anecdotal references to data contained in a San Diego study conducted several years ago. APCC has checked references to the San Diego study and other data.

For the last four quarters, a typical payphone has averaged quarterly revenue from dial-around calls of just under \$41.00, with the amount varying some from quarter to quarter, depending on seasonal factors. Coin revenue per quarter at the average payphone is about twice the amount of the dial around compensation to about 2.25 times the amount of dial around compensation. Anecdotal notations from the San Diego study indicated that at the time as much as 20-25% of calling from payphones was to social service agencies. APCC is in the process of attempting to gather additional data in this area and will report the data if the studies can be completed but there is reason to believe this number may have increased. Notations of estimates believed to have come from the same San Diego study are that there is on average slightly more than one (1) 911 call per month from a payphone, which is less than the estimates discussed in the meeting.

Please feel free to contact me if there are any questions. I regret the slight delay in submitting this letter and apologize for any inconvenience caused to any party.

Mr. Scott Sawyer
July 8, 2011
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Sincerely,

/s/
Albert H. Kramer

CC:

Ms. Julie Veach
Ms. Lisa Gelb
Mr. William Dever
Ms. Pamela Arluk
Ms. Denise Coca
Ms. Lynne Engledow
Ms. Victoria Goldberg
Ms. Garnet Hanly
Mr. Travis Litman