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December 18, 1997

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 991000-TP
Proposed Rules relating to Pay Telephone Svcs.

Dear Ms. Bayó:

✓ Enclosed is an original and fifteen copies of BellSouth Public Communications, Inc.'s Comments, which we ask that you file in the captioned matter.

E. Cottwell A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.
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Sincerely,

Nancy B. White (kr)
Nancy B. White

0 Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

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on a deregulated service. BSPC believes that the market will dictate the minimum time period required on local payphone calls through consumer reaction to time limits imposed by competing payphone providers. Consumers who are provided notice of time limitations on the sign card as well as audible announcements are equipped with the information necessary to make a market decision regarding use of the competing provider's payphone. BSPC believes that a truly deregulated service will not have such regulations imposed on the provision of the service.

BSPC points out that beginning January 1, 1998, dial-around access codes will expand to include 10XXXX. These rules should be amended to reflect these additional codes.

BSPC believes the language in Rule 25-24.515(12), as amended, is intended to mimic the language on this issue in the FCC orders under CC Docket 96-128. BSPC believes, however, that this language does not clearly reflect that intention. Since 0-calls are a type of operator service call, readers may be unsure of the routing requirements for these calls. BSPC believes the following language would make this rule clear:

(12) All 0-calls shall be initially routed to the serving local exchange telecommunication provider. All other calls, including other operator service calls, may be routed to the pay telephone provider's carrier of choice unless the end user dials the appropriate access code for their carrier of choice, i.e., 950, 10XXX, 101XXXX, and toll free access (e.g. 800 and 888).

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Rule 25-24.515 (13), regarding the time period for exemptions to the Commission's rule on blocking incoming calls is overly burdensome and causes a payphone service provider unnecessary expense. BSPC believes that if a situation exists at a payphone location that would cause law enforcement officials to request the restriction on incoming calls, the situation is not one that will diminish over time. If a restriction on incoming calls is lifted after one year, the original problems which existed will eventually return. A requirement that local law enforcement attest that a reduction in crime is linked to such blocking of incoming calls also forces a deduction on the part of the officer. No factual evidence could possibly exist in any given instance that proves the linkage between incoming call blocking and reduced crime. BSPC is interested in providing payphones in locations where the transient public most needs these services. Administrative roadblocks such as the proposed process required to obtain a waiver to block incoming calls in locations where it is necessary increase the cost of providing the service, add to the frustration experienced by location providers when they cannot control their own business property and will ultimately cause payphones to be removed. Removing payphones from locations they are most needed for the safety, security and convenience of the transient public and location providers and their employees and customers is not in the public interest nor consistent with the objectives of Congress in the Telecommunications Act of 1996.

The proposed rule changes that allow a payphone service provider to charge for incoming calls after the first five minutes will eliminate any location provider or payphone service provider motivation to limit a payphone to only outgoing calls in order to make more money. As such, restricting phones to outgoing calls only will be

requested in those circumstances where it is an absolute requirement to keep the payphone in place. An administrative process that is repetitive and burdensome such as the one proposed will cause a dearth of payphone services in high crime areas, the specific areas where payphones are most needed for the safety and security of the general public.

Respectfully submitted this 18th day of December, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (kr)

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**CERTIFICATE OF SERVICE
DOCKET NO. 951560-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by
U.S. Mail this 18th day of December, 1997 to the following:

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