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703/264-4968



US Sprint.

ORIGINAL  
FILE COPY

August 9, 1991

Mr. Steve Tribble  
Director, Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0850

Re: ~~Docket No. 910060-TP~~, In Re: Petition of the Attorney  
General and the Public Counsel to Adopt Rules Governing  
900 Services

Dear Mr. Tribble:

Enclosed for filing with the Commission are an original and  
fifteen (15) copies of Sprint Gateways' Comments in the above  
matter. Please date-stamp the extra copy of this filing and return  
it to me in the enclosed self-addressed, postage prepaid envelope.  
Thank you.

Very truly yours,

Craig D. Dingwall  
General Attorney

- ACK ✓
- AFA \_\_\_\_\_
- APP 1
- CAF \_\_\_\_\_
- CML
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 6
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH 1
- SEC 1
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- OTH \_\_\_\_\_

DOCUMENT IN YOUR FILE  
08109 AUG 12 1991  
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of the Attorney ) Docket No. 910060-TP  
General and the Public Counsel ) Filed: August 12, 1991  
to adopt rules governing 900 )  
services )  
\_\_\_\_\_ )

COMMENTS OF US TELECOM, INC. D/B/A SPRINT GATEWAYS

U S Telecom, Inc. d/b/a Sprint Gateways (Sprint Gateways), through its attorneys, respectfully submits its comments in response to the Commission Staff's proposed changes to the Phase I rules.

INTRODUCTION

On July 31, 1991, the Commission held a hearing on proposed Phase I rules in the above-captioned matter. At the hearing Staff proposed changes to the Phase I rules. Staff proposed that bill messages be required on the section of the bill containing 900 or 976 service charges in lieu of placing the required bill messages on each page. Sprint Gateways supports Staff's proposed change.

DISCUSSION

Sprint Gateways supports the Commission's goals of informing customers of their billing rights associated with pay-per-call services. Two of the goals in this proceeding are to inform customers that nonpayment of pay-per-call charges will not result in disconnection of local service and that customers can obtain blocking services from the LEC. Sprint Gateways supports these goals.

Sprint Gateways originally believed, and still believes, that

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a periodic bill insert can adequately inform customers of their billing rights. Sprint Gateways believes that unnecessary, additional notification of a consumer's rights will encourage customers not to pay valid charges with the customer knowing that no harm will come to them. All parties supported the Staff's proposed language, except Public Counsel, who could not offer any reasonable reason for notice of each page of the bill. While Sprint Gateways continues to believe a bill insert is an adequate vehicle to notify consumers, Sprint Gateways supports the new language proposed by Staff.


The Staff's proposal that bill messages be required on the section of the bill containing 900 or 976 service charges, in lieu of placing the required bill messages on each page, offers several advantages. As compared to original Phase I language, the Staff's proposed language allows the customer communication goals of this proceeding to be met while not requiring a message on every page of the bill. Messages on each page of a bill containing pay-per-call charges increases the cost of billing and will increase the length of the bill to the customer. In contrast, Staff's proposed language requires that each section of the bill contain the required messages which we believe more than adequately notifies customers of their billing rights while not excessively notifying customers encouraging non-payment.

CONCLUSION

For the forgoing reasons, Staff's proposed changes to the Phase I rules should be adopted. Bill messages should be required on the section of the bill containing 900 or 976 service charges, in lieu of placing the required bill messages on each page.

DATED: August 9, 1991

Respectfully submitted,

  
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Craig D. Dingwall  
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703/264-4968

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of Sprint Gateways' Comments in Docket No. 91-00-60-TP has been served by U.S. Mail to the following parties of record on this 9th day of August 1991:

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