

ISSUES  
FLORIDA PUBLIC SERVICE COMMISSION  
TALLAHASSEE, FL 32304-0000

Unfiled  
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In the Matter of  
the Florida Public  
Service Commission Rules  
Governing Prepaid Calling Services

Docket No. 98085-FTL

COMMENTS OF  
DORTEL COMMUNICATIONS, INC.

Dortel Communications, Inc., trading as "TRICOM International" (hereinafter referred as "TRICOM International" or the "Company") is an authorized international facilities-based and resale carrier that operates between the United States and various international points. Among its services, TRICOM International offers prepaid calling card services. Prepaid calling cards, bearing the name "TRICOM," are sold in the Florida area by unaffiliated distributors of TRICOM International who purchase the cards from the Company at wholesale rates.

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP Callwell TRICOM International commends the Florida Public Service Commission (the "PSC") for its initiative in proposing rules to govern prepaid calling card services. As CAF \_\_\_\_\_  
CMU 1 indicated in Order No. PSC-96-1224-POP-TL, the prepaid calling card industry is rapidly CTR \_\_\_\_\_  
EAG \_\_\_\_\_ growing and as the market has grown so has the need to impose certain regulations to govern LEG 5 these services. Additionally, we support the importance of protecting consumers to ensure LIN \_\_\_\_\_  
OPC 1 that they are receiving quality service when they purchase prepaid calling cards. As we read RCH \_\_\_\_\_  
SEC 1 the proposed rules, however, we note certain ambiguities.  
WAS \_\_\_\_\_  
OTH ngb Dr

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**Section 25-24.910 of the proposed rules states that a "company shall not provide PPCS without first obtaining a certificate of public convenience and necessity as a local exchange company, alternative local exchange company, or interexchange company."<sup>1</sup> Section 25-24.900 in turn, defines a company as "any entity providing prepaid calling services using its own or resold telecommunications network to provide prepaid calling services."**

**The provision of prepaid calling card service is typically conducted through a variety of companies or entities (e.g., calling card provider, network provider, distributors and marketers). The company that sells the card bearing its name is often not the same entity that markets and sells the card throughout the United States. Using Florida as an example, a prepaid calling card which permits international, interstate and intrastate calls to be made may be sold in Florida by a distributor while the provider of the card does not operate in Florida or maintain an office there. With such cards, customers call an 800 number that is provided and staffed by another company that has no affiliation with the calling card provider. This network provider completes the domestic calls. The prepaid calling card provider compensates the network provider for its completion of callings originating and terminating within Florida (and all other calls within the United States) by paying a flat rate of a specified number of cents for each minute of calling time. The calling card provider does not lease or own facilities in Florida.**

**Presuming that a calling card provider that leases or resells a network or the services**

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<sup>1</sup> As defined by the proposed rules at 25-24.905, PPCS stands for Prepaid Calling Services.

of a network is defined as a company under the rules, it then must seek certification as a local exchange company, an alternative local exchange company, or interexchange company while not being any of these in Florida. Before the final rules are adopted, we suggest that the FPSC clarify this issue.

Additionally, the FPSC should take into consideration that most calling card providers typically maintain large inventories of cards, thus if the proposed rules are adopted, the FPSC should incorporate a grandfather clause that provides a certain time period within which the calling card provider must conform its cards to comply with the new rules.

Respectfully submitted,

Dental Communications, Inc.



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