



ORIGINAL

Andrew Iear, Director - Industry Relations

Telecommunications  
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Via Facsimile and Priority Mail

27 January 1998

Ms. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
Capital Circle Office Center  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32309-0873

98 JAN 30 PM 7:13  
MAIL ROOM

RE: Rules Governing Prepaid Calling Services, 25-24.900 FAC et seq., Docket  
980254-T1

Dear Ms. Bayo:

The Telecommunications Resellers Association (TRA), on behalf of its more than 650 company members and 29 Florida-based members, and in lieu of an appearance before the Florida Public Service Commission during its January 30, 1998 rule hearing, hereby expresses its general support of the Staff's Draft amended proposed Rules for Prepaid Calling Card Services (Rules). TRA urges the Commission to adopt the proposed Rules with one additional amendment.

TRA has been an active party to this proceeding (see e.g. Comments of the TRA, February 4, 1997 and Response to Staff Interrogatories, April 18, 1997). TRA believes that the proposed Rules generally constitute an effective balance between maintaining the public interest and not unduly burdening service providers. TRA believes, however, that Rule 25-24.930(2)(c) which requires that retailers and distributors provide consumers with required information by contract rather than by "other means", as is allowed by Rule 25-24.935, should be revised to be consistent with Rule 25-24.935 and afford service providers like flexibility in complying with the proposed Rules.

- ACK \_\_\_\_\_
  - AFA \_\_\_\_\_
  - APP \_\_\_\_\_
  - CAF \_\_\_\_\_
  - CMU \_\_\_\_\_
  - CTR \_\_\_\_\_
  - EAG \_\_\_\_\_
  - LEG \_\_\_\_\_
  - LIN \_\_\_\_\_
  - OPC \_\_\_\_\_
  - RCH \_\_\_\_\_
  - SEC \_\_\_\_\_
  - WAS \_\_\_\_\_
  - OTH \_\_\_\_\_
- TRA urges the Commission to adopt the Rules as proposed by Staff, with the exception of Rule 25-24.930(2)(c) which should be brought into conformity with the language in Rule 25-24.935.
- Sincerely,
- Telecommunications Resellers Association
- Andrew O. Iear*  
Andrew O. Iear
- Enclosure
- 1
- all to be filed*

DOCUMENT NUMBER DATE  
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