

September 28, 2001

BY HAND DELIVERY

Blanca Bayó, Director
Florida Public Service Commission
Division of Commission Clerk and
Administrative Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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COMMISSION
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Re: UNDOCKETED – Prison Payphone Workshop

Dear Ms. Bayó,

Enclosed for filing are an original and 10 copies of WorldCom, Inc.'s post-workshop comments.

If you have any questions, please contact me at your convenience.

Thank you for your assistance with this matter.

Sincerely,



Donna Canzano McNulty

cc: Rick Moses
Mary Anne Helton

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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Pay Telephone Problems)
In Confinement Facilities)
_____)

Undocketed

Filed: September 28, 2001

POST-WORKSHOP COMMENTS OF WORLDCOM, INC.

On August 29, 2001, the Commission held a workshop to seek input regarding inmate pay telephone service, to determine the root cause of why some calls cannot be completed to end user locations served by an ALEC, to determine if 0+ calls made from pay telephones located outside confinement facilities experience the same problem, and to explore the necessity for rulemaking.

WorldCom, Inc., on behalf of its operating subsidiaries in Florida, hereby files its post-workshop comments.

INTRODUCTION

Staff is reviewing a complex problem that needs to be addressed by a multi-faceted approach. WorldCom believes that the current rules should be updated to reflect the fact that the Telecommunications Act of 1996 and Chapter 364, Florida Statutes, allow for local competition. WorldCom would like to work with Staff to amend the rules to address staff's concerns.

Currently some types of calls, such as collect calls and 10XXX, may not be completed to ALECs for various reasons. As discussed extensively during the workshop, not all ALECs are updating their customer information in the line information databases (LIDB), which means that other telecommunications companies will not be able to determine who to bill for the calls that they carried. By rule, the Commission should

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require all ALECs to update LIDB on daily basis. The incumbents already do this as do many, but not all, ALECs.

Another aspect to resolving this problem is to ensure that telecommunications carriers have the information they need to complete calls, in addition to information provided in LIDB. Some ALECs do not provide billing name and address information (BNA) to other telecommunications companies upon request when certain types of calls are completed to the ALEC's customers. The Commission should require all ALECs to provide BNA in a timely manner and at a reasonable cost to ILECs, ALECs and IXCs upon request. WorldCom believes that reasonable cost for BNA should be no more than \$.33 per transaction and a set-up fee of \$50 per batch file. In addition, there should be no limit to the number of BNA requests, for example, 5 records versus 1000. The ALECs should be required to provide all the records that are requested at a reasonable cost and in a timely manner. This is consistent with the requirements of the FCC.

The Commission also needs to recognize there are legitimate reasons that some calls may not be completed and amend its rules accordingly. For instance, when a confinement facility or a telecommunications company believes there is high toll fraud, criminal or illegal activity, the telecommunications provider should be allowed to block the calls. One recent example of a new fraud problem is the call-forwarding of 0+ collect inmate calls to a local number which bypasses facilities of approved call list of each inmate. In such situations, the inmate has a non-inmate set up a local line near the prison and the line is set up to auto-call forward to another phone number, thereby bypassing the approved call list for the inmate. In some cases, if debit calling is available to the inmate, the call can be automatically forwarded to the unintended recipient, who does not even

have the opportunity to refuse the call. Obviously this poses public safety concerns. Also, customers of prepaid local service providers may only be paying for local service and receiving some types of calls such a collect or dial around are not included in their service package. Moreover, some customers simply request call-blocking. Telecommunications companies also should be permitted to block some types of calls such as collect or dial around calls to CMRS providers (such as pagers). Finally, telecommunications companies should be allowed to block calls that are accepted by the customer and billed to the customer, but the customer refuses to pay.

Based on the foregoing, WorldCom recommends that the Commission amend its rules as follows:

IXC RULES

Rule 25.24.471 – Application for Certificate

- (c) Where only one interexchange carrier is available in a confinement facility, that interexchange carrier shall provide for completion of all inmate calls allowed by the confinement facility subject to the following exceptions:
- (1) when the confinement facility or telecommunications company believes there is high toll fraud, criminal or illegal activities;
 - (2) when calls are completed to prepaid local service providers and public payphones;
 - (3) when calls would be routed to end users who have requested call-blocking;
 - (4) for calls that are denied by LIDB or for calls where the ALEC fails to provide LIDB service;
 - (5) for calls in which the interexchange carrier is unable to obtain Billing Name and Address (BNA) records;
 - (6) for CMRS services;
 - (7) for collect calls to local numbers programmed to auto-call forward calls outside the local calling area; and
 - (8) for calls accepted by the customer and billed to the customer, but the customer refuses to pay.

PAY TELEPHONE RULES

Rule 25-24.515 –

- (21) Providers serving confinement facilities shall provide for completion of all inmate calls allowed by the confinement facility subject to the following exceptions:
- (a) when the confinement facility or telecommunications company believes there is high toll fraud, criminal or illegal activities;
 - (b) when calls are completed to prepaid local service providers and public payphones;
 - (c) when calls would be routed to end users who have requested call-blocking;
 - (d) for calls that are denied by LIDB or for calls where the ALEC fails to provide LIDB service;
 - (e) for calls in which the interexchange carrier is unable to obtain Billing Name and Address (BNA) records;
 - (f) for CMRS services;
 - (g) for collect calls to local numbers programmed to auto-call forward calls outside the local calling area; and

- (h) for calls accepted by the customer and billed to the customer, but the customer refuses to pay.

ALEC RULES

Rule 25-24.840 – Service Standards

- (c) Within six (6) months of the effective date of this rule, all ALECs shall be required to provide billing name and address (BNA) information to any other ALEC, ILEC, or IXC that requests it, and shall provide it at a reasonable cost and in a timely manner.

- (d) Within twelve (12) months after the effective date of this rule, all ALECs shall update information in Line Information Databases (LIDB) on a daily basis.