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Case Numbers: 96-1310-TP-COI

Date: 04/20/2009

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FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's)
Investigation into the Implementation)
of Section 276 of the Telecommunications)
Act of 1996 Regarding Pay Telephone)
Services.)

Case No. 96-1310-TP-COI

**SBC OHIO'S
INITIAL POST-HEARING BRIEF
CORRECTED PAGE 30
(CONFIDENTIAL VERSION)**

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2004 MAR 15 PM 3:35

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2004 MAR 15 PM 3:36 for Restricted Coin Access is so low⁸ that the costs are trivial and the existing rate is appropriate.

(Currie Direct at 30; Currie Direct Confidential Attachment 1, Page 4 of 5, Line 5.)

PUCO

The Commission should retain the current tariff rate of \$10.75. However, if the Commission disagrees that the trivial cost exception is applicable to Restricted Coin Access, then it should order that the price be reduced to **\$0.95**, which is under the ceiling developed by the Physical Collocation Tariff Order methodology.

C. The Commission Should Maintain SBC Ohio's Existing Local Usage Billing Structure.

SBC's Local Usage service currently is billed in 73 message call package and individual additional messages. A message is one local call, regardless of duration. SBC proposes to keep this billing structure for Local Usage but modify the rates discussed previously. SBC can modify the rates in the existing billing structure relatively quickly and inexpensively by making adjustments to the rate tables.

PAO, on the other hand, is proposing that SBC change its Local Usage billing structure to bill on a minute-of-use basis rather than message basis. SBC opposes that proposal because changing the existing billing structure would require expensive and time-consuming changes to the billing system. The process normally takes up to eighteen (18) months. (McPhee (Watkins) Rebuttal at 2.)

The Commission should reject any efforts to require SBC to modify its billing structure, because the expensive and time-consuming changes are not needed to implement changes to the Local Usage rates at issue in this case. PAO recognizes this by putting forth an alternate proposal to use a different minute to message cost conversion factor than that proposed by SBC

⁸ The projected demand for restricted coin access is 2 per year. (Currie Direct Confidential Attachment 1, Page 4 of 5, Line 5.)