

RECEIVED

SEP 26 1996

DOCKETING DIVISION
Public Utilities Commission of Ohio

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission)	
Investigation Relative to Establish-)	Case No. 83-464-TP-COI
ment of Intrastate Access Charges.)	
In the Matter of the Application of)	
The Ohio Bell Telephone Company)	
for Approval of an Alternative Form)	Case No. 93-487-TP-ALT
of Regulation.)	
In the Matter of the Implementation)	
of Substitute Senate Bill 306 or)	
Substitute House Bill 734 of the 121st)	Case No. 96-532-TP-UNC
General Assembly)	

**COMMENTS OF AT&T COMMUNICATIONS OF OHIO, INC.
RESPONDING TO AMERITECH OHIO'S LETTER OF SEPTEMBER 18, 1996**

I. INTRODUCTION

AT&T Communications of Ohio, Inc. ("AT&T"), by its attorneys, respectfully submit these comments in response to Attorney-Examiner Jeffrey R. Jones' Entry of September 19, 1996 in the above cases. That Entry provided interested parties with an opportunity to file comments in response to Ameritech Ohio's letter of September 18, 1996 on the subject of the pay telephone set use fee.

Ameritech's May 23, 1996 tariff filing with the Federal Communications Commission ("FCC") could not be more patently clear -- the pay telephone set use fee or charge (the "set use fee") is a part of the Carrier Common Line Charge basket ("CCLC"). The failure of Ameritech to eliminate the set use fee from its intrastate tariffs on September 1, 1996, therefore,

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician J. M. Schaeffer Date Processed 9-27-96

unquestionably violates the settlement agreement entered into Case No. 96-532-TP-UNC. In accordance with the settlement agreement, if Ameritech Ohio is to retain the benefits of its alternative regulation plan, the Commission must direct Ameritech to immediately eliminate its recently created set use fee, a part of the CCLC, and refund the charges recovered from IXC's since September 1, 1996.

II. THE SET USE FEE IS AN ELEMENT OF THE CCLC

On April 26, 1995, Ameritech sought a waiver of the FCC's part 69 Rules in order to restructure¹ the charges for the use of its pay telephones to originate interstate traffic. The waiver was necessary in order to restructure rates and create the new pay telephone use fee.

Ameritech Ohio acknowledged in its August 16, 1996 Memorandum Contra in Case No. 83-464-TP-COI that costs associated with the receipt of pay telephone traffic by interexchange carriers ("IXCs") have always been included in the CCLC, a charge based on each carrier's total minutes of switched access use. Ameritech claimed in its FCC filing that it had developed the ability to identify all interstate traffic that originates from its pay phones

¹ Ameritech Ohio stated that "[t]he institution of Ameritech Ohio's set use fee was accompanied by a restructuring of rates to remove costs previously included in the calculation of the CCLC." As will be explained below in these comments, pay telephone costs were not removed from the CCLC calculation. Instead, the basis of recovery of such costs was changed from a total switched access minutes basis to the number of calls from a pay telephone. In fact, Exhibit 1 to Ameritech's May 23, 1996 FCC tariff filing demonstrates that the "current revenues" and "projected revenues" for the CCL access service after creation of the new rate element within the CCLC basket (the set use fee) were virtually identical (\$224,647,817 before the creation of the new CCL rate element and \$224,673,668 projected after creation of the set use fee as a new rate element). Thus, the restructure was merely to create a new element to be included within the CCLC basket, namely, the set use fee.

and the identity of the IXC to which such traffic was routed. With this recently developed information, Ameritech proposed to establish a new discrete rate element within the CCLC to recover pay telephone costs on a different basis (i.e., the number of pay telephone calls instead of each carrier's total minutes of switched access use.)

Ameritech's FCC tariffs filed to establish this new element, however also illustrate that the set use fee has been and still is an element of the carrier common line charge. See attachment A. Carrier common line access service has three rate elements: premium rates for terminating and originating minutes; non-premium rates for terminating and originating minutes, and the pay telephone use fee (the set use fee). This set use fee was established because Ameritech wanted to change the cost recovery methodology of pay telephone costs. Pay telephone costs are still recovered in the CCLC, but on a different basis than are premium rates and non-premium rates. Pay telephone costs are now recovered on the basis of the number of calls originating from Ameritech pay phones rather than on the basis of total switched access minutes. As succinctly shown in Exhibit 1 to Ameritech's FCC tariff filing (attachment A), the set use fee rate element was created out of the first two rate elements of the CCL (premium and non-premium rates). Only the recovery mechanism for CCL changed; the pay telephone traffic costs were created from pre-existing rate elements of the CCLC and are still considered carrier common line access costs according to the Ameritech FCC tariff.

The fact that the set use fee is merely a rate element within the CCLC is further supported by the conclusion of the staff of the Wisconsin PSC in its September 4, 1996 letter to Ameritech Wisconsin.² Although Ameritech Ohio's counsel indicates that both the law in Ohio and the facts distinguish the Ohio case from the Wisconsin case, that is inaccurate.

As referenced in the Wisconsin PSC staff letter, Wisconsin has a statute which prohibits a price-regulated telecommunications utility, such as Ameritech Wisconsin, from reinstating or substituting an intrastate carrier common line charge after September 1, 1996. While Ohio does not have a similar statute, Ameritech Ohio has agreed to the same prohibition by virtue of the settlement it signed in Case No. 96-532-TP-UNC, which was accompanied by S.B. 306, legislation which allowed reinstatement of Ameritech Ohio's alternative regulation plan. While Ameritech Wisconsin is statutorily prohibited from mirroring interstate carrier common line charges, Ameritech Ohio is likewise prohibited by virtue of its settlement agreement. The fact remains that the PSC of Wisconsin staff has recently addressed this issue and has found that the set use fee is a replacement for a portion of the CCLC. This Commission should find persuasive the Wisconsin staff's conclusion.

In fact, Ameritech itself called the set use fee "a new rate element of the Carrier Common Line basket" at page 7 of its reply comments submitted

² The Wisconsin PSC staff letter was filed in this docket by MCI Telecommunications Corporation and AT&T on September 9, 1996.

in FCC Docket No. CC 96-268. Indeed, Ameritech went on to state that it will identify the

"pay telephone revenue requirement allocated to originating and terminating CCL charges . . . then divide that amount by the number of interstate calls originating from Ameritech pay telephones during that base period. To maintain revenue neutrality Ameritech will treat the costs to be recovered through the set use fee as an exogenous amount and remove those costs from the Common Line basket price cap index." (Ibid.)

Finally, a careful review of Ameritech Ohio's September 18, 1996 letter also illuminates that Ameritech Ohio never affirmatively denies that the set use is part of the CCL. The reason for this obvious omission is plain; the set use fee is a part of the CCLC.

III. AMERITECH HAS VIOLATED THE SETTLEMENT AGREEMENT IN CASE NO. 96-532-TP-COI

Ameritech Ohio signed the settlement agreement in Case No. 96-532-TP-COI on May 20, 1996. Paragraph 4 of that settlement agreement provides:

4. Ameritech Ohio shall timely file tariffs which reduce to zero (\$0.00) for the term of the plan of alternative regulation the intrastate carrier common line rate effective September 1, 1996. The Commission shall approve such tariff filing to be effective no later than September 1, 1996.

Ameritech Ohio stipulated to the reduction of the CCL rate to zero. It did not stipulate to a particular revenue reduction level.³ When Ameritech

³ Much of Ameritech's September 18, 1996 letter is devoted to what can only be viewed as creative accounting - manufacturing the illusion that even without the elimination of the set use fee, IXCs are receiving a greater value than the projected \$21 million dollar impact at the time the settlement was reached. This is both irrelevant and misleading. It is irrelevant

Ohio signed the stipulation in May, 1996 pay telephone traffic costs were being recovered through the carrier common line charge, but on the basis of total switched access minutes. Today, pay telephone costs are still recovered through the carrier common line charge, but, via this new element, on the basis of the number of calls originating from Ameritech Ohio pay telephones.

This intrastate set use fee is part of the CCLC and must be reduced to zero just as the rate for premium and non-premium usage CCL charges have been reduced to zero. Anything otherwise is a violation of the settlement agreement and the clear intent of the parties in signing that agreement.

IV. CONCLUSION

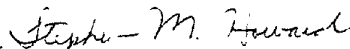
The pay telephone set use fee should have been eliminated as of September 1, 1996 as it is part of the carrier common line charge ("CCLC"). Merely because the method of recovery of pay telephone costs differs from the method of recovery for premium and non-premium rates should not make a difference. Ameritech's own FCC tariffs clearly show that the set use fee is part of the CCLC.

The settlement agreement in Case No. 96-532-TP-UNC provided for a reduction of the intrastate carrier common line rate to zero. Zero means zero. Ameritech Ohio has continued to mirror its interstate set use fee in Ohio, and,

because the Settlement Agreement in Case No. 96-532 was a rate reduction, not a specific revenue reduction. It is misleading because while the \$21 million represented the PUCO Staff's estimated impact of eliminating the CCL in Case No. 93-487-TP-ALT, Ameritech has increased the interstate CCL by over 50% since May, 1996 when the Settlement Agreement was signed. It should not be lost on this Commission that Ameritech Ohio has "made itself whole" since the elimination of the other intrastate CCL rate elements with these interstate increases. These increases - contrary to Ameritech's letter - represent no additional value to AT&T in the intrastate.

thus has violated the settlement agreement. AT&T respectfully requests the Commission to order Ameritech to refund all set use fee dollars recovered since September 1, 1996 to the inter-exchange carriers and to require Ameritech to file a new tariff which provides for a rate of zero for the set use fee.

Respectfully submitted,

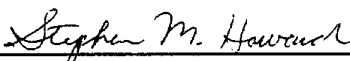


Benita A. Kahn
Stephen M. Howard
VORYS, SATER, SEYMOUR AND PEASE
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008

Attorneys for AT&T Communications
of Ohio, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of AT&T Communications of Ohio Inc. Responding to Ameritech Ohio's Letter of September 18, 1996," was served upon the parties of record, as designated on the attached service list, by U.S. mail, postage prepaid, this 26th day of September, 1996.



John F. Kelly, Esq.
Ameritech Ohio
150 E. Gay Street, Room 4-C
Columbus, Ohio 43215

Bruce Weston
Attorney at Law
169 W. Hubbard Avenue
Columbus, Ohio 43215

Sally W. Bloomfield
Bricker & Eckler
100 South Third Street
Columbus, Ohio 43215

Gregory J. Dunn, Esq.
Crabbe, Brown, Jones, Potts & Schmidt
500 S. Front Street, Suite 1200
Columbus, Ohio 43215

Kerry Bruce
Department of Public Utilities
City of Toledo
One Government Center
Toledo, Ohio 43667-00001

Ellis Jacobs
Attorney at Law
Legal Aid Society of Dayton
333 W. First Street, Suite 500
Dayton, Ohio 45402

Barth E. Royer
Judith B. Sanders, Esq.
Bell, Royer & Sanders Co., LPA
33 S. Grant Avenue
Columbus, Ohio 43215

Charles S. Rawlings, Esq.
O'Malley, Lenahan & Gill
75 Public Square, 13th Floor
Cleveland, Ohio 44114

Diane Stinson, Esq.
Arter & Hadden
One Columbus
10 W. Broad Street
Columbus, Ohio 43215

William M. Ondrey Gruber
Assistant Director of Law
Room 106 - City Hall
601 Lakeside Avenue
Cleveland, Ohio 44114

Janine L. Migden
Maureen R. Grady
Hahn, Loeser and Parks
10 W. Broad Street, Suite 1800
Columbus, Ohio 43215-3820

Robert A. Ganton
Department of the Army
901 North Stuart Street
Arlington, VA 22203-1837

Joseph P. Meissner
Director of Urban Development
1223 W. Sixth Street
Cleveland, Ohio 44113

Douglas W. Trabaris
TCG America, Inc.
233 S. Wacker Drive, Suite 2100
Chicago, IL 60606

Dennis K. Muncy, Esq.
Meyer, Capel, Hirschfeld, Muncy, Jahn & Aldeen
Burnham Athenaeum Building
306 W. Church Street, P.O. Box 6750
Champaign, Illinois 61826-6750

Karin W. Riley
Assistant Attorney General
Ohio Department of Education
P.O. Box 1001
Columbus, Ohio 43255-0101

John W. Bentine
Chester, Willcox & Saxbe
17 S. High Street
Columbus, Ohio 43215

Clyde Kurlander
Three First National Plaza
40th Floor
Chicago, IL 60602

J. Raymond Prohaska
Thompson, Hine & Flory
One Columbus
10 West Broad Street
Columbus, Ohio 43215

Donald Pokorny
Attorney at Law
70 S. Maple Street
Orwell, Ohio 44076

Thomas E. Taylor
General Counsel
Cincinnati Bell Telephone Company
201 E. Fourth Street
P.O. Box 2301
Cincinnati, Ohio 45201-2301

Samuel C. Randazzo
Richard P. Rosenberry
Denise C. Clayton
Emens, Kegler, Brown, Hill & Ritter
65 E. State Street, Suite 1800
Columbus, Ohio 43215

Sheldon A. Taft
Vorys, Sater, Seymour and Pease
52 E. Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008

Martha Jenkins
Mary A. Hull
Sprint Communications Company L.P.
8140 Ward Parkway, 5E
Kansas City, Missouri 65114-2006

Frank D. Darr
David C. Bergmann
Office of Consumers Counsel
77 S. High Street, 15th Floor
Columbus, Ohio 43266-0550

John Ludenia
Sandra K. Williams
United Telephone Company of Ohio
665 Lexington Avenue
P.O. Box 3555
Mansfield, Ohio 44907-0555

John W. Kennedy
GTE North Incorporated
100 Executive Drive
Marion, Ohio 43302

Carol A. Caruso
Ohio Cable Telecommunications Association
50 W. Broad Street, Suite 1118
Columbus, Ohio 43215

Janaan L. Poling
Chillicothe Telephone Company
68 E. Main Street
Chillicothe, Ohio 45601

Thomas E. Lodge
Thompson, Hine & Flory
One Columbus
10 West Broad Street
Columbus, Ohio 43215-3435

Vicky M. Norris
Century Telephone Company of Ohio
65 E. State Street, Suite 1000
Columbus, Ohio 43215

"ATTACHMENT A"

Ameritech

2000 West Ameritech Center Drive
4682
Hoffman Estates, IL 60198-1025
Office 708/248-3332
Fax 708/248-3890

WC

Kristin G. Shortman
Director
Federal Regulatory Planning & Policy

May 23, 1998

Transmittal No. 974

Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Attention: Common Carrier Bureau

The accompanying tariff material, issued on behalf of Ameritech and bearing Tariff F.C.C. No. 2, Access Service, is sent to you for filing in compliance with the requirements of the Communications Act of 1934, as amended. This material, scheduled to become effective May 24, 1998, consists of revised tariff pages as indicated on the following revised check sheet.

Tariff F.C.C. No.

2

Check Sheet No.

881st Revised Page 1
208th Revised Page 1.1

Under authority of Special Permission No. 98-493 of the Federal Communications Commission, Ameritech proposes revisions to the tariff and support documentation for Ameritech's pending Transmittal No. 953 and advancing the effective date to May 24, 1998. Transmittal No. 953, filed March 5, 1998, proposes to introduce a Pay Telephone Set Use Fee and restructure rates to remove costs included in CCL rates which are related to providing pay telephones.

Support material pursuant to Section 81.49 of the Federal Communications Commission's Rules and Regulations is submitted herewith.

- 2 -

The required filing fee, check number 1198 for \$565.00, the original copy of this letter and F.C.C. Form No. 159 were sent to the Mellon Bank in Pittsburgh, PA via UPS Next Day Air on May 23, 1998. All correspondence and inquiries concerning this filing should be addressed to me at the above address.

Very truly yours,

Kristin U. Shulman *JS*

Attachments:

**Tariff Pages
Documentation**

Copy of Letter and Attachments concurrently delivered to:

**Chief, Tariff Review Branch (Public Reference Copy)
International Transcription Services, Inc.**

ACCESS SERVICE
CHECK SHEET

Title pages 1 and 2 and Pages 1 to 655 inclusive of this tariff are effective as of the date shown.
Original and revised Pages as named below and Supplement Nos. 1, 5, 6, 11, 12, 13, 14, 18, 21, 23, 26, 27, 28, 29, 31, 32, 33, 34, 35, 36, 38, 41, 42, 43, 46, 48, 49, 50, 51, 55, 56, 57, 58, 59, 62, 64, 66, 69, 70, 71, 72, 74, 79, 83, 85, 88, 89, 90, 92, 93, 94, 98, 99, 100, 101, 103, 106, 108, 110, 117, 121, 133, 134, 138, 137, 140, 144, 153, 160, 162, 164, 165, 167, 170, 179, 183, 184, 189, 191, 194, 195, 196, 197, 199, 200, 201, 203, 204, 206, 209, 210, 214, 215, 216, 217, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 232, 233, 234, 236, 238, 237, 239, 244, 246, 247, 248, 249, 250, 251, 252 and 253 contain all changes from the original tariff that are in effect on the date hereof.

Page	Number of Revision Except as Indicated	Page	Number of Revision Except as Indicated	Page	Number of Revision Except as Indicated
Title 1	2nd	16	12th	39	5th
Title 2	6th	16.1	7th	39.1	7th
1	881st*	16.2	6th	39.1.1	1st
1.1	208th*	16.3	1st	39.2	Original
1.2	179th	16.4	2nd	40	1st
1.3	228th	16.5	Original	41	2nd
1.4	173th	16.6	1st	42	4th
1.5	151st	16.7	3rd	42.1	1st
1.6	116th	17	1st	43	1st
1.7	89th	18	6th	44	6th
1.8	54th	19	10th	45	6th
1.9	65th	19.1	11th	45.1	3rd
1.10	23rd	19.2	11th	45.2	Original
1.11	38th	19.3	7th	46	9th
2	3rd	20	7th	47	11th
3	7th	20.1	4th	47.1	2nd
3.1	9th	21	3rd		
4	11th	23	3rd		
4.1	7th	24	1st		
5	11th	25	1st		
5.1	13th	26	3rd		
5.2	2nd	27	2nd		
6	4th	28	3rd		
6.1	2nd	28.1	Original		
7	6th	34	4th		
7.1	3rd	34.1	1st		
8	11th	35	5th		
8.1	4th	35.1	1st		
9	16th	36	8th		
9.1	1st	36.1	6th		
10	21st	37	13th		
10.1	8th	37.1	4th		
10.2	8th	37.2	6th		
11	4th	37.3	5th		
12	5th	37.4	1st		
13	5th	37.5	2nd		
13.1	5th	38	9th		
13.2	6th	38.1	10th		
13.3	6th	38.2	5th		
15	14th	38.2.1	2nd		
15.1	9th	38.3	3rd		
15.2	1st	38.4	3rd		

* New or revised Page

(TR974)

Issued: May 23, 1996

Effective: May 24, 1996

Kristin U. Shulman, 4082
Director, Federal Regulatory Planning & Policy
3000 W. Ameritech Center Drive
Hoffman Estates, Illinois 60139-1625

AMERITECH OPERATING COMPANIES

TARIFF F.C.C.NO. 2
205th Revised Page 1.1
Cancels 205th Revised Page 1.1

ACCESS SERVICE
CHECK SHEET

Page	Number of Revision Except as Indicated	Page	Number of Revision Except as Indicated	Page	Number of Revision Except as Indicated
48	3rd	68.2	3rd	84.3	1st
49	11th	69	7th	85	10th
49.1	9th	69.1	Original	85.1	2nd
50	11th	70	4th*	86	1st
50.1	2nd	70.1	Original	87	3rd
50.2	2nd	70.2	2nd*	88	8th
50.2.1	2nd	70.3	2nd	89	4th
50.3	2nd	70.4	3rd	89.1	12th
50.4	1st	70.5	Original	89.2	11th
50.5	2nd	70.6	Original	90	7th
50.6	Original	70.7	Original	90.1	5th
51	1st	70.8	Original	90.2	Original
53	7th	70.9	Original	91	1st
53.1	6th	70.10	Original	93	3rd
53.2	5th	70.11	Original	94	4th
53.3	6th	70.12	Original	95	1st
54	8th	70.13	1st	97	5th
54.1	11th	70.14	Original	98	12th
54.2	1st	70.15	Original	99	4th
55	1st	70.16	Original	99.1	Original
56	7th	70.17	Original	104	3rd
56.1	2nd	70.18	Original	107	1st
56.2	1st	70.19	Original	109	1st
56.3	1st	70.20	Original	110	3rd
56.4	1st	70.21	Original	110.1	4th
56.5	1st	70.22	Original	111	8th
57	7th	70.23	2nd*	111.1	2nd
58	1st	70.24	36th*	111.1.1	2nd
59	16th	70.25	16th	111.1.2	3rd
59.1	11th	72	1st	111.1.3	2nd
59.1.1	Original	75	2nd	112	7th
59.2	4th	76	19th	112.1	4th
59.3	1st	77	19th	112.1.1	2nd
60	10th	78	17th	112.1.2	2nd
61	8th	79	18th	112.2	4th
61.1	6th	80	18th	113	12th
62	4th	80.1	2nd		
63	7th	81	4th		
64	7th	81.1	3rd		
64.1	6th	82	4th		
65	5th	82.1	Original		
65.1	2nd	83	6th		
66	8th	83.1	1st		
66.1	7th	84	14th		
67	19th	84.1	5th		
67.1	6th	84.1.1	2nd		
68	17th	84.1.2	1st		
68.1	17th	84.2	4th		

* New or revised Page

Issued: May 23, 1996

(TR974)

Effective: May 24, 1996

Kristin U. Shulman, 4062
Director, Federal Regulatory Planning & Policy
2000 W. Ameritech Center Drive
Hoffman Estates, Illinois 60196-1028

ACCESS SERVICE

3. Carrier Common Line Access Service

The Telephone Company will provide Carrier Common Line Access Service (Carrier Common Line Access) to customers in conjunction with Switched Access Service provided in Section 5 of this tariff.

3.1 General Description

Carrier Common Line Access provides for the use of end users' Telephone Company provided common line by customers for access to such end users to furnish Interstate Communications.

Premium Access is Switched Access Service provided to customers under this tariff which furnish interstate MTS/WATS and Switched Access Service in an end office converted to equal access.

Non Premium Access is Switched Access Service provided in an end office not yet converted to equal access to customers that do not furnish interstate MTS/WATS.

A Special Access Surcharge, as set forth in 7.4.2(E) following, will apply to interstate special access service provided by the Telephone Company to a customer, in accordance with regulations as set forth in 7.4.2 following.

A Pay Telephone Use Fee will apply to all completed interstate calls originating from pay telephones.

Sy
Sy

y Relased material scheduled to become effective on deferred date of
June 3, 1996 under Transmittal No. 988.

Issued: May 23, 1996

(TR974)
Effective: May 24, 1996

Director, Federal Regulatory Planning & Policy, 4042
2000 W. Ameritech Center Drive
Hoffman Estates, Illinois 60136-1025

ACCESS SERVICE

3. Carrier Common Line Access Service (Cont'd)

3.3 Undertaking of the Telephone Company

3.3.1 Provision of Service

Where the customer is provided Switched Access Service under other sections of this tariff, the Telephone Company will provide the use of Telephone Company common lines by a customer for access to end users at rates and charges as set forth in 3.3 following.

3.3.2 Interstate and Intrastate Use

The Switched Access Service provided by the Telephone Company includes the Switched Access Service provided for both interstate and intrastate communications. The Carrier Common Line Access rates and charges as set forth in 3.3 following apply to interstate Switched Access Service access minutes and Pay Telephone messages in accordance with the rate regulations as set forth in 3.3.4 following (Percent Interstate Use - PIU).

By

3.4 Obligations of the Customer

3.4.1 Switched Access Service Requirements

The Switched Access Service associated with Carrier Common Line Access shall be ordered by the customer under other sections of this tariff.

3.4.2 Supervision

The customer facilities at the premises of the ordering customer shall provide the necessary on-hook and off-hook supervision.

Revised material scheduled to become effective on deferred date of
June 3, 1998 under Transmittal No. 998.

Issued: May 23, 1998

(TR974)

Effective: May 24, 1998

Director, Federal Regulatory Planning & Policy, 4062
2000 W. Ameritech Center Drive
Hoffman Estates, Illinois, 60136-1028

ACCESS SERVICE

3. Carrier Common Line Access Service (Cont'd)

3.3 Rate Regulations (Cont'd)

3.3.5 Determination of Premium and Non-Premium Charges (Cont'd)

(E) The originating Premium Access or Non-Premium Access, per minute charge(s) apply to:

- all originating access minutes of use;
- less those originating access minutes of use associated with FGA Access Services where the off-hook supervisory signaling is forwarded by the customer's equipment when the called party answers;
- less all originating access minutes of use associated with calls placed to 700, 800 and 900 numbers;
- plus all originating access minutes of use associated with calls placed to 700, 800 and 900 numbers for which the customer furnishes for each month a report of either the number of calls or minutes or a report of the percent of calls or minutes that terminate in a Switched Access Service that is assessed Carrier Common Line charges, and for which a corresponding reduction in the number of originating access minutes of use has been made as set forth in (D) preceding.

3.3.6 Application of Telecommunications Carrier Pay Telephone Use Fee

A Pay Telephone Use Fee will apply to any telecommunications interexchange carrier using the facilities and/or services of Telephone Company pay telephones. This charge is assessed for use of those facilities or services to complete interstate calls which originate from pay telephones (including, but not limited to calls dialed using 10XXX, 950, 0+, 1+ and 800 numbers). The Pay Telephone Use Fee will apply for each completed interstate message originating from a Telephone Company pay telephone.

By

By

y Reissued material scheduled to become effective on deferred date of
June 3, 1986 under Transmittal No. 988.

(TR974)

Issued: May 23, 1986

Effective: May 24, 1986

Director, Federal Regulatory Planning & Policy, 4G62
2000 W. Ameritech Center Drive
Hoffman Estates, Illinois 60190-1026

ACCESS SERVICE

3. Carrier Common Line Access Service (Cont'd)

3.9 Rates and Charges

All States

Carrier Common Line Charge

Premium Rates

Rate

Terminating and Originating
- Per Access MinuteSy
SyIllinois
Indiana
Michigan
Ohio
Wisconsin\$.002316 Sy
.005066
.005922
.005203
.004624 SySy
||
||
||
Sy

Non Premium Rates

Terminating and Originating
- Per Access MinuteSy
SyIllinois
Indiana
Michigan
Ohio
Wisconsin.001042 Sy
.002289
.002665
.002341
.002081 SySy
||
||
||
Sy

Pay Telephone Use Fee

Sz

- Per Originating Message
for Completed Calls

.245 Rx

Sz

- z Reissued material scheduled to become effective on deferred date of June 3, 1996 under Transmittal No. 986.
- x Issued under authority of Special Permission No. 88-495.
- y Reissued material scheduled to become effective on June 3, 1996 under Transmittal No. 985.

(TR974)

Issued: May 23, 1995

Effective: May 24, 1996

Director, Federal Regulatory Planning & Policy, 4G62
2000 W. Ameritech Center Drive
Hoffman Estates, Illinois 60196-1026

Set Use Fee Modification
Transmittal No. 974
May 23, 1988

DESCRIPTION AND JUSTIFICATION

Under authority of Special Permission No. 98-492, Ameritech hereby submits revisions to the tariff and support documentation for Ameritech's pending Transmittal No. 953. Transmittal No. 953, filed March 5, 1988, proposes to introduce a Pay Telephone Use Fee and restructure rates to remove costs included in CCL rates which are related to providing pay telephones.

The revised rate reflects 1985 base period Telephone Use Fee demand and the 1985 revenue requirement. Also, per the Commission staff's request, included is a revised Part 69 Interstate Cost Allocation Report.

Exhibits provided are:

- | | |
|-----------|---|
| Exhibit 1 | Rates and Revenue |
| Exhibit 2 | Rate Calculation |
| Exhibit 3 | Part 69 Interstate Cost Allocation Report |

Exhibit 1

AMERITECH
Pay Telephone Use Fee
Rates and Revenues

	1998 Base Period Demand	Current Rates	Current Revenue	Residual Demand	Proposed Rates	Proposed Revenue
OCG						
Terminating Prem.	27,292,831,811	\$0.002946	\$137,718,720	27,292,831,811	\$0.004250	\$115,993,709
Terminating Non-Prem.	8,884,392	\$0.002271	\$19,877	8,884,392	\$0.001913	\$18,575
Originating Prem.	17,222,497,440	\$0.005046	\$88,904,722	17,222,497,440	\$0.004250	\$73,195,614
Originating Non-Prem.	2,883,889	\$0.002271	\$6,566	2,883,889	\$0.001913	\$5,503
Pay Telephone Use Fee	0	0	0	142,998,080	\$0.2480	\$35,463,732
TOTAL			\$224,647,817			\$224,673,698
Difference					Percent change	\$25,881 0.01%

Exhibit 2

AMERITECH
Pay Telephone Use Fee

Rate Calculation

Pay Telephone Use Fee Revenue Requirement	\$35,483,752
--	--------------

Pay Telephone Use Fee Demand	142,999,000
---------------------------------	-------------

Pay Telephone Use Fee Proposed Rate	0.2480
--	--------

EXHIBIT 3

Part 69 Interstate Cost Allocation Report

	Common Line Pay Telephone
Plant Specific Expenses	11,290,992
Plant Non-Specific Expenses Excluding Accounts 6540 & 6560	2,371,837
Customer Operation Marketing	1,585,087
Customer Operation Services	1,371,409
Corporate Operations Expense	4,612,897
Other Expenses	16,875
FCC Expense Adjustment	72,843
Depreciation & Amortization	7,877,819
Total Expenses	29,199,759
State & Local Taxes	276,459
Other Taxes	1,439,653
Federal Income Tax	1,021,343
Net Return @ 11.25%	3,601,696
Total Payphone Expenses, Taxes and Return	35,538,909