



Two Conway Park
150 Field Drive
Suite 300
Lake Forest, IL 60045

(847) 582-8800 telephone
(847) 582-8801 fax
(847) 582-8805 HR fax

April 6, 2000

Ms. Blanca S. Bayo, Director
Florida Public Service Commission
Division of Records and Reporting
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0862

00 APR -7 AM 11:44
MAIL ROOM

RE: Comments concerning Docket No. 990994-TP

Dear Director Bayo:

OnePoint Communications (OPC) is a telephone service reseller, currently certificated to provide service within the State of Florida, although not yet actually serving customers within the state. OPC does currently provide local and long distance service to residential customers in eight states. We support the efforts of the Florida Commission to ensure clear, understandable, and honest billing for all telephone services, as represented by the rule changes proposed in Docket 990994-TP. OPC wishes to respectfully suggest minor modifications to the proposals, in order to aid the efficient introduction of billing revisions throughout the country.

As the Commission is aware, the Federal Communications Commission and several other states are currently examining similar rule changes as proposed in Florida to ensure understandable charging to customers. FCC rules referred to as "Truth-In-Billing" rules took full effect as recently as five days ago, and the FCC has requested additional comments on standardized nomenclature for federally regulated services (see CC Docket 98-170, released May 11, 1999). OPC has completed a lengthy and expensive conversion process to achieve the standards set by the FCC. We would request that any changes adopted by this Commission be coordinated with the FCC and other states in order to achieve the goal of customer protection while also maintaining industry efficiency.

Secondly, blocking of billing of specific types of services such as third party billing at the request of an individual customer is feasible, but can become costly and administratively burdensome. OPC requests that if the Commission orders such blocking capability, it restrict such customer requests to one such request per year.

Finally, OPC requests that the Commission permit the billing companies to format any required changes to the bills in such a way that the customer is fully informed of any changes to billing or any third party billings, but that the format may vary according to the specific billing system requirements of each company. Uniformity among all billing carriers would be difficult, if not impossible, to achieve.

Sincerely,

Edward J. Marsh
Manager, Regulatory Affairs

- AFA _____
- APP _____
- CAP _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- MAS _____
- OPC _____
- RRR _____
- SEC _____
- WAW _____
- OTH _____

DOCUMENT NUMBER-DATE
04348 APR-78
FPSC-RECORDS/REPORTING

Done 4/11/00