Re: Regulation of Prepaid Calling Card Services, WC Docket No. 05-68

On April 15, 2005, Mr. Charles S. Abell, the Principal Deputy Undersecretary of Defense for Personnel and Readiness, Department of Defense, signed the attached letter which includes information to assist the Commission in their rulemaking.

The Department of Defense (DoD) permits Service members deployed overseas to place Health, Morale and Welfare (HMW) calls to the United States during non-duty hours through the official Defense Information System Network. An average of 34,000 HMW calls are placed daily from the Operation Enduring Freedom and Operation Iraqi Freedom theaters. Details are provided in the attached letter on use of prepaid calling card by deployed military members. The letter also states the DoD would support FCC initiatives to ameliorate the direct and indirect impact of the Universal Service Fund contributions and intrastate access charges on prepaid calling cards used by members of the Armed Forces. As suggested in the notice of proposed rulemaking, the DoD would support action by the Commission to exempt prepaid telephone calling cards sold in, at, or by military resale outlets from the Universal Service Fund and intrastate access charges. In addition, the DoD recommends that the Commission consider actions to exempt all prepaid calling cards calls from intrastate access and Universal Service Fund charges when such calls originate from military installations and/or the Defense Switching Network.

On behalf of the DoD, one electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with the Commission’s rules.

Sincerely,

Hillary J. Morgan
Deputy General Counsel
Regulatory and International Law