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May 20, 1992

Federal Communications Commission
Office of the Secretary

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Memorandum

From: Mr. Jan Masek, PBS/The Print Group Inc.

To: Alfred Sikes, Chairman, FCC

Dear Mr. Sikes,

Enclosed are my comments regarding docket No. 92-105. Since these comments were drafted, I have participated in a telephone conference of the ICCF, the industry forum where I have made a request for an access code, namely * *. I must share with the commission what happened during that agenda setting conference because it is a perfect illustration of why the access code allocation process is currently unfair and discriminatory.

It is my perception that the commission favors competition but if the present players maintain their current roles and positions, we are not likely to see competition anytime soon.

On December 10, 1991, I wrote to NANP Administration at Bellcore to request allocation of access code * *. Copy of Bellcore letter is in appendix. In the reply, it was suggested that I bring the topic to ICCF as a means of pursuing my goal of obtaining an access code to deploy a new telephone convenience feature. That is exactly what I did. I requested from the ICCF that it takes as an issue my request for allocation. On May 18, 1992, the agenda setting teleconference took place where the Administrator of NANP actually opposed to ICCF taking my issue, saying that it should probably be handled by the IILC, another industry forum. That is the equivalent of having American Airlines handling allocation of landing slots. Chances are, they'll stall you or send you to the wrong place.

When I suggested to the administrator the he could hardly oppose a move which he himself recommended, he replied that his suggestion had for intent my participation in numbering issues. Mr. Chairman, I am willing to participate in anything which will further my goal of obtaining an access code but my involvement is not a vague academic debate or some intellectual passion. It is for action and implementation.

In my many interactions with Bellcore and telco's, I sense no desire to cooperate whatsoever. I support the notice of proposed rulemaking on N11 the commission has issued. It is the best thing that could happen to this industry.

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List A B C D E

My hope is that this summer I can complete the process of allocation without having to resort to the FCC, FTC and the Department of Justice to finally obtain what I need. I urge the commission to take a clear stance that it will not stand for unfair practices and that it will back all the way parties who want to bring innovation to the telecommunication field.

Respectfully,

A handwritten signature in cursive script, appearing to read "Jan Masek".

Jan Masek

jm/sa

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
The Use of N11 Codes and other) C C Docket No. 92-105
Abbreviated Dialing Arrangements)
)
)

General Comments

To: Introduction and Background Section

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"discontinuance on six months notice if codes are needed for other purposes"

The possibility of needing to recall codes is understandable but it should be done within the framework of a clear policy which sets out when and how this can be done.

It is my opinion that 611 and 811 should be placed on the list of access codes immediately to be recalled. 611 brings no special value to the subscriber and is an unfair advantage the telco's have over independent service providers.

As for 811 which then truly becomes a seven digit number leading to business office locations, the entire value of an abbreviated access number is rendered meaningless with the 811-XXXX format.

A standard seven digit number is adequate to connect subscribers to such offices and wasting 811 on such a process is in contradiction with NANPA's assertion that access codes are a rare and precious commodity. Freeing up these codes should be done now. The basis for privilege of using an N11 should be whether value to telephone users is generated.

There's obvious value in 9-1-1 and in 4-1-1. I fail to see value in 6-1-1 and 811-XXXX.

Discussion Section

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Access code 4-1-1 should be restricted to directory assistance. More value is delivered to the subscriber when services are uniform Nationwide. Service codes should be allocated in priority to services which are currently not available on the network. For instance, the Cox request for 511 does not make that case fully.

Hard copy yellow pages already exist and therefore it may be serving the subscriber better by using * 411 as a uniform national access to yellow pages directory. The subscriber would still receive access to this service easily, consumer recognition would be good and it would leave an added option for 511 to connect subscribers to a service which does not exist under any format.

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611 and 8-1-1- XXXX should be placed under immediate recall with a 12 or 18 month timetable. The inconvenience of doing so now is a lesser evil than having to postpone innovative services for months or years because no more N11's are in inventory. The monopolistic, anticompetitive nature of our telecommunications network has lead to depriving subscribers of creative enhanced features. When the only thing our telco's can come up with is 811-XXXX to reach their business office, that's the symptom of a greater problem. The system needs a shock and sooner would be better.

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N11's should be available immediately. Their recall should require a minimum of 12 months notice and only if a NPA was required.

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N11 codes should enhance telephone services and the highest priority should be given to services which do not exist under any form now. To use such rare codes for services which are not immediately related to network functionality would be unfair. Let those peripheral applications, not adjunct to basic service use vertical service codes.

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Providers of services who fail to create revenue exceeding their expenses will simply go out of business. Such codes should return to inventory and provisions should be built into the system to prevent that a failing N11 service cashes in before it's too late by auctioning to the highest bidder this property. One way may be to place a 6 month window for transfer of code ownership. Acquirer of the provider would be required to maintain the nature of the service at least for one year after acquisition. They would obtain transfer of the code and in reality be acquiring the good will attached to code. It is easy to imagine that if there is initially 150 different uses for 7-1-1 that some safeguards have to be in place so that money does not become what "buys" a code but market demand by users which enables a code's application to spread geographically. Only one type of enhanced service per area code for each N11 should be allowed or user confusion will result. At least 3 of the 6 potential N11's should be allocated to services which intend to be National in scope and would be set aside while local test market justifies their eventual rapid deployment.

The remaining 3 codes would service more regional uses and may change between NPA's.

Recall order for use as NPA should first target the regional codes and be decided by a drawing. There should be no need to provide for any of the National N11's recall since many NPA's will phase in January 1, 1995.

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Vertical codes should be created in * x x, * x x x, x #, xx#, x x x #, x * x, * x *, formats and an aggressive coordination effort instituted to standardize these and any existing or future access codes across all networks. Cellular N11's, wire line N11's,.....etc., should all mean the same to the users or confusion and frustration will result.

NANPA should be removed from Bellcore and given to a forum carefully crafted which would reflect a democratic use of these public resources. I have applied for service access codes with Bellcore and with over 50 phone companies. Of the 50 request, fewer than 15 have acknowledged with a letter or a call the request made over 50 days ago.

The level of cooperation, responsiveness and good will I have been offered is not what the American Dream promises. A few examples of these are copied in the Appendix and they either fail to understand what a SAC is or take clever detours to avoid or postpone the process of allocation. One even replied asking for a purchase order. Much of the "discontent" climate sweeping this country has been traced back to the notion that democracy has died and that nothing works. These codes should be managed by a forum who wants the best for subscribers, not another kind of lobby process where money buys outcome.

Innovative ways to use the network should be given very high priority for code allocation. Whether we speak of 3 regional N11's or 3 National N11's, in either case they should be limited to one code per entity.

Acquisition or merger of regional providers who were using distinct codes for similar services should receive a waiver of this restriction. The one of the two codes no longer needed by them should be returned within 6 months.

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Too many regulations from too many entities is an increasing threat to our ability to compete globally. France, Australia, New Zealand, Singapore are all ahead of us in telecommunications.

We must realize that we're losing our edge, look to one body to control nationally all that relates to telecommunications, broadcast and cable. We may triumph in the information age but for the moment, we are stagnating in the regulation age. Less is more and soon is imperative.

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N11 dedicated to information services which enhance the network's performance are a welcomed contribution. Network Enhancements should be a strict requirement and types of applications such as sports, astrology or stock quotes should be diverted to standard 7 digit number. The goal is network value and performance. Catering to broader information products, entertainment or education would be misuse since other possibilities can just as easily implement them.

Appendix

64.1401 A) Should include 611 and 811 within 1 year of their immediate recall.

64.1402 A) NANPA can only recall regional N11's for a true NPA use or where a national ubiquitous service is desired.

B) Recall period should be one year.



Tom Fink,
Mayor

Anchorage Telephone Utility

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TELEPHONE (907) 561-3000
Telex 090-26-532



Owned by the
Municipality
of Anchorage

April 8, 1992

Jan Masek
Professional Business Systems
302 N. LaBrea Ave, Suite 200
Los Angeles, California 90036

Dear Mr. Masek,

We are in receipt of your letter dated March 24, 1992 requesting a service access code. We appreciate your interest in offering new telephone convenience features. Your request will take a while to evaluate but we wanted to acknowledge receipt of your request. We should have an answer within a few weeks.

Sincerely,
ANCHORAGE TELEPHONE UTILITY

Nancy Massin
Nancy Massin
Executive Assistant



A Pacific Telephone Company

April 15, 1992

Jan Masek
Professional Business Systems
302 N. La Brea Ave - Suite 200
Los Angeles, California 90036

This letter is in response to your March 24, 1992, letter requesting allocation of a service access code to Professional Business Systems. All telephone numbering plans for public networks conform to standards established by the International Telephone and Telegraph Consultive Committee (CCITT). Nevada Bell, along with all other Local Exchange Carriers, adhere to the North American Numbering Plan. At Divestiture, the administration of the NANP was vested in Bellcore by the Court, in Amendment No. 33 of the Plan of Reorganization.

Service Access Codes (SACS), which include N00 and N11, are administered by the NANP Administration Organization. For further information, you might contact Bellcore and request document SR-TSY-002275.

The asterisk is utilized for signalling after call set-up and will not provide network access.

If you wish seven digit access to the network, please contact our sales organization. Ron Gallagher is our Sales Manager and can be reached on (702) 688-7211. For Engineering information you can call me on (702) 333-3000.

A handwritten signature in cursive script, appearing to read "R.L. Combs".

R.L. Combs
Engineering Manager - Planning
Nevada Bell
645 E Plumb Ln. Room C140
Reno, NV 89502

cc: Peggy Garber
Ron Gallagher
Stan Ostrom

Southern New England Telephone
530 Preston Avenue
Meriden, Connecticut 06450
Phone (203) 634-6351
Facsimile (203) 634-9331



Suzanne L. Bullock
*Marketing
Administration Assistant
Carrier Services*

May 7, 1992

Mr. Jan Masek
Professional Business Systems
302 N. La Brea Avenue, Suite 200
Los Angeles, California 90036

RE: "Service Access Code" Allocation

Dear Jan,

Southern New England Telephone (SNET) is not in a position to honor your request. SNET neither has a tariff nor otherwise offers a service allocating "service access codes" to end users or "interexchange carriers."

As you are probably aware, the issue of "service access code" allocation is being discussed at several national forums at the present time. These discussions center around the limited number of "service access codes" and how to best utilize these resources.

If I can be of any assistance please call.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne Bullock".

Suzanne Bullock

cc: G. Clement

