

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of  
  
Administration Of The  
North American Numbering Plan

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CC Docket No. 92-237  
Phase II

COMMENTS OF THE NYNEX TELEPHONE COMPANIES

I. INTRODUCTION

New England Telephone and Telegraph Company and New York Telephone Company (the NYNEX Telephone Companies or NTCs) submit these Comments in response to the Commission's Notice Of Inquiry (NOI) released October 29, 1992, in the above-captioned matter.<sup>1</sup> We respond to the Commission's specific requests for information relative to expanding the Carrier Identification Codes (CICs) used for Feature Group D (FGD) access.<sup>2</sup> The FCC should permit the industry's progress towards such expansion to continue so that the growing needs of our access service customers can be met.

1 Comments on Phase I of the NOI, concerning who should administer the North American Numbering Plan (NANP) and certain other issues, are being submitted by the NTCs under separate cover today.

2 NOI paras. 36-38.

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## II. BACKGROUND

Any entity purchasing FGB and/or FGD Trunk Side Access Service under the provisions of a local exchange carrier Access Tariff is assigned a CIC.<sup>3</sup> CICs were created prior to divestiture in an effort to respond to requests from Other Common Carriers (OCCs) for improvements in interconnection arrangements.

CICs are presently administered by the NANP Administrator (NANPA) based upon guidelines developed through industry consensus at the Industry Carriers Compatibility Forum (ICCF). The ICCF has addressed the need to deal with the pending exhaust of CICs through several ICCF-sponsored workshops that began in April 1988. The NANPA has continually advised the FCC of developments occurring at these workshops.

A two-phase plan has been developed (with industry consensus) to forestall CIC code exhaust. The first phase will split the administration of the FGB and FGD assignments and expand the FGB CICs so that the exhaust date of FGD CICs will be delayed. Phase one will be implemented by April 1, 1993. The second phase will expand the FGD CICs to four digits and will be implemented in the first half of 1995.<sup>4</sup> The FCC inquires whether it is worthwhile to move from three digit CIC

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<sup>3</sup> Currently, the CIC is a three digit code of the format XXX. The CIC is the last three digits of the customer-dialed Carrier Access Code (CAC). The CAC for FGB is 950-0XXX or 950-1XXX. (The entity purchasing the access service may choose either a 1 or 0 in the 950 dialing scheme to precede the CIC.) The CAC for FGD is 10XXX.

<sup>4</sup> See NOI paras. 16, 36-37.

to four digit CIC FGD access, and asks four specific questions on the costs, benefits and technical issues relating to such expansion.<sup>5</sup>

### III. NYNEX TELEPHONE COMPANIES' POSITION

The NYNEX Telephone Companies have actively participated in the industry forums which have worked the CIC expansion issues. The CIC expansion plan submitted to the FCC by the NANPA is the result of several industry iterations over the years. The industry identified technical and administrative alternatives, examined their feasibility, and the ICCF accepted the plan submitted to the FCC by the NANPA. As a result, CIC assignment guidelines have been written, technical requirements issued, and switch development is well on its way, as it must be, to meet a first half 1995 FGD exhaust date. Any change of course at this late date would only exacerbate the potential that the supply of CICs will be exhausted.

As the NANPA forecasted, the supply of three digit CICs will likely exhaust by Second Quarter 1993. To handle that situation, the FGB CIC will be expanded and the administration of the FGB and FGD CICs will be separated. That action will mean that approximately 220 three digit FGD CICs will be available for assignment. These 220 CICs are now forecasted to be used by the first half of 1995. At that time,

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<sup>5</sup> NOI para. 38.

the industry plan calls for the introduction of four digit FGD CICs.

We now turn to the FCC's four specific questions in the NOI in this area.<sup>6</sup>

#### IV. RESPONSES TO FCC'S FOUR SPECIFIC QUESTIONS

FCC Question 1: "What are the costs and technical issues associated with converting FGD CICs to a 4-digit format?"

As opposed to the FGB expansion, for which change was only required in our tandem offices, the FGD expansion will require a change in every switching office in our network. The costs associated with converting FGD CICs to a four digit format involve the implementation of switch generic updates, the development and addition of switch feature software, hardware additions, advancing the retirement of switches for which vendor support is not available, and the LEC cost for modification of vendor and LEC-supported Operational Support Systems (OSSs). In addition, other systems or services supporting the use of CICs for routing must also be modified (e.g., Common Channel Signaling, 800 Data Base). The estimated cost for the NTCs is \$130 million.

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<sup>6</sup> NOI para. 38.

FCC Question 2: "What are the benefits of doing so and how do these benefits compare with costs?"

In the industry discussion of CIC assignment guidelines, it became apparent that access customers envision an increasing need for CICs to facilitate the implementation of new services which they are providing to their customers. (Although the NTCs certainly receive new revenues from such use of our access services, we are unable to quantify this impact.) If CICs exhaust, new carriers stand to be denied entry into the marketplace, and implementation of new products/services may be delayed.

FCC Question 3: "Are there alternative technical approaches that would allow all long distance carriers and other end users to achieve equal access?"

As discussed above, the adopted plan for CIC expansion is the result of several iterations by the industry. The ICCF-sponsored CIC expansion workshop examined technical and administrative alternatives and settled upon the current plan. Considerations included the relief period provided, impact upon the industry, feasibility and the ability to implement the proposed plans prior to CIC exhaust.

FCC Question 4: "If FGD codes are not expanded, what rules should govern the assignment, recall, transfer and use of the FGD codes that will be available?"

The CIC assignment guidelines as written by the ICCF CIC workshop simply provide these codes up to a specified number per entity if FGB or FGD access is ordered by that entity. Although some usage is required in the present guidelines, any amount of usage will qualify the customer for retention of the code. It would be appropriate to require that some specified amount of usage should be demonstrated before multiple codes are assigned or retained. Any supplemental CICs that do not meet an industry-determined minimum usage requirement should be available for reclamation for the pool.

In addition, the FCC might consider allowing transfers of CICs between entities. Transfers may be negotiated between the parties involved with all costs to be borne by one of the negotiating parties.

V. CONCLUSION

The FCC should permit the industry's plans and progress towards FGD CIC expansion to continue in order that the growing needs of our access service customers can be met.

Respectfully submitted,

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