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

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In the Matter of )  
 )  
Administration of )  
the North American )  
Numbering Plan )  
 )  
 )

CC Docket No. 92-237  
Phase 2

REPLY COMMENTS OF AMERICAN TELEPHONE  
AND TELEGRAPH COMPANY

American Telephone and Telegraph Company ("AT&T")  
hereby submits its reply comments on the Notice of Inquiry  
in CC Docket No. 92-237, released October 29, 1992  
("NOI").<sup>1</sup>

The NOI requests comment (p. 6837) in two areas,  
specifically: (i) who should administer the North American  
Numbering Plan ("NANP") and how could the administration be  
improved ("Phase 1"); and (ii) the proposed expansion of  
the Carrier Identification Codes ("CIC") used for Feature  
Group D ("FG D") access from a three to a four-digit format  
("Phase 2"). On January 8, 1993, the Commission deferred

<sup>1</sup> In the Matter of Administration of the North American  
Numbering Plan, 7 FCC Rcd. 6837 (1992). A list of  
parties submitting comments in this proceeding, and the  
abbreviated designations used herein, is attached as  
Appendix 1.

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the date for filing replies in Phase 1 until February 24, 1993, therefore this reply addresses only the comments on Phase 2.<sup>2</sup>

As AT&T recognized in its comments (p. 8), and as most other commenters confirm, the long-term solution for the need to accommodate additional access customers is expansion to four-digit FG D CICs. AT&T (pp. 8-10) and most other commenters also showed, however, that for a number of reasons, implementation of this expansion should proceed cautiously, and with an appropriate transition period. Contrary Bellcore's claim (p. 10 n.11), these issues are still open.<sup>3</sup> The record shows that because of the extensive equipment changes that will be required and the significant costs that must be incurred, the demands of the market should control the duration of the transition, and also control when that transition should begin.

First, as many commenters correctly suggest, implementation of CIC expansion should be delayed as long

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<sup>2</sup> See In the Matter of Administration of the North American Numbering Plan, CC Docket No. 92-237, DA-93-14, released January 8, 1993.

<sup>3</sup> The lack of consensus on this issue is most evident in the comments of GTE and CBT. GTE, on the one hand, argues (p. v) that it "is imperative that any conversion be accomplished in a minimum amount of time," while CBT states (p. 6) that "Conversion to a four-digit format should be driven by market forces in each LEC's territory; not by a uniform Commission mandate." See also Ameritech, pp. 3-4; SBC, p. 10 n.11 (where SBC calls for an 18-month transition period that would not begin until four-digit CICs are fully implemented).

as reasonably possible. NTCA, for example, calls (p. 2) for a "careful approach that balances the many concerns." And the comments suggest a number of alternative approaches that would delay the need for CIC expansion, including, for example, aggressive reclamation of unused codes, unique assignment of separate FG B and FG D CICs, limiting the availability of CICs to carriers, or that 10XXX codes be grandfathered or be maintained and supplemented with (rather than being replaced by) 101XXXX codes.<sup>4</sup> Each of these alternatives should be fully considered before CIC expansion is begun.

Some commenters also show that if or when CIC expansion becomes necessary, an extended transition period may be required, well in excess of the finite 18-month period suggested by Bellcore, to accommodate the required equipment modifications. APCC (pp. 2-7) and Intellicall (pp. 4-5), for example, explain in detail how conversion to 101XXXX codes would be particularly onerous for private pay phone manufacturers and operators, requiring an extended implementation period at significant cost.<sup>5</sup> Many customers

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<sup>4</sup> See, e.g. Ad Hoc, pp. 36-37; Allnet, pp. 8-9; APCC, p. 7; AT&T, p. 9; Bell Canada, p. 6; CBT, p. 6; Centel, p. 4; Intellicall, p. 6; NATA, p. 6; SNET, pp. 5-6; Sprint, p. 12.

<sup>5</sup> Only recently, private pay phones were mandated by law to include the capability to dial 10XXX codes. Telephone Operator Consumer Services Improvement Act of 1990 ("TOCSIA"), Pub. L. No. 101-435, 104 Stat. 1986 (1990), codified at 47 U.S.C. § 226; see also In the Matter of Policies and Rules Concerning Operator Service Access (footnote continued on next page)

will have similar concerns regarding their customer premises equipment ("CPE"). Customers with PBXs, for example, would have to purchase and implement modifications (software and hardware) to permit them to dial expanded CICs. AT&T estimates that the cost to its customers would range up to \$15,000 for each PBX to add the necessary modifications, depending on the type and age of the equipment. Based on previous customer buying behavior, it will take more than six and a half years before all AT&T PBX users have CPE in place that will work with expanded CICs.<sup>6</sup> Clearly, any transition period should address such customer concerns.

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(footnote continued from previous page)

and Pay Telephone Compensation, 6 FCC Rcd. 4736 (1991), recon., FCC 92-275, released July 10, 1992, petitions for reconsideration and review pending. Thus, most private pay phones would now require modifications to handle the longer codes, and some older equipment may be incapable of being modified and thus would have to be replaced.

<sup>6</sup> These estimates assume that extensive customer education about CIC expansion will result in a 300 percent increase, based on five years' historical data, in traditional customer buying behavior with respect to PBX upgrades.

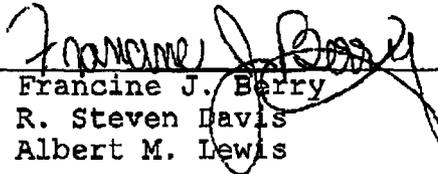
\* \* \*

The initial comments in this proceeding confirm that the Commission's review of the planned CIC expansion is both timely and necessary. Based on the comments, the Commission should assure that CIC expansion should proceed cautiously as required by the needs of the market.

Respectfully submitted,

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January 27, 1993

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CC DOCKET NO. 92-237

1. Ad Hoc Telecommunications Users Committee ("Ad Hoc")
2. Aeronautical Radio, Inc. ("ARINC"), and the Air Transport Association of America ("ATA")
3. Allnet Communications Services, Inc. ("Allnet")
4. American Personal Communications ("APC")
5. American Public Communications Council ("APCC")
6. Ameritech Operating Companies ("Ameritech")
7. AMSC Subsidiary Corporation ("AMSC")
8. Bell Atlantic
9. Bell Canada
10. Bell Communications Research, Inc. ("Bellcore")
11. BellSouth Corporation ("BellSouth")
12. Canadian Steering Committee on Numbering ("CSCN")
13. Cellular Telecommunications Industry Association ("CTIA")
14. Centel Corporation ("Centel")
15. Cincinnati Bell Telephone Company ("CBT")
16. Cox Enterprises, Inc. ("Cox")
17. GTE Service Corporation ("GTE")
18. Illinois Commerce Commission ("Illinois Commission")
19. Information Industry Association ("IIA")
20. Intellicall, Inc. ("Intellicall")
21. McCaw Cellular Communications, Inc. ("McCaw")
22. MCI Telecommunications Corporation ("MCI")
23. Metrocall of Delaware, Inc. ("Metrocall")

24. MFS Communications Company, Inc. ("MFS")
25. National Association of Regulatory Utility Commission ("NARUC")
26. National Cable Television Association ("NCTA")
27. National Telephone Cooperative Association ("NTCA")
28. New York State Department of Public Service ("NYDPS")
29. North American Telecommunications Association ("NATA")
30. North Pittsburgh Telephone Company ("North Pittsburgh")
31. New England Telephone and Telegraph Company and New York Telephone Company ("NYNEX")
32. Pacific Telesis, PacTel Corporation, Pacific Bell, and Nevada Bell ("Pacific Companies")
33. Paging Network, Inc. ("PageNet")
34. Rochester Telephone Corporation ("Rochester")
35. Southern New England Telecommunications Corporation ("SNET")
36. Southwestern Bell Corporation ("SBC")
37. Sprint Corporation ("Sprint")
38. Telco Planning, Inc. ("Telco")
39. Teleport Communications Group ("TCG")
40. Telocator, the Personal Communications Industry Association ("Telocator")
41. United States Telephone Association ("USTA")
42. Unitel Communications Inc. ("Unitel")
43. U S West, Inc. ("U S West")
44. Vanguard Cellular Systems, Inc. ("Vanguard")
45. Whidbey Telephone Company ("Whidbey")

CERTIFICATE OF SERVICE

I, Alice Popelka, do hereby certify that on this 27th of January, 1993, a copy of the foregoing "Reply Comments of American Telephone and Telegraph Company" was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached service list.

  
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Alice Popelka

Dated: January 27, 1993

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