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

FEB 17 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:

800 Presubscription Rules for
800 Providers and
Responsible Organizations

RM- _____

**EMERGENCY PETITION FOR DECLARATORY
RULING OR, IN THE ALTERNATIVE, RULEMAKING**

ALLNET COMMUNICATION SERVICES, INC

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Dated: February 17, 1993

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SUMMARY

Allnet Communication Services, Inc., (Allnet), herein requests that the Commission adopt, on an expedited basis, policies or rules governing the conduct of 800 Responsible Organization (RespOrgs) and 800 providers. The proposed policies or rules for 800 services would be analogous to the Commission's presubscription rules and policies for dial-1 interLATA services. The proposed policies or rules would resolve, before May 1, 1993, the following three issues:

- 1) that an 800 subscriber's existing 800 RespOrg or carrier may not take more than a prescribed amount of time (proposed to be two days) to complete the necessary steps to implement 800 RespOrg and carrier routing changes in the SMS (This period shall be referred to, herein, as the "post-800 order conversion delay."),
- 2) that an 800 end using subscriber may initiate all such changes for its own 800 service, and
- 3) that a subscriber need only complete one standard form, submitted to either its new or existing 800 provider/RespOrg, to implement 800 carrier and/or RespOrg changes.

TABLE OF CONTENTS

SUMMARY i

I. A Precursor to Portability Under 800 Data Base 4

II. Past Lessons To Avoid A Future 800 Data Base Portability Debacle ... 8

III. The 800 Guidelines, Adopted By the Standards Committees,
Will Not Prevent These Problems 10

IV. The Commission Must Adopt 800 Presubscription Rules 14

V. Conclusions 16

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Allnet Communication Services, Inc., (Allnet), herein requests that the Commission adopt, on an expedited basis, policies or rules governing the conduct of 800 Responsible Organization (RespOrgs) and 800 providers.¹ The proposed policies or rules for 800 services would be analogous to the Commission's presubscription rules and policies for dial-1 interLATA services. The proposed policies or rules would resolve, before May 1, 1993, the following three issues:

- 1) that an 800 subscriber's existing 800 RespOrg or carrier may not take more than a prescribed amount of time (proposed to be two days) to complete the necessary steps to implement 800 RespOrg and carrier routing changes in the SMS (This period shall be referred to, herein, as the "post-800 order conversion delay."),²
- 2) that an 800 end using subscriber may initiate all such changes for its own 800 service, and
- 3) that a subscriber need only complete one standard form, submitted to either its new or existing 800

¹In contrast to the rules and policies proposed herein, the currently open Docket No. 86-10 only deals with the policies and rules governing the conduct of local exchange carriers.

²If an 800 customer is delinquent in paying its bill, however, the RespOrg or carrier need only respond to the party initiating the change that the requested changes will not be implemented until two days after the billing delinquency is resolved.

provider/RespOrg, to implement 800 carrier and/or RespOrg changes.

Although there is an obvious need to have addressed these issues before 800 portability becomes available on May 1, 1993, they have not been specifically addressed by either the standards committees or the Commission's proceedings, thus far. The standards committee's Guidelines for 800 Data Base (800 Guidelines) confuse the situation, more than they clarify it. The 800 Guidelines do not guarantee an 800 subscriber the right to either chose its carrier and/or its RespOrg. Instead, such changes may only be initiated by the 800 customer with the established "business relationship" with the 800 carrier and/or RespOrg.

Based on Allnet's recent experience in the pre-data base 800 portability environment with AT&T,³ Allnet estimates that 8% or more of all 800 subscribers will find themselves powerless to change their own RespOrg and/or carrier, while maintaining their existing 800 number. Furthermore, for the remaining 92% of 800 customers, the change of 800 carrier and/or RespOrg may take weeks to complete, if it is completed at all. Over 80% of all orders took more than 22 days to process. Allnet attributes these conversion problems to carriers acting in their own self-interest, without any requirements that they conform to any standards or recognize any 800 subscriber order.

With Allnet's pre-data base portability experience with AT&T, AT&T has been able to drag out the post-order conversion delay period to be literally weeks long. To defend its slow action, a never ending list of reasons were developed including an admitted lack of resources at AT&T to accommodate as little as 100 to

³See, discussion infra.

200 conversion orders per month, the 800 subscriber not having recognized standing to request a change of carrier, and improperly filled out AT&T-specific conversion forms. Meanwhile, AT&T was able to fill hundreds of new orders each day within a matter of days. Understandably, resources were not an issue when it came to acquiring new customers, but they only seemed to be an issue when the activity involved the loss of existing customers. This double standard, which is founded in the self-interest and self-preservation of any profit-making business enterprise, is reminiscent of the mid- to late- 1970's when the pre-divestiture Bell System found every excuse to delay or otherwise not deliver connections to its competitors. Now, with 800 portability, every 800 provider, including local exchange carriers and interexchange carriers alike, will have the opportunity to engage in such practices with regard to 800 end using subscribers. The industry cannot tolerate the type of chaos that this self-interested behavior creates -- particularly as 800 portability becomes widely available on May 1, 1993.

End using subscribers, as well as 800 carriers who plan to play by the spirit of the 800 portability program, will be the losers. If history is to repeat itself, 800 end using subscribers will find themselves penalized for having chosen to transfer their services to another carrier. The incumbent 800 RespOrg/carrier may commence charging to the 800 end using subscriber either higher nondiscounted rates or an exorbitant termination fee, while refusing to release the end using subscriber's 800 service. Under a portability arrangement, the end using subscriber, who is caught between the two RespOrgs/carriers, tends to see the new RespOrg/carrier as the cause of the problem, not the incumbent RespOrg/carrier. Thus, not only does the end using subscriber suffer from the resulting pandemonium, the newly chosen

800 RespOrg/carrier also is damaged both financially and with regard to its customer reputation.

Things will be worse, on a larger scale, in a data base portability environment. There are currently no rules under consideration or adopted by the Commission controlling 800 carrier or RespOrg behavior in the 800 presubscription process. Thus, Allnet urges that such rules or policies be adopted without delay. There is no alternative. Without Commission prescribed 800 presubscription rules, the promised benefits of 800 data base will not materialize. Without such firm rules, the only effect of 800 portability for most 800 subscribers will be increased costs, and degraded service quality for the 800 ratepaying public.⁴

I. A Precursor to Portability Under 800 Data Base

In order to smooth the transition to full portability using the centralized data base, and to provide AT&T 800 end using subscribers the benefits of Allnet's advanced 800 services before May 1, 1993, Allnet developed and implemented a "pre-data base portability" arrangement exclusively for 800 end using subscribers. Under that arrangement, an AT&T 800 end using subscriber could use Allnet's 800 services, while keeping their AT&T 800 number.⁵

⁴Other issues still need to be resolved before May 1, 1993, include those raised in the Allnet declaratory ruling concerning the role of AT&T's patents on market structure and rates (see, Petition for Expedited Declaratory Ruling Regarding AT&T Ownership of Pre-Divestiture Patents, filed by Allnet, July 10, 1992; also see, MCI v. AT&T, Civil Action No. 92-2858 and US v Western Electric, Civil Action No. 82-0192, filed by MCI in United States District Court for the District of Columbia, December 21, 1992).

⁵The pre-data base portability arrangement is generally illustrated in the figure in the text. It employed some standard AT&T 800 Megacom/ISDN internetworking features which allowed the AT&T network and the Allnet network to operate in a coordinated and unitary fashion. As the Commission is now familiar, under the existing 800 access plan, 800 calls are routed by local exchange carriers on the basis of the "NXX" portion of the 800 number dialed (i.e., 800-NXX-XXXX). There are currently approximately 180 NXX's which are automatically routed to AT&T. These

Allnet Pre-Data Base Portability Conversion Program Implementation:

During August 1992, Allnet solicited from AT&T information on how to order the existing standard AT&T offerings that were required to allow AT&T 800 end

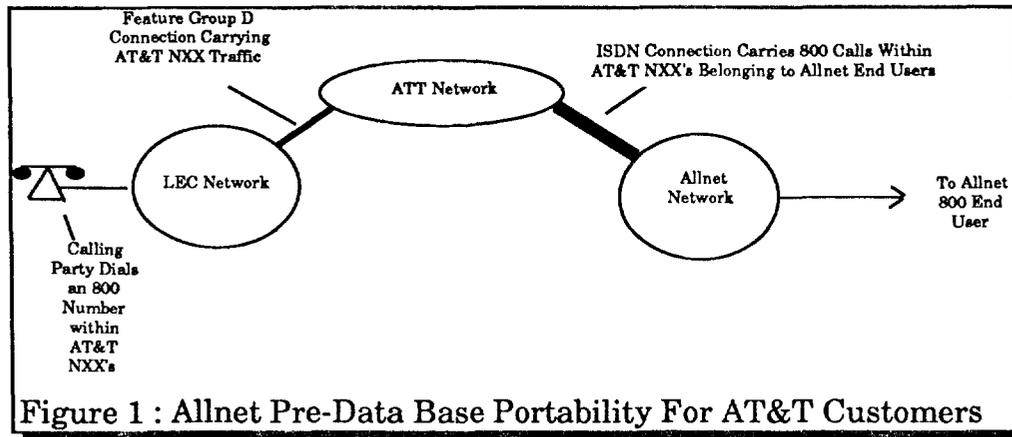


Figure 1 : Allnet Pre-Data Base Portability For AT&T Customers

using subscribers to use Allnet 800 services prior to May 1, 1993, without the need to change their 800

number ("Pre-Data Base Portability Conversion"). AT&T informed Allnet that three standard forms were required to be filled out. The first form, the "AT&T Transfer Form," must be filled out by the customer. See, Exhibit I, herein. The second and third forms, the "AT&T Request for Nodal Service" and "AT&T Request for Wide Area Telecommunications Service," were also required for each 800 order. Id.

On or about October 15, 1992, Allnet began submitting the necessary 800 conversion orders to AT&T. It is Allnet's understanding that AT&T's order processing for disconnection and rerouting of a customer's 800 services involves an initial

NXX's shall be referred herein as "AT&T NXX's." In order for a non-AT&T interexchange carrier (IXC) to complete an 800 service to an end user whose 800 number lies within an AT&T NXX, AT&T must route the calls made to that 800 customer's 800 number to a point of interconnection with the IXC over an ISDN service connection. Under these circumstances, the non-AT&T IXC is able to provide advanced routing features within its own network and assume responsibility for the AT&T 800 charges AT&T assesses for the delivery of the call to the non-AT&T IXC's point of interconnection. The end user becomes the customer of the non-AT&T IXC, and the non-AT&T IXC becomes the customer for the AT&T-provided originating access.

step for determining whether the order is a "good order." This process is to take no longer than two days from the date of receipt of the order. This initial determination addresses the threshold issue of whether the existing customer account associated with that 800 number has an overdue AT&T 800 service balance due,⁶ is covered by a term agreement, or affiliated with an aggregator or reseller arrangement.⁷

After an order is determined to be a "good order," a Firm Order Commitment is made. According to AT&T's schedules it should be issued within 10 days. A "Firm Order Commitment" sets forth the scheduled date for the conversion between carriers, i.e., the date that AT&T will begin routing calls over the coordinated ISDN connection to the Allnet network. The install date was typically within ten days from the date that the Firm Order is issued.⁸ Ironically, AT&T was able to convert back a customer to AT&T within a matter of a few hours, in contrast to the multi-week period that AT&T took to convert the customer away from AT&T, even though the steps required were identical.

AT&T's Consistent Failure to Timely Convert Customers. Since the time that the first pre-data base portability order was placed, AT&T has consistently either missed the deadline for issuing an Firm Order Commitment or refused to process such order because the 800 customer was affiliated with an aggregator, or reseller. By February 2, 1993, 80% of all orders submitted to AT&T had not been

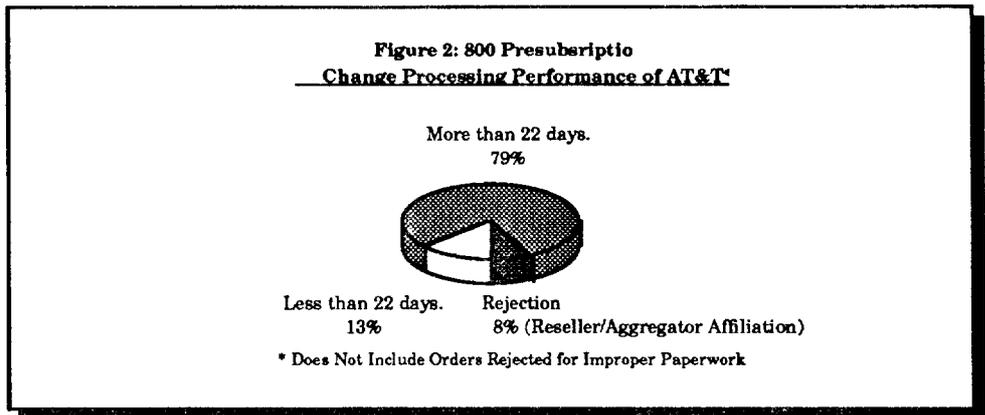
⁶As noted above, a carrier or RespOrg may tariff a requirement that it will not release a customer's service if that customer has an outstanding balance with that carrier or RespOrg.

⁷This step would occur in the data base portability environment, also.

⁸This porting step would be highly simplified in the data base portability environment, requiring only several minutes at an SMS keyboard to make the proper entries into the SMS. Thus, under 800 data base this step should take only minutes, rather than days.

ported to Allnet by AT&T's own self-imposed deadline of 22 days. Delays averaged 30 days, reaching as high as two months. In addition, AT&T had outrightly rejected almost 8% of all otherwise valid 800 end using subscriber requests based on claims that these 800 customers were not authorized to request conversion to Allnet, even though there was no dispute that the 800 number was routed to those 800 subscribers.⁹

As noted above, Allnet witnessed that AT&T provided more timely order processing for acquisition of an 800 end using subscriber's services than its did for a conversion to one of its 800 competitors. In addition, the determination as to whether AT&T would accept an 800 order from a subscriber who was alleged to have been associated with an 800 aggregator or reseller, was, at best, erratic. The delays and failures of an incumbent 800 carrier/RespOrg to properly process orders



severely damag-
es its competi-
tors by reducing
the 800 revenues
(and associated
dial-1 revenues)
that they would

have otherwise collected. These impediments also increase the costs of operation for competitors by forcing them to devote resources to "solving" the delay problem with extensive followup. Worst of all, however, the delays and refusals to process orders damages the competitor's reputation with its newly acquired customer.

⁹The base amount of this calculation excludes orders that were rejected because the paperwork was incomplete or otherwise not properly filled out.

From a rational business point of view, AT&T has every reason to find a basis for delaying the conversion of its customers to a competitor's services. Once an 800 customer converts to AT&T's competitors, AT&T receives less revenue from that customer, while its competitor gains revenue and market penetration. The only rational reason for AT&T or any other carrier not to delay or otherwise fail to process conversion orders would be if the carrier believed that such behavior were unlawful and accompanied by legal consequences. With no explicit Commission rule or policy requiring that a carrier or RespOrg process conversion orders within a firm period, and with antitrust cases difficult and expensive to bring about, AT&T will be joined by other carriers in engaging in this behavior in the data base portability environment. A rule is clearly needed and the conversion process standardized for the 800 subscriber.

II. Past Lessons To Avoid A Future 800 Data Base Portability Debacle

The evolution of the 800 data base portability parallels in some important ways the evolution of dial-1 interLATA presubscription. However, these similarities should sound alarms at the Commission.

In the case of dial-1 interLATA presubscription, the Commission failed to initially implement rules for dial-1 carriers. Instead, it relied upon the industry to handle these problems and work them out. "Best efforts" turned out not to be good enough as millions of dial-1 interLATA end using subscribers found their dial-1 interLATA services on carriers they either did not choose or no longer wanted to use. Flagrant abuses occurred -- from the largest carrier to the smallest. The Commission did not take initial steps to avoid these problems.

The problems could have been avoided. It was not until 1992, ten years after divestiture and under intense Congressional pressure, that the Commission finally took steps to tighten those rules to prevent further abuses. It would be wasteful and irresponsible to fail to take steps to avoid these problems before 800 data base portability takes effect. The 800 data base portability post-order delay problem promises to be far worse than the dial-1 interLATA presubscription problem in the mid-1980's. The post-conversion delay problem will be particularly onerous on smaller to medium size end using subscribers. These end using subscribers are in no position to seriously litigate 800 conversion disputes, and they are without a meaningful, lawful, self-help remedy.¹⁰ Unlike outbound dial-1 services, an 800 end using subscriber cannot "dial-around" an 800 carrier or 800 RespOrg who refuses to release control over the carriage or management of the 800 end using subscriber's services and number. Thus, the 800 end using subscriber is trapped and forced to use services of a carrier or RespOrg who refuses, through either negligent or intentional acts, to release their 800 service to a competitor. The problem is further aggravated under data base portability because the end using subscriber has no way of determining in a timely manner and on its own whether its 800 service is being carried by the correct carrier or being managed by the RespOrg of its choice. In contrast, with dial-1 interLATA presubscription, an end using subscriber can dial 1-700-555-4141 to instantaneously determine which carrier is carrying their 1+ interLATA traffic.

¹⁰An end user must pay tariffed charges to a carrier for services rendered even if that carrier is not authorized to carry the traffic. See, 47 USC 203, also, Consumer Alert: Unauthorized Changes In Long Distance Carriers, FCC Public Notice, November 2, 1990 ("If you have been switched to a long distance company without your permission....you must pay for any long distance calls you made using the unauthorized long distance service.")

Thus, there is no self-help method for an 800 end using subscriber to determine in a timely fashion that its 800 services is on the wrong 800 carrier and/or being managed by the wrong RespOrg. Moreover, there is no self-help remedy available for correcting these problems. The end result will be unmitigated chaos in the post-May 1, 1993 period for 800 end using subscribers, if the recommendations proposed herein are not adopted

III. The 800 Guidelines, Adopted By the Standards Committees, Will Not Prevent These Problems

The 800 Guidelines are, by design, purposely broad and vague. They represent a consensus view of many carriers with diverse interests. Consensus could not be reached if the 800 Guidelines were designed to accommodate one carrier's business plan, while failing to do the same for others -- regardless of how arguably inconsistent those plans may be with the Commission's 800 portability policies. In addition, the 800 Guidelines were primarily drafted by carriers, rather than end using subscribers. As the Commission has recently recognized, consensus among industry members does not necessarily lead to proper Commission rule interpretation.¹¹ In fact, the consensus approach in its design, causes the 800 Guidelines to lean in favor of the carriers, rather than the end using subscribers. In any case, the standards are, by design and antitrust legal requirements, voluntary and not enforceable.¹²

¹¹See, Notice of Proposed Rulemaking, re: Safeguards to Improve the Administration of the Interstate Access Tariff and Revenue Distribution Processes, CC Docket No. 93-6, RM 7736, released February 11, 1993 at ¶28.

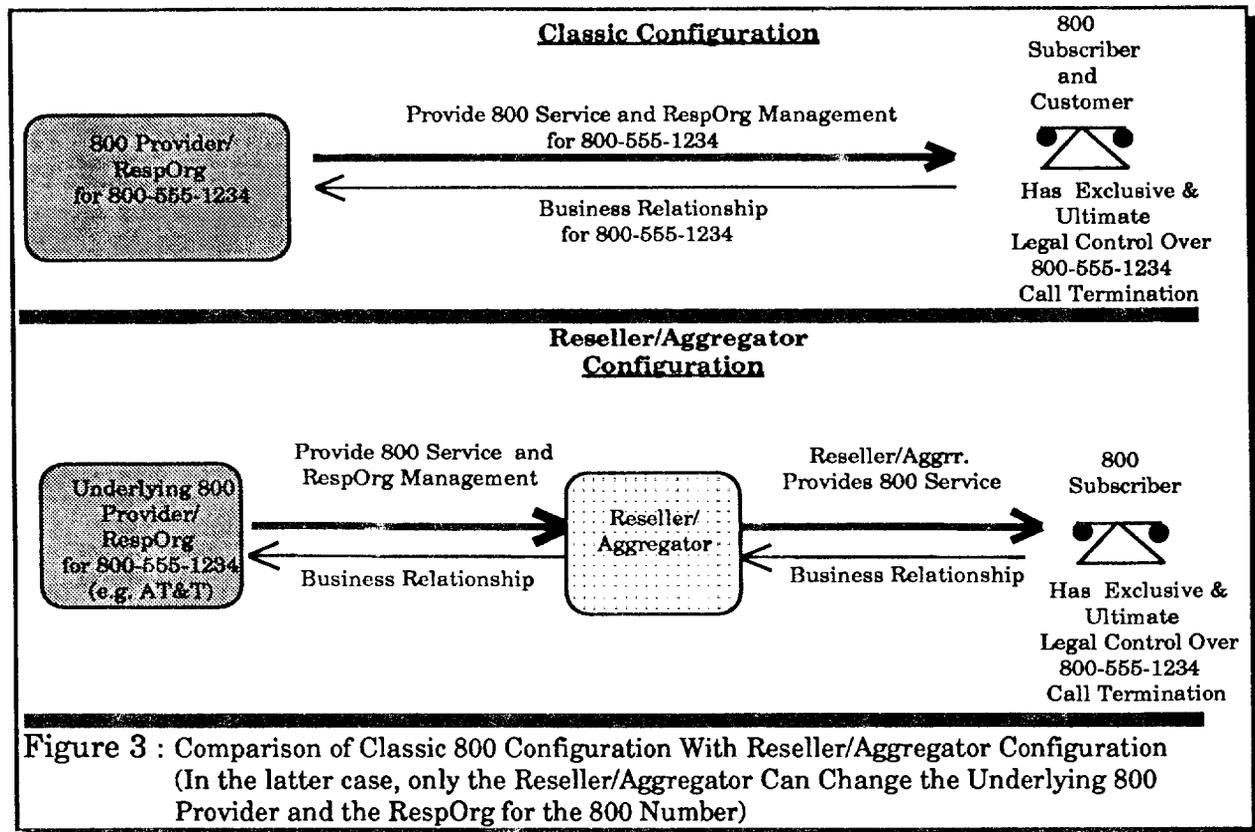
¹²As noted, even if the standards committees had adopted a meaningful standards regarding these matters, those standards would, as a matter of law, only be voluntary. The Commission is the only body that can adopt and enforce standards for a maximum post-conversion delay period, and who may authorize a RespOrg and/or carrier routing change. Moreover, even if such 800 Guide

A reasonable reading of the 800 Guidelines would indicate that an incumbent 800 RespOrg could not accept a written request from an 800 end using subscriber or through a written request forwarded by an 800 end using subscriber's newly chosen RespOrg. Specifically, sections 3.2.1 - 3.2.3 of the 800 Guidelines allow only the "customer" to request a RespOrg change and to terminate its "business relationship" with the incumbent RespOrg.¹³ Similarly, sections 3.3.1 - 3.3.3 calls allows only the initiation of carrier changes by the 800 "customer." The definitions of the 800 Guidelines describe the 800 "customer" as either the "service subscriber," or an "800

lines were incorporated into the SMS tariffs, as proposed by the Commission in its February 10, 1993 Order, such restrictions would only be enforceable with regards to a firm who purchases from those SMS tariffs. In addition, it is unlikely that that NASC will be in a position to enforce the guidelines against the major RespOrgs (obviously, the NASC would not, as a practical matter, refuse RespOrg access to major RespOrg).

¹³See, Exhibit III, herein.

service provider,” In the case of a reseller arrangement, the reseller is the 800



RespOrg’s customer because only it has a business relationship with the incumbent RespOrg. Thus, only the reseller’s orders to the RespOrg will be honored with regard to changes for that end using subscriber’s 800 number. Thus, try as they may, the 800 end using subscriber who purchases their 800 service from a reseller (or aggregator) will, by the rules set forth in the Guidelines, be trapped at the mercy of their resale carrier.¹⁴ This situation is illustrated in Figure 3.

¹³Although the 800 Guidelines define an “800 service subscriber” as the “800 entity who subscribe to 800 service from the 800 service provider and is financially responsible for traffic resulting from callers dialing the specific 800 number assigned to the subscriber. Note: The 800 service provider definition specifically excludes entities reselling 800 services.” The 800 Guidelines do not require the 800 RespOrg to accept routing and RespOrg change orders directly from the 800 service subscriber who purchases their 800 service through a reseller. See, discussions in text and Figure 3.

As to time limits for the execution of conversions to a new RespOrg or 800 carrier, the 800 Guidelines do not set forth any concrete, and thus enforceable, standards. For carrier changes, the 800 Guidelines only require that an incumbent carrier to process a carrier conversion order from an existing subscriber "in a timely manner."¹⁵ For RespOrg change or carrier changes initiated by the 800 customer, the 800 Guidelines do not provide any concrete time limits on how long an incumbent RespOrg must take in completing conversion to a new RespOrg or completing carrier changes. As pointed out earlier, based on Allnet's experience in the pre-data base portability environment, the time for post-order conversion could last weeks before either a RespOrg or carrier routing change takes effect. The incumbent 800 RespOrg has the incentive and ability to slow down such conversions. The delay provides the RespOrg an opportunity to resell the customer, as well as create discontent with the newly chosen RespOrg and/or carrier who will ultimately be blamed by the customer for the delay.¹⁶

Finally, the 800 Guidelines do not set forth a standard form for the 800 end using subscriber, or 800 customer, to complete that will be honored by all 800 RespOrgs and/or carriers to initiate conversions. It is Allnet's understanding that this void was knowingly left to be filled by "business relationships" established with each RespOrg and carrier. The net result is that each RespOrg and carrier is left to

¹⁴See, Guidelines for 800 Data base, Issue 2, November 9, 1992 at Section 3.3.4.

¹⁵Currently pending before the Commission are proposals to allow the NASC or a secondary RespOrg to make changes that an intransigent RespOrg refuses to carry out. [such as proposal was made by Sprint in CC Docket No. 86-10, filed July 10, 1992.] However, such proposals only set forth a second best solution that will not solve the basic problem. The primary solution should be that proposed in the text, namely simple rules requiring when and how a RespOrg or carrier selection change is accomplished.

define their own conversion forms -- each RespOrg/carrier will exercise its right to reject the forms that it has not "approved."

In sum, the 800 Guidelines fail to adequately address key issues that only the Commission can successfully address. If left only with the existing 800 Guidelines, even if enforced, disputes concerning who may authorize a change of RespOrg or carrier will develop. Disputes will also develop in a battle of the forms. Finally, disputes will develop as to whether a requested change has been honored or dishonored in good faith. These delays and conversion disputes will create large transaction costs, impeding the development of a dynamic competitive environment.

IV. The Commission Must Adopt 800 Presubscription Rules

As explained above, based on the experience that Allnet has had with AT&T in the pre-data base portability environment, as well as a review of the 800 Guidelines, it is clear that new rules and policies regarding 800 presubscription must be adopted by the Commission. The proposed rules or regulations are as follows:

1) An 800 end using subscriber's existing 800 carrier and RespOrgs must either a) complete all processing of 800 carrier RespOrg and underlying carrier changes within two business days, or b) set forth in writing to the end using subscriber within such time why such requests for changes were rejected or otherwise not processed,

2) Each 800 carrier and RespOrg must honor written requests of all the 800 end using subscriber's RespOrg and carrier routing change requests for that subscriber's 800 number, whether those requests are submitted directly by the 800 end using subscriber or the 800 end using subscriber's written request is conveyed through its agent. A copy of an end using subscriber RespOrg/carrier request form must contain the following information:

- a) the 800 number,
- b) that the 800 end using subscriber attests to, under penalty of law, that the end using subscriber is the exclusive subscriber of

the 800 number, and assumes all liability for the misappropriation of traffic of any claims of other end using subscriber,

- c) an affirmative statement that the subscriber appoints the new RespOrg/carrier (which ever is appropriate) as their new RespOrg/carrier (as appropriate).¹⁷

- 3) An "800 end using subscriber" for an 800 number is the entity who 1) through contractual or other legal relationship it can be definitively determined that such entity has the exclusive and absolute legal right to designate the physical point(s) of termination for all calls dialed using that 800 number and 2) who receives no compensation of any kind for the transmission, delivery, or management of calls originated using that number. If no entity satisfies both conditions of the prior provision, then the regulated common carrier whose network serves as the last exclusive physical point of connection(s) for all calls originated using an 800 number shall be treated by these Guidelines as the 800 end using subscriber for that 800 number.

¹⁶A copy of such a form is set forth in Exhibit II, herein.

V. Conclusions

For the reasons set forth herein, Allnet urges the Commission to adopt on an expedited basis 1) a firm, objective standard of two business days within which an incumbent 800 service provider/RespOrg, using prescribed forms, must complete the work necessary to convert its existing customer over to the customer's new 800 carrier/RespOrg of their choice, and 2) a clear definition of an "end using subscriber" who shall have unquestioned and unique authority to its 800 RespOrg/carrier conversion requests be honored by that end using subscriber's incumbent 800 RespOrg and carrier when a Commission prescribed standard form is completed by that subscriber.

Respectfully submitted,
ALLNET COMMUNICATION SERVICES, INC


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Dated: February 17, 1993

Exhibit I

Existing Pre-Data Base Portability Forms



Transfer Of Service Agreement and Notification For WATS/800 Family Of Services

I, _____, Hereby Request That AT&T
(Former Customer)
transfer or assign service for Account Number(s) _____

To _____
(Customer)

Former Customer understands and agrees that this transfer or assignment does not relieve or discharge it from remaining jointly and severally liable with New Customer for any obligations existing at the time of transfer or assignment. These obligations include: (1) all outstanding indebtedness for the account numbers specified above and (2) the unexpired portion of any applicable minimum payment period(s).

New Customer hereby assumes all obligations of Former Customer at the time of transfer or assignment. These obligations include: (1) all outstanding indebtedness for the service and (2) the unexpired portion of any applicable minimum payment period(s).

Services are not to be interrupted or relocated at the time transfer or assignment is made. This transfer or assignment will become effective on the later of _____ or AT&T's agreement in writing of the transfer or assignment.
(Date)

When a transfer or assignment occurs, a Record Change Only Charge applies.

Nothing herein shall give any customer, assignee, or transferee any interest or proprietary right in any given AT&T service telephone number.

Former Customer *(Date)*
Authorized Representative

Title

New Customer *(Date)*
Authorized Representative

Title



Request For Nodal Service

Originator Information
 Customer Name _____
 Originator Name _____
 Telephone No. _____
 Address _____
 Fr. No. _____ Rm. No. _____
 City, State, Zip _____
 Date Request Sent To AT&T 1 / 1 / _____
 Customer Order No. _____
 Customer Ckt ID _____
 Customer Fax No. _____

Billing Information
 Bill To _____
 Address _____
 Fr. No. _____ Rm. No. _____
 City, State, Zip _____
 Billing Contact _____
 Telephone No. _____
 Master Customer Number _____
 Bill Acct. No. () _____
 Sales Tax Status:
 Exemption Attached Exemption On Fbs With AT&T
 Not Exempt

Service Type
 Megacom Account Switched 56 Kbps
 Megacom ADD World Connect
 SASS Other (Specify in Remarks)

Service Details
 Quantity _____ Requested DD 1 / 1 / _____
 Related Customer Order No. _____
ORDER ACTIVITY:
 New Add Channels
 Disconnect AT&T Ckt ID _____
 Change Existing AT&T Ckt ID _____
 Supplement AT&T Order No. _____
 Change DD To 1 / 1 / _____
 Cancel
 Other (Specify in Remarks)
 Intrastate Capability Y N
 International Capability Y N

Remarks _____

For AT&T Use Only
 Date Rec'd/PASS No. _____
 Sales Rep _____ Ext. _____
 USO No. _____
 No. of Orders _____ No. of Lines _____
 Related Orders _____
 Works With _____
 Account Id _____ Ckt _____
 Project No. _____
 APP Date 1 / 1 / _____ DD _____
 CC _____ TYA _____ Firm SR
 Intrastate Capability Yes No PSM _____
 International Capability Yes No
 TOP _____ MPC _____
 TNS _____ thru _____ SIS _____
 TN _____ BT _____
 RTN _____ NRN _____
 APN _____ ECO _____
 SO _____ 4E _____
 CLP _____ Signaling _____
 OCO _____
 Remarks _____

For Credit Management Use:
 Advanced Payment Received \$ _____
 Deposit Received \$ _____

Access Type
 Quantity _____ DSI option? Y
 AT&T Access (PL Access order requires)
 T1.5 T48 V6
 Private Line Access Order No. _____
 IEC Access (Tie-down required)
 DSI CDS V6
 Customer Provided Access (Tie-down)
 CP; Type _____

Service Acceptance Information
 Customer Contact _____
 Telephone No. () _____

Customer Name _____

Customer Order No. _____

Customer Service Address

Name _____

*Address _____

DG _____ FLR _____ RM _____

City, State, Zip _____

Local Serving Office (NPA/NXX) _____

Local Contact _____

Telephone No. _____

Engineering Contact _____

Telephone No. _____

Multi-Tenant Bldg.? Y N

CLI of AT&T Serving Office (8 char) _____

Service Specific Information

MEGACOM[®] WORLD CONNECT[®]

Do you want answer supervision from the 4ESS to your switch?

Y N

Are you replacing your current AT&T WATS service with Megacom? Y N

• If Yes, provide the order number placed with AT&T to disconnect your WATS service _____

MEGACOM[®] 800

Type of Service

- Basic (All Serving Areas)
- Custom (Selected Serving Areas and/or NPAs)

• Complete Attachment A for Custom

Routing Arrangement/Hunting Arrangement

New Existing

• If existing, provide the lead 800 number: 800- _____

Advanced Features

- | | |
|--|--|
| <input type="checkbox"/> Single Number Service | <input type="checkbox"/> Call Allocator |
| <input type="checkbox"/> Area Code Routing | <input type="checkbox"/> Command Routing |
| <input type="checkbox"/> Routing Control Service | <input type="checkbox"/> Call Prompter |
| <input type="checkbox"/> Courtesy Response | <input type="checkbox"/> Time Manager |
| <input type="checkbox"/> 800 Referral | <input type="checkbox"/> Day Manager |

Listing Information

- 800 Directory Assistance
- Non-Published Published
- 800 Service Directory
- Non-Published Published

For AT&T Use Only

Date Received/PASS No. _____

Service Specific Information

MEGACOM[®] 800 (Cont)

Will you require the DNIS-800 (Dialed Number Identification Service) feature?

Y N

• Can the CPE accept 0 as the first digit outpulsed?

Y N

• Are there additional digits that the CPE will not accept?

Y N

If yes, please specify _____

Source of Audible Ringing or Dial Tone

PEEX (KEY ACC) Channel Unit

Are you using Megacom 800 for a remote access ap:

Y N

Are you using Authorization Codes?

Y N

Length of Authorization Codes _____

Are you replacing your current AT&T 800 service with Megacom 800? Y N

• If Yes, provide the order number placed with AT&T to disconnect your AT&T 800 service _____

Requested 800 Number(s) _____

Please provide the projected number of calls per mth their associated minutes and busy hour information this location. If you do not have AT&T 800 service this location, please estimate for each.

Number of Calls _____

Associated Minutes _____

Present Busy Day(s) _____

Present Busy Hour(s) _____

Busy Hour Attempts _____

Transfer of Calls

From: _____

To: _____



Request for Wide Area Telecommunications Service

7-64
7-11-6

Administrative

Account Number _____
 CSC Contact _____
 Customer Name _____
 Street Address _____
 Room No. _____ Floor No. _____
 City, State, Zip _____
 Tel. Number (____) _____
 Person To Contact _____
 Tel. Number (____) _____

Firm Order New Request Requested Due Date _____
 Or Or
 Inquiry Supplement _____

Customer Order No. _____
 Customer Circuit I.D.(s) _____

AT&T Order No. _____
 AT&T Circuit I.D.(s) _____

Related Order No.(s) _____

Billing Information

Bill To Company _____ Billing Tel. Number _____
 Street Address _____
 Room No. _____ Floor No. _____ Person to Contact _____
 City, State, Zip _____ Tel. Number (____) _____

Jurisdiction
 Interstate Or Intrastate

Tax Status Certification
 Federal Exempt State Exempt
 On File Attached On File Attached

Service Type

WATS Advanced 800
 800 Domestic MEGACOM
 800 Canada MEGACOM 800
 800 Overseas Other READYLINE

Request Type

New Service Move Existing
 Add To Existing Change Existing
 Change Due Date Disconnect (Complete)
 Cancel Request Disconnect (Partial)
 Other Change

Geographic Service Area & Quantity

Service Area	Quantity

Total Quantity Ordered

Transfer of Calls (From) _____
 (To) _____
 Transfer of Calls Period _____

Listing Information For 800 Directory Assistance

Non Published Published

Name _____
 Address _____
 City _____
 State & Zip _____

Agency Agreement

Customer Representation Authorization Third Party Agent's Name _____
 On File Attached On File Principal's Name _____
 On File Attached

Remarks

Submitted By _____ Date _____ Time _____

Engineering Specifications

Customer's Engineer Name _____ Tol. Number (_____) _____

AT&T Account No. _____ Customer Name _____

Service Code _____ Customer Order No. _____

		Transmission Levels			
Wiring	Signalling	Receive TLP	Transmit TLP	4 Wire TLV (TLP)	
				<input type="checkbox"/> 2 <input type="checkbox"/> 4	
<input type="checkbox"/> Touch Tone Or <input type="checkbox"/> Rotary	Hunting Type <input type="checkbox"/> RA <input type="checkbox"/> CR <input type="checkbox"/> UD <input type="checkbox"/> CP <input type="checkbox"/> PF	Hunting Preferential Fill In For CO or PF _____ _____ _____ _____ _____	Hunting Options <input type="checkbox"/> Dand Advanc <input type="checkbox"/> NHNI <input type="checkbox"/> Y <input type="checkbox"/> R <input type="checkbox"/> Split <input type="checkbox"/> Combine <input type="checkbox"/> Multiple Distable	Tie Down (Cable & Pair) Assignment(s) Required <input type="checkbox"/> Yes <input type="checkbox"/> No	
					Connecting Facility Assignment (CFA) System _____ Channel(s) _____

Location Information

Name _____

Address _____

Bldg. No. _____ Rm. No. _____ Fl. No. _____

City, State, Zip _____

Contact _____

Tol. Number (_____) _____

Access Instructions _____

LSO _____
 NPA NXX

Termination Specifications

Dornac Conrax Jack

Other _____

If Jack, Enter Information Below:

Jack USOC _____

Jack Number _____

Jack Position _____

New Or Existing

Registration Number _____

REN _____

Affidavit Attached

Mail Tie Down and Label Information To:

Company _____

Attention of _____

Address _____

City, State, Zip _____

Remarks _____
