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

In the Matter of Administration of the North American Numbering Plan Notice of Proposed Rulemaking	CC Docket 92-237

COMMENTS OF BELL ATLANTIC

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COMMENTS OF BELL ATLANTIC

Summary

Bell Atlantic[1] urges the Commission to act promptly in this proceeding to facilitate the transfer of the North American Numbering Plan Administration responsibilities from Bellcore to an independent non-governmental entity. This new numbering administrator should also assume responsibility for central office code administration one year after it takes over NANP administration.

Bell Atlantic supports the regulatory and competitive conditions that would allow the Commission to require open presubscription for all toll calls -- both interLATA and intraLATA. However, those conditions do not exist today. The premature implementation of intraLATA presubscription would

[1] The Bell Atlantic telephone companies serving New Jersey, Pennsylvania, Delaware, Maryland, Virginia, West Virginia and the District of Columbia, Bell Atlantic Mobile and Bell Atlantic Personal Communications Inc.

ultimately hurt consumers by decreasing their competitive choices.

1. THE COMMISSION SHOULD FACILITATE THE ESTABLISHMENT OF A NEW NATIONAL NUMBERING ADMINISTRATOR.

Bell Atlantic supports an orderly transfer of the responsibilities of the North American Numbering Plan Administrator ("NANPA") to an entity not affiliated with Bellcore. The new administrator should be an independent, non-governmental entity that will handle future administration of the North American Numbering Plan ("NANP") and will assign and administer numbering resources according to nondiscriminatory guidelines.[2] This transfer should occur promptly after the implementation of interchangeable NPAs in 1995, by January 1, 1996.

Today, exchange carriers administer central office ("CO") codes in their territory. In many ways, this is a more complex job than that performed by NANPA. These responsibilities include the following: processing applications for CO codes, determining if the request for a CO code is in compliance with assignment policies and guidelines, performing technical analysis

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[2] The functions of the NANPA include assignment and administration of NPA codes, Carrier Identification Codes, Service Access Codes, SS7 point codes, Vertical Service Codes (i.e., *XX codes), ANI information digit pairs, the assignment of NXX codes in the 900 NPA, the 809 NPA (Caribbean area code), the 456 NPA (for inbound international traffic) and the 800-855 line number code (used for services provided for hearing-impaired service). In addition, initially it will undertake responsibility for 555 line numbers. The new administrator also will continue participation in both domestic and international industry fora as well as respond to requests for information or action from the Commission and the industry at large.

to determine the appropriate CO code to assign, notifying the industry of shortages of CO codes, maintaining records of codes already assigned and those available, surveying assigned codes to project NPA exhaustion, adding information to the Routing Database System, analyzing and resolving problems related to misrouted calls and calls that cannot be completed, tracking switch cutovers and code assignments, and ensuring code applicants place codes in service within the appropriate time frame.

Central office code administrators also perform overall NPA planning.[3] CO code administrators also must have in-depth knowledge and familiarity with the area covered by an NPA, the layout of networks (including those for all exchange carriers, cellular carriers and competitive access providers), possible code conflicts (i.e. for cellular and paging carriers), and those carriers authorized by a state to receive CO codes. They must also know the unique dialing plans within each NPA, within each state and across state lines and be able to distinguish local and toll calls. In addition, after codes are assigned, the CO code administrator may be called upon to help ensure that the newly

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[3] The code administrator organization develops plans for NPA relief and initiates implementation efforts, submits necessary information to obtain a new NPA, and has overall responsibility to coordinate the implementation of a new NPA with all affected parties. The new CO code administrator, like the current CO code administrators, must administer CO codes in nondiscriminatory fashion following Industry Carriers Compatibility Forum guidelines.

assigned codes can be routed by the multitude of networks that currently exist.

Because of this complexity, it would be unwise to transfer CO code administration to the new administrator immediately. The new administrator cannot be expected to have sufficient knowledge of these varied responsibilities from the outset. The administrator will also need time to establish working relationships with the individual state public service commissions. Bell Atlantic suggests that the new administrator be given a year's experience with the NANPA functions before taking over responsibility for CO code administration. This two-step process will permit for a more orderly transition to the newly created administrator.

The new administrator should be selected through a Request For Proposal process. This process will ensure that the charges for administrative functions are reasonable and that the entity that can best handle future administration of the NANP and CO codes will become the new administrator.

Policy board. The Commission should establish a policy board separate from the new administrator. This board should be given the authority to resolve numbering assignment disputes and set policy for the new administrator. The policy board should consist of a manageable number individuals who represent a cross-section of the telecommunications industry (including regulators and users of telecommunications services) and would act as a buffer between the new administrator and the Commission. The

board would oversee the development of numbering policy, monitor the new NANP and CO code administrator for compliance with established policy regarding numbering resources, review all policy issues referred by the administrator and act as an appeals board for resolution of policy disputes. Bell Atlantic supports the suggestion that has been made within the industry that the Alliance for Telecommunications Industry Solutions be asked to oversee the establishment of this board.

The board must be a forum where decisions are reached through consensus. Any attempt to force premature decisions through arbitration or mediation would work against such consensus. In addition, such a requirement would cause more litigation rather than encouraging members of the industry to work cooperatively to resolve issues. Therefore, the board should not have the power to resolve matters by arbitration or mediation.

Funding. All service providers benefit from the sound and efficient administration of numbering resources. The costs of the new number administration mechanism should, therefore, be borne by all users of these resources. Providers of telecommunications services should fund the NANPA's activities through a fee schedule for new numbering resources.

The funding plan should be forward looking. There should be no attempt to recover for numbering resources that have already been assigned and that are currently in use. The Bell companies -- through their funding of Bellcore and years of

administering the NANP -- have already paid for the resources that have been assigned through the existing number administration process, and there is no reason to try to recover these costs twice. In addition, many of the resources currently in use are associated with their carrier of last resort and universal service obligations -- obligations that not all providers have. It would be unfair to make those carriers that have these obligations pay twice for numbering resources associated with those obligations.

State authority. The Commission also seeks comments on whether it should adopt a uniform dialing plan.[4] Historically, the states have controlled the dialing plans within their territories. This has worked well because different dialing issues arise in different states and each state is closer to the particular facts in its territory. Bell Atlantic favors continuing the current system.

Transition for Feature Group D CIC expansion. Bell Atlantic agrees that there should be a phase-in period for expanding from three- to four-digit Feature Group D CICs. However, there is no reason for this transition to last well into the next millennium, as suggested by AT&T and MCI, or to be without end, as Sprint advocates.[5]

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[4] Notice, ¶ 44.

[5] AT&T Comments, p. 9; MCI Reply Comments, pp. 4-6; Sprint Reply Comments, pp. 1-3.

The plan to change to four-digit CICs was adopted in 1988.[6] Thus, even if it is true that it will take six and a half years for all PBX users to have equipment in place to handle the expanded CICs and some independent payphones would be made obsolete by the change,[7] all segments of the industry have already been aware *for six years* that CICs would be expanded. Two additional years would be more than a reasonable transition period and should not be an unfair burden on any segment of the industry.[8]

2. THE COMMISSION SHOULD NOT CHANGE ESTABLISHED INTRALATA DIALING PATTERNS AT THIS TIME.

The Commission asks whether it should require exchange carriers to deliver all interstate intraLATA calls to the caller's presubscribed interexchange carrier, unless the caller indicates otherwise.[9] It also seeks comment on "dual presubscription" schemes, such as the one proposed by Allnet, in which customers separately choose carriers for different types of

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[6] Notice, ¶ 49.

[7] Notice, ¶ 53.

[8] Two years would be longer than other similar transitions ordered by the Commission. For example, the Commission originally ordered private payphone providers to unblock 10XXX calls within six months. Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation, 6 FCC Rcd 4736 (1991). The Commission then granted a stay of that order. 7 FCC Rcd 2146 (1992). In the final order, the Commission lifted the stay and required unblocking eighteen months after the date of the original order. Order on Reconsideration, 7 FCC Rcd 4355 (1992).

[9] Notice, ¶ 58.

toll traffic.[10] The Commission should not change existing arrangements -- arrangements fairly well understood by consumers -- at this time. Rather, it should consider these questions as part of a broader examination of competitive issues in toll markets, such as in the rulemaking requested by Bell Atlantic and others almost a year ago.[11]

As the Commission correctly observes, intraLATA toll calls dialed without an access code are completed by the exchange carrier.[12] This practice -- like the practice of presubscription itself -- has its origins in the AT&T consent decree. The decree court concluded that because the Bell companies were completely barred from competing in the interexchange marketplace, they would face "an almost insuperable disadvantage" competing for presubscription selections against carriers that could offer a full range of toll services.[13] The Bell companies would quickly be driven from the toll marketplace, depriving consumers of a competitive choice and local exchange providers of last resort of an important source of contribution.

The Commission has agreed with the decree court's assessment. "As a practical matter, if [the Commission] were to

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[10] *Id.* ¶ 57 & n.96.

[11] Petition For Rulemaking To Determine The Terms And Conditions Under Which Tier 1 LECs Should Be Permitted To Provide InterLATA Telecommunications Services, RM 8303 (July 15, 1993) ("InterLATA Petition").

[12] Notice, ¶ 55.

[13] *United States v. Western Elec. Co.*, 569 F. Supp. 1057, 1108 (D.D.C), aff'd, 464 U.S. 1013 (1983).

require intraLATA, interstate presubscription, it would be highly unlikely that any customers would select the LEC for *intra*LATA, interstate calling because customers choosing the LEC would need to use IXC access codes, such as 10XXX, for all *inter*LATA, interstate calls."[14]

Bell Atlantic looks forward to the day when it will be able to compete with interexchange carriers in the provision of interLATA and intraLATA toll services on the same terms and conditions. To this end, Bell Atlantic and other Bell companies asked the Commission almost a year ago to initiate a rulemaking to adopt rules governing their entry into the interLATA business.[15] Among these rules, would be new regulations concerning the handling of interstate intraLATA traffic.[16] Bell Atlantic urges the Commission to move ahead with that proceeding without delay.

A. Implementing the Proposed Changes Now Would Confuse and Injure Consumers.

After ten years, most consumers are finally coming to understand the changes in their telephone serving arrangements

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[14] Allnet Communication Services, Inc. v. US West, Inc., 8 FCC Rcd 3017, 3026 (1993).

The Notice affirms that presubscription could "effectively prevent the BOCs from competing for" interstate, intraLATA calls and "may also conflict with the MFJ assumption that the BOCs would be able to compete for all intraLATA toll traffic." Notice, ¶ 57.

[15] See note 11 supra.

[16] See, e.g., Comments of MFS Communications Company, InterLATA Petition, RM 8303, at 6 (filed Aug. 30, 1993).

that divestiture and presubscription have brought about. Most are generally aware of the fact that their exchange carrier provides their local service and some "short distance" toll service on a presubscribed basis, while an interexchange carrier provides the remainder of their long distance service on a presubscribed basis. Most of these intraLATA toll calls are intrastate, not interstate calls. As the Notice acknowledges,[17] the Commission's jurisdiction extends only to the interstate calls. Therefore, an order by the Commission changing how these interstate toll calls are handled would only rekindle consumer confusion.[18]

Consumers would also be hurt by the inevitable loss of Bell Atlantic as a viable competitor for their intraLATA business. Nothing has changed to alleviate Bell Atlantic's "almost insuperable disadvantage," that the decree court described in 1983 and which the Commission recognized last year. The interexchange carriers would be able to offer themselves as the only toll carriers a customer needs. In addition, they could offer volume discounts and other packages based on all toll calls, intraLATA and interLATA.[19] Bell Atlantic could not

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[17] Notice, ¶ 8.

[18] For example, Bell Atlantic customers in Philadelphia who have presubscribed interexchange carriers today might be asked for presubscription choices for their interstate intraLATA calls (to Delaware), while retaining Bell Atlantic as their intrastate intraLATA carrier (for the rest of the Philadelphia LATA).

[19] E.g., Tariff FCC No. 2., p 77.10, § 3.9.6 (AT&T).

compete against these plans because it can offer neither "one-stop" shopping nor tie toll volume discounts to any interLATA service. Because Bell Atlantic could not match the interexchange carriers on price or convenience, it would quickly lose intraLATA business and become an inconsequential competitive force.

Leaving the intraLATA markets to the interexchange carriers would not be in the best interest of consumers. These carriers have demonstrated a propensity to increase prices and an aversion to price competition. A recent report from the Commission shows that interstate toll rates increased by more than 9 percent in the twelve months ending in March of this year[20] -- about three times the rate of inflation. On May 13, AT&T announced a 4 percent price hike for some calls placed by business customers.[21] The recent rate of increase for interstate long distance calls is, in fact, greater than the price rise history of the cable industry that prompted Congress to pass the Cable Act of 1992.

These interexchange carrier price increases are made even more notable by the fact that the access charges paid by these carriers have been decreasing. In fact, AT&T alone failed to pass on to its long distance customers more than $2 billion of

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[20] Trends in Telephone Service (May 1994).

[21] "AT&T to Hike Business Long-Distance Prices By 4 Percent," Reuter Bus. Report (May 13, 1994).

access charge reductions it has received.[22] There is no reason to expect that the interexchange carriers will behave any more competitively in the intraLATA markets than they have in the interLATA arena.

At this same time, local and intraLATA toll rates have been essentially flat and, when inflation is taken into account, have actually been decreasing.[23] Bell Atlantic has continued to reduce interstate intraLATA rates. In fact, the rates proposed by Bell Atlantic in its April 1, 1994 tariff are at or below AT&T's tariffed rates for all times periods and all mileage bands. Under those rates, the daytime call from Silver Spring, Maryland, to Manassas, Virginia, cited in the Notice[24] would be 23 cents a minute using Bell Atlantic-Maryland or 24 cents a minute using AT&T.

B. Consumers Can Use Interexchange Carriers' IntraLATA Services Today.

Existing dialing arrangements do not prevent consumers from using interexchange carriers for interstate intraLATA calls. Within the Bell Atlantic region there are three LATAs that cross state lines.[25] Any customer may use an interexchange carrier

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[22] National Economic Research Associates, Effects of Competitive Entry in the U.S. Interstate Toll Markets: An Update (May 27, 1992).

[23] Trends in Telephone Service, Tables 5 & 6 (May 1994).

[24] Notice, n.94.

[25] The Philadelphia LATA includes all of Delaware; the Washington, D.C. LATA includes northern Virginia and parts of Maryland; and the Hagerstown LATA includes parts of West Virginia and Maryland.

simply by dialing the 10XXX code associated with a particular carrier. Many large customers use dedicated special access circuits to connect directly to interexchange carriers and can use them for both their interLATA and intraLATA traffic. Other medium and large users with PBX's program them to dial the access code automatically so that they reach an interexchange carrier for all their toll calls. Similarly, automatic dialers and speed calling offer the same capability to residential customers and small businesses.

C. The Commission Should Carefully Consider The Costs of the Various Alternatives.

Since neither statewide intraLATA presubscription nor interstate intraLATA presubscription has been implemented anywhere, it is difficult to estimate the actual costs it would generate.[26] Moreover, the costs could vary greatly depending on how the Commission chooses to implement presubscription. The principal options for offering presubscription are:

(1) Extended one-PIC method. This would effectively restrict the end user's choice of a presubscribed interstate intraLATA toll carrier to that end user's presubscribed interLATA carrier.

(2) Modified two-PIC method. Under this option, the presubscribed interstate intraLATA carrier could be either the presubscribed interLATA carrier or the exchange carrier.

(3) Two-PIC method. This option would permit customers to designate any two PICs -- one for

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[26] Although a handful of states have approved presubscription or have established task forces to submit recommendations for implementation and cost recovery, no state has yet implemented statewide intraLATA presubscription.

interLATA calls and one for interstate intraLATA toll calls.

(4) Multiple-PIC. This option would allow customers to choose multiple carriers based on route-specific pricing, time-of-day discounts and other criteria.

Each of these methods has different cost and policy implications and the Commission must consider each of them before deciding whether to order presubscription. This consideration should include examination of the following costs:

- the purchase and installation of generic software upgrades;
- a phased-in timetable for presubscription consistent with an economically reasonable switch replacement program;
- translations, including updating central office routing tables and individual customer presubscription choices;
- additional tandem capacity;
- additional central office equipment;
- the selection process for residents to choose their presubscribed carrier, including balloting and billing inserts; and
- administrative costs.

As already stated, it is premature for the Commission to order presubscription before other essential regulatory changes are made. If, however, the Commission decides to proceed with some form of presubscription -- *which it should not* -- before Bell Atlantic is permitted to offer interLATA services, it should not require presubscription under the extended one-PIC method. That method would bar Bell Atlantic from being a presubscribed carrier.

In addition, if the Commission orders presubscription now, it would have to create a funding mechanism to pay for the costs. The Commission would need to decide how the interexchange carriers (the sole beneficiaries of presubscription) will pay for the costs they incur to implement presubscription. Ultimately, however, it will be the customers who will pay the costs.

Conclusion

The Commission should move promptly to facilitate the establishment of a new mechanism for number administration. It should consider new intraLATA dialing and routing options in the same proceeding in which it establishes rules to allow all exchange carriers to compete equally in interLATA markets.

Respectfully submitted,

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I hereby certify that a copy of the foregoing "Comments of Bell Atlantic" was served this 7th day of June, 1994, by first class mail, postage prepaid, on the parties on the attached list.

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