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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
Administration of the North ) CC Docket No. 92-237  
American Numbering Plan ) Phases One and Two  
)

REPLY COMMENTS OF AT&T

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## SUMMARY

The importance of numbering issues in the telecommunications market is confirmed by the number of comments the Commission has received in response to its Notice of Proposed Rulemaking ("NPRM") addressing the future administration of the North American Numbering Plan ("NANP") and certain related numbering resource issues.

Significantly, many of the commenters, and in particular customers, confirm that requiring "1+" presubscription for interstate intraLATA toll calls would increase competition and thereby benefit consumers. Such presubscription would alleviate an unnecessary and anomalous inconsistency in the Commission's long-standing requirement of presubscription for other interstate calling. Only the LECs suggest that the Commission should not permit customers to choose their carrier for all interstate service, to permit interstate intraLATA toll calls to be routed to a customer's presubscribed carrier. Their claims do not begin, however, to justify continuation of these customer restrictions. Many commenters also agree that a nationwide, uniform 1+ ten-digit dialing plan should be implemented for toll calling to provide customers with consistent, easy to understand dialing protocols for toll calls from anywhere in the country.

There is overwhelming support for the planned expansion of Carrier Identification Codes ("CIC") from three to four digits, and in particular, the Commission's

recognition of the need for a significant transition period within which to accomplish this change. The only disagreement is how long the transition period should last. Given the current industry plan for CIC expansion, and customer concerns with the equipment modifications required for its implementation, the Commission's proposed six-year transition period should serve as a minimum, with the market determining if in fact a longer period is required.

Finally, virtually all commenters support the Commission's proposal to establish promptly a non-government entity to replace Bell Communications Research Corporation ("Bellcore") as the NANP Administrator ("NANPA"), a function Bellcore has performed since 1984. Many of these commenters have participated in industry discussions of this issue for more than a year. As most comments show, the new NANP administration organization should consist of an Oversight Committee to develop and adopt major numbering policies, a NANPA that would functionally administer numbering resources under the guidance of the Oversight Committee, and an Industry Numbering Group that would include subcommittees responsible for technical support for specific numbering issues. In addition, a sponsor organization would provide logistical support and coordination, including secretarial services, for the numbering organization.

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REPLY COMMENTS OF AT&T

AT&T Corp. ("AT&T") hereby submits its reply comments on the Notice of Proposed Rulemaking in CC Docket No. 92-237, released April 4, 1994.<sup>1</sup>

INTRODUCTION

The Commission opened this docket in October 1992 with a Notice of Inquiry ("NOI") to explore issues pertaining to the future administration of the North American Numbering Plan ("NANP").<sup>2</sup> Comments on both the NOI

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<sup>1</sup> In the Matter of Administration of the North American Numbering Plan, 9 FCC Rcd. 2068 (1994) ("NPRM"). A list of parties submitting comments in this proceeding, and the abbreviated designations used herein, is attached as Appendix 1.

<sup>2</sup> Administration of the North American Numbering Plan, 7 FCC Rcd. 6837 (1992). Since 1984, Bell Communications Research Corporation ("Bellcore") has served as the NANP Administrator ("NANPA"). In this capacity, Bellcore administers the integrated numbering plan for World Zone 1 ("WZ1"), that covers the United States and seventeen other countries. The functions of the administrator include: assignment of numbering resources; monitoring the availability of these

and the NPRM confirm that, increasingly, customer and carrier access to, use of, and control over numbering resources and numbering or dialing plans could significantly affect the availability of competitive services to customers and the ability of service providers to compete. Now more than ever, it is thus critical that the administration of numbering resources, and decisions as to their use, be accomplished in as fair and procompetitive a manner as possible.

I. COMMENTERS CONFIRM THAT PRESUBSCRIPTION FOR ALL INTERSTATE TRAFFIC, INCLUDING INTRALATA, SHOULD BE REQUIRED NOW.

Many commenters (most significantly, those representing customers) concur that, as the NPRM correctly observed (9 FCC Rcd. at 2077), customers have been unnecessarily denied the ability to presubscribe to their preferred carriers for interstate intraLATA toll calls.<sup>3</sup> Today, the incumbent LEC automatically retains and completes these calls without regard to customers' choice of interexchange carrier, in stark contrast to the Commission's long-standing rule that requires presubscription for other interstate toll service. These commenters also concur that

(footnote continued from previous page)

resources; and participation in industry, national and international standards bodies.

<sup>3</sup> See, e.g., Ad Hoc, p. 14; Allnet, p. 6; AT&T, p. 4; API, p. 5; CompTel, p. 2; MCI, p. 17; VarTec, p. 7.

allowing 1+ presubscription for interstate intraLATA toll calls would greatly enhance the opportunity for competition in this segment of the intraLATA business -- just as presubscription intensified competition in the interLATA business.<sup>4</sup> This increased competition could stimulate the entry of new carriers and offering of new services, and should result in lower prices, higher quality, and more choice for customers.

Predictably, the LECs argue in their comments that they should be permitted to maintain their control over interstate intraLATA toll calls.<sup>5</sup> None of the arguments presented by those who oppose customer choice demonstrates, however, how customers could be better off without the benefits 1+ presubscription for interstate intraLATA toll calling would provide, nor do they even begin to justify the continued imposition of these customer restrictions.

Some LECs claim that because the BOCs are prohibited from providing interLATA service by the terms of the Modification of Final Judgment ("MFJ"), other carriers should not be allowed to compete for intraLATA toll traffic until the BOCs are allowed to enter the interLATA business.<sup>6</sup>

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<sup>4</sup> See, e.g., Ad Hoc, p. 14; Allnet, p. 6; API, p. 5; AT&T, p. 4; CompTel, p. 2; MCI, p. 17; MFS, p. 6; VarTec, p. 7.

<sup>5</sup> Ameritech, p. 10; Bell Atlantic, p. 8; GTE, pp. 21-22; NYNEX, p. 18; SBC, p. 17.

<sup>6</sup> Ameritech, p. 9; Bell Atlantic, p. 8; GTE, pp. 21-22; NYNEX, p. 18; SBC, p.17.

Both as a matter of MFJ analysis and sound public policy, this position is unfounded.

The line of business restrictions contained in the MFJ arose from the fact that the local exchange and exchange access business is a bottleneck monopoly, on which interexchange carriers are entirely dependent in offering toll service. IntraLATA toll service, in contrast, is not a natural monopoly.<sup>7</sup> Indeed, the provision of that service is as dependent on monopoly access facilities as are other toll services, and there is thus no logical connection between the MFJ line of business restrictions on the one hand (which relate to bottleneck facilities) and intraLATA toll service. This is confirmed by the fact that, under the MFJ, the LATAs were drawn to maximize the possibility for competition.<sup>8</sup> In any event, irrespective of the lack of merit to these LECs' claims, no valid public interest would be served by continuing unnecessarily to deny consumers their choice of carriers for potentially-competitive intraLATA toll services.

There is also no merit to the assertions that presubscription for interstate intraLATA calls would have an

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<sup>7</sup> This fact has been recognized by the more than forty states which permit, at least, some type of intrastate intraLATA toll competition.

<sup>8</sup> United States v. Western Electric Co., 569 F.Supp. 990, 1004 (D.D.C. 1983).

improper economic impact on the LECs.<sup>9</sup> First, it may well be that LEC toll revenues will decline as customers are increasingly able to enjoy the benefits of competition in obtaining intraLATA service. What this reflects, however, is that those toll rates today are far above competitive costs, and should be reduced as competition stimulates greater efficiency. Moreover, LECs will continue to be the virtually exclusive providers of the exchange access required to offer intraLATA toll service. The increased competition that would result from presubscription for this traffic may well stimulate the volume of traffic and thus further increase LEC access revenues. And in any case, competitors for intraLATA toll service will have to price their service to recover all their costs, including the access charges they will have to pay the LEC. The LECs thus should retain a significant price advantage over would-be intraLATA toll competitors, because the LEC markup on its access service that is a direct cost to a competing service provider is profit for the competing LEC.<sup>10</sup>

<sup>9</sup> See, e.g., CHA, p. 2; RH/FM/L/TC, p. 3.

<sup>10</sup> AT&T is not unmindful of the related concern in the comments (RH/FM/L/TC, p. 3) that loss of the LEC monopoly on intraLATA toll calling could adversely affect universal service. To the extent that intraLATA toll rates are set at uneconomic levels to generate a subsidy and are protected by monopoly status, however, competition is necessarily foreclosed and efficiency is impaired -- all to the greater detriment of universal service. AT&T strongly supports universal service and has long urged the Commission to consider in a broader proceeding the adoption of new rules to impose on all

II. A NATIONWIDE UNIFORM 1+ TEN-DIGIT DIALING PLAN SHOULD BE IMPLEMENTED FOR TOLL CALLING.

In response to the Commission's request for comments on Ad Hoc's suggestion (NPRM, 9 FCC Rcd. at 2075) that such a plan be adopted, a number of commenters show (Ad Hoc, pp. 9-11; API, pp. 2-3; CompTel, pp. 5-6; MCI, p. 16; Sprint, pp. 10-11; TCG, pp. 10-11) that the absence of a uniform dialing plan is confusing and impairs customers' ability to distinguish between local and toll calls. API (p. 3), for example, shows that having the same 1+ ten-digit dialing plan for all toll calls would benefit all customers by providing a consistent, simple, easy to understand and remember method of dialing calls from anywhere in the country.<sup>11</sup> Further, NATA (pp. 9-10) confirms that 1+ ten-digit dialing would simplify the operation of CPE features and functions, for example, toll restrictions. Sprint (p. 12) explains that "[c]onsistent use of '1' as a toll indicator should also increase the efficiency of the LEC

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service providers a competitively-neutral mechanism for funding universal service. In this case, however, the incidence of interstate intraLATA toll calling is relatively small, and is so intertwined with the far-larger body of interstate interLATA calling, that the Commission's presubscription proposal can be adopted forthwith.

<sup>11</sup> Such a plan would also help customers reduce toll fraud, as LCI (p. 3) points out.

network." And CSCN (p. 2) advises that "[i]n Canada, 1+ 10 digit dialing for toll calls will be adopted as a uniform national standard coincident with the introduction of INPAs."<sup>12</sup>

Only certain LECs, once again, oppose adoption of this uniform dialing plan. GTE, for example, contends (pp. 14-15) that after the introduction of interchangeable NPAs, the digit 1 will indicate to switching systems that ten digits should follow, which may or may not signify a toll call. Pacific Companies (p. 10) argue that after numbers are portable, customers will not know if the person they are calling is located in an area that would result in toll charges or not. Possible changes like these to the dialing plan that may be allowed or required at some time in the future, through implementation of portability, expansion of NPAs or otherwise, should be addressed in the ongoing discussions of the Industry Numbering Committee. Whatever their future impact, these concerns provide no basis for avoiding the implementation and benefits of a uniform dialing plan now.

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<sup>12</sup> In fact, 43 states have already adopted 1+ ten-digit dialing for intraLATA, home NPA toll calls, and NARUC (p. 5) encourages all states to adopt the same dialing plan. See also NATA, p. 9; Sprint, p. 11.

III. CIC EXPANSION SHOULD BE IMPLEMENTED AS PLANNED AND THE MARKET SHOULD DETERMINE THE APPROPRIATE TRANSITION PERIOD FOR THE EXPANSION OF THESE CODES FROM THREE TO FOUR DIGITS.

Most commenters agree with the Commission's tentative conclusion (NPRM, 9 FCC Rcd. at 2076) that the planned expansion of CIC codes used for FG D access is reasonable and should be implemented as scheduled in the first half of 1995.<sup>13</sup> They also recognize that a sufficient transition period is required to, as the NPRM (id.) states, "reduce -- even to the point of virtually eliminating -- the hardships imposed on pay phone providers, manufacturers, and PBX users." The only dispute is how long the transition period should last.

The principal concern expressed by those commenters (Ameritech, p. 7; NYNEX, p. 15; Pacific Companies, p. 11; SBC, p. 13) who favor a transition period shorter than the six years proposed by the Commission is that the 2000 four-digit CICs that have been reserved for distribution during the transition period will be exhausted too quickly to allow a six-year transition.<sup>14</sup> None of these

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<sup>13</sup> AirTouch, p. 8; Ameritech, p. 6; AT&T, p. 7; Bellcore, p. 7; BellSouth, p. 13; GTE, p. 17; MCI, p. 17; NCS, p. 7; NYNEX, p. 15; OPASTCO, p. 5; SBC, p. 15; Sprint, p. 13.

<sup>14</sup> The current industry plan, which recognizes the need for a transition period, allows the assignment of 2000 four-digit codes while still permitting the use of existing 10XXX dialing for the users of networks assigned three-digit CICs. Thus, until all of the initial 2000 four-digit codes have been assigned, it would not be necessary to require only 101XXXX dialing.

commenters, however, provides any support for their claims that the initial 2000 codes will not last at least six years. Indeed, even Bellcore acknowledges (p. 8) that at the current rate of assignment, the initial supply of codes would last 11 years.

Given these facts, and the concerns reiterated here by customers and equipment manufacturers (NCS, p. 7; NATA, p. 9) regarding equipment modifications that will be necessary to permit the use of expanded carrier access codes, it would appear that a six-year transition period is the minimum acceptable, and the marketplace demand for additional CICs should ultimately determine the length of the necessary transition period.

IV. AN IMPARTIAL, WORLD ZONE 1 NUMBERING ORGANIZATION SHOULD BE ESTABLISHED PROMPTLY TO ADMINISTER THE NANP.

Virtually all commenters agree with the Commission's tentative conclusion that an impartial, industry-driven entity should be established promptly to perform NANP administration,<sup>15</sup> and many commenters cite progress the industry -- through the Future of Numbering

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<sup>15</sup> Allnet (p. 7) and NCS (p. 5) suggest that the Commission itself should perform the NANPA function. Although most commenters (see, e.g., ATIS, pp. 7, 9; CompTel, p. 2; GTE, p. 5; McCaw, pp. 2, 5; NECA, p. 13; Nextel, p. 6; Sprint, p. 5; Stentor, pp. 2-3) confirm that active Commission participation in the NANPA process is needed, there is no need for the Commission to create a governmental infrastructure to be the NANPA.

Forum ("FNF") -- has made on a number of questions concerning NANP administration.<sup>16</sup>

Many commenters support the agreement reached at FNF that a World Zone 1 Numbering Organization ("WZ1NO") should be established. As AT&T showed (pp. 9-10), and other commenters also suggest (see, e.g., Ameritech, p. 8; GTE, p. 4; SBC, pp. 2-3; Sprint, p. 3), this organization should be composed of three components (see AT&T, Appendix 1), which in combination would perform all of the functions necessary to administer the NANP, with autonomy where appropriate to avoid claims of bias in the administration of critical numbering resources.<sup>17</sup>

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<sup>16</sup> As the NPRM recognizes (9 FCC Rcd. at 2069 n.9), the FNF was established to consider Bellcore's 1992 proposal on the future of numbering in World Zone 1. Since its first meeting in March of 1993 (open to all industry participants and attended by representatives from a broad cross-section of the telecommunications industry), the FNF focused primarily on the future organization and structure of NANP planning and administration.

<sup>17</sup> Most commenters agree (see, e.g., Ad Hoc, pp. 2, 6; AMTA, p. 6; AT&T, p. 10 n.11; BellSouth, p. 9; McCaw, p. 3; MCI, pp. 6-7; MFS, p. 4; Nextel, p. 12; OPASTCO, p. 4; PCIA, p. 7; TCG, p. 5; Vanguard, p. 3) that Central Office ("CO") code assignment functions should also be centralized within the NANP administrator, as suggested in the NPRM (9 FCC Rcd. at 2073), and only LECs (Bell Atlantic, pp. 3-4; CBT, p. 3; NYNEX, pp. 9-10; Pacific Companies, pp. 6-7; SBC, p. 10; USTA, p.8; U S West, p. 9) suggest that the centralization should be delayed to permit the new NANP administrator to become familiar with all of its responsibilities. There is no reason, however, why the new administrator could not be appropriately staffed to assume this responsibility from the beginning.

A majority of the commenters also agree that the Oversight Committee should rely on consensus to arrive at decisions, and that in the absence of consensus, an intermediate alternative dispute resolution ("ADR") process could be employed before the Commission is called on to resolve disputes.<sup>18</sup> Just as they did in FNF, certain LECs (Ameritech, p. 4; BellSouth, p. 9; NYNEX, p. 7; Pacific Companies, p. 5; USTA, p. 5) claim that an ADR process that relies on "facilitation," for example, would be sufficient. As MCI (p. 10) and others show, however, the increasing criticality of numbering resources in competitive communications markets dictates that disputes must be resolved on a timely basis and with finality. For this reason, it would be more appropriate to adopt an ADR process based on arbitration and not facilitation.<sup>19</sup> WZ1NO should establish guidelines requiring that if the Oversight Committee is unable to reach consensus in a certain amount of time (e.g., six months), the issue would be presented to an arbitrator for decision. Ultimately, all parties could continue to address concerns directly to the Commission, through a complaint proceeding or otherwise.<sup>20</sup>

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<sup>18</sup> AT&T, p. 11; BellSouth, p. 9; MCI, pp. 10-11; PCIA, p. 3.

<sup>19</sup> See AT&T, pp. 11-12; NATA, p. 5; Sprint, p. 8; TPI, p. 5.

<sup>20</sup> NPRM, 9 FCC Rcd. at 2072.

A few commenters (Bell Atlantic, p. 4; NYNEX, p. 6) would like the Oversight Committee to be a representative body, that is, membership would be limited to representatives of various industry segments. The majority of commenters demonstrate that the paramount concern with the new NANP administration is that it be neutral, and the best way to ensure neutrality is to have committee membership open to all interested private and government parties.<sup>21</sup>

With respect to funding for the WZ1NO, AT&T and the other commenters generally support the principles that were identified by the FNF funding subgroup, in particular, that all users of NANP resources should share in the funding of the WZ1NO uniformly and without discrimination.<sup>22</sup> There was also support for having NECA perform the function of implementing the funding mechanism, given its current experience managing industry-wide support funds (e.g., Universal Service Fund, Lifeline Assistance,

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<sup>21</sup> Ameritech, p. 3; AT&T, p. 9; ALTS, p. 4; MCI, p. 6; NARUC, p. 4. For this reason, most commenters also opposed having either NECA or ATIS as the NANPA (see, e.g., ALTS, p. 4; CTIA, p. 3; McCaw, p. 3; MFS, p. 3; Telaccess, p. 3). Suggestions (U S WEST, p. 5; SBC, p. 5) that membership should be limited to those entities with a "material" interest would also inappropriately limit membership. Any entity that wants to participate can determine for itself if its interest is "material."

<sup>22</sup> AT&T, pp. 12-13; CTIA, p. 6; GTE, p. 13; MFS, p. 5; NARUC, p. 5; PCIA, p. 8; Sprint, p. 9; Stentor, p. 3; USTA, p. 9; Vanguard, p. 12.

Telecommunications Relay Services ("TRS")).<sup>23</sup> And based on the comments (see AT&T, p. 13; CTIA, p. 6; Pacific Companies, p. 7; PCIA, p. 9; SBC, p. 7), it would not appear to be necessary to implement Commission fees (NPRM, 9 FCC Rcd. at 2073) to cover the Commission's expenses for oversight of the NANP.

#### CONCLUSION

As the comments show, the Commission should require that interstate intraLATA toll calls be delivered to the customer's presubscribed interexchange carrier, and require nationwide, uniform 1+ ten-digit dialing for all toll calling. Further, the Commission should find that the transition period for the conversion from three- to four-digit CIC codes will be a minimum of six years, and

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<sup>23</sup> See, e.g., AT&T, p. 13; PCIA, p. 9.

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possibly longer if market forces require. Finally, the Commission should direct that a WZ1NO be established to ensure the availability of critical numbering resources for existing and new services.

Respectfully submitted,

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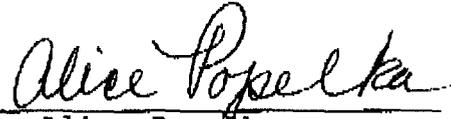
1. Ad Hoc Telecommunications Users Committee ("Ad Hoc")
2. AirTouch Communications ("AirTouch")
3. Alliance for Telecommunications Industry Solutions ("ATIS")
4. Allnet Communications Services, Inc. ("Allnet")
5. American Mobile Telecommunications Association, Inc. ("AMTA")
6. American Personal Communications ("APC")
7. American Petroleum Institute ("API")
8. Ameritech Operating Companies ("Ameritech")
9. Association for Local Telecommunications Services ("ALTS")
10. Bell Atlantic Telephone Companies ("Bell Atlantic")
11. Bell Communications Research, Inc. ("Bellcore")
12. BellSouth Corporation ("BellSouth")
13. Canadian Steering Committee on Numbering ("CSCN")
14. Cathey, Hutton and Associates, Inc. ("CHA")
15. Cellular Telecommunications Industry Association ("CTIA")
16. Cincinnati Bell Telephone Company ("CBT")
17. Communications Managers Association ("CMA")
18. Competitive Telecommunications Association ("CompTel")
19. Dean Brothers Publishing Company ("Dean Brothers")
20. GTE Service Corporation ("GTE")

21. GNVW Inc./Management ("GNVW")
22. LCI International Telecom Corp. ("LCI")
23. McCaw Cellular Communications, Inc. ("McCaw")
24. MCI Telecommunications Corporation ("MCI")
25. MFS Communications Company, Inc. ("MFS")
26. Missouri Public Service Commission ("MoPSC")
27. National Association of Regulatory Utility Commissioners ("NARUC")
28. National Communications System ("NSC")
29. National Exchange Carrier Association, Inc. ("NECA")
30. Nextel Communications, Inc. ("Nextel")
31. North American Telecommunications Associaton ("NATA")
32. NYNEX Corporation ("NYNEX")
33. Organization for the Protection and Advancement of Small Telephone Companies ("OPASTCO")
34. Pacific Bell and Nevada Bell ("Pacific Companies")
35. Personal Communications Industry Association ("PCIA")
36. Rock Hill Telephone Company, Fort Mill Telephone Company, Lancaster Telephone Company ("RH/FM/L/TC")
37. Southwestern Bell Corporation ("SBC")
38. Sprint Corporation ("Sprint")
39. Stentor Resource Centre Inc. ("Stentor")
40. Telaccess ("Telaccess")
41. Telco Planning, Inc. ("TPI")
42. Telecommunications Resellers Association ("TRA")

43. Teleport Communications Group Inc. ("TCG")
44. United States Telephone Association ("USTA")
45. U S WEST, Inc. ("U S WEST")
46. Vanguard Cellular Systems, Inc. ("Vanguard")
47. VarTec Telecom, Inc. ("VarTec")

CERTIFICATE OF SERVICE

I, Alice Popelka, do hereby certify that a true copy of the foregoing Reply Comments of AT&T Corp. was served this 30th day of June, 1994, by United States mail, first class, postage prepaid, upon the parties listed on the attached service list.

  
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