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

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

MCI REPLY COMMENTS

MCI TELECOMMUNICATIONS CORPORATION

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## SUMMARY

Most commenters agree that, beyond having the requisite expertise, the new organization(s) handling numbering issues must be free of the influence of any segment of the telecommunications industry. After reviewing the comments of other parties in this proceeding and reflecting on its own experiences, MCI concludes that the North American Numbering Plan (NANP) administrator should not be selected by The Alliance for Telecommunications Industry Solutions (ATIS). ATIS has been too closely associated with the local telephone industry to now function as an impartial entity. It is unreasonable for companies to be expected to reveal crucial technical information which has the possibility of finding its way to a perceived competitor.

Recognizing the importance that the NANP Administrator will play in the new numbering regime and that it be a "fair umpire," MCI believes that the NANP Administrator should report directly to the Commission. The NANP Administrator should also be selected by the Commission itself. MCI believes the Commission should play an active role in formulating effective management of numbering issues and should give specific direction, structure, and processes for the telecommunications industry to follow in

handling NANP issues and should provide an effective dispute resolution mechanism to ensure that important numbering issues and recommendations are decided and forwarded to the Commission.

MCI does not oppose ATIS sponsorship of a NANP oversight committee if (1) ATIS recognizes its new broadened constituency interests; (2) ATIS establishes an effective industry numbering policy development structure; and (3) the Commission directs the establishment of an effective dispute-resolution mechanism.

MCI believes it is important that mechanisms be put in place to facilitate the development of widely shared agreement or consensus on numbering issues. To accomplish this, it is essential that the NANP oversight committee have "open" membership and that membership not be limited to particular representatives. To do otherwise would skew the development of policy in favor of the local exchange companies, which would constitute the dominant voting bloc. To ensure that positions on numbering issues reflect the shared view of a variety of interests, decisions should be made on a "substantial consensus" basis.

To avoid customer confusion as to when a toll call is being placed, MCI supports the use of "1" as the toll indicator for all calls. This view is shared by not only other interexchange providers, but by a number of other interests in the industry.

Finally, MCI believes interstate intraLATA equal access should be authorized. Intrastate intraLATA competition has worked very well in jurisdictions which authorize it, resulting in lower toll rates to consumers. There is no reason why the same results would not apply here.

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North American Numbering Plan ) Phase One and Two

REPLY COMMENTS

MCI Telecommunications Corporation (MCI) hereby furnishes its comments in reply to comments filed by other parties in the above-captioned proceeding.<sup>1/</sup>

Background

In its initial comments, MCI concurred in the Commission's recommendation that North American Numbering Plan (NANP) administrative functions be handled by a nongovernmental entity that would receive direction from a nongovernmental oversight committee within the Alliance for Telecommunications Industry Solutions (ATIS).

MCI recommends that policy recommendations be made to the Commission by an ATIS-sponsored, industry consensus forum on numbering issues, so long as the Commission directs the formation of an industry numbering consensus structure and process, and adopts of an effective dispute resolution mechanism. The latter is essential to have in place, if industry consensus cannot be

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<sup>1/</sup> FCC 94-79, released April 4, 1994. Initial comments were filed on June 7, 1994.

reached on any numbering issue within a reasonable time period. To function effectively, it is also essential that ATIS recognize its broadened constituency interests -- beyond local exchange carriers (LECs) -- and be amenable to implementing a Commission directed industry numbering policy development structure and process.

In its initial comments, MCI supported a nationwide uniform use of the digit "1" as a toll identifier and further supported the proposition of consumer choice in presubscription to the interstate intraLATA carrier of their choice. Further, MCI did not oppose the Commission's proposal for a six year permissive dialing period associated with the implementation of four digit Feature Group D Carrier Identification Codes (CICs). Finally, MCI argued that issues relative to local number portability and 500 Service Access Codes (SAC) numbering be resolved in other proceedings as expeditiously as possible.

#### The NANP Administrator Should Report Directly to the Commission

In its initial comments, MCI took the position that ministerial functions should be removed from Bellcore and handled by an impartial nongovernmental entity that would be hired by and report to ATIS. However, in light of the comments of other parties in this proceeding and its own experiences to date, MCI no longer supports ATIS sponsorship of NANP administration.<sup>2/</sup>

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<sup>2/</sup> Other parties also oppose ATIS as a sponsoring organization. See comments of Airtouch Communications (Airtouch) at 4; The Cellular Telecommunications Industry Association (CTIA)

Rather, MCI has concluded that, independent of a nongovernmental oversight committee under ATIS sponsorship, the public would best benefit from a NANP administrator who reports directly to the Commission.<sup>3/</sup>

Several reasons have persuaded MCI to alter its position. Primarily, MCI is persuaded by the arguments of many commentators that no entity closely associated with an industry segment should provide sponsorship of the NANPA function. Even a perception that the holder of the contract could exert undue influence on the NANPA entity is unacceptable. Certainly, changing from Bell Communications Research Corporation (Bellcore) sponsorship to ATIS sponsorship would provide only minimal improvement over what the industry has recognized as an unmanageable situation.

MCI would like to draw particular attention to the fact that ATIS has only recently expanded its membership beyond the LEC community. Even though ATIS has opened its membership to non-LECs, the ATIS Board of Directors is still dominated by them.

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at 3; MFS Communications Company, Inc. (MFS) at 3; McCaw Cellular Communications, Inc. (McCaw) at 4; Vanguard Cellular Systems, Inc. (Vanguard) at 11; Telaccess at 3; Ad Hoc Telecommunications Users Committee (Ad Hoc) at 5; and Allnet Communication Services, Inc. (Allnet) at 7.

<sup>3/</sup> Other parties agree that the Commission should assume NANP administrator responsibilities. See, e.g. comments of the National Communications System (NCS) at 5; Allnet at 7; and Telaccess at 4. Commission handling of NANP responsibilities is consistent with a number parties who call for the Commission to play a greater role in the industry policy development process. See comments of MFS at 2-5; NCS at 4-5; Dean Brother Publishing Company (Dean Brothers) at 2-3; Nextel Communications, Inc. (Nextel) at 3-8; Vanguard at 3-6; Telaccess at 4; National Exchange Carriers Association, Inc. (NECA) at 11; McCaw at 2-8; and Air Touch at 2-3.

The current Board is comprised of twenty-one LECs, three interexchange carriers, two Competitive Access Providers, and Sprint, which has both a LEC and an interexchange carrier interest. Consequently, there is a significant risk that a NANP administrator under contract to ATIS will be unduly influenced by the LEC dominated ATIS Board.

In addition, if ATIS were to be tasked with sponsoring the NANP administration function, a potential would exist for the ATIS legal counsel to influence the administrator. Since the counsel serves at the pleasure of the ATIS LEC-dominated Board, it must be concluded that LEC interests may be favored over those of other interests.

On the other hand, administration of the numbering plan under the direct reporting supervision of the Commission would have several advantages. First, it would eliminate any potential conflict of interest or bias. Further, it would be responsive to many of the commentators that urged direct Commission involvement in the administrative function. Finally, it would seem to remove any issue as to whether the Commission could implement fees to pay the NANP administrator since, clearly, the funds would be collected to offset the costs associated with the performance of a governmental function.

#### Selection of NANP Administrator Should Be by FCC

If the NANP Administrator is selected through a competitive bidding process, the Commission itself should make the selection.

If not, the Commission should act to establish the NANPA activity in a manner similar to the way it established the National Exchange Carrier Association, Inc. (NECA). As with NECA, the new NANPA could function pursuant to the rules and guidelines which the Commission establishes for this purpose.<sup>4/</sup>

#### The ATIS Oversight Committee Should Have Open Membership

It is beyond rational dispute that eligibility for the nongovernmental oversight committee within ATIS must be open to all interested persons. This will ensure the widest possible discussion of viewpoints and positions and will facilitate the building of an industry consensus on numbering issues. Moreover, it is unreasonable to expect competitors to represent each other's interests in areas as contentious as the use, allocation and assignment of numbering resources.

Consequently, MCI strongly opposes any "representative" plan such as that proposed by NYNEX Corporation (NYNEX),<sup>5/</sup> which would restrict the membership of a policy board to those representing various industry entities.<sup>6/</sup> Not only would the plan limit discussion of issues and stifle efforts to build industry

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<sup>4/</sup> This is not to suggest, of course, that NECA would be the appropriate entity to be selected here.

<sup>5/</sup> See comments of NYNEX at 6.

<sup>6/</sup> See also comments of American Mobile Telecommunications Association, Inc. (AMTA) at 5; Bell Atlantic at 4; and Air Touch at 2. MCI does not object to the proposition that an oversight committee be placed within the ATIS organizational structure. MCI is less concerned about possible bias because consensus procedures are proposed to be followed.

consensus but, when coupled with its definition of consensus ("more than a simple majority but less than unanimity"), NYNEX's proposal would skew policy outcome in favor of LEC interests, given LEC policy board domination. Thus, the NYNEX proposal would guarantee 55% of the seats on the ATIS policy board to LECs, including NYNEX, while dividing the remaining seats among other diverse interests.

#### Consensus Decisionmaking Should be Followed

The ATIS oversight committee should not set policy but, rather, should facilitate industry consensus on policy issues through the committee system. Generally, MCI believes that informal industry processes are valuable as a means of avoiding lengthy and formal governmental processes. MCI also believes that the industry consensus process should protect the rights of all participants, especially those of minority interest groups, as in the case of the American National Standards Institute (ANSI) due process.

It is apparent that decisions based upon a simple majority vote could easily lead to the dominance of one set of interests over others. MCI therefore proposes that all NANP decisions be determined by the standard of a "substantial consensus within and among interest groups."

As indicated in its "Numbering Process Proposal" (FNF/94-042, a copy of which was attached to its initial comments), there is a sound basis upon which to end the posturing and redundant

arguments that too often accompany discussions and delay resolution of important issues. The proposal provides that arbitration be used as the means to resolve disputes when consensus is not achievable within a specified time frame and sets forth details of procedures that should be used. The results of arbitration would be binding on the Committee to the same extent that any industry consensus is binding, and should be incorporated in relevant documents issued, without any further debate in the industry forum process.

MCI Qualifiedly Supports Sponsorship by a Reformed ATIS of the Industry Forum Activities

As distinguished from MCI's opposition to ATIS sponsorship of the NANP administrator, MCI does not oppose ATIS sponsorship of an oversight committee and industry consensus process, provided certain conditions are met. MCI does not oppose the limited ATIS sponsorship of an oversight committee if (1) ATIS recognizes its new broadened constituency interests; (2) ATIS establishes an effective industry numbering policy development structure; and (3) the Commission directs the establishment of an effective dispute-resolution mechanism. Sponsored by ATIS, the oversight committee could utilize the administrative support capabilities of ATIS, such as, providing meeting arrangements, meeting notices and staffing assistant functions. In such a structure, the scope of the Industry Numbering Committee (INC) could be broadened to include the activities of the Future of Numbering Forum (FNF) and could report directly to ATIS on a

"peer level" with the Carrier Liaison Committee. With Commission direction, this structure could quickly be put in place.<sup>7/</sup>

With regard to the composition of the new organizational structure, MCI supports several suggestions by commentators. MCI supports the comments of Nextel Communications, Inc. (Nextel) that the Commission should require Bellcore to file a report indicating the full range of NANP activities.<sup>8/</sup> MCI agrees that this would help make informed decisions about functions and costs of the new organization. MCI also supports the notion that any new organization should be subject to periodic evaluation to ensure that it is carrying out its mandate.

MCI opposes the suggestion made by the Association for Local Telecommunications Services (ALTS) concerning the need for public comment with respect to all existing NANP policies developed by Bellcore.<sup>9/</sup> Nextel's suggestion discussed in the previous paragraph would accomplish the same result much more efficiently. One concern in acting on ALTS's approach is that using existing NANP policies as a point of departure for policies of the new organizational structure would run the risk of resulting in only minor changes to existing policies, when a broad consensus

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<sup>7/</sup> Due to the concerns mentioned herein, MCI agrees with Sprint that ATIS should not be permitted to veto or override the decisions of the oversight committee. See comments of Sprint at 3.

<sup>8/</sup> Nextel comments at 14-15.

<sup>9/</sup> ALTS asks that Bellcore policies be distributed for public comment and Commission approval prior to any shift in ministerial responsibilities. Comments of ALTS at 8.

appears to exist for major reform. Additionally, subjecting the procedures to public comment would further delay implementation and would be redundant if Nextel's suggestion were adopted.

Digit "1" Should be used as a Toll Indicator

MCI supports the use of "1" as the toll indicator for all toll calls, a view shared by not only other interexchange providers,<sup>10/</sup> but by a number of other interests in the industry as well.<sup>11/</sup> MCI firmly believes that dropping the "1" as a toll indicator would result in customer confusion, which of course should be avoided to the maximum extent possible in any industry action.

Predictably, opposition to this proposal comes from the LECs.<sup>12/</sup> GTE Service Corporation (GTE) argues that with new numbering plan areas, the digit "1" would indicate to switching systems that 10 digits will follow which, GTE argues, may not necessarily mean a chargeable toll call to the dialing customer.<sup>13/</sup> Pacific Bell argues that "1" should not be used as

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<sup>10/</sup> See the comments of AT&T at 6, Sprint at 10, LCI International Telcom Corp. (LCI) at 1, and Comptel at 1.

<sup>11/</sup> See the comments of the American Petroleum Institute (API) at 2, the North American Telecommunications Association (NATA) at 9, the Canadian Steering Committee on Numbering (CSCN) at 2, and The Ad Hoc Telecommunications Users Committee (Ad Hoc) at 9.

<sup>12/</sup> The comments of the following parties show opposition to the mandatory use of such dialing: US West at 13, Pacific Bell at 10, Bell Atlantic at 6-7, Ameritech at 6, and GTE at 14-15.

<sup>13/</sup> Comments of GTE at 14-15.

a toll indicator because it would require the introduction of four second time delays on its network.<sup>14/</sup>

In both arguments, GTE and Pacific Bell fail to explain the entire scenario. GTE fails to note that mandatory 10-digit dialing alleviates the need to use the prefix "1" to indicate that 10 digits follow. Pacific Bell fails to point out that its timing proposal is only needed where both 7 digit and 10-digit toll calling exist. Neither concern is valid when "1" is used to indicate that a toll call is being placed and mandatory 10 digit dialing is implemented. The concerns of GTE and Pacific Bell's also appear to be inflated, given North American Telecommunications Association (NATA) reports that equipment manufacturers have already taken steps to adjust to these matters.<sup>15/</sup>

#### Interstate IntraLATA Equal Access Should be Authorized

MCI supports the authorization of interstate intraLATA "1+" dialing parity and presubscription, as do a number of other parties.<sup>16/</sup> It agrees with AT&T, the Competitive Telecommunications Association (Comptel) and the Telecommunications Resellers Association (TRA) that such

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<sup>14/</sup> Comments of Pacific Bell at 9-10.

<sup>15/</sup> See the comments of NATA at 10.

<sup>16/</sup> See the comment of API at 5, MFS at 6, VarTec at 7, AT&T at 4, Ad Hoc at 13-14, LCI at 2, Telco Planning at 3, Comptel at 3, Telecommunications Resellers Association (TRA) at 1, and Allnet at 1.

presubscription would increase competition.<sup>17/</sup>

MCI also agrees with Comptel and TRA that authorization of 1+ interstate, intraLATA presubscription would do no more than force the LECs to inform their customers that they may continue to use the LEC by dialing 10XXX plus the long distance number, the same conditions under which interexchange carriers conduct their business.<sup>18/</sup> Moreover, MCI also agrees with Comptel that if LECs are required to compete on an access-code basis, they will seek to minimize the costs of implementing two-PIC (presubscribed interexchange carrier) capabilities. MCI agrees with TRA's assessment that if 1+ equal access were extended to the interstate, intraLATA toll market, carriers would bring to business and residential customers in that market the same "superior" rates and service they now provide in the interstate interLATA market.<sup>19/</sup>

Predictably, the LECs want to continue the practice of screening and carrying for themselves interstate intraLATA calls.<sup>20/</sup> In their comments, these parties generally argue that

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<sup>17/</sup> See the comments of TRS at 7, AT&T at 4, and Comptel at 4.

<sup>18/</sup> Pursuant to the Carrier Identification Code Guidelines, LECs can and do have carrier access codes. For instance, New Jersey Bell's CAC is 10652 and Bell South's CAC is 10187. See "Carrier Identification Code Administration Guidelines", Industry Compatibility Forum, ICCF 92-0726-002, June 11, 1992.

<sup>19/</sup> Comments of TRA at 7.

<sup>20/</sup> The comments of the following parties show opposition to changing current LEC screening arrangements: Southwestern Bell at 10; BellSouth at 14; US West at 18; NYNEX at 18; Bell Atlantic at 7-8; Cathy Hutton & Associates at 3; Missouri Public Service

presubscription should not be ordered until the Regional Bell Operating Companies (RBOCs) are allowed to carry interLATA traffic, and that implementation of a 2-PIC system would be burdensome. Such arguments are based upon the false assumption that RBOCs and interexchange carriers operate on equal footing. They do not.

Foreclosure of the RBOCs from the interLATA market arises from a documented and well known history of years of monopoly abuse by the Bell system. With the divestiture of AT&T, the Modification of Final Judgment (MFJ) imposed restrictions on in order to limit the potential for these companies to exploit their monopoly power to the detriment of the public.<sup>21/</sup> No serious commentator could argue that the MFJ was also intended to restrict non-BOC entities from entry into intraLATA markets, especially for the carriage of interstate calls. In fact, it is clear that the court anticipated intraLATA competition.<sup>22/</sup> With this backdrop, the attempt to tie interstate intraLATA competition to their own restrictions has no legal basis and

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Commission at 3; Rock Hill, Fort Mill and Lancaster Telephone Companies at 3-4; Ameritech at 10; and GTE at 21.

<sup>21/</sup> See generally, Modification of Final Judgment Sec. II(D), cited in United States v. AT&T, 552 F. Supp. 131, 225-234 (D.D.C. 1982).

<sup>22/</sup> The divestiture court wrote "... the lack of competition in this [intraLATA] market would constitute an intolerable development. The opening up of competition lies at the heart of this lawsuit and of the decree entered at its conclusion, and the significant amount of the traffic that is both intrastate and intra-LATA should not be reserved to the monopoly carrier." United States v. Western Electric Co., 569 F. Supp. 990, 1005 (D. D.C. 1983).

disserves the public interest.

Intrastate intraLATA competition has worked well in the jurisdictions which authorize it, and there is no reason why the same results would not apply here. In its deliberation, the Commission should award great weight to the results of empirical studies which quantify the relationship between competition and intraLATA toll rates. One Commission study, of which judicial notice may be taken, showed that intraLATA toll rates were 4 percent lower for day and evening periods in states which allow intraLATA competition than in states which prohibit it.<sup>23/</sup>

In addition, the Federal Trade Commission released a study which concluded that states which restrict entry into intraLATA markets have toll prices that are approximately 7 percent higher than states which allow intraLATA competition.<sup>24/</sup> These studies offer compelling evidence that competition results in significant benefits to consumers and there is no reason to conclude that such benefits would not equally benefit consumers affected in these markets.

#### GTE's Permissive Dialing Analysis Distorts The Issue

GTE argues for a permissive dialing period of less than the

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<sup>23/</sup> The study was conducted by then Commission economist Chris Fentrup, "The Effect of Competition and Regulation on AT&T's Toll Prices, and of Competition on Bell Operating Company IntraLATA Toll Prices," June, 1988.

<sup>24/</sup> Alan D. Mathios and Robert P. Rogers, "The Impact of State Price and Entry Regulation on Intrastate Long Distance Telephone Rates", Bureau of Economics, Federal Trade Commission, November, 1988.

Commission has proposed. It contends that a six year permissive dialing period would require significant and unwarranted LEC investment or an unacceptable increase in post dial delays".<sup>25/</sup> GTE argues for aacknowledges elsewhere in its filing that its problems with post dial delay and LEC investment occur only after all of the 5XXX and 6XXX series CICs have been assigned.<sup>26/</sup> It is only after that point that a LEC switch would have to analyze a four digit CIC that may be in conflict with a three digit CIC. Consequently, permissive dialing could extend to a point in the future when the 5XXX and 6XXX are exhausted and the three thousand and first CIC code is assigned. In addition, GTE has neglected to mention that overlap outpulsing is not used with SS7 interconnection. Therefore, the post 5XXX and 6XXX post dial delay issue would not be experienced in an SS7 configuration, which GTE and the LECs have extensively deployed in their networks. In addition, based upon the past 10 years of experience with three digit CICs, the new 5XXX and 6XXX resource can be expected to last twenty years, as AT&T pointed out in its initial comments.

MCI believes that a reasonable approach to solving this problem would be to monitor the assignment rate and have the industry convene a meeting to address this issue when the fourteen hundredth CIC from the new 5XXX and 6XXX series has been assigned. This formula and process is similar to that which was

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<sup>25/</sup> Comments of GTE at 15.

<sup>26/</sup> Comments of GTE at 16.

used for the three digit CIC expansion (700th assignment).

CONCLUSION

For the reasons stated herein, the Commission should take into full account the comments set forth in MCI's initial comments, as modified or supplemented herein.

Respectfully submitted,

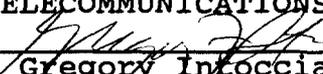
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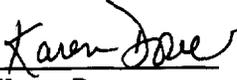
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