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OFFICE OF SECRETARY

Robert Daniel Hanssen

Chairman, Sprint Customer Advisory Committee

Chairman, Dallas-Forth Worth, Texas Sprint Users Group

April 06, 1994

The Honorable Reed Hundt
Chairman, Federal Communications Commission
1919 M Street
Washington, D.C. 20554

Re: Administration and implementation of the North American Numbering Plan; CC Docket No. 92-237

Dear Chairman Hundt:

As Chairman of the SPRINT Customer Advisory Committee, Chairman of the Dallas-Fort Worth, Tx. SPRINT Users Group, and a user of telecommunications services; I wish to address several significant concerns regarding implementation and administration of the North American Numbering Plan; (NANP).

I realize that we have depleted the potential number combinations under the current numbering plan and acknowledge the general benefits of NANP. However, the sweeping changes outlined and proposed for implementation in January, 1992 have the potential to create a profound negative impact; (both economically and operationally), on virtually every citizen in private, commercial, and government sectors.

It is deeply disturbing that decisions are being made with so little input from a limited number of people concerning an issue that will impact all of us for the next ten or more years. Specifically, public awareness of the FCC Notice of Inquiry in this matter and implications thereof is virtually non-existent except among a few select individuals.

Even though the overall approach is to phase in the NANP over a period of time, who will make the continuous changes to the telephone systems, facsimile machines, auto dialers, personal computers, mainframe computers, and countless other machines that use telecommunications interface to accomplish their task/s? How many of these machines will become obsolete or require expensive

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upgrades? What will be the cost to re-write and test the billions of lines of computer code to accommodate the new numbering plan? What will be the impact to consumers in life threatening situations related to health care, police, fire, and other emergency services if mistakes are made and/or the public is not properly educated? Unfortunately, it is the consumer who will bear the burden of this change, both financially and personally.

I am reminded, by this matter, of the Hearing Aid Compatibility Act which was, and is, a necessary change that benefits all sectors of the population. Unfortunately, it too was poorly communicated and preparation for implementation was poorly administered. This created a delay in implementation and ballooning costs. The costs were originally estimated at pennies per phone and soared to over $20.00 per phone in some cases. The final result was a scaled down implementation of the Act.

Before I could fully support changes to the NANP, it must pass the litmus test of reasonability and the application of consumer awareness. However, I do not think this has occurred and that very little consideration has been given to the technical and financial impact of implementation on small, medium, and large businesses as well as residential users. The following sections summarize the basis for these concerns.

1. Failure to adequately communicate information related to NANP to the public.

As recently as January, 1994; many of our PBX vendors knew nothing about a change in the NANP. Fewer yet were aware the change is scheduled to take effect January, 1995. Today, if you ask the general public, you will discover that very few have heard about the plan and those that have do not understand the impact.

2. The operations/systems impact on consumers of multiline PBX, Centrex, and other business telephone systems appears to have been ignored.

a.) To control costs, ensure customer satisfaction, and manage their telecommunications network; most companies utilize software programs such as "Call Accounting", "Least-Cost-Routing", "Speed-Dial", and "Network Dialing Plans". With the implementation of NANP the software programs used in these applications must be updated, upgraded, or replaced.

General discussions have been held with vendors in regard to this concern. The following are the results of those discussions:

Executone - PBX software which is compatible with NANP does not exist at this time and there are no plans in place to create such. They will, on a quarterly basis, manually update existing software programs in each PBX at a cost to their customers.

ISI Infortext - Current Call Accounting software programs are not compatible with NANP and will not accommodate an update to be compatible. It will be necessary for the customer to purchase a new software program for each of their PBXs.

Rolm - PBX software programs purchased in 1993 are compatible with NANP. Software programs purchased prior to that time will require updates at a cost to the customer.

Northern - The Northern SL1-NT REL14 is not compatible with NANP and will require an upgrade to an REL19, at a cost to the customer.

AT&T - The AT&T G1 is not compatible with NANP and will require an upgrade to a G1-N at a cost to the customer. Additionally, the AT&T Horizon can not be upgraded and must be replaced entirely, at a major expense to the customer.

b.) Companies who hard-code phone numbers into PC systems and host computer systems for security and ease of use will have to pay programmers to re-key phone numbers and dialing procedures to accommodate NANP.

c.) Business and residential uses of PCs who use dial-up software programs to access public networks and business systems will have to; in some cases, purchase new software programs to accommodate NANP.

These concerns are compounded given the fact that Bellcore has not resolved all issues related to the implementation of NANP. Many issues are still in the "recommendations" stage. As these are resolved and phased in, will consumers be required to purchase new software/systems, as those just purchased or updated with the last phase will become obsolete?

3. **An apparent lack of FCC regulation of telecommunications providers and vendors resulting in a financial impact/burden on consumers.**

As in the examples sited in item "2", each vendor has taken their own direction in accommodating NANP. Each has decided what software/systems can be updated, upgraded, or must be replaced. Additionally, each has established a cost associated with each respective action.

Since the FCC has mandated the implementation of NANP, consumers have no choice but to modify their telephone systems. This leaves the consumer at the mercy of the telecommunications providers and vendors. Without regulation, the consumer must pay whatever the provider or vendor requires for the necessary modifications to maintain normal operations. This opens the door for telecommunications providers and vendors to make unprecedented high profits.

Additionally, there will be an implementation cost incurred by Local Exchange Carriers for NANP. This cost will ultimately be passed on to the consumer. This raises several questions/concerns:

* Will this be accomplished by increased rates or via surcharges?

* Will it be based on number of phones, type of phone service/s, number of calls, or number of minutes used?

* Who establishes what costs constitute implementation of NANP and which should/should not be passed on to the consumer?

* Will it be calculated based on Bellcore estimates or after the fact when the true dollar amount is known; anticipating Bellcore estimates to be substantially below what the actual costs will be per analysts predictions?

*I understand NANP is to be accomplished in phases. Will the costs be passed on in phases?

* Will the charges be one-time, monthly, or indefinite?

* Since Bellcore has the responsibility for administrating NANP, what regulations are in place to prevent the Bell Companies from making implementation decisions based on systems and programs they are already utilizing? Should this occur, it would result in proportionately greater implementation costs for other Local Exchange Carriers and as such greater costs to the consumers in these areas.

* If a company has offices in non-equal access areas, will their costs be substantially greater?

With implementation eight months away, resolution to these issues can not be delayed. A delay will result in an undue burden on US businesses and could, when combined with other economic factors, create overwhelming economic hardships for many. These grave concerns have also been addressed by other groups. The groups I represent fully endorse the AD HOC Telecommunications Users

Committee's reply comments to the FCC Notice of Inquiry in this matter and will continue to monitor the activities related to the implementation of NANP.

Should you or any member of your staff wish to contact me concerning any issue in this matter, please feel free to do so.

Sincerely,

Robert Daniel Hanssen
Chairman, SPRINT Advisory Committee
Chairman, Dallas-Fort Worth, Tx. SPRINT Users Group

cc: President William J. Clinton -
President of the United States of America

Vice-President Albert A. Gore
Vice-President of the United States of America

Senator Ernest F. Hollings -
Chairman of the Senate Committe on Commerce, Science, and Transportation

Congressman John D. Dingell -
Chairman of the House Committe on Energy and Commerce

William Cafon -
Acting Secretary of the Federal Communications Commission

Sprint Customer Advisory Committee

Dallas-Fort Worth, Texas Users Committee