

November 23, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

Re: *RM-8535, Provision of Access for 900 Number Service*

On behalf of Pacific Bell, please find enclosed an original and six copies of its "Comments in Response to Teleservices Industry Association's Petition For Rulemaking" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Provision of Access for) RM No. 8535
900 Number Service)
_____)

PACIFIC BELL'S COMMENTS IN RESPONSE TO
TELESERVICES INDUSTRY ASSOCIATION'S PETITION FOR RULEMAKING

Pacific Bell agrees that providing number portability for 800 services has increased competition in that market. Competition for 900 transport could be likewise improved if 900 subscribers are able to keep their numbers and move their service to competing carriers. However, we disagree that the 800 Database system could be quickly and cheaply modified to include 900 services.

I. The 800 Database Service System Can Only Support 800 Services

The proposition that the 800 Database Service System could be easily expanded to include 900 services seems logical. The 800 Database Service System in place today works in the manner described in the Teleservices Industry Association's Petition for Rulemaking (TIA's Petition) at Attachment A. Calls are routed generally as described.

However, the system was designed as a dedicated system for 800 service. To be most efficient, all numbers handled in the system are assumed to be 800 numbers. For example, the Service Control Points (SCPs) that work with the 800 Service Management System are hard-coded to handle 800 services. Therefore, only the last seven digits are necessary to determine how the 800 call should be handled. Using the same system to accommodate 900 services would require that the software for 800 SCPs be modified to first determine if the query is for an 800 or 900 service. This additional screening may delay the processing of all 800 and 900 calls.

Modifications to distinguish a 900 call or record from an 800 call or record would also be necessary in other areas such as number administration, customer record input, mechanized generic interface, carrier notification and approval, record loading into the Service Management System (SMS), service maintenance, and other system analysis and testing functions. Such software changes would take time and resources to implement at an unknown cost.

Additionally, the 800 Database Service System handles billions of 800 queries annually. The SMS system would need increased capacity to handle 900 services. The addition of 308

NXXs (up to 308,000 records) assigned for 900 services would need to be accommodated.

We thus have several primary concerns with using the 800 system for 900 portability that would need to be resolved. Call processing record capacity, 800 (TCAP) query processing capacity and the modifications necessary to handle the difference between 800 and 900 service must all be addressed well before any changes can be made to the 800 Database System for 900 services.

TIA's suggestion that such modifications to the 800 Database Service System could be undertaken without significant cost (TIA Petition at 15-18) is unfounded and unlikely. Although the 800 Database experience may be a good starting point for a working model for any service that could benefit from service provider portability, it does not follow that the 800 Database Service System itself should be used to provide that portability.

II. Administration For 900 Service Portability Should Also Be Separate From 800 Database Service

TIA also suggests in its Petition for Rulemaking that the administrative costs of implementing 900 portability would also be minimal because "almost all necessary regulatory ground rules have already been established for 800 number portability."

(Petition at 18.) Again, the 800 Database Service System administrative guidelines may serve as a starting model for 900

services. However, we should not assume that the needs for both services are the same. There may be differences that should be addressed by the industry. It would be better for the industry to agree on an approach rather than possibly compromising the 800 system without examining other options.

In addition to the modifications discussed above, increased support would be required for the Number Administration Support Center (NASC). The NASC handles 800 service inquiries from Responsible Organizations (Resp Orgs) that provide account record information. Additional staff would be necessary to handle 900 services. The billing functions of the NASC would also need to be increased and modified to identify and bill for administrative services for 900 service records.

At best, then, there are many unknowns associated with developing 900 portability. The 800 Database Services model is one example to be reviewed but there may be other models, perhaps based on AIN (Advanced Intelligent Network) technology that would be more appropriate. In order to determine which solutions are best for 900 portability, a full review of network and regulatory options should first be initiated by the industry.

III. Any Review Of Possible Options Will Need to Consider Cost Recovery Issues

800 services generated over \$5 billion in national revenues in 1993. The magnitude of 800 services justified the development of the Database System. TIA states (at i.) that "pay-per-call revenues totaled approximately \$600 million" in 1993. It isn't clear how much of this revenue is associated with 900 services, as opposed to other pay-per-call services (i.e., 976 services). If a portability solution for 900 services could be developed, the costs of developing it must be recovered. Today, access to interexchange carriers for 900 services is provided using six digit screening at our end offices. There is no charge or rate associated with that process. A 900 database query will require a per query charge. And, based on the much lower volume of 900 traffic, the unit cost, on a per query basis, might be much higher than that for 800 queries.

IV. Conclusion

We agree that number portability for 900 services would provide more choice. The industry should examine the 800 Database Service System and analyze whether it can be easily or inexpensively modified to accommodate 900 services. The industry should also review other alternatives. The Commission must

carefully consider all available options before issuing a rulemaking.

Respectfully submitted,

JAMES P. TUTHILL
THERESA L. CABRAL

A handwritten signature in cursive script that reads "Theresa L. Cabral". The signature is written in black ink and is positioned above a horizontal line.

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Date: November 25, 1994