

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C 20554

In the Matter of )  
 )  
Teleservices Industry Association's )  
Petition for Rulemaking to Amend )  
the Commission's Rules Concerning )  
Provision of Access for 900 )  
Number Service )

RECEIVED  
RM-8535 NOV 23 1994  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

COMMENTS

Sprint Corporation hereby submits its comments on the above-captioned petition filed by Teleservices Industry Association, pursuant to the Commission's October 25, 1994 Public Notice (Report No. 2037).

The Teleservices Industry Association has petitioned the Commission to initiate a rulemaking proceeding that would establish rules and regulatory policies for 900 number portability. Currently, 900 access customers are assigned specific NXX codes. 900 calls are routed using a six-digit screening to the appropriate access customer which provides 900 interexchange transport service. Because 900 calls are routed in this way, a subscriber to an interexchange carrier's 900 transport service cannot change carriers without changing its 900 number. Thus, the 900 numbers are not "portable."

According to the Teleservices Industry Association, this lack of 900 number portability has restricted the development of competition among interexchange carriers providing 900 service and has resulted in inflated prices, fewer service

No. of Copies rec'd 078  
List A B C D E 000

options and a lower quality of service. The Association states that 900 number portability will bring significant benefits to consumers and can be implemented without significant cost.

Sprint recommends the initiation of a rulemaking proceeding which will address all number portability issues currently before the Commission, not just 900 number portability. For many services, number portability is a prerequisite to competition because it removes barriers which make customers captive to particular carriers and levels the playing field. The broad-based rulemaking should therefore include number portability for all services for which the lack of number portability impedes vigorous competition, including personal communications services or 500 access, local service, and 900 access. It should also consider future services which will require number portability. An integrated approach to the number portability issues will result in efficiencies and reduced implementation costs.

The Commission has recognized the importance of number portability for various services. For example, in discussing 500 number portability, the Commission stated in its May 3, 1994 letter from Richard Metzger to Ronald Connors that it "continue[s] to believe that number portability should be achieved as expeditiously as possible." The Commission encouraged Bellcore "to continue to work with the Industry Numbering Committee to develop an implementation plan that will lead to number portability within the 500 code without

the need for further Commission proceedings." Id. Sprint, however, urged the Commission to open an investigation of the 500 number portability issue and to establish an implementation schedule as the most expeditious way to implement number portability. See, Comments of Sprint on Petitions for Waiver of Part 69 for 500 access service, filed August 30, 1994.

In the Notice of Inquiry in CC Docket No. 92-237, In the Matter of Administration of the North American Numbering Plan, the Commission sought comment on local number portability. 7 FCC Rcd 6837 (1992). The Commission noted the arguments made by competitive access providers "that the inability of customers to change carriers without changing telephone numbers provides a barrier to local competition." Id. at 6842. In its subsequent Notice of Proposed Rulemaking, the Commission stated that it "recognize[d] the importance of local number portability to the promotion of competition in the local exchange market." 9 FCC Rcd 2068, 2075 (1994). However, it decided to defer consideration of the issue because it believed "far more study of the technical feasibility, implementation costs, and overall benefits of such portability is needed before we can determine whether this Commission should mandate local number portability." Id. A number portability rulemaking would address these issues identified by the Commission for local number portability, as well as issues related to number portability for various access and other services.

Efficiencies will be gained and technical solutions will be improved by addressing all number portability issues together, rather than in a piecemeal fashion. Based on the outcome of the rulemaking, software and facilities can be designed to accommodate all existing and future services which require number portability. The alternative--addressing number portability for services on a case-by-case basis--will require the design and implementation of new software and facilities for each service. Such an approach would be more costly and inefficient.<sup>1</sup>

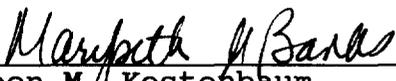
---

<sup>1</sup>The Teleservices Industry Association asserts without any implementation design or cost justification that "900 number portability can be implemented without significant cost." Petition at 15. This assertion is based on the Association's belief that "[t]he transmission infrastructure ...has been deployed, and the facilities necessary to operate the database likewise are in place" and "the major expense to complete infrastructure deployment is the software necessary to make the 900 number database work." Petition at 17. Unfortunately, the screening and routing information for 900 service cannot be simply appended to the 800 data base. Therefore, the Association's belief that the cost of implementing 900 number portability will be minimal is not correct.

Thus, Sprint urges the Commission to open a broad-based rulemaking to address all number portability issues currently before it. An integrated approach will produce superior results and will promote competition in existing and future services.

Respectfully submitted,

SPRINT CORPORATION

  
\_\_\_\_\_  
Leon M. Kestenbaum  
Jay C. Keithley  
Marybeth M. Banks  
1850 M Street, N.W., Suite 1110  
Washington, D.C. 20036  
(202) 857-1030

Craig T. Smith  
P.O. Box 11315  
Kansas City, MO 64112  
(913) 625-3065

November 23, 1994

**CERTIFICATE OF SERVICE**

I, Joan A. Hesler, hereby certify that on this 23rd day of November, 1994, a true copy of the foregoing "COMMENTS" of Sprint Corporation, was served U.S. First Class Mail, Postage Prepaid, or Hand Delivered, upon each of the parties listed below.

  
Joan A. Hesler

Kathleen Wallman  
Chief  
Common Carrier Bureau  
FEDERAL COMMUNICATIONS COMM.  
1919 M Street, N.W.  
Room 500  
Washington, D.C. 20554

Peggy Reitzel  
Common Carrier Bureau  
Room 544  
FEDERAL COMMUNICATIONS COMM.  
1919 M Street, N.W.  
Washington, D.C. 20554

INTERNATIONAL TRANSCRIPTION  
SERVICE  
1919 M Street, N.W.  
Room 832  
Washington, D.C. 20554

David Nall  
Acting Chief  
Tariff Division  
FEDERAL COMMUNICATIONS COMM.  
Room 518  
1919 M Street, N.W.  
Washington, D.C. 20554

Edwin N. Lavergne  
Rodney L. Joyce  
GINSBURG, FELDMAN & BRESS  
1250 Connecticut Avenue, N.W.  
Washington, D.C. 20036