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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 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)

COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

The Teleservices Industry Association (TIA) has filed a Petition for Rulemaking, seeking national service provider portability for the 900 Service Access Code (SAC). In the current 900 service, Interexchange Carriers (IXCs) are assigned specific NXX (N=1-9; X=0-9) codes within the 900 SAC; thus, a 900 subscriber wishing to change its IXC must also change its 900 number. Portability drives 800 data base service, and TIA wants Local Exchange Carriers (LECs) to utilize 800 technology in implementing 900 service provider portability.

Southwestern Bell Telephone Company (SWBT) consistently supported the concept of service provider portability in the 800 data base docket. Such portability, however, is not an end in itself, but is rather a means to expanded competition. If service provider portability will not increase competition, especially if the cost of implementation is high, purported benefits become problematic.

As the Commission is well aware, 900 service has been plagued for years by Information Providers (IPs) charging outrageous prices for questionable services. Congress passed the Telephone Disclosure and Dispute Resolution Act (TDDRA--47 U.S.C. § 228) to control these practices, and the Commission has

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promulgated rules thereunder (47 C.F.R. 64.1501 et seq.). Indeed, the Commission is currently conducting a Further Notice of Proposed Rulemaking in CC Docket No. 93-22 to determine if additional restrictions should be placed upon IPs.

Minutes of use for 900 service in SWBT's territory have shrunk--from an average of over 4 million per month in 1990 to less than 2.5 million in 1994. This reduction has not been caused by lack of 900 service provider portability, but rather by general public concern with the content and quality of 900 services.

Also, as Congress and the Commission have tightened pay-per-call rules, IPs have shifted their focus from 900 service altogether in an attempt to circumvent regulation. Today, many information services publications contain advertisements touting alternative IP dialing plans--800, POTS, 10XXX access and international numbers. Much of the decline in 900 service minutes of use is attributable to this migration, and 900 service provider portability will do nothing to stanch the flow.

Moreover, TIA has grossly underestimated the cost of implementing 900 portability. TIA incorrectly assumes that existing networks could perform 900 data base queries. Intelligent Network One (IN1), the technological platform of 800 data base, was designed by switch vendors to be a "single trigger" service; that is, a query is launched to a data base when a "single trigger" is recognized. The "trigger" currently searches for the digits "800". IN1 cannot look for multiple triggers, such as "800" and "900". To accomplish this, new switch development would be required in SWBT end offices and tandems. An alternative would utilize the next

generation of intelligent network architecture--"Advanced Intelligent Network" (AIN)--which will support multiple triggers and thus support data base queries for multiple numbering plans.

In addition to an expensive network upgrade, a 900 data base would also require national number administration. The 800 data base number administration does not have surplus capacity to handle 900 numbers. An extensive and expensive systems analysis would be required to determine needed additions such as software development, hardware installation, and ongoing administration and support.

TIA also incorrectly believes that regulatory issues concerning 900 service provider portability will be easily and quickly addressed, because most problems have already been solved in the 800 data base proceeding. Many 800 data base issues remain open, however. Tariffing issues, for example, are the subject of an ongoing direct case and accounting order. TIA also wrongly assumes that Commission Rules for 800 data base would automatically apply to 900 service. The Commission has ordered the seven Regional Bell Operating Companies (RBOCs) to manage the national 800 number administration process. It does not automatically follow that the industry would want the seven RBOCs to assume this responsibility for 900 numbers. Nor does it automatically follow that the RBOCs would want to assume responsibility for 900 number administration.

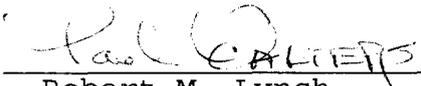
Because minutes of use for 900 service are dropping, because IPs are shifting their services away from 900 numbers, and because implementation of a nationwide 900 data base system would

be both costly and time-consuming, the Commission should reject TIA's Petition and not institute a rulemaking. Instead, the Commission should concentrate in Docket 93-22 on stopping the myriad abuses which continue to plague the information service industry.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By



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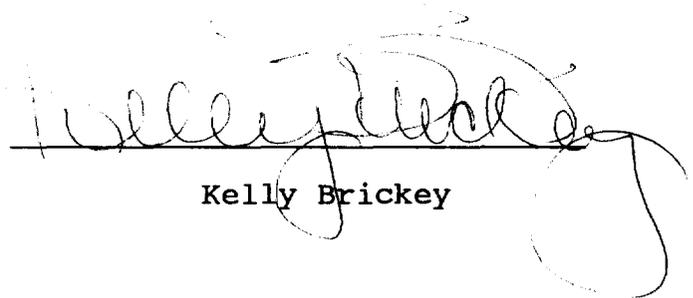
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November 23, 1994

CERTIFICATE OF SERVICE

I, Kelly Brickey, hereby certify that the foregoing "Comments of Southwestern Bell Telephone Company", has been served this 23rd day of November, 1994 to the Parties of Record.

A handwritten signature in cursive script, appearing to read "Kelly Brickey", is written over a horizontal line. The signature is fluid and somewhat stylized, with a large loop at the end.

Kelly Brickey

November 23, 1994

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