

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

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
)  
Petition for Rulemaking Concerning )  
Provision of Access for )  
900 Number Service )

RM-8535

**COMMENTS OF THE INTERACTIVE SERVICES ASSOCIATION  
IN SUPPORT OF THE PETITION FOR RULEMAKING**

The Interactive Services Association ("ISA"), by counsel and pursuant to Section 1.405 of the Federal Communications Commission's ("Commission") Rules, submits these Comments in response to the Petition for Rulemaking ("Petition") filed on October 18, 1994 by the Teleservices Industry Association ("Petitioner"). The ISA supports the Petitioner's proposal that the Commission issue a Notice of Proposed Rulemaking for the purpose of evaluating the feasibility and benefits of adopting regulations to require 900 number portability.

The ISA is a twelve year old non-profit North American association representing the business and public policy interests of the emerging consumer interactive services industry. The ISA's 300-plus member companies represent the full spectrum of industries active in developing and delivering telecommunications-based interactive services to consumers. The ISA's members include companies from the advertising, broadcasting, cable television, commercial online, computer, financial services, interactive television, marketing, publishing, telephone, and travel industries. Several ISA members are actively involved in the interstate 900 pay-per-call industry, either as interexchange carriers, local exchange carriers, service bureaus, information

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providers, or third party billing entities.<sup>1</sup>

The ISA respectfully requests that the Commission initiate a rulemaking to formally analyze the economic and other issues concerning the implementation of 900 number portability.

Respectfully submitted,

INTERACTIVE SERVICES ASSOCIATION

By: 

Robert L. Smith, Jr.  
Executive Director  
Interactive Services Association  
Suite 865  
8403 Colesville Road  
Silver Spring, MD 20910-3368

301/495-4955  
301/495-4959 Fax  
isabob@aol.com E-mail

William W. Burrington, Esq.  
Burrington & Associates  
Suite 600  
1250 Connecticut Avenue, NW  
Washington, DC 20036-2603  
(ISA Public Policy Counsel)

202/833-2333  
202/833-1234 Fax  
billburr@aol.com E-mail

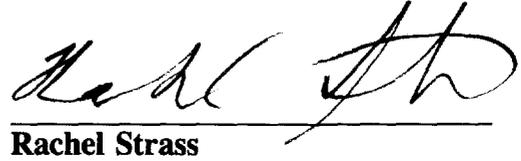
Dated: November 23, 1994

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<sup>1</sup> In May, 1994, the National Association for Interactive Services ("NAIS") merged with the ISA. The former NAIS, dissolved as a result of its merger with the ISA, was an active party before the FCC throughout its earlier 900 number proceedings.

***CERTIFICATE OF SERVICE***

**I, Rachel Strass, certify that on November 23, 1994 a copy of the *Comments of the Interactive Services Association* were hand delivered to the counsel for the Petitioner in RM-8535.**

  
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**Rachel Strass**

**Dated: November 23, 1994**