

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 900) RM-8535
Number Service)

**REPLY COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION**

The United States Telephone Association (USTA) files this reply to comments filed last week in the above captioned docket. USTA is the principal trade association of the local exchange industry, with over one thousand members.

The Teleservice Industry Association (Association) has asked the FCC to institute a rulemaking in order to require local exchange carriers (LECs) to implement a new system for screening "900" numbers. The Association's goal is to enable audiotext providers to move their 900 numbers from one interexchange carrier to another without changing telephone numbers.

Many of those who commented on the Association's Petition agreed that 900 number portability would give audiotext providers more choice and flexibility in purchasing

0210

CCB

interexchange services.¹ USTA certainly agrees. But those same commentators also point out that the costs of implementing 900 portability may very well outweigh the benefits, particularly given today's network technology.² USTA also strongly agrees with that assessment.

Two other themes emerged from the comments that USTA would urge the FCC to carefully consider. First, the Commission is already exploring issues involved with local number portability and, more immediately, portability for the 500 code. There are many common issues associated with portability for 500 and 900 numbers.³ It would therefore make no sense to consider 900 portability separately from 500.

Second, the Commission must consider not only the technical aspects of a portability plan, but the necessity for cooperation among LECs, interexchange carriers, and audiotext providers on a myriad of implementation and operations issues. The Association seems to make the assumption that if the FCC requires LECs to build this new system, interexchange carriers will automatically participate. This is not a safe assumption. As the FCC is well aware, it was necessary for the Commission

¹See, e.g., NTS at 1, MCI at 1, Pacific Bell at 1 and U S WEST at 1.

²See, e.g., BellSouth at 3, Ameritech at 1, Southwestern Bell at 2, Pacific Bell at 2-3 and U S WEST at 2-4.

³See, e.g., Sprint at 2 and U S WEST at 12-13.

to require all carriers to make their 800 numbers part of the database system so that the benefits of portability would be available to all 800 customers.

Ongoing operation of the system must also be considered. For example, U S West's comments contains a good discussion of the questions relevant to operating the Service Management System (SMS).⁴

The Association points to the 800 portability system as the model to emulate for 900. Last week, commentators extensively described the limitations inherent in the 800 system that make it unsuitable for use with 900 numbers.⁵ USTA will not repeat those points here. But it is also important to remember that 800 numbers may be nearing exhaust. The North American Numbering Plan Administrator recently asked the Industry Numbering Committee to address the issue of 800 number exhaust. According to the Administrator, the introduction of 800 number portability has greatly exceeded projections for 800 number use and exhaust will occur within the next few years. When deciding whether to formally pursue 900 number portability in a rulemaking, the FCC should take into account the industry effort that will be required to replenish the supply of "toll free" numbers. This is another

⁴See U S WEST at 6-8. See, also, Pacific Bell at 4.

⁵See, e.g., Sprint at 4, n.1 and U S WEST at 2-4.

example of why various numbering issues cannot be considered in isolation.

Portability for 500 numbers is definitely a piece of the same puzzle. After considering how best to approach assignment of 500 numbers, the Commission released a letter on May 3, 1994 directing that these numbers be assigned on an NXX basis, but also directing the industry to work toward a plan for 500 number portability. USTA members and staff have been active in that industry effort, and have also discussed the progress with FCC staff in two ex parte contacts. (The filings related to these are attached.) In addition to discussing with the staff the Advanced Intelligent Network technology approach that several commentors in this docket highlighted, USTA emphasized considerations unique to small LECs. These "small company" issues are equally relevant here and any steps the FCC takes in response to the Petition for Rulemaking should take them into account.

It is absolutely understandable that Teleservices Industry Association members wish to be able to change their interexchange providers without having to change 900 numbers. But the comments filed show that the technical means suggested by the Association to accomplish its goal is not workable. Duplicating today's 800 approach would result in a system that

would probably not be affordable in light of 900 call volumes.⁶

Perhaps more importantly, new technology is on the horizon that will allow LECs to implement such services in a more efficient manner.⁷ At this time, the Commission should encourage audiotext providers to work within industry forums on 900 portability just as it directed for 500 numbers.⁸ If the FCC later believes that more formal involvement of the Commission and its staff is necessary, any proceeding on 900 should also encompass 500 numbers.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

BY


Mary McDermott
Vice President & General Counsel

Linda L. Kent
Associate General Counsel

U.S. Telephone Association
1401 H Street, NW
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November 30, 1994

⁶See, e.g., Pacific Bell at 5, U S WEST at 9-11 and BellSouth at 2-3.

⁷See Southwestern Bell at 2-3.

⁸See BellSouth at 5.



United States Telephone Association

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June 9, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, DC 20554

Re: Ex Parte Meeting
CC Docket N. 92-237

RECEIVED
JUN 10 '94
FEDERAL COMMUNICATIONS
COMMISSION
SECRETARY

Dear Mr. Caton:

On June 9, 1994, Paul Hart of USTA and Maria Estafania of Bell Atlantic met with Peyton Wynns regarding the above referenced docket. The discussion was consistent with USTA's written filing in that docket and also centered around the Commission's May 3, 1994 letter regarding number portability for "500" numbers. A copy of material prepared by USTA and discussed at the meeting is attached.

Due to the lateness of the meeting, an original and a copy of this ex parte meeting notice are being filed in the office of the Secretary on June 10, 1994. Please include it in the public record of this proceeding.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Mary McDermott".

Mary McDermott
General Counsel

cc: Peyton Wynns

JUNE 9, 1994

COMMISSION CONTACT ON NATIONAL NUMBER PORTABILITY

- **REPRESENTING USTA's NATIONAL SERVICES ADVISORY COMMITTEE**

- **ESTABLISH ONGOING DIALOGUE**
 - **PROMOTE UNDERSTANDING OF INDUSTRY CAPABILITIES**

- **COMMISSION EXPECTATIONS IN REGARD TO NATIONAL PORTABILITY**
 - **DRIVERS**

- **ELEMENTS OF A PLAN RESPONSIVE TO THE COMMISSION's MAY 3 LETTER**

- **FUTURE CONTACTS**

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EX PARTE



United States Telephone Association

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September 19, 1994

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

RECEIVED
SEP 19 1994
FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE
SECRETARY

RE: Ex Parte Meeting
CC Docket No. 92-237

Dear Mr. Caton:

On September 16, 1994, Paul Hart of USTA met with Peyton Wynns regarding the above-referenced docket. The discussion was consistent with USTA's written filing in that docket. A copy of material prepared by USTA and discussed at the meeting is attached.

Due to the lateness of the meeting, an original and a copy of this ex parte meeting notice are being filed in the office of the Secretary on September 19, 1994. Please include it in the public record of this proceeding.

Respectfully submitted,

A handwritten signature in cursive script that reads "Mary McDermott".

Mary McDermott
Vice President and General Counsel

Attachment

cc: P. Wynns

SEPTEMBER 16, 1994

**USTA/COMMISSION CONTACT ON IMPLEMENTATION ISSUES
OF INDEPENDENTS IN REGARD TO PROVISION OF
N00 NXX ACCESS**

THIS CONTACT IS IN THE INTEREST OF PROVIDING INSIGHT TO THE COMMISSION IN ORDER TO UNDERSTAND THE UNIQUE ISSUES AND THEIR EFFECTS ON PROVISION OF ACCESS FOR N00 NXX TRAFFIC ORIGINATED IN INDEPENDENT END OFFICES. THE DISCUSSION WILL PROVIDE SOME HISTORICAL INFORMATION, A COMPARISON OF ISSUES REGARDING N00 AND 800 NXX SCREENING, AND ISSUES FOR TRANSITION TO NATIONAL SERVICE PROVIDER PORTABILITY IN PERSONAL NUMBERS.

HISTORICAL CONSIDERATIONS

- **SOME EXCHANGE CARRIERS HAVE IMPLEMENTED ADVANCED NETWORK CAPABILITIES, BUT MANY INDEPENDENTS RELY ON OTHER CARRIERS IN SUPPORT OF MUCH OF THEIR SERVICE PROVISION - SUCCESSFUL IMPLEMENTATION MUST OCCUR WITHIN THE ENVIRONMENT OF THESE DEPENDENCIES. EXAMPLES:**
 - **800 SERVICE**
 - **SS7 NETWORK SUPPORT**
 - **OPERATOR SERVICES**
 - **AMA RECORDINGS**
 - **TANDEM SWITCHING**
- **"IN THE BEGINNING", 800 SERVICE WAS IMPLEMENTED BY AT&T IN THE LATE 60s, ORIGINALLY BY MEANS OF SCREENING FUNCTIONS. A DATABASE STRUCTURE WAS IMPLEMENTED IN 1981. MANY INDEPENDENTS PARTICIPATED BY DIRECTING 800 TRAFFIC TO BELL COMPANIES FOR PROCESSING**

IMPLEMENTATION OF NXX

800

SERVICE DEFINED, UNDERSTOOD AND IMPLEMENTED

ALL DIALING 1+

CALLED PARTY PAYS

NO END OFFICE RECORDING CAPABILITY

NO0

NO UNIVERSAL SERVICE DEFINITION EACH NO0 SERVICE PROVIDER UNIQUELY DEFINES SERVICE REQUIREMENTS

0+ AND 1+ DIALING OPTIONS

BILLING OPTIONS VARY - SERVICE PROVIDER DEFINED

RECORDING MAY BE REQUIRED

FUTURE TRANSITION TO NATIONAL SERVICE PROVIDER PORTABILITY

800 NXX TO PORTABILITY

IMPLEMENTED AS A RESULT OF A REGULATORY MANDATE

CENTRAL POINT EXISTED FOR NUMBERING PLAN ADMINISTRATION AND DATABASE SYNCHRONIZATION

PROCEDURES IN PLACE FOR ENTRY OF RECORDS AND CHANGES INTO NATIONAL ADMINISTRATIVE SYSTEM

COMMON INTERFACE DEFINED FROM SMS TO SERVICE CONTROL POINTS

PORTABILITY REQUIRED INTELLIGENT NETWORK FACILITIES

NO0 NXX TO PORTABILITY

DEPLOYMENT OF A NATIONAL SERVICE STRUCTURE NOT CURRENTLY SUPPORTED BY A VALID BUSINESS CASE

REQUIRES DEVELOPMENT

REQUIRES DEVELOPMENT

NO STRUCTURE - NO DEFINED INTERFACES - WILL BE DIFFERENT FROM 800

PORTABILITY WILL REQUIRE ADVANCED INTELLIGENT NETWORK FACILITIES

**SERVICE PLATFORM SUITABLE FOR
EXPANSION WAS AVAILABLE AND
OPERATIONAL - STILL WAS A MAJOR
UNDERTAKING**

**BOCs FUNDED DETAILED TECHNICAL
REQUIREMENTS IN ACCORDANCE WITH
PRE EXISTING SERVICE STRUCTURE**

**SERVICES AVAILABLE FROM SERVICE
MANAGEMENT SYSTEM ARE TARIFFED**

**800 WAS EXISTING PRODUCT WITH
KNOWN DEMAND**

**COST RECOVERY ACCOMPLISHED IN
ACCORDANCE WITH COMMISSION
DETERMINATIONS**

**NATIONAL SERVICE PLATFORM NOT
DEFINED - MAJOR TECHNICAL AND
OPERATIONAL CHALLENGE**

**DETAILED TECHNICAL REQUIREMENTS
CANNOT BE DEVELOPED UNTIL A
NATIONAL STRUCTURE IS DEFINED
AND AGREED TO IN THE INDUSTRY**

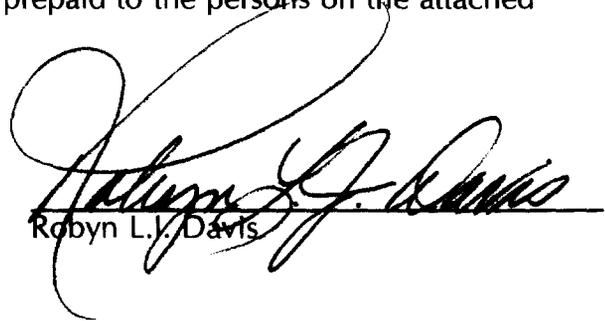
**NATIONAL ADMINISTRATOR MUST BE
FUNDED BY SERVICE PROVIDERS**

**UNKNOWN CONDITIONS APPLY TO
DEMAND FOR PERSONAL NUMBER
SERVICES**

**DEVELOPMENT OF VALID BUSINESS
CASE REQUIRES ADEQUATE COST
RECOVERY**

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on November 30, 1994 copies of the Reply Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


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