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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 )  
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Telephone Number Portability )  
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CC Docket No. 95-116  
RM 8535

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COMMENTS OF THE  
YELLOW PAGES PUBLISHERS ASSOCIATION

The Yellow Pages Publishers Association ("YPPA")<sup>1/</sup> hereby comments on the Commission's telephone number portability Notice of Proposed Rulemaking.<sup>2/</sup> In the Notice, the Commission sought comment on several technical and policy issues that are likely to arise with the implementation of telephone number portability. While the issues identified constitute a necessary "first step" for the Commission's general analysis of this subject, the

<sup>1/</sup> YPPA is the largest trade association of directory publishers in North America. Its membership represents 90% of all directories published in North America. The directory industry employs more than 46,000 people in the United States in printing facilities, distribution centers, and marketing, sales and service offices across the country. Directory publishers and their suppliers employ over three million people. Approximately \$320 billion in sales are generated annually throughout the economy as a result of directory advertising.

<sup>2/</sup> Telephone Number Portability, Notice of Proposed Rulemaking, FCC 95-284, released July 13, 1995 ("Notice").

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FCC may not have considered the significant ramifications that telephone number portability is likely to have on the directory publishing industry.

Telephone directories are generally the most complete source to obtain the listings of businesses and residences nationwide, and are distributed to every home and business with a telephone.<sup>3/</sup> The transition to telephone number portability is expected to have a direct and substantial impact on the directory publishing industry, and to the millions of consumers and businesses that rely on that industry. Therefore, YPPA respectfully requests that the Commission explicitly seek input from the directory publishing industry in order to develop reasonable time frames in which to make any changes necessary to accommodate telephone number portability. In addition, the FCC needs to provide the maximum flexibility possible to allow the marketplace to develop the methods for implementing such changes. Failure to take these considerations into account could create severe problems for virtually every American consumer and business.

To appreciate the magnitude of the changes that the directory business may have to undertake once number portability is available, a brief overview of current directory publishing practices is helpful. Telephone directories are traditionally compiled and distributed on the basis of appropriate geographic and business requirements. They are

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<sup>3/</sup> States typically require franchised local exchange companies to regularly publish listings of all their subscribers -- the White Pages. Yellow Pages are one of the most widely used advertising resources in America. Ninety percent of all U.S. adults referred to the Yellow Pages at least once in the past year. U.S. adult consumers referred to the Yellow Pages an estimated 19 billion times a year, resulting 88 percent of the time in a contact with a store or business. Yellow Pages is the fifth-largest advertising medium, with \$9.8 billion in annual revenue.

viewed as reference works and typically remain in circulation for a period of one year. Once directory boundaries are established by a given publisher, most publishers determine the appropriate directory in which to include a subscriber -- and the appropriate directory to deliver to that subscriber -- from the subscriber's telephone number. More specifically, by knowing the NXX prefix of a subscriber, directory publishers have usually been able to know the general location of the subscriber and the specific directory which covers that subscriber's location. This is done by sophisticated data processing systems, which automatically associate a specific telephone number with a particular directory. A large directory publisher that publishes several hundred different directories will typically use a complex publishing program -- with extensive data and tables -- to automatically assign millions of telephone numbers to their appropriate directories.

Although it might be theoretically possible to assign subscribers to the appropriate directory by virtue of an address, most current systems were not developed with that in mind and are not easily or inexpensively adaptable to such a requirement. Moreover, for some subscribers, the listed address may not reflect where service is rendered, making it an impractical vehicle for assigning such customers.<sup>4/</sup>

As the Commission recognized in its Notice, in a location portability environment, the association between telephone numbers and geographic locations may dissolve. A particular telephone number which currently is associated with a specific locality and a specific directory serving that locality, could in fact be moved to a different locality served by a

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<sup>4/</sup> "Listed address" is the address listed in the directory.

different directory, perhaps published by a different company. Depending upon the circumstances, the subscriber's new location might or might not be within a local calling area.<sup>5/</sup> Directory publishers will no longer be able to rely on the NXX prefix to determine which directory covers that subscriber. Thus, radical changes to the directory publishing industry may be necessitated by a transition from interim portability measures.

It is not currently clear how all directory publishers will determine which directory covers which subscribers, if they cannot rely upon NXX codes. Nor is it clear how to convey to directory users that a call to a particular number that has the same NXX as the calling number may now be outside the local calling area, and subject to different charges. These are important issues and will have to be dealt with thoughtfully.

Telephone number portability will force the directory industry to revamp significant aspects of its current operations. Such wholesale changes are expected to involve considerable expense and time. YPPA members anticipate that it would be impossible for most publishers to produce accurate and complete directories in a number portability environment with today's publishing systems. It is therefore imperative to YPPA members that the FCC afford adequate time and flexibility to develop and implement all the changes necessary to operate in a number portability environment. The industry is in the midst of attempting to identify and analyze all of the implications that telephone number portability will have on it and on those it serves. It is not now able to identify the optimal solutions to the issues raised.

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<sup>5/</sup> Many directories currently list sets of NXXs which are within given local calling areas.

Accordingly, YPPA respectfully requests that the Commission continue to seek input from all facets of the telephone industry, including directory publishers, to ensure that telephone number portability can be implemented in a workable, efficient, and productive fashion.

Respectfully submitted,

The Yellow Pages Publishers Association

A handwritten signature in black ink, appearing to read "Albert Halprin", written over a horizontal line.

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