

95-155

RECEIVED

OCT 12 1995

DOCKET FILE COPY ORIGINAL

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Please find attached the original and one (1) copy of materials cited in In the Matter of Toll Free Service Access Codes, CC Docket No. 95-155, FCC No. 95-419 (adopted October 4, 1995).

No. of Copies rec'd
List ABOVE

0+1



The Nationwide Pest Control Experts

NAI
The Terminix International
Company L. P.
860 Ridge Lake Boulevard
Memphis, TN 38120
901/766-1480

August 4, 1995

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, D. C. 20554

RECEIVED *DFP 269*

OCT 12 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

RE: VANITY 800 NUMBER PROTECTION - 800 NUMBER EXHAUST

DOCKET FILE COPY ORIGINAL

Dear Mr. Hundt:

We would like to strongly recommend that the release of the "888" toll-free numbers be initially restricted to those telephone customers currently using the "800" vanity numbers. Terminix International, Inc., part of ServiceMaster, L.P., relies heavily on the 800-TERMINIX number in our media and print advertising. We also get a measurable level of calls on 800-TERMINEX.

In 1994, over 166,865 calls from customers and prospective customers were received on 800 TERMINIX/EX. For year-to-date 1995, we have received approximately 135,494 calls.

It is imperative that our organization be offered the first opportunity to obtain usage of 888-TERMINIX since TERMINIX is our registered trademark. Otherwise, there is the possibility that we will be forced to work through a "number broker" to obtain rightful usage of our brand name. Further, we want to maintain ease of access for our current and future customers. For that reason, we also need to obtain usage of 888-TERMINEX.

Your actions to provide for a one-time, limited, set-aside of 888 numbers prior to the general availability of the 888 service code will benefit our customers and help maintain the integrity of our brand name which we have built over 68 years in the termite and pest control business.

Sincerely,

Eugene D. Gauthreaux

Eugene D. Gauthreaux
President and Chief Operating Officer
Terminix International

cc: Ms. Kathleen Wallman
Chief, Common Carrier Bureau
Federal Communications Commission
Washington, D. C. 20554



11/11/95
DFD-261

July 28, 1995

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Subject: Reservation of 888 Numbers

Dear Mr. Hundt:

This is to express our agreement with AT&T relative to 800/888 number protection for their existing customers.

In this vain, we request reservation of the following 888 numbers

888-322-3633

888-828-7496

888-631-2159

I thank you for your prompt attention to this request.

Regards,

A handwritten signature in cursive script that reads "Jane A. Murphy".

Jane R. Murphy,
Controller

xc: Ms. Kathleen Wallman
Chief, Common Carrier Bureau
Federal Communications Commission
Washington, D.C. 20554

Jack Borisko - AT&T

July 26, 1995



DFD-256
CLB
MARY

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Dear Sir,

I am writing to express my concern about vanity 800 number protection with the introduction of 888 toll free numbers. We at SelecTel have invested considerable time and money in building our business and, the use of vanity 800 numbers has played a significant role in our success.

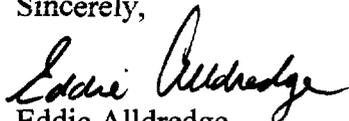
We are very concerned that the introduction of 888 toll free numbers will cause confusion among our customers as well as financial hardship for our company unless steps are taken by the F.C.C. to protect us. In order to mitigate the confusion and hardship, we respectfully suggest the following:

There should be a one-time set aside of 888 numbers prior to general availability of the 888 service code. During this set aside period, customers who have existing, well known, 800 numbers should be permitted to reserve the corresponding 888 numbers.

After the set aside period, first come, first serve principles should apply.

Action by the F.C.C. is mandatory in order to minimize customer confusion, frustration and fraud in this matter.

Sincerely,


Eddie Alldredge
Vice President

cc Ms. Kathleen Wallman
Chief, Common Carrier bureau
Federal Communications Commission
Washington, D.C. 20554



CAR SIGNS
POLICE RIOT SHIELDS
ADVERTISING PRODUCTS
SILKSCREENED & EMBROIDERED APPAREL

100B
DFP-260

July 26, 1995

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Hundt;

HTH manufactures car signs which are sold mainly to the pizza industry and a riot shield which is sold to law enforcement agencies and foreign governments. We have 8 patents on our products and we are able to sell our products worldwide from own manufacturing facility in Winter Park FL due to our extensive use of 800 numbers. We have built our company by advertising our 800 number on every product sold and in every kind of advertisement we have done over the last 10 years. (magazines, brochures, flyers, postcards, trade shows etc.) This number is our primary access to the public since the majority of our sales are done over the 800 numbers.

It for this reason I am extremely interested in maintaining our access to our customers and would want to obtain the 888 number for the same 800 numbers (800-321-1850 and 800-367-0915) . Both numbers have been heavily advertised for over 10 years and we consider them our goodwill and the future of our company depends on them. I would not think it fair for a company to get the 888 number for our same 800 number and sell look-a-like signs and shields based on my 10 years of building this product line.

The FCC should provide for a one-time, limited, set-aside of 888 numbers prior to the general availability of the 888 service area code. I feel that during this period I should be able to receive the same 888 number that I hold for my 800 numbers as the numbers are widely known and accepted and used by my customers and future customers.

I would not think it fair if someone obtained my 888 number and then sold it to a competitor to take advantage of our years of good service and products. Also , extreme confusion and frustration and potential fraud could result from dialing the corresponding 888 number of our heavily advertised 800 numbers and mistakenly assuming that the customer had reached our business when in fact they had reached a counterfeit manufacturer of our patented products.

I also feel there would be wrong numbers and they are expensive to our company in both time and the direct cost related to the wrong number.

I have just spent 4 years in federal court protecting our patents. Our company prevailed but the cost in time and money was tremendous. The possibility of expensive litigation is

very likely for incumbent 800 subscribers as myself, whose toll-free numbers serve as trade-names and are associated with over 10 years of goodwill for our present and future customers. Our company would be forced to incur the expensive litigation to defend our trademark infringement and unfair competition by a third party taking advantage of our 800 number through the 888 number and confusing potential customers.

Sincerely;

A handwritten signature in black ink, appearing to read 'William A. Elmer', written in a cursive style.

William A. Elmer
President

cc: Ms Kathleen Wallman
Chief, Common Carrier Bureau
Federal Communication Commission
Washington, D.C. 20554

Warner-Lambert
2000 ...
...

...
... MORRIS ...
...

CEB

DFD-263

**WARNER
LAMBERT**

DOCKET FILE COPY ORIGINAL

July 25, 1995

Mr. Reed Hundt, Chairman
Federal Communications Commission
Washington, DC 20554

Dear Mr. Hundt:

Warner-Lambert Company has a serious concern regarding the forthcoming 888 area code where its implementation may impact the viability of our vanity 800 numbers. These are the numbers that are associated with those products that have name recognition and are extremely important to our Company's business.

We request that we are provided the opportunity to reserve the corresponding numbers in the 888 area code.

Very truly yours,



Robert Jenny
Manager - Telecommunications

c: J. Gwasdacus
J. Harris
D. D. Lappas

Ms. Kathleen Wallman
Chief, Common Carrier Bureau
FCC
Washington, DC 20554

GEICO

Washington, DC



(CB)
DFD-
264

ONE GEICO PLAZA ■ Washington, D.C. 20076-0001

June 5, 1995

Reed Hundt
Chairman, FCC
1919 M Street, NW
Room 856
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Mr Hundt:

GEICO is a direct response property casualty auto insurance company. Due to our direct response approach to the insurance marketplace, we have a critical dependency on 800 telephone numbers. We receive a million calls a month on a variety of 800 telephone numbers.

As you are aware, the Telecommunications industry will run out of traditional "800" telephone numbers prior to the end of 1995. The plan that has been established by the Industry Numbering Committee (INC) to migrate to the new numbering "888" scheme lacks one important ingredient.

What is not included in the efforts by the INC is a protection policy that falls more so under the purview of the FCC. The absence of an industry wide 800 number protection policy may well result in extensive consumer confusion and potential distrust in the traditional toll free calling that has been so prevalent for many years. Fraudulent and/or competitive activities may result in added advertising and monitoring costs which in turn will have to be passed on to consumers in the form of higher prices for services provided.

800 numbers have become entrenched in virtually all businesses and every industry. GEICO would like to petition the FCC to establish an 800 number protection policy. We believe this can be done by placing vanity numbers and significant numeric numbers on a reserve list for first choice by the current user company of the corresponding "888" vanity number or significant numeric number.

I would be happy to discuss this with you or anyone of your staff members in more detail. I appreciate your review and consideration.

J. C. Reed
Assistant Vice President

-
- Government Employees Insurance Company
 - GEICO General Insurance Company
 - GEICO Indemnity Company

Shareholder Owned Companies Not Affiliated with the U.S. Government



DEF-
266

CHRISTOPHER G. McCANN
Vice President

July 11, 1995

DOCKET FILE COPY ORIGINAL

Mr. Reed Hundt
Chairperson
Federal Communications Commission
Washington, DC 20554

Dear Mr. Hundt:

I am writing to you because of my great interest and concern regarding the events in the telecommunications industry dealing with the 800 service and the pending implementation of the 888 service.

As you can tell by the name of our company, we are obviously a large user of 800 service. My brother, Jim, and I have built a successful business around 800 service over the past nine years. In fact, I believe we are one of the pioneers who followed the urging of the telecommunications industry to build a business based on toll-free 800 service; and in fact, have transformed this into a leading brand.

From the very beginning we knew that our efforts needed to be focused on establishing the 1-800-FLOWERS name (and telephone number) as a brand. We have been successful doing so and certainly hope to experience continued growth. To support our growth we have made a tremendous investment in advertising over the past several years. We have also extended our branding to two other access channels for our customers to reach us. The newer access channels are Interactive On-Line Services and retail stores. We have been successful in both of those areas due in large part to the recognition of the 1-800-FLOWERS brand name.

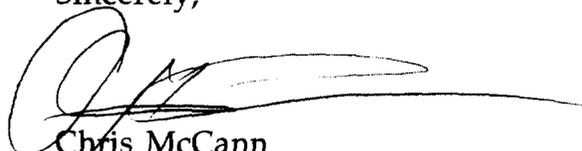
As I have been reading in the press and also from discussions with our telecom carriers, I certainly recognize the problems facing the industry as it relates to number exhaust within the 800 service. I also understand the implementation of the 888 service has been decided on as the answer to the pending number exhaust issue. While I have expressed the concern to our telecom carriers, I thought it appropriate that I express our concern to you in hopes that the FCC would get involved in this issue and help protect the investment that we have made over the years, as well as other entrepreneurs and small businesses.

Page Two
July 11, 1995
Mr. Reed Hundt

Through years of hard work and significant investment in brand building, we have grown from one small flower shop in New York City, into a national floral company. I certainly would hate to see our efforts undermined by someone receiving the same corresponding numbers as 1-800-FLOWERS in the 888 exchange. Based on experience I can assure you that this will cause consumer confusion and could potentially undermine everything that our brand has come to stand for. I have been asking the telecom carriers to please recognize the fact that some efforts need to be made to protect companies such as ours that have built a brand around an 800 number. I am sure we are not the only company in this position, but I would also guess that it is not a large group of concerned companies.

Mr. Hundt, I would appreciate it very much if you could please take our concern into consideration when you and the other members of the FCC discuss this issue. Please feel free to contact myself, or my brother, Jim McCann, at any time if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris McCann", with a long horizontal flourish extending to the right.

Chris McCann
Vice President
1-800-FLOWERS



PEACHTREE FABRICS, INC.

Distributors of Decorative Upholstery Fabrics

August 2, 1995

mmw
DFD 271

DOCKET FILE COPY ORIGINAL

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, D.C. 20554

Dear Sir:

Our company currently uses a vanity 800 telephone number, 1-800-PEACHES. With the opening of new area code 888 we would like the opportunity to reserve the corresponding 888 vanity number to our current one. It is our feeling that allowing us to protect our current vanity number would protect the investment we have made in establishing, advertising and using this number and at the same time protect us from some of the confusion that may occur in the market place when the new 888 area code is opened.

We thank you for the opportunity to express our feelings on this matter.

Sincerely,

PEACHTREE FABRICS, INC.

William M. Bullard
Senior Vice President - Administration

WMB:mmw

cc: J. Parvin

CCB



JEFFREY A. DISKIN
Vice President
Corporate Marketing

01/27/95
DFP-272

August 3, 1995

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Hundt:

I am writing today to express my concern over the impending exhaustion of 800 service numbers, and the introduction of the 888 service numbers. As you may know, Hilton Hotels Corporation utilizes several vanity 800 numbers that are key to our marketing efforts and have resulted in brand recognition from our guests.

It is critical to our business and many others' that the FCC provide a one time opportunity to reserve 888 numbers corresponding to existing vanity 800 numbers prior to general availability.

This process would minimize the risk of potential litigation for current 800 subscribers whose toll-free numbers serve as their trade-names, thereby susceptible to trademark infringement or unfair competition by third parties. This would also minimize consumer confusion and frustration associated with similar toll-free numbers within an industry.

The fact that 800 numbers are nearing exhaustion is a clear indication that this tool is used successfully by many corporations as a marketing advantage. Your careful consideration to the introduction of 888 numbers will have a far-reaching impact upon both the telecommunications industry, as well as all associated marketplaces.

Thank you for your consideration.

cc: Ms. Kathleen Wallman
Chief, Common Carrier Bureau
FCC

THE MONEY STORE®

July 28, 1995

DIARY
DFD-278

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Hundt:

I am writing to you as an advocate of vanity 800 number brand protection in view of the proposed new 888 toll free exchange now under consideration.

The Money Store has built a successful and growing publicly held national company using our flagship telephone number 1-800 LOAN YES (1-800-562-6937). The FCC should allow a one-time opportunity for companies such as The Money Store to reserve our corresponding flagship number under the new 888 exchange.

Our number is widely known, accepted and used by consumers nationwide. Widespread consumer confusion can be avoided by allowing a pre-registration period for companies having nationally recognized 800 vanity numbers.

The Money Store recognizes the need to expand toll free capacity and supports the proposed new exchange. The general availability of 888 numbers should proceed on a standard first-come, first-serve basis following the limited pre-reservation period for companies holding nationally recognized vanity numbers.

We appreciate your consideration.

Sincerely,



Charles P. Cannata
Vice President

cc: Ms. Kathleen Wallman
Chief, Common Carrier Bureau
Federal Communications Commission
Washington, D.C. 20554

August 7, 1995



mary ccb
DFD 279

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Hundt:

I am writing today to express my concern over the impending exhaustion of 800 service numbers, and the introduction of the 888 service numbers. As you may know, Hilton Hotels Corporation utilizes several vanity 800 numbers that are key to our marketing efforts and have resulted in brand recognition from our guests.

It is critical to our business and many others' that the FCC provide a one time opportunity to reserve 888 numbers corresponding to existing vanity 800 numbers prior to general availability.

This process would minimize the risk of potential litigation for current 800 subscribers whose toll-free numbers serve as their trade-names, thereby susceptible to trademark infringement or unfair competition by third parties. This would also minimize consumer confusion and frustration associated with similar toll-free numbers within an industry.

The fact that 800 numbers are nearing exhaustion is a clear indication that this tool is used successfully by many corporations as a marketing advantage. Your careful consideration to the introduction of 888 numbers will have a far-reaching impact upon both the telecommunications industry, as well as all associated marketplaces.

Thank you for your consideration.

Sincerely,


John L. Brinker

Corporate Director of Telecommunications

JLB/nm

cc: Ms. Kathleen Wallman
Chief, Common Carrier Bureau
FCC



August 3, 1995

Barnett Technologies, Inc.

Post Office Box 44145
Jacksonville, Florida 32231-4145

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RE: Vanity 800 Number Protection - 800 Number Exhaust

Dear Mr. Hundt:

With the impending introduction of 888 toll-free numbers, customers with vanity 800 numbers today, such as 1-800-BARNETT, are concerned about brand protection. This is because Barnett Bank in particular, and the banking industry in general, is increasing the use of toll-free vanity numbers as part of a growing retail-oriented banking product delivery strategy that is driving financial marketing in the 1990's and through the turn of the century.

Clearly, Barnett Bank, along with its many banking and financial competitors, will be looking to obtain the new corresponding 888 vanity numbers as they become available. Brand protection in the introduction of 888 numbers is an issue the FCC should seriously address because a protection policy at this time is the single most effective way for the FCC to maintain the level playing field so necessary to maximizing the free market system in our economy.

We understand that the FCC currently is examining the question of whether or not a segment or percentage of 888 numbers should be set aside for 800 brand protection, and, if so, how the process of 888 number reservation would work. Barnett Bank strongly urges the FCC to establish an 888 number set aside policy in the following manner:

- Provide, on a one-time basis, a limited set of 888 numbers for this purpose prior to the general availability of the 888 service area code.
- During this period of time, allow 1-800 customers who have existing 800 vanity numbers which are brand identifiers, such as 1-800-BARNETT, to reserve the corresponding 888 numbers.
- Upon the general availability of 888 numbers, apply the standard first come/first served principle to all subsequent 888 number requests.

Page 2
Mr. Reed Hundt
August 3, 1995

Forcing existing users of 800 vanity numbers to literally "start over" in the development of marketing efforts tied to the 888 number introduction would place an unreasonable burden on their shoulders to the unfair advantage of subsequent participants in this form of marketing. We urgently recommend the adoption of a set aside policy prior to the general introduction of 888 numbers in the interest of a level playing field for all competitors in our free market economy. Thank you for what I know will be serious consideration of this important issue.

Yours truly,



John C. DuBose
Director - Technology Services

cc: Ms. Kathleen Wallman
Chief, Common Carrier Bureau
Federal Communications Commission
Washington, D.C. 20554



Hyatt Hotels & Resorts
Omaha Reservation Center
9805 Q Street
Omaha, NE 68127 USA

Telephone: 402.593.8800
Telex: 6875050
FAX: 402.593.9838

August 7, 1995

DFD-281

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, D.C. 20054

DOCKET FILE COPY ORIGINAL

Dear Mr. Hundt:

Hyatt Hotels and Resorts is very concerned with the recent proposal of adding "888" service in addition to the current "800" toll free service. We do understand the growing need for additional telephone numbers and know the way to solve this issue is by adding an additional area code that also functions as "toll free". Our concern lies with the awareness to the public and the marketing monies that are spent in promoting toll free services.

Currently, the public identifies a toll free number as having the area code "800". Once there is a second area code, we believe that companies, such as ours, will begin receiving either a large number of misdialed calls, as a result of the area code, or that someone else will receive calls from our guests that are requesting Hyatt services. Either of these situations can be costly to a company, not to mention confusing to the consumer. To continually increase our phone volume, there is significant marketing and customer awareness of our "800" numbers, therefore; we are recommending that certain highly publicized customer service "800" numbers also be given an "888" designation.

I hope that you will strongly take into consideration our recommendation, as the service provided on our telephone number is a vital link to our success.

Sincerely,

Christine Brosnahan
Director of Finance &
Tele-Services

CB:jaf

cc: Kathleen Wallman
Chief, Common Carrier Bureau, Federal Commissions Bureau
Joan Lowell
Assistant Vice President , Hyatt Reservation Center



August 8, 1995

Mr. Reed Hundt
Chief, Common Carrier Bureau
Federal Communications Commission
1919 "M" Street
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Hundt:

We have operations throughout the United States and overseas. Communication on our 800 numbers takes place 24-hours-a-day, 7-days-a-week; and it would create a serious problem for our operations if these numbers are changed.

It is our belief that the FCC should provide for a one-time, limited set-aside of 888 numbers prior to the general availability of the 888 service area code.

During this period of time, customers who have existing 800 numbers that are widely known and accepted and are utilized by consumers (i.e., not limited to internal business use) should be permitted to reserve the corresponding 888 numbers.

Upon the general availability of 888, the standard first-come, first-serve principle should apply to all reservation requests for 888 numbers.

Several public interests would be served by this action:

- * Minimizes the risk of premature exhaustion of 888 numbers which could result if there were a "gold rush" for immediate replication of all 800 numbers in the 888 service area code;
- * Minimizes brokering activities by unscrupulous parties seeking to acquire and "sell" corresponding 888 numbers to the current 800 vanity number owner;
- * Minimizes consumer confusion and frustration and potential fraud arising from dialing the corresponding 888 number of a popular 800 vanity number on the mistaken assumption that the same business entity utilizes both numbers;
- * Minimizes the problem of wrong number calls and associated costs incurred when the corresponding 888 number is assigned to a subscriber other than the 800 vanity number owner;

Ms. Kathleen N. H. Wallman
August 8, 1995
Page Two

- * Minimizes potential litigation for incumbent 800 subscribers, whose toll-free numbers serve as their trade names and/or are associated with the goodwill of the customer's business, and are susceptible to trademark infringement and/or unfair competition by third parties seeking to use confusingly similar vanity numbers in order to leverage off the significant brand investment made by the incumbent 800 subscriber.

Thank you for any consideration given to the ideas outlined in this letter.

Sincerely,



Ronald D. Ryan
President

RDR:LL

cc: Ms. Kathleen Wallman



DFD-282

DOCKET FILE COPY ORIGINAL

August 9, 1995

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, D.C. 20554

Dear Mr. Hundt:

I understand that the FCC is currently considering a method to expand the pool of domestic toll-free telephone numbers by using the prefix "888" as well as "800." I am the manager of Telecommunications at Rosenbluth International, the third largest corporate travel management company in the US. We are users of vanity 800 numbers, and I am writing to encourage the incorporation of a one-time, limited set-aside of 888 numbers for existing vanity number users. This would give us the opportunity to keep both the 800 and 888 version of our vanity numbers. If another company obtains the 888 version of our vanity numbers, then both Rosenbluth and the 888 number owner will have the problem of receiving and paying for calls that were intended for the other company.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Julie Stewart".

Julie Stewart
Manager of Telecommunications Planning
Rosenbluth International

cc: Julie Bohn



Hilton Reservations Worldwide

P.O. Box 115060 • Carrollton, TX 75011-5060 • 214-770-6100

DFD-285

August 7, 1995

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Hundt:

I am writing to express my concern over the impending exhaustion of 800 service numbers and the introduction of the 888 service numbers. As you may know, Hilton Reservations Worldwide utilizes several vanity 800 numbers that are key to our marketing efforts and have resulted in brand recognition from our guests.

It is critical to our business and many others that the FCC provide a one-time opportunity to reserve 888 numbers corresponding to existing vanity 800 numbers prior to general availability.

This process would minimize the risk of potential litigation for current 800 subscribers whose toll-free numbers serve as their trade names, thereby susceptible to trademark infringement or unfair competition by third parties. This would also minimize consumer confusion and frustration associated with similar toll-free numbers within an industry.

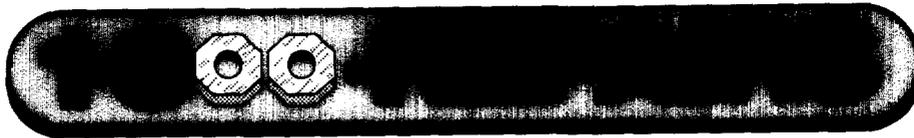
The fact that 800 numbers are nearing exhaustion is a clear indication that this tool is used successfully by many corporations as a marketing advantage. Your careful consideration to the introduction of 888 numbers will have a far-reaching impact upon both the telecommunications industry as well as all associated marketplaces.

Thank you for your consideration.

Sincerely,

Sam L. Perry
President

SLP/aml



DFD-316

July 31, 1995

DOCKET FILE COPY ORIGINAL

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, D.C. 20554

Dear Mr. Hundt:

It is my understanding that 888 numbers will soon be available. Our company over the past 10 years has spent hundreds of thousands of dollars towards promoting our vanity number, 1-800-REPAIRS. It would not be fair to allow someone to buy 888-REPAIRS without giving us a first opportunity to do so.

The confusion factor alone would be incredible. We are anticipating receiving over 100,000 calls a day. Some callers are calling for emergency services. We are confident that the confusion would not only cost us millions of dollars, but quite probably life threatening situations. Just think. If you called for a gas leak and your message was left at the wrong company.

Please take whatever action necessary to ensure that companies, like ourself have a first opportunity for the 888 exchange and any other new exchanges.

With kindest regards,

Kerry P. Lauricella
Chairman
Repairs Inc./800/REPAIRS

cc: Ms. Kathleen Wallman
Chief, Common Carrier Bureau
Federal Communications Commission

DFD-317



PRODUCTS FOR PETS... AND THE PEOPLE WHO CARE FOR THEM

July 28, 1995

DOCKET FILE COPY ORIGINAL

Mr. Reed Hundt
Chairman
Federal Communications Commission
Washington, D.C. 20554

Dear Mr. Hundt:

I am writing to ask for your help when the new 888 area code, which will augment the 800 code, is activated.

I ask that you strongly consider a one-time limited set aside period for businesses and individuals who own 800 numbers to be allowed to reserve for their use the 888 area code number. For instance, New England Serum Company uses several 800 numbers, one of which is 1-800-637-3786. This translates into 1-800-NE-SERUM. We have owned this number for many, many years. It would be devastating to our business for a competitor or another business to use the 888 number for similar types of products. That would be trading our good name for their own use. By allowing a one-time ability for a business to reserve its corresponding 888 number, would prevent this concern in my mind.

Our 800 number has generated a tremendous amount of goodwill and name recognition for our business. We would look at another business using the 888 number as unfair and potentially a deceptive practice that would be deliberately used to confuse our customers into believing that the holder of the 888 number was indeed a representative of New England Serum Company.

If there is anything I can do to help have this one-time, limited, set aside period to occur, please don't hesitate to contact me directly. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark J. McSweeney".

Mark J. McSweeney
Vice President - Finance & Administration

MJM/la

cc: Ms. Kathleen Wallman



DFD-262

July 24, 1995

Kathleen Wallman
Chief of Common Carrier Bureau
Federal Communications Commission
1919 M Street N.W.
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Ms. Wallman:

I am writing this letter pursuant to and consistent with a conversation my office had last week with Anne Bisese.

We own the phone number 800-DISCOUNT (800 347-2686). Like other businesses with vanity numbers we have spent considerable time and money marketing our service via this number. Our concern is that when the new 888 area code becomes available a competitor will be able to get 888-DISCOUNT (888 347-2686) and capitalize on our marketing. To be fair to the businesses that have promoted vanity numbers they should have an opportunity to get the same number in area code 888 that they have marketed in area code 800.

Please look into this matter for us and hopefully respond with a favorable reply.

Sincerely,
800-DISCOUNT CLUB, INC.

A handwritten signature in black ink, appearing to read "John C. Hartman", with a long, sweeping flourish extending to the right.

John C. Hartman,
President/C.E.O.

lc2101

800-Discout Club, Inc.
P.O. Box 87
Englishtown, New Jersey 07726
Tel. (908) 972-8700
Fax (908) 972-3766