



**GENERAL OFFICES**

1935 South Campbell • Springfield, Missouri 65898 • (417)887-1915

DEF- 257

CCB

July 25, 1995

DOCKET FILE COPY ORIGINAL

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

**Dear Mr. Hundt:**

**Bass Pro Shops and its affiliated companies urge you to develop a process whereby we can reserve or block the use of the 888 toll free service area code numbers that correspond to our existing 800 vanity numbers.**

**We believe irreparable damage will be done to our business if we cannot protect our vanity numbers.**

- 1. We spend millions of dollars each year promoting our 800 vanity numbers because of the high retention rate among the people that see our advertisements, catalogs, signs and television commercials. If another firm had the corresponding 888 numbers, they would undoubtedly receive some of our calls just as we would receive some of theirs. The net result for both companies would be lost customers, sales and profits, and higher expenses.**
- 2. There will be some people that will reserve as many 888 vanity numbers as possible in order to "broker" these numbers to the companies that have the corresponding 800 vanity numbers or to the competitors of those companies.**
- 3. Other businesses will be in a position to leverage off the significant brand investment we have in our 800 numbers which presents us with unfair competition.**
- 4. Credit card fraud will be rampant. People calling the 888 number that corresponds to ours, either by mistake or because they assume it is our number, could be misled if the owner of the 888 number presents themselves as Bass Pro Shops and pretends to take the caller's order, thus obtaining the caller's credit card number and expiration date. Armed with this credit card information, these criminals can order merchandise by phone from the company of their choice or sell the information to other criminals.**

**Mr. Reed Hundt**  
**July 25, 1995**  
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**In fact, these criminals could even advertise in local markets as Bass Pro and defraud thousands of people before anyone could catch on to their scam. By that time, they would have closed up shop and moved on. Having the vanity number would make their ads credible.**

- 5. We will be forced into litigation against companies that have corresponding 800 and 888 numbers to ours in order to protect our trademarks from infringement.**

**Sincerely,**



**ARLEY M. CLARK**  
**Director of Catalog Services**

**cc: Scott Bracale, Vice President of Catalog**

# 800 USA LOAN®

USA LOAN, Inc.®  
333 Elm Street  
Dedham, MA 02026

DFD-287

Phone 617-329-6001  
Fax 617-320-0033

August 10, 1995

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

DOCKET FILE COPY ORIGINAL

RE: 800 / 888 Exchange - Vanity Telephone Numbers

Dear Mr. Hundt:

I want to express our strong support of the AT&T proposal which would allow the existing holders of any 800 vanity phone number to have the first option to acquire the corresponding 888 vanity phone number for the new 888 toll free exchange.

Implementation of this proposal would protect both the consumer and the holders of the 800 vanity numbers and their brand names from unnecessary confusion. This opportunity for confusion, if permitted to occur, would also create the possibility for potential brand name abuse and consumer fraud. In addition, erroneous billing created by miss dials of 888 calls placed in error to the more common and ingrained 800 numbers would be eliminated.

We consider that the protection of our brand name and reputation is a very serious matter. Both USA LOAN and 800 USA LOAN are US Registered Trademarks. Additionally, in an effort to protect our brand name across the communications spectrum, we have acquired control of the corresponding Internet Domain Name USALOAN.COM. Since the mid 1980s well in excess of \$10,000,000 has been spent in the advertising and promoting of the 800 USA LOAN brand name and 800 toll free phone number. This brand name and vanity phone number advertising effort has included newspaper, print, TV, radio, and direct mail.

The opportunity now exists to lock the barn door before the horse is stolen. This proposal is in both the consumer's and the business's best interest. Since we would clearly pay the same telephone rates as anyone else, there does not seem to be any compelling reason not to accept this AT&T proposal. We feel that it is simply the right thing to do.

If you have any questions or if I can be of help in any way, please feel free to contact me.

Very truly yours,



Vincent P. Keenan Jr.  
President

cc: Ms. Kathleen Wallman ✓

CCB  
DFD-288



Norwest Technical Services, Inc.  
Norwest Operations Center  
255 Second Avenue South  
Minneapolis, Minnesota 55479

August 10, 1995

Mr. Reed Hundt  
Chairman  
Federal Communications  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: 800 Number Protection

Dear Chairman Hundt:

It is our understanding that there is a question about duplication of existing 800 numbers under the 888 numbering scheme.

We believe that extraordinary consideration should be given to insure that duplication of specialized 800 numbers does not occur under the 888 numbering plan. The total quantity of existing 800 numbers that are used for specialized advertising, either through the use of a company name or another mnemonic pattern, is relatively minimal in comparison to the total of 800 numbers assigned. Restriction on number assignment would not diminish appreciably the total availability of new numbers.

It would be unfortunate if an 888 number were assigned to a new subscriber that duplicated a heavily advertised 800 number, and an unsuspecting new subscriber began to receive hundreds of calls intended for the original assignee. The new number user could be overwhelmed by the sheer number of calls, and obligated to pay for those calls. I do not believe that would be the intent of the organization assigning numbers.

Another issue exists regarding duplication of 800 and 888 numbers. This is with deliberate duplication of numbers. We believe that attempts may be made to secure numbers under the 888 numbering scheme that duplicate 800 numbers, for the purpose of "stealing" business from the original subscriber. In order to avoid this possibility, we believe that a subscriber to an existing, highly advertised 800 number should be allowed to have the 888 number that corresponds to their 800 number either assigned to them or held in reserve from assignment to another party.

Please feel free to contact me if you would like more information about Norwest's concerns in this matter. (612)667-7049

Thank you for your time and attention.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Heise", written in a cursive style.

Bob Heise  
Manager, Government Relations

BH:cs

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

Webb Edwards, Chief Technology Officer  
Norwest Technical Services

Wayne Christensen, Principle Communications Consultant  
Norwest Technical Services



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DFD 2.85

**ROBERT E. DIRKS**  
*Senior Vice President Marketing*

August 3, 1995

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

DOCKET FILE COPY ORIGINAL

Dear Mr. Hundt:

I am gravely concerned about the impending exhaustion of 800 service numbers, and the introduction of the 888 service numbers. 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.

A large, stylized handwritten signature in black ink, appearing to read 'R E D I C'.

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



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DFD 286

August 8, 1995

DOCKET FILE COPY ORIGINAL

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

Dear Mr. Hunt:

We understand that the shortage of 800 numbers is resulting in a new 888 number being offered in the near future. Brink's Home Security has invested over 25 million dollars in the last four years advertising via our 1-800-2BRINKS and 1-800-9BRINKS vanity numbers. Due to this investment, we are requesting that the FCC hold the 1-888-2BRINKS and 1-888-9BRINKS aside for Brink's Home Security prior to offering the 888 numbers to the general market. We would also like to reserve the 1-888-4BRINKS number as well.

Your assistance in this matter is most appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Larry E. Tramel".

Larry E. Tramel  
Director, Information Services  
and Communications

LET/asw

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

(11)B  
DFD-258

**WEISLEDER**  
TELE-COMMUNICATIONS, INC. 

2520 Highway 35 / Manasquan, NJ 08736 / 908-223-1616 / 1-800-WEISLEDER / Fax 908-223-4454

July 26, 1995

DOCKET FILE COPY ORIGINAL

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

Dear Mr. Hunt:

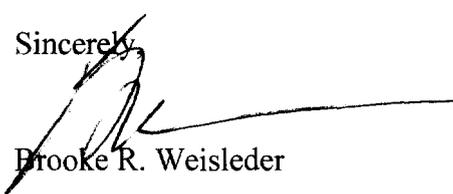
I am writing to you to urge you to permit current **800 number customers** to reserve the new **888 exchange** equivalent.

**800 numbers** have become a valuable asset to businesses nationwide. With the new toll-free 888 exchange, there would be tremendous consumer confusion and fraud if businesses were unable to reserve and/or use the 888 equivalent of their 800 numbers.

Before general availability of the new 888 numbers, there should be a reservation system put in place for the current customers of record of 800 numbers. Businesses have invested very heavily in the marketing of their 800 numbers to gain customer recognition; subsequently, if they were not given the opportunity for the 888 equivalent, there would be massive consumer confusion, complaints, fraud and other disconcert that could have been avoided.

AT&T is on the right track placing both their customers and the public in the forefront. I suggest that you give very serious consideration to their plan.

Sincerely,

  
Brooke R. Weisleder

BRW/pm  
cc: Kathleen Wallman  
Chief Consumer Bureau, FCC



27 July 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 support of 800 number brand protection with the advent of the new 888 toll free exchange. I support the following approach:

- o **The FCC should provide for a one-time, limited, set-aside of 888 numbers prior to general availability of the 888 service area code. During this period, customers who have existing 800 numbers that are widely known and accepted and are utilized by external customers should be permitted to reserve the corresponding 888 numbers. Upon general availability of the 888 area code, the standard first-come, first serve principle should apply to all requests for 888 numbers.**

Several public interests would be served by this approach:

- o **minimize risk of premature exhaustion of 888 numbers which could result if there were a rush for immediate replication of *all* 800 numbers in the 888 service area code.**
- o **minimize brokerage activities by parties seeking to acquire and "sell" corresponding 888 numbers to the current "vanity" number owner.**
- o **minimize customer confusion and frustration and potential fraud arising from dialing the corresponding 888 number of a popular vanity number on the mistaken assumption that the same business entity utilizes both numbers.**
- o **minimize 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.**

Mr. Reed Hundt  
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- o **minimize the potential for litigation for incumbent 800 subscribers, whose toll-free numbers serve as their trade-names and/or are associated with the goodwill of the customers' 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 number.**

Again, I believe the above approach will ensure public interests are served as the new 888 service area code is introduced. It's imperative that this new area code be implemented with a plan aimed at protecting both existing 800 "vanity" customers while ensuring general availability of the new 888 area code to the public as a whole.

Please contact me at 708/320-4017 if I can provide you with an additional input on this important issue.

Sincerely,



Linda Thompson Orfanos  
Telecommunications Manager  
Kemper National Insurance Companies

cc: Ms. Kathleen Wallman, FCC, Washington