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

In the Matter of	)	
Toll-Free Service Access Codes	)	CC Docket No. 95-155

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COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION

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SUMMARY

MCI does not support a requirement that a RespOrg obtain an affirmative request from a subscriber before reserving a number, or a requirement for an escrow deposit when reserving a number. MCI does not support reducing the time periods during which a number can be held in certain statuses, or further restricting the quantity limitation on reserved numbers.

MCI supports a 45-day advance reservation period prior to opening of the 888 code. MCI supports holding 800 vanity numbers in unavailable status until they can be resolved after the code is opened. MCI also supports a 50 percent trigger for the planning of implementation beyond the 888 code. MCI supports collection of additional information and release in aggregate form only. And, MCI supports a limited industry campaign to educate the public about additional toll-free resources.

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MCI Telecommunications Corporation and its affiliated companies (MCI)[1] respectfully submit these comments in response to the Notice of Proposed Rulemaking (Notice) released by the Federal Communications Commission (FCC or Commission) in the captioned proceeding.[2] As explained more fully below, MCI opposes requiring affirtmative requests from subscribers before numbers can be reserved and opposes an escrow requirement. MCI supports an advance reservation approach prior to opening of the 888 code and holding 800 vanity numbers in unavailable status until after the code is opened and their assignment can be resolved. MCI does not support reducing the time periods during which a number can be held in certain statuses, or further restricting the quantity limitation on reserved numbers. MCI supports a 50

[1] MCI has expanded from its core long-distance business and today provides a wide array of consumer and business long-distance, local, data and video communications, as well as on-line information, electronic mail, network management services and communications software.

[2] FCC No. 95-419, released Oct. 5, 1995.

percent trigger for the planning of implementation beyond the 888 code, collection of additional information and release in aggregate form, and an industry campaign to educate the public about additional toll-free resources.

I. EFFICIENT USE OF TOLL-FREE NUMBERS

A. THE COMMISSION SHOULD NOT REQUIRE A RESPONSIBLE ORGANIZATION TO OBTAIN AN AFFIRMATIVE REQUEST BEFORE RESERVING A NUMBER

MCI does not support the Commission's proposal to require a Responsible Organization (RespOrg) or 800 service provider to have an affirmative request from a subscriber before assigning a toll-free number to the customer (para. 13). Toll-free and other communications services are often promoted to prospective customers by telephone marketing. Requiring a request from subscribers would impose a substantial and unnecessary burden, and would unreasonably delay service installationa and implementation.

Nor is a separate request necessary when the toll-free number is requested by the customer as part of a "package" of services. The customer's request for such an offering should be sufficient to signify interest in the toll-free number. The FCC should recognize that communications services are increasingly offered in conjunction with other telecommunications services. Requiring an authorization for each service or feature would discourage a trend that is beneficial to customers and in which customers are

increasingly expressing an interest.

Finally, a request requirement would unnecessarily burden RespOrgs and the FCC in monitoring and policing these requests.

B. THE COMMISSION SHOULD NOT REQUIRE AN ESCROW DEPOSIT FOR REQUESTS TO RESERVE NUMBERS

MCI does not support the FCC's proposal to require a deposit into an escrow account for each toll-free number requested to be held in reserved status (para. 14-16). An escrow deposit would unnecessarily increase the costs of administering toll-free resources. The FCC has enforcement authority it can use against an entity or individual who abuses the number reservation process. An enforcement action would be more effective in deterring abuse than would imposition of a fee for reservation and the cumbersome processes it would entail.

If a decision were made to impose such a fee, the FCC would need to establish a fee structure and level that would apply across all services to avoid discrimination against any service segment. There is a risk that setting a level high enough to deter an errant large business customer might require a fee so high as to inhibit a residential or small business customer from obtaining a number that it needs. The FCC should recognize that some business customers would have a greater ability to pass this fee to their own customers as a cost of doing business. This could increase

costs to consumers of not only telecommunications services but of products and services purchased from businesses that use toll-free numbers.

C. MCI DOES NOT SUPPORT REDUCING THE TIME PERIODS DURING WHICH NUMBERS ARE HELD IN CERTAIN STATUSES

The FCC proposes to reduce the amount of time a number can remain in reserved status from 60 to 45 or 30 days (para. 18). MCI does not support this proposal as its experience shows that a certain amount of time is needed to make the necessary arrangements with local exchange carriers and to have the numbers processed for activation by the database manager. For example, if the toll-free customer is requesting new service and needs a T-1 trunk, the RespOrg must negotiate and obtain the facility from the local carrier.

MCI does not support the FCC's proposal to reduce from twelve to four months the amount of time a number can be in assigned status before it is changed to working status (para. 18). The assigned period refers to the time after which the RespOrg has entered specific customer routing information in the Service Management System's (SMS's) toll-free number record, and while the number is pending activation in the SMS to be sent to the local exchange carriers' Service Control Points. The assigned period was established at 12 months to accommodate the needs of certain customers with special needs requiring the number to be set

up at a later date. Decreasing this period would prevent RespOrgs and toll-free service providers from meeting the special needs of these customers.

MCI also does not support the proposal to reduce the transitional period between disconnect and spare statuses from six to four months (para. 19). One purpose of the transitional period is to allow sufficient time between the former number holder and the new customer taking that number, so that residual calls intended for the former holder are minimized. These calls would be billed to the new customer who would then be responsible for paying for them. If the former holder of the number advertised that number heavily in its business undertakings (for instance, a catalog company), residual calls could potentially interfere with the new number holder's ability to conduct its own business. Therefore, MCI believes that six months is needed to protect the new customer from receiving calls intended for the former customer.

Finally, MCI does not support the proposal to reduce the amount of time numbers can be suspended, pending reactivation, from twelve to four months (para. 19). Many numbers are placed in this status for nonpayment or as a result of other billing disputes. In MCI's experience, resolution of these disputes may take longer than four months. While twelve months may be longer than necessary to resolve some customer situations, a shorter period would not

accommodate all cases. In any event, many numbers are either reactivated or released to spare as soon as the dispute is resolved and are not held for the full 12 months. Therefore, decreasing the period would not yield a substantial body of numbers for reassignment, as the Commission apparently anticipates.

D. THE COMMISSION SHOULD ENCOURAGE THE USE OF PERSONAL IDENTIFICATION NUMBERS

The FCC asks whether it should encourage the use of Personal Identification Numbers (PINs) with toll-free numbers (para. 20). As stated in the Notice, MCI has certain residential and commercial applications that make use of PINs. If the FCC establishes incentives for the use of PINs (para. 21), MCI should be eligible for rewards because it has used PINs prior to any FCC policy promoting their use.

MCI supports an FCC approach that encourages but does not mandate the use of PINs. From the perspective of conserving numbering resources, the use of PINs makes sense. However, as the FCC noted, PINs have disadvantages: they prevent individual customers from porting shared numbers, and they may place an 800 service provider at a disadvantage compared with competing companies that do not use PINs. For these and other reasons the use of PINs would not be appropriate for every toll-free service.

The FCC also asks whether it should encourage PIN use for numbers with low usage and seeks comment on how to define low usage (para. 21). MCI does not support a policy approach that would identify certain numbers or certain services as being less worthy of having a toll-free number. The fact that a number may have little use per month does not make its use less important than high-volume use. For example, an individual who wears a pager so that her aged mother with a heart condition can reach her at any time of day may consider these occasional calls as the most important calls received. As a matter of public policy, the FCC should not get involved in making judgments on the value of calls made to toll-free numbers.

As a practical matter, it would be quite difficult for the industry to identify numbers that have low-volume usage. The volume of usage is not visible to the database manager but only to the individual customers and the 800 service providers. The RespOrg would not release this information without the customer's consent. Consequently, any FCC enforcement of a low-volume policy would be dependent on voluntary disclosure by customers of their service usage.

The FCC also asks whether certain services should be removed from the 800 resource and onto another code, making specific reference to personal and paging segments. MCI does not support segmentation of toll-free resources. Assigning distinct services to separate codes would be an

inefficient use of these resources. The 800 resource would deplete eventually and a third code would need to be opened while the 888 code would be only partially depleted. In addition, as mentioned elsewhere in these comments, services are increasingly offered in packages. Therefore, it may be difficult to determine for a particular service package which resource would be appropriate.

E. THE COMMISSION SHOULD NOT DECREASE THE QUANTITY LIMITATION FOR RESERVED NUMBERS

The industry's 800 number assignment guidelines limit the quantity of numbers a RespOrg can reserve to the greater of 1,000 numbers or 15 percent of the RespOrg's total working numbers.[3] The FCC proposes a permanent cap limiting the total quantity of reserved numbers to a percentage less than the current 15 percent, possibly as low as three percent (para. 33).

MCI supports the 15 percent limit established in the industry's guidelines. This limitation seemed to be working prior to June 1995, when the FCC imposed conservation measures on the 800 number resource. To MCI's knowledge, there has been no proof of "warehousing" or hoarding of numbers; nor has the FCC stated that it found evidence of warehousing or hoarding in its investigation. These are merely unsubstantiated claims put forward by a few parties.

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[3] Industry Guidelines for 800 Number Administration, Section 2.2.5, Issue 4, June 8, 1995.

Thus, there is no need to further restrict the guideline that was in effect prior to conservation.

The Commission also proposes to require RespOrgs to certify to the FCC that: (1) there is an identified subscriber who has agreed to be billed for service associated with a number requested from the database; and (2) there is an identified, billed subscriber for a number before switching a number from reserved or assigned to working status (para. 34). It asks whether this information should be considered proprietary and whether it should be required monthly, quarterly or annually.

It is not clear how extensive the FCC intends these reports to be. If the FCC intends that the RespOrg would generally certify, on a periodic basis, that it has customers for each reserved and working number, then MCI does not object to filing such a certification.

If, however, the RespOrg would be required to certify information about specific numbers and subscribers, then MCI has serious concerns about the proposal. It appears that the Commission may intend to require an officer of the RespOrg entity to certify, under penalty of fine or imprisonment, that the subscriber is reserving or activating the number under valid circumstances. This requirement would not be possible given the relationship of RespOrg and subscriber. The RespOrg provides toll-free service and the numbers associated with that service. It has no reason to

question, as a general matter, the validity of the customer's request. Furthermore, when the customer requests activation and pays for the service, the RespOrg has no reason to suspect -- and no way to confirm -- that the number is not being activated legitimately. MCI, acting as a RespOrg for the subscriber, would not be in a position to certify to the intention of the subscriber; nor should it be expected to subject itself to penalty for the potential wrongdoing of its customer.

II. IMPLEMENTATION OF THE 888 TOLL-FREE CODE

A. THE COMMISSION SHOULD CODIFY PROCEDURES FOR THE RESERVATION OF TOLL-FREE NUMBERS

The FCC asks whether current reservation and assignment policies should be codified or amended. It asks specifically for comment on (1) the first-come, first-served reservation and assignment process; (2) the reservation limit of 1,000 or 15 percent of a RespOrg's total working toll-free numbers;[4] and (3) the 60-day maximum reservation before converting to working status (para. 23). It also asks whether a number requested by two RespOrgs should be subject to dispute resolution; and, if no resolution resulted, whether the number should be assigned by lottery.

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[4] MCI has addressed the 15 percent reservation limit and the 60-day reservation period in these comments at section I.E., above.

MCI supports the concept of number reservation on a first-come, first-served basis. This concept runs consistently throughout the industry's guidelines for numbering resources, toll-free as well as others. MCI sees no reason to alter that general principle, which also is accepted as an allocation mechanism in other respects.

Furthermore, as long as the industry continues to observe the first-in-time reservation concept for the toll-free resource, there should be no need for dispute resolution. It is virtually inconceivable that a number would be reserved at the exact same instant by two RespOrgs.

The FCC raises the issue of large RespOrgs using automatic reservation technology (para. 23). MCI believes there is no reason for the FCC to take any action on the use of multiple or mechanized interfaces by RespOrgs. The fact that one RespOrg has a bigger or better system than another does not establish that the 800 database reservation process is flawed or unfair. Every carrier has the opportunity to invest in and to make its network as large as necessary to meet the needs of its customers. The Commission should not create a disincentive to do so. Nor should a carrier be punished for being efficient or responsive to its customers. Also, as the Commission is aware, these RespOrgs purchase access through the local exchange carriers' SMS tariffs. This ability is open to every RespOrg wishing to purchase multiple access.

Finally, the FCC asks whether it should have different reservation procedures for codes of high demand (e.g., 800-555) (para. 23). MCI believes there should not be special rules for any segment of the toll-free resources. It would be difficult, if not impossible, for the FCC or the industry to determine in advance whether a numbering resource would be in high demand. The opening of the 800-555 resource was a special circumstance that may not be duplicated. All segments of the 888 and other toll-free resources should be available under the same reservation procedures.

B. THE COMMISSION SHOULD ALLOW NUMBER RESERVATION PRIOR TO OPENING OF THE 888 RESOURCE

The FCC asks how it can ensure that no degradation occurs in the performance of the SMS when there is a high volume of activity on the data links (para. 24). It asks whether the data links should be expanded to accommodate the volume of traffic expected with opening of the 888 code, or whether the volume would be only temporary.

MCI expects that the high volume that may be experienced at the opening of the 888 resource would be temporary and would not be maintained throughout the life of the code. Nevertheless, it is worth noting that prior to institution of the 800 conservation measures, MCI had experienced problems with number reservations that were associated with the limitations of the local exchange carriers' data links. This may indicate that the data links

are insufficient to handle general operations of toll-free reservation and assignment. If the FCC is concerned that the volume may exceed the technological capabilities of Bellcore and some of the local exchange carriers, then the FCC should direct them to upgrade their data links. As mentioned above, RespOrgs are paying access fees to these carriers for 800 routing. These fees should be used to maintain the network so that it can comfortably accommodate the projected toll-free needs. The industry and toll-free customers should not be required to suffer with daily limits on the quantity of numbers that can be reserved due to outdated capabilities of one or more of the local carriers.

The FCC also proposes allowing numbers to be reserved 45 days in advance of the general availability of the next toll-free code but not allowing those reservations to change to working status until the availability date or beyond (para. 25). As a measure to alleviate the heavy burden related to opening of the new 888 code, MCI supports using an advance reservation period beginning 45 days before the code is opened for general activity. This should reduce the load on the data links that might otherwise occur because of the demand that has not been satisfied due to 800 conservation measures. The first-come, first-served principle should apply during the advance reservation period.

The FCC asks whether a new toll-free code should be activated gradually; and what measures it should take to effectuate gradual implementation, such as limiting the quantity of numbers that can be drawn from the database in a given time period (para. 24). The FCC further proposes limiting the quantity of numbers that can change from reserved to assigned to working status in one day (para. 25). MCI does not support daily limitations of this nature or phased introduction of the toll-free resources because customers should have the opportunity to request and obtain any available number in the 888 resource, rather than having to wait until the number is released at a later, arbitrary time.

C. THE COMMISSION SHOULD DIRECT THE DATABASE MANAGER TO HOLD CLAIMED VANITY NUMBERS IN UNAVAILABLE STATUS UNTIL THEIR ASSIGNMENT IS RESOLVED

The FCC asks for comment on certain measures designed to protect the interests of the holders of 800 vanity numbers: (1) allowing a right of first refusal to permit the holder of a number to receive the equivalent 888 number (para. 41-43); (2) identifying subscribers by industry codes and preventing assignment of the 888 number to a company with the same code as the 800 holder (para. 44-45; (3) holding vanity numbers in the 888 code until a percentage of that code has been depleted (para. 46); and (4) sharing an intercept message between the similar 800 and 888 numbers

(para. 46).

There are valid arguments on both sides of this issue. In view of the issue's complexity, MCI agrees with the proposal of the SMS/800 Number Administration Committee (SNAC) to have RespOrgs compile a list of all numbers that would be protected under such a policy and have the SMS hold these numbers in unavailable status until a time after the opening of the code. This would allow the 888 code to be opened as scheduled on March 1, 1996. These protected numbers could then be assigned after the Commission resolves the issues associated with protection of vanity numbers, either to the vanity holders or to subscribers in general.[5]

As to the merits of the Commission's proposals, MCI believes the right of first refusal has the greatest potential for protecting the right of the 800 holder. MCI has polled its subscribers and has found substantial support for the right of first refusal. MCI itself has numbers that it would consider protecting in this manner.

MCI does not support the proposal to use industry codes to protect vanity numbers (para. 44-45). This option is so administratively complex for all parties involved as to be unworkable. First, assigning a classification that would have meaning in a fluid communications industry would be

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[5] MCI also believes the Commission should direct the database manager to assign the unavailable status to any numbers to be used for toll-free Directory Assistance until the FCC resolves the proceeding examining toll-free DA (para. 48).

virtually impossible. The Commission recognized in the Notice the difficulty of classifying conglomerates that may fit within multiple classifications. Second, RespOrgs and the database manager would be so consumed with questions associated with classifications that they could scarcely perform other required duties. Third, tracking the number beyond initial assignment would require new procedures since the database does not currently keep a history of assigned numbers. Fourth, carrying the protection mechanism beyond the 888 resource, as envisioned by the proposal, would raise the system to nightmarish proportions. Fifth, as the Commission recognized in the Notice, this proposal would delay introduction of new codes because of the technical changes that would have to be made to the system.

Finally, MCI does not support use of a transitional intercept message shared by the holders of 800 and 888 numbers. An intercept message would not be workable for many voice and data commercial applications because the intercept message would interrupt the automated message stream. Also, providing this capability for all toll-free numbers would create a tremendous burden on the network and would require costly modifications.

D. THE COMMISSION SHOULD NOT IMPOSE A CIRCUIT BREAKER RULE ON DAILY OPERATIONS

The FCC asks for comment on use of a circuit breaker method similar to the method used to suspend trading on the

stock market for short periods (para. 52-55). One proposed model would be used to effect conservation when exhaust of a toll-free code is approaching. The other proposed model might be activated to conserve numbers on a daily basis.

The Commission proposes that the exhaust conservation model could be executed when the exhaust date for the current toll-free code is announced. The RespOrg would be limited to a weekly consumption rate equal to the weekly average quantity of numbers it obtained during the previous twelve months. If the RespOrg exceeded the threshold, it would be limited to one-half of its weekly average consumption rate until one month after the new code is activated.

MCI supports using a conservation mechanism during periods when the toll-free code is approaching exhaust. The proposed model is consistent with the adjusted allocation model that is being used during the final months of 800 conservation. MCI supports using this allocation model for exhaust conservation for subsequent toll-free codes.

MCI does not support a conservation rule that would apply to daily operations of the RespOrgs. The Commission proposes that each RespOrg's rate of consumption would be computed by averaging the five days of highest consumption during the previous month, and that if the RespOrg were to reserve three times that rate in a single day, the circuit breaker rule would take effect.

As noted elsewhere in these comments, the Commission has not stated that it found any proof of hoarding or warehousing during its investigation of 800 number usage. Unless it can justify that there is a need for a cumbersome and complex daily conservation mechanism, no measure should be implemented. Absent a valid reason for such limitations, the customer should be able to obtain the numbers it needs, and the RespOrg should be in a position to reserve and obtain numbers for their customers.

E. THE COMMISSION SHOULD NOT REQUIRE IDENTIFICATION OF HIGH-VOLUME NUMBERS

The FCC asks whether a number that receives a high volume of calling should be identified for a potential subscriber of the number in another toll-free code (para. 47). It asks how high-volume numbers might be identified in the SMS.

It is easy to sympathize with the plight of the subscriber that obtains a number in the 888 resource that corresponds to a high-volume number in the 800 resource (this subscriber might expect a high number of misdials). However, as stated above, it is not currently possible to identify these numbers in the database. Consequently, the Commission should not require RespOrgs to identify these numbers.

III. MCI SUPPORTS A 50 PERCENT TRIGGER FOR THE PLANNING OF IMPLEMENTATION BEYOND 888

The FCC proposes that the industry identify a trigger that would alert the industry when the current toll-free code is approaching exhaust so the next code can be implemented (para. 27). It proposes that the triggering event might be when unassigned numbers in the 888 database decline to a specified percentage of total numbers, such as 50 percent. It asks whether it should mandate implementation of a new toll-free code on six months' notice to improve the transition to a new code.

MCI supports identification of a trigger and supports using 50 percent consumption as the trigger point. This should avoid some of the frenzy involved in the transition between the 800 and 888 resources. The 50 percent trigger also should be sufficient to accommodate accelerated depletion as occurred when the 800 resource approached exhaust. Nevertheless, the FCC should take into account the accelerated depletion model that is being developed by the Industry Numbering Committee.[6] This forecasting concept uses an exponential modeling curve as a tool to predict the exhaust of the toll-free resources.

MCI also supports a mandate that implementation would need to occur six months after the trigger is announced. As

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[6] See draft letter from Denny Byrne and Bob Hirsch, Co-Chairs, Industry Carriers Compatibility Forum, to Doyle Griffin and Don Werner, Ordering and Billing Forum Moderators, regarding Toll-Free Resource Exhaust Planning Process, not yet dated.

the Commission stated in the Notice, six months should be adequate time to deploy hardware or conduct testing needed before a new code can support live traffic, especially since the SMS, Signaling Control Point vendors and switch vendors have stated that their products would support codes beyond 888.

MCI supports a requirement that all network switches in the U.S. should have installed, by February 1997, at least the software needed to support all toll-free codes reserved by the industry in January 1995 (para. 29). This would apply to all codes from 877 to 822.

MCI also supports an FCC requirement that 800, 888 and subsequent toll-free code calls will be routed by the local exchange carrier (LEC) over the same trunk groups connected to their interconnecting carriers (para. 30). As MCI stated in industry meetings on implementation of the 800 and 888 codes, routing toll-free calls through a tandem rather than an end office is inefficient and unnecessarily costly to interconnecting carriers.

MCI supports the FCC's tentative conclusion that each toll-free code should meet the call set-up time requirements established in the 800 database proceeding (para. 30). Finally, MCI would support oversight by the North American Numbering Council of implementation of codes beyond 888 (para. 27), with intervention by the Commission, as necessary.

IV. ADMINISTRATION OF TOLL-FREE DATABASES

MCI supports the Commission's conclusions related to tariffing of toll-free access. The Commission concludes that 888 service and subsequent toll-free codes should be treated as functionally interchangeable with 800 services in the LECs' 800 access tariffs (para. 56). It concludes that Part 69 provisions for 800 service would cover 888 service and that the LECs would not need a waiver of Part 69. It concludes that costs of providing 888 service should be treated in accordance with the procedures it established for 800 service and that the LECs should file their tariff revisions on not less than 45 days' notice.

V. MCI SUPPORTS COLLECTION OF ADDITIONAL INFORMATION AND RELEASE TO THE PUBLIC IN AGGREGATE FORM

The FCC proposes that DSMI be required to submit periodic reports to the FCC on toll-free number utilization (para. 31). It proposes that these reports include information on each toll-free code, including: (1) quantity of numbers in spare status (available for assignment); (2) quantity of numbers in working status (in use); (3) the quantity of numbers assigned to working status each month; (4) estimated time remaining before that code is exhausted, along with the method used to calculate the estimated time remaining; and (5) quantity of numbers assigned to other categories contained in the industry guidelines. The FCC also asks whether information on the toll-free market should