

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
TOLL FREE SERVICE)
ACCESS CODES)

CC Docket No. 95-155

To: The Commission

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**COMMENTS OF AIRTOUCH PAGING
ON THE NOTICE OF PROPOSED RULEMAKING**

AIRTOUCH PAGING

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SUMMARY

AirTouch Paging is commenting on the Notice of Proposed Rulemaking respecting Toll Free Service Access Codes. Generally, the comments support the Commission's efforts to adopt a forward looking allocation plan for toll free SACs that will assure smooth transitions between codes. However, AirTouch Paging is concerned that some of the specific proposals represent an over reaction to the recent 800 number shortage which, if implemented, would prove to be overly burdensome. As a result, AirTouch Paging supports a more limited regulation of toll free SACs by the Commission in certain circumstances.

AirTouch Paging advocates rules that promote early planning for SAC exhaustion and provide the industry with adequate notice of impending exhaustion. Planning activities should be completed with the aid of industry participants. AirTouch Paging proposes using the ICCF Central Office Code Assignment Guidelines as the model for managing toll free SACs declared to be in jeopardy of exhaustion.

AirTouch Paging recommends a tiered set of rules for managing the transition between SACs. The current rules guiding transition between the 800 and 888 SAC are acceptable. Future transitions should require less Commission intervention and the rules should be adapted to reflect this fact.

AirTouch Paging endorses strict penalties for parties found to be abusing the Toll Free SAC allocation plans that come out of this rulemaking proceeding. Recommended penalties include

number stripping, loss of certification, and fines. The comments object to, as overly broad, any blanket application of burdensome rules requiring subscriber certificates, escrow deposits and circuit breakers to discourage number warehousing and hoarding.

AirTouch Paging advocates an even-handed approach to toll free SAC code allocation in which no segment of the communications industry is singled out for disparate treatment. For example, AirTouch strenuously objects to partitioning the 800 SAC from other toll free SACs based on service type, and to creating any privileges for "vanity" numbers. In general, any proposal to treat providers of paging service differently than others is opposed as unworkable and shortsighted.

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**COMMENTS OF AIRTOUCH PAGING
ON THE NOTICE OF PROPOSED RULEMAKING**

AirTouch Paging^{1/}, by its attorneys, hereby submits its Comments on the Notice of Proposed Rulemaking (the "NPRM") adopted October 1, 1995, in the above-captioned proceeding in which the Commission is seeking comment on the management of current and future toll free service access codes (SACs).^{2/} The following is respectfully shown:

**I. AirTouch Paging Has a Substantial
Substantial Basis for Informed Comment**

1. AirTouch Paging is a substantial provider of narrowband wireless services throughout the United States. AirTouch Paging provides services to approximately 1,800,000 paging units from facility-based operations in 21 states. The

^{1/} AirTouch Paging is a subsidiary of AirTouch Communications. These Comments reflect the views of the paging subsidiary.

^{2/} FCC 95-419, released October 5, 1995.

company is rapidly building out nationwide paging systems that will greatly expand the scope of its operations. AirTouch paging also is actively involved in developing narrowband PCS networks of national scope.^{3/}

2. With the growth of its national service offerings, AirTouch Paging is encountering an increasing number of customers requesting nationwide toll free 800 numbers for their pagers so that callers may reach them toll free from anywhere in the United States. Consequently, AirTouch Paging regularly orders 800 SAC numbers and provides them on request to certain paging subscribers. The company also uses 800 numbers for customer service. The active involvement of AirTouch Paging in the use of toll free numbers provides it with useful insights into the issues raised in the NPRM.

3. AirTouch Paging also has considerable knowledge regarding SAC exhaustion issues which have become familiar topics of discussion in both federal and state forums. Wireless carriers, such as AirTouch Paging, have been impacted greatly by proposed methods of establishing and implementing new area codes where number shortages exist. AirTouch Paging has actively participated in various proceedings dealing with these issues. In the process, it has gained valuable experience in understanding the technical and economic implications of dynamic numbering plans.

^{3/} AirTouch holds a nationwide narrowband PCS frequency and several regional PCS authorizations.

4. Based upon the foregoing considerations, AirTouch Paging has a substantial basis in experience for informed comment in this proceeding.

**II. Regulation of Toll Free Service
Access Codes Should be Limited**

5. The Commission's underlying concern regarding the fair allocation and exhaustion of toll free numbers is well founded. AirTouch Paging appreciates that the number of practical applications for toll free numbers is increasing. As a result, the quantity of toll free numbers being used will continue to grow and the market participants will become even more diverse. This complexity creates a greater need for rules that ensure that all participants have an equal opportunity to secure the toll free telephone numbers that the market demands for their services and to ensure that the resource is not extinguished. AirTouch Paging, therefore, agrees that some new rules must be put in place.

6. AirTouch Paging believes, however, that any new rules must use a light regulatory touch. The Commission must be careful not to create rules which overburden the numbering system. As is set forth in greater detail within, AirTouch Paging supports carefully circumscribed rules that address three important points: number exhaustion, transition issues and abuses.

A. Number Exhaustion

7. AirTouch Paging agrees on the need for Commission involvement that ensures timely notification of all necessary parties of the impending exhaustion of a toll free SAC and for the creation of safeguards to ensure that the new SAC is available prior to exhaustion of the old SAC. The industry and the Commission cannot tolerate another crisis in which available toll free numbers are threatened to be exhausted unexpectedly. Since all telecommunications companies use 800 number resources, the ability to properly forecast and predict impending exhaustion is a necessity.

8. The SMS database administrator has responsibility for monitoring the database to determine when a SAC is likely to expire. At the administrator level, planning for a new SAC should begin when the previous SAC is introduced.^{4/} Planning should include representatives of all groups affected by, or required for, actual implementation of the plan.^{5/} This is to ensure that transition to the next SAC will be as seamless as possible.^{6/} AirTouch Paging supports using a 50% depletion level

^{4/} NPRM at para. 27. In fact, since everyone knows that 888 will exhaust, perhaps the next several toll free SAC codes should be implemented now.

^{5/} These are exactly the activities that are done on a local level when an NPA is nearing exhaust.

^{6/} AirTouch Paging anticipates that the need for Commission interjection in later SAC rollouts will be greatly reduced as the necessary technology is implemented and the procedures for number management are perfected. Any rules adopted should thus be reviewed before being applied in later rollouts. The Commission might find it helpful to

as the trigger for implementing the previously developed SMS database administrator's plan,^{7/} so long as that trigger provides a six month notice period to allow businesses to prepare internally for the change.^{8/}

9. AirTouch Paging recommends the Commission adopt the ICCF Central Office Code Assignment Guidelines as a model for the procedures to follow after the trigger is reached.^{9/} Under these guidelines, each user of the toll free SAC would have to review their existing number usage and return those numbers which exceed the forecasted amount. All requests for numbers would be treated in a fair and impartial, first-come, first-served, manner. In addition, reserved codes would be returned voluntarily, and if their expected implementation is beyond the new SAC date, cancelled.^{10/} AirTouch Paging believes the ICCF model is superior to the circuit breaker models described in the NPRM which will not work because they unfairly restrict a

work with an industry group, such as the ICCF or INC, to develop appropriate guidelines.

^{7/} NPRM at para. 27.

^{8/} As an alternative, the SMS database administrator could use the same rules as the local code administrators do as set forth in the ICCF Central Office Code (NNX/NXX) Assignment Guidelines (10/26/94 Revision).

^{9/} ICCF Guidelines § 7.

^{10/} Id. § 7.4(d).

RespOrg's ability to get new numbers even if no one else is requesting such numbers.^{11/}

B. SAC Transition

10. AirTouch Paging sees no reason to change now the rules that are in place to manage the transition from 800 to 888. These rules, which limit the number of 800 numbers RespOrgs and Service Providers may reserve at one time, have served the public interest because it was not certain in the absence of these strict measures that the infrastructure for the new SAC would be in place prior to or concurrently with the exhaustion of the 800 SAC.

^{11/} NPRM at paras. 51-55. Paragraph 53 proposes a circuit breaker model to be used once a SAC exhaustion date had been established. The weekly historical consumption average suggested is a viable but not an ideal option. One drawback is the model's failure to accommodate RespOrgs and Subscribers who suddenly encounter business changes which could reasonably cause them to need a much larger allotment of numbers. The best example is the subscriber who secures a new license to operate a service and needs a large quantity of numbers from a single RespOrg. The weekly limit based on historical average could prevent a legitimate need from being met when no other reason exists to block the reservation. Implicit in this scenario is also a competition issue. Large RespOrgs and 800 Service Providers will likely be better able to meet this kind of demand because their historical average will be higher than a smaller entity's historical average. The circuit breaker becomes a bar to the smaller entity being able to attract larger transactions. The circuit breaker model suggested in paragraph 55 should only be an option if exhaustion has been forecasted. It is subject to the same criticism as the model described in paragraph 53. Regardless of the above, if circumstances become serious (i.e. there is a significant likelihood the new SAC cannot be implemented before exhaustion of the old), the Commission is encouraged to use whatever means necessary to stem exhaustion of numbers under the old SAC.

11. However, AirTouch Paging believes that maintaining these same rules for future transitions is likely to result in over-regulating toll free SAC introduction for other 8-based SACs (899, 877, etc.). The transition between 800 and 888 requires greater Commission involvement because of the many unknowns associated with the transition, and the mere fact that it is the first such transition. Future transitions should not require as much Commission involvement because many of the uncertainties will have been eliminated. It is, therefore, recommended that no additional rules (other than those discussed in the Exhaustion Section above) be adopted until more is known about the effectiveness of the rules in the previous transition.

12. SACs based on the number 8 (8XX) will eventually be exhausted. The Commission, working with the industry, should establish a high level, strategic plan in anticipation of this exhaustion.^{12/} The strategic plan, for instance, should include a determination of what will be the next category of SAC numbers (7XX, 9XX, etc). In the meantime, specific tactical plans and rules should be delayed until the industry becomes more educated on future technologies and business needs so that all viable options may be considered.^{13/}

^{12/} Once again AirTouch Paging encourages the Commission to work with and through industry groups to develop these plans and rules. Industry input and involvement in the process will conserve scarce Commission resources and better resolve issues.

^{13/} Even if the use of toll free SACs continues to accelerate, which is likely, having a series of 8XX numbers available will provide considerable time until a transition to a new

C. Abuse of SAC Allocation Plans

13. AirTouch Paging recognizes that warehousing and hoarding of toll free numbers can occur. However, these abuses appear to be the exception, not the norm. Imposing burdensome anti-warehousing rules on all market participants for the actions of a few would unfairly lead to additional costs and inefficiencies in service deployment.^{14/} AirTouch Paging recommends that the Commission avoid subjecting users of toll free numbers to overly stringent procedures that would result in otherwise unnecessary Commission involvement or monetary investment to secure toll free numbers unless there is evidence of abuse. When abuse has been demonstrated,^{15/} strict safeguards to eliminate the abuse may be appropriately applied to the abusing party.^{16/}

14. The Commission has asked whether RespOrgs should be required to prove that, for each 800 number to be reserved or placed in working status, a real subscriber exists for the

SAC number category is required.

^{14/} As the Commission's experience has shown in the licensing arena, anti-speculation and warehousing rules seldom work and do impair the business plans of existing and new service providers.

^{15/} AirTouch Paging defines abuse as any fraudulent request for toll free service. A request is fraudulent if it is not driven by any actual need or good faith forecast of the need for such service.

^{16/} This should include stripping the abusing party of numbers and imposing monetary forfeitures.

service.^{17/} The RespOrg could also be required to store such proof for two years. While this requirement may deter the RespOrg from unnecessarily reserving numbers, it also creates a tremendous record generation burden. To implement this plan, the subscriber would, no doubt, be required to provide proof to the RespOrg. This will lead to more paperwork for the subscriber and may compromise proprietary information on the subscriber's customer.^{18/} The RespOrg would have to process and store more paper, thus adding to the cost of service. And, the database administrator would be required to ask for proof of a subscriber before reserving the number for the RespOrg. This could create the need for additional fields to be built into the systems managing number allocation.

15. All of the above adds time, cost, and complexity to the number assignment process.^{19/} Instead, sanctions should be directed only at abusers.^{20/} This solution directs the penalty and its affects to the offending party. Another

^{17/} NPRM at para. 13.

^{18/} Proprietary customer information could be released if the RespOrg offered the actual order from the subscriber as proof of the subscriber's existence. Depending on the subscriber, the order could contain private credit information, etc. which the database administrator would not need in order to release the number. The privacy concerns are exasperated by the storage requirement which may cause private yet non-essential information to be available to unapproved parties.

^{19/} This runs counter to the need to make the system more efficient.

^{20/} Periodic audits of 800 number use could be conducted to ferret out abuse.

alternative would be to require subscriber verification from randomly selected RespOrgs.^{21/} This would provide a deterrent to the casual reservation of numbers without creating all the unnecessary paperwork.

16. AirTouch Paging discourages requiring an escrow deposit for all industry participants.^{22/} In order for an escrow deposit to serve as an effective deterrent to abuse, the amount must be large enough to make its payment and loss significant. However, the size and sophistication of the RespOrgs, 800 Service Providers, and subscribers varies, which makes determination of an appropriate amount difficult. The users and providers of toll free service differ greatly in their ability to devote capital to the reservation of telephone numbers. Some communications businesses operate on extremely small margins. Others generate considerable revenue, but must constantly reinvest their proceeds from operations into their networks. Some others are cash rich.

^{21/} The SMS database administrator could create an algorithm which would randomly instruct the administrator to ask for subscriber verification. If the RespOrg or 800 Service Provider could not provide such proof in 24 hours, the reservation would not be made and a report would be generated noting the failure. A copy of the report should be kept on file by the administrator and also sent to the RespOrg. If such failures occurred three times in a two year period, the database administrator must notify the Commission. The Commission should then investigate why the RespOrg failed to provide subscriber proof and whether there have been other requests which appear to have been made in bad faith. If the three failure reports were justified, a fine should be imposed. If the three failures are representative of a larger problem, additional fines, suspension, or decertification should be imposed.

^{22/} NPRM at paras. 14-16.

Companies in the first two categories do not have the ability to leave substantial sums of money in an escrow account or to put at risk. To such companies, the escrow account could actually serve as a barrier to entry to a telecommunications-related business or could prolong or eliminate a business' ability to make the infrastructure investments needed to update or expand their business. Only cash rich businesses could afford to make the necessary deposit and remain competitive. The end result is less competition overall.

17. The Commission suggested one option which would require only RespOrgs and 800 Service Providers to pay the deposit.^{23/} In some instances this would present the same cash flow problem discussed above. This option may also be putting RespOrgs and 800 Service Providers in the position of financing the operations of their subscribers.^{24/} The risk here is that the subscriber may be the actual abuser (i.e. through hoarding) and yet it is the RespOrg or Service Provider whose money is at risk. AirTouch Paging therefore recommends that fines and decertification are better options for penalizing abusers.

III. An Even Handed Approach Is Best

18. Analysis reveals that paging companies are using an increasing quantity of toll free SACs in their businesses.

^{23/} **NPRM** at para. 14.

^{24/} It also puts the subscriber at risk that the RespOrg goes out of business.

This change has occurred for very positive reasons. There has been broad market acceptance of wide-area and nationwide paging systems, with a corresponding desire on the part of subscribers to enable pages to be placed to them without cost to the dialing party. Best of all, from the subscribers point of view, a number of highly competitive providers have entered this wide-area paging segment of the market, resulting in lower prices and increased demand.

19. AirTouch Paging is aware of the fact that the increase in the drawdown of 800 numbers by paging companies contributed to concerns over exhaustion, and caused the Commission to take a close look at the paging industry to determine whether its use of toll free numbers was deserving of special attention.^{25/} With one notable and troubling exception,^{26/} the Commission decided not to single out the paging industry for disparate treatment since the NPRM generally proposes to subject all users of 800 numbers to similar non-discriminatory requirements. AirTouch Paging strongly endorse an even-handed approach. It would be an unwise move toward micromanagement for the Commission to encumber particular segments of the telecommunications marketplace with special toll free number procedures or requirements. The NPRM must maintain a balanced course.

^{25/} Apparently, mandating the use of PIN technology and restricting the use of 800 numbers by individuals (including paging users) both were considered by the staff.

^{26/} See discussion in paragraph 20, supra.

20. AirTouch Paging disagrees with the Commission's proposal to partition the use of the 800 SAC and assign another toll free SAC for personal and pager use.^{27/} The Commission suggests that business users and vanity number holders have a more cultivated tie to the use of the 800 SAC and insinuates that personal users and paging subscribers are less tied to the 800 SAC. While it is true that a form of brand recognition and goodwill has been cultivated with certain 800 numbers, this tie cannot be identified purely by the type of service. There is an embedded base of 800 number users for services like paging and voice mail which has also cultivated recognition for their 800 number. For many users, pager and voice mail numbers serve as their primary business number. Service professions such as plumbers, locksmiths, and sales people rely, because of the transient nature of their day-to-day operations, on toll free access to pagers as a means for customers to reach their business. The Commission underestimates the importance of these assigned 800 numbers to their users.

21. Any attempt to allocate 800 versus 8XX numbers based on type of service would be an unfair allocation, especially if this allocation results in assigning current 800 users new 8XX numbers in order to free up the 800 SAC.^{28/} The Commission should be extremely reluctant to interfere with the

^{27/} NPRM at para. 46.

^{28/} Paging customers, like other telephone number users, widely distribute their numbers and would suffer great disruptions in service if they were forced to change to a new number.

dynamic workings of the communications marketplace by subjecting isolated categories of users to unique requirements. This is particularly true since the distinction between one-way and two-way services is evaporating with the introduction of interactive paging offerings. Any lines the Commission seeks to draw between service categories based upon historical service offerings are likely to prove short-sighted and disruptive of the development of a freely competitive market.

22. For related reasons, AirTouch Paging does not support the creation of any special privileges, including the Commission's Right of First Refusal proposal,^{29/} for current holders of vanity numbers. Such privileges would immediately reduce the pool of 888 numbers available to other users. As a result, the telecommunications industry would face exhaustion of the 888 SAC and another transition period sooner than necessary. And, AirTouch Paging does not see any fair means for making the initial determination of what constitutes a vanity number.^{30/} AirTouch Paging recommends instead that state and federal trademark, unfair competition, and consumer protection laws be relied on to provide protection should other businesses try to

^{29/} Id. at paras. 41-42.

^{30/} A vanity number could be categorized by the existence of repeating digits or digits which spell words or phrases. It could also be a number which is used by a large percentage of an industry, a geographic area, or other category of customer. The number of options is large, with no single

capitalize on the number recognition built up by a current 800 number owner.

23. The NPRM asks whether the Commission should reward the use of PINs as a means for slowing down the exhaustion of toll free numbers.^{31/} AirTouch Paging is pleased to see the Commission is looking to encourage rather than mandate the use of PINs since not all services can function using PINs. For example, certain PIN-based paging services are not desirable because they are incompatible with the use of SS7 technology to provide certain enhanced paging features and services; create user inconvenience and technical complications by requiring extra digits to be dialed; and result in less efficient use of the Public Switched Telephone Network.^{32/} However, PIN technology may be a viable option for certain service types. Nevertheless, AirTouch Paging is not convinced that additional incentives are necessary (or desirable^{33/}) to encourage PIN use. There already are economic incentives to use PIN technology that flow from the fact that fewer numbers are required and the corresponding costs

^{31/} Id. at para. 21.

^{32/} See Personal Communications Industry Association's Proposed Approach for the Toll-Free Resource, White Paper, July 17, 1995. The White Paper discusses in great detail that actual limitations PIN technology would place on provisioning paging services.

^{33/} The idea of offering incentives to encourage communications users to make particular technology choices raises the specter of a set of regulations as complicated as the tax code which is replete with economic incentives.

will be less. AirTouch Paging suggests that the market is already incenting number users properly.^{34/}

IV. Other Measures

24. AirTouch Paging understands the Commission's desire to improve efficiency by reducing the time a number may be left in certain service status categories.^{35/} Businesses should be encouraged to manage their use of telecommunications services carefully, and it is not unreasonable for businesses to face internal changes with adequate notice. However, in certain respects, the proposals to reduce time periods present problems.

25. AirTouch Paging recommends that the time periods for the assigned and suspended categories be reduced from 12 to 6 months, rather than from 12 to 4 months as proposed by the Commission. The four month window is too short to accommodate complex change and places businesses in the position of having less control over meeting their requirements. The ability to have numbers assigned or suspended for six months is a good compromise because it provides adequate lead time for even large business changes, such as those which occur with a merger or acquisition. Even more important, AirTouch Paging opposes reducing the aging status category from 6 months to 4 months. With the current 6 month aging period, AirTouch Paging has

^{34/} The Commission should balance any further rules on PIN technology with the fact that PIN numbers destroy service provider portability.

^{35/} NPRM at paras. 18-19

experienced numerous problems with customers getting paged mistakenly by someone trying to reach a former holder of the 800 number. Consequently, AirTouch paging recommends increasing the aging period to one year which correlates more closely with the normal cycle in which new yellow page directories are issued.^{36/} In sum, AirTouch Paging requests that the time period be adjusted slightly.^{37/}

26. AirTouch Paging recommends that the SMS database continue to be administered by DSMI. DSMI has managed the database for many years and has been effective in their efforts. Current proposals to change the manager have been raised due to concern that the RBOCs have the ability to exercise too much control over DSMI because of their joint ownership of Bellcore (DSMI's parent company). The concern has been significantly reduced by the subcontracting relationship established with Lockheed. It will be eliminated when Bellcore is sold by the RBOCs. Finally, there is no evidence of impropriety which justifies changing the database manager. The SMS database is too important to risk the problems which would invariably arise by changing management responsibility.

^{36/} Since 800 numbers are used so often in business promotion, it is usually the appearance of a number in the yellow pages under the listing for the former holder that causes the mistaken calls.

^{37/} AirTouch Paging's recommended adjustments are: Reserved status reduced from 60 to 45 days; assigned status reduced from 12 to 6 months; aging status increased from 6 to 12 months and; suspended status reduced from 12 to 6 months.

27. AirTouch Paging believes the current first-come, first-serve (FCFS) system is the most equitable and efficient means to reserve toll free numbers.^{38/} Dispute resolution is too time consuming a method for determining number assignment. Lotteries are a viable option for allocating numbers but should only be resorted to for single number requests by one or more parties. A final option might be to pull highly desirable numbers, such as those with repeating digits (7777) or digit patterns (767-6767) out of assignment blocks so that RespOrgs electronically reserving large blocks of numbers are unable to secure these numbers as part of the block. Lotteries could then be used to break ties for requests for the desirable numbers. It is realized that such an option puts additional burdens on the system administrator and may not be feasible.

28. AirTouch Paging supports the proposal^{39/} that all toll free numbers should be stored in a single interchangeable directory assistance (DA) database and should be accessible by dialing any toll free SAC and 555-1212. As each new toll free SAC is opened, 555-1212 for that SAC should be reserved for DA use. AT&T's monopoly over management of the 800 Directory Assistance service should be eliminated.

29. AirTouch Paging believes the current procedures offered by toll free service providers adequately deal with wrong numbers. Depending on the size of the customer, the existence of

^{38/} NPRM at para. 23.

^{39/} Id. at para. 48.

a contract, and the extent of the problem, the 800 subscriber has, among many, the option of having charges for the wrong number credited, of seeking a carrier-provided intercept to direct the call, or working with the carrier and the other subscriber to find a mutually agreeable solution.^{40/} These options are similar to those proposed by the Commission. Creating actual rules in this area may be unnecessary.^{41/}

30. AirTouch Paging is sensitive to the problems that can be created from a new SAC number holder getting misdialed calls from a high usage 800 SAC number. AirTouch Paging suggests that one approach would be to have all RespOrgs report to the Commission its top ten percent usage numbers. Assignment of these numbers would then be delayed for six months to allow for the new SAC to become familiar to users.^{42/}

^{40/} Sales Representatives at AT&T, MCI and Sprint all claim to offer such options. AT&T added the caveat that the degree of help they could provide depended on the size of the account, the extent of the wrong number problem, and whether the conflicting toll free number was also an AT&T number. Credits were suggested as the best option, but all three carriers recognized that tracking the wrong numbers was the responsibility of the call recipients and could be a large burden. AT&T also listed several "self-help" options such as trying to buy out the conflicting 800 number. The one benefit of regulating in this area is that it could make carrier-provided solutions available to less significant customers.

^{41/} Id.

^{42/} Id. at para. 21.

CONCLUSION

The foregoing premises having been duly considered, AirTouch Paging respectfully requests that the Commission proceed with the adoption of rules governing toll free SACs in a manner consistent with these comments.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Pamela Frye, a secretary with the law firm of Bryan Cave LLP, hereby certify that a copy of the foregoing **Comments of AirTouch Paging on the Notice of Proposed Rulemaking** was hand-delivered on November 1, 1995, to the following:

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