

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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MAY 28 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Administration of the)
North American Numbering Plan)

CC Docket No. 92-237

Phases One and Two

DOCKET FILE COPY ORIGINAL

REPLY OF SBC COMMUNICATIONS INC.

SBC Communications Inc. (SBC) by its Attorneys and on behalf of its subsidiaries, including Southwestern Bell Telephone Company (SWBT), Southwestern Bell Mobile Systems (SBMS), and Southwestern Bell Communications Services, Inc. (SBCS), hereby files its Reply in the above proceeding. Most parties filing Comments herein agree that: 1) the transition (or permissive) dialing period for expansion from three to four digit Carrier Identification Codes (CICs) should be ended in the near future, and 2) the restriction on the assignment of no more than one CIC per entity must be lifted.

I. **THE TRANSITION PERIOD SHOULD BE ENDED.**

SBC, in its Comments, indicated that the Commission should end the transition period no later than December 31, 1996. Most parties filing Comments agree that the transition period should end in the near future, and that a permissive period of six years is much too long.¹ SBC supports Bell Atlantic's conclusion that the reasons cited in the

¹ Pacific Telesis Group at 5; Cincinnati Bell Telephone Company at 1; Bell Atlantic at 1; NYNEX at 4.

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Commission's April 30 , 1996, Public Notice, regarding the significant events which have occurred since the initial pleading cycle in this docket closed, demonstrate the need for a shorter, rather than a longer, transition period.² Section 251 of the Telecommunications Act of 1996 (the Act) requires local exchange carriers (LECs) to provide dialing parity. SBC maintains that toll dialing parity cannot exist as long as there are differences in the length of the Carrier Access Code (CAC). SBC supports NYNEX's contention that "to achieve full dialing parity, such providers of telephone service should be placed on an equal footing in respect to CAC dialing."³ The transition period of six years, which was contemplated well before the Act, is much too long and must be shortened. Those parties suggesting that a six year transition period, or longer, be maintained still have not made any substantive or convincing arguments indicating why such an extended period is necessary.

II. THE RESTRICTION OF ONE CIC PER ENTITY SHOULD BE ENDED.

SBC, in its Comments, indicated that the Commission should remove the limit of one CIC per entity. Numerous parties agree.⁴ As the Commission is well aware, the Act significantly changes the landscape of the telecommunications industry. Limiting the number of CICs does not further the Act's goals of promoting competition and reducing

² Bell Atlantic at 1.

³ NYNEX at 3.

⁴ AT&T at 7; BellSouth at 5; U S West at 2; GTE at 3; Pacific Telesis Group at 3.

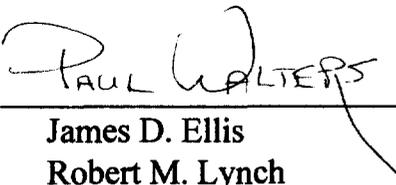
regulation. Additionally, as BellSouth notes, there are 84 four-digit CICs available for assignment each month from May 1996 to December 1997 (in the 5000 and 6000 range).⁵ Since the monthly assignment rate (for the six month period ending April 1986) has been only 16 codes under the Commission's restriction plan, eighty-four codes per month will likely be more than a sufficient supply to satisfy industry needs.

III. CONCLUSION

SBC urges the Commission to end the transition (or permissive) dialing period for CICs in the near future and promptly lift the restriction on the assignment of CICs.

Respectfully submitted,

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⁵ BellSouth at 3.

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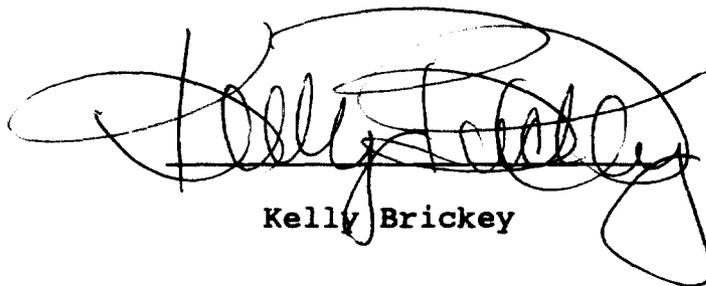
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CERTIFICATE OF SERVICE

I, Kelly Brickey, hereby certify that the foregoing "Reply SBC Communications, Inc.", have been served May 28, 1996 to the Parties of Record.



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