

cc Docket No. 95-155

AAA SIGNS
JUDY MANUFACTURING CO., INC.
 2016 AUGUSTA ROAD
 WEST COLUMBIA, SOUTH CAROLINA 29170
 TELEPHONE (803) 794-8203 • (800) 768-8204

**F A X
 COVER SHEET**

RECEIVED
 JUN 24 1996
 FEDERAL COMMUNICATIONS COMMISSION
 SECRETARY

WE ARE SENDING 1 PAGES, INCLUDING THIS PAGE.

PLEASE CALL IF YOU DO NOT RECEIVE ALL PAGES.

TO: *Reed Hundt, Chairman, FCC*
 FROM: *Mary Alice Judy, Sec. Treas.*

DATE: *2-29-96*

DOCKET FILE COPY ORIGINAL

REFERENCE: *888 Service*

MESSAGE: *Mr. Hundt,*

Please stop the 888 process now before it goes into effect. Our 800 number has not been protected.

Thank You

*Mary Alice Judy
 Secretary/Treasurer*

OUR FAX NUMBER IS (803) 794-8206
 OUR PHONE NUMBERS ARE (803) 794-8203
 AND
 WATTS LINE NUMBER 800-768-8204

ALL OF US AT AAA SIGNS HOPE THAT YOU ARE HAVING A VERY FINE DAY!

2-29-1996 5:17PM

FROM ASHE GLASS-MIRROR 813 988 3651

P. 1

cc Docket No. 95-155



COMPLETE GLASS SERVICE

4850 E. BUSCH BLVD. TAMPA, FL 33617-6012
PH. (813) 988-5565 FAX (813) 988-3651

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JUN 24 '96

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY



FAX COVER SHEET

DATE: 2-29-96

DOCKET FILE COPY ORIGINAL

FAX # 202-418-2801

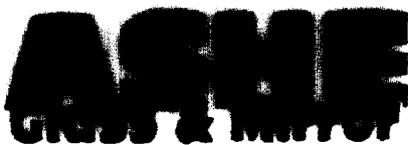
TO: REED HUNDT, CHAIRMAN

FCC

PAGES: 3 INCLUDING COVER SHEET

MEMO: STOP 888 SERVICE

FROM: Frank M. [Signature]



COMPLETE GLASS SERVICE

4850 E. BUSCH BLVD. TAMPA, FL 33617-6012
PH. (813) 988-5565 FAX (813) 988-3651



February 29, 1996

DEAR SIR,

I AGREE WITH ROBERT H. TATE, CHAIRMAN, THE STOP 888 COMMISSION THAT THE 888 SERVICE SHOULD BE STOPPED NOW BEFORE IT IS ENACTED. MY 800 NUMBER IS NOT ONE OF THE PROTECTED NUMBERS AS 'GTE' DID NOT INFORM ME AS TO WHAT THE 888 NUMBERS MEANT. I AM ENCLOSING THE ONE AND ONLY INFORMATION FROM 'GTE' SANS ANY PHONE NUMBER TO INQUIRE AS TO WHAT THE LETTER MEANS. NOT KNOWING BEFOREHAND ABOUT 888 NUMBERS. THEREFORE MY NUMBER WAS NOT RESERVED. I BELIEVE THAT THE 888 SERVICE IS UNNECESSARY AND WRONG.

FRANK M. ASHE
President
ASHE GLASS & MIRROR, INC.



Request To GTE For 888 Number Reservation(s)

I hereby authorize GTE to act as my agent and take action as available under Federal Communications Commission (FCC) rules and regulations to attempt to reserve on my behalf the 888 numbers specified below.

I understand that:

- the regulations regarding reservation of new 888 numbers, including 888 numbers based on existing 800 numbers are: (1) determined and administered by the FCC and its agents, and (2) not yet established as of the date that GTE transmitted this form to me;
- GTE cannot control and is not liable for the acts or omissions of the FCC or its agents, including acts or omissions relating to 800 and 888 number rules and regulations;
- GTE does not represent or guarantee that I will receive reservations or assignments of any specific 888 number(s), including those listed below.

Ranked below from highest to lowest priority are those 888 numbers that I wish GTE to attempt to reserve for my company. In addition, each 888 number request is coded with one of the following criteria:

E = External Vanity - This is the 888 version of an advertised 800 number currently used by our company today that is issued externally for our customers (non-employees) to contact our business and for which GTE is the RespOrg.

I = Internal Vanity - This is the 888 version of an 800 number currently used by our company today that is used internally for employee applications and for which GTE is the RespOrg.

- All 888 numbers requested must be in numeric format.*
1. 888 - _____
 2. 888 - _____
 3. 888 - _____
 4. 888 - _____
 5. 888 - _____

Company Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone Number: _____

Customer Name: _____ Date: _____

Customer Signature: _____ Title: _____

CC Docket No. 95-155

RECEIVED
JUN 21 1996
FEDERAL COMMUNICATIONS
COMMISSION
SECRETARY

DATE: February 29, 1996
TO: Reed Hundt, Chairman
Federal Communications Commission
FROM: Anthony J. Bova
Anthony J. Bova Productions
PAGES: 1 (INCLUDING COVER)
RE: Issuing Toll Free 888 Service

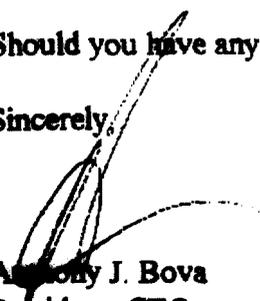
DOCKET FILE COPY ORIGINAL

Dear Mr. Hundt:

We oppose the concept of issuing toll free 888 service and want to see it stopped before it is enacted.

Should you have any questions, please do not hesitate to contact us.

Sincerely,


Anthony J. Bova
President, CEO

AJB/jsk

ANTHONY J. BOVA PRODUCTIONS



A.B.C. Moving & Storage
19H Gardner Road
Fairfield, NJ 07004

PHONE: 201-808-2828 FAX: 201-808-6761

A.B.C. MOVING AND
STORAGE CO., INC.
24 W. SHEFFIELD AVE
ENGLEWOOD, N.J.
07631

AND

TO: REED HUNDT — CHAIRMAN (FAX-202-418-2801)

FROM: BRUCE PEARSON — PRESIDENT

DATE: MARCH 7, 1996

NUMBER OF PAGES: 1

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SECRETARY
OFFICE OF THE
COMMISSIONER

The number of pages includes this cover page. If you have not received all of the pages indicated, or if there is a clarity problem, please contact us at one of the above numbers.

CHAIRMAN HUNDT —

REMARKS:

I JUST RETURNED FROM
VACATION AND I HAVE FOUND IN MY
ATTENTION BOX, A NOTICE THAT THERE
IS ACTION GOING ON TO IMPLEMENT
AN "888" AREA CODE — I PERSONALLY
REQUIRE 3 "800" NUMBERS IN MY
BUSINESS AND I WORKED HARD AND WAS
PATIENT FOR A LONG TIME IN ORDER TO GET
3- "800" NUMBERS THAT WOULD WORK
BEST TO PROMOTE MY BUSINESS AND GIVE
ME A PROJECTION OF MORE FUTURE BUSINESS.
I FOR ONE WANT MY NAME AND
MY 3 "800" NUMBERS ADDED TO THE
"PROTECT MY 800 NUMBERS LIST" —

THANK YOU —

BRUCE PEARSON
PRESIDENT

THANK YOU



cc Docket NO. 95-155m Newman
CCB

RWBA

Robert Wade Brown & Associates
Independent Telecommunications Consulting

RECEIVED
JUN 21 1996
COMMUNICATIONS COMMISSION
SECRETARY

March 11, 1996

Robert H Tate, Chairman
The Stop 888 Commission
55 Church Street, Suite #4711
New York, NY 10007-3100
212/693-2001, Fax 212/312-2074

DOCKET FILE COPY ORIGINAL

Dear Mr. Tate:

I am in receipt of your February 29, 1996 1:35pm ct Fax to "TeleCommunications Director, American Heart Association Heart Memorials, Harlingen, Texas 78550-8584, 210/412-0139", forwarded to me via snail mail, requesting our participation in your effort to stop the deployment of the 888 NPA.

American Heart Texas does not oppose the deployment of the 888 NPA per se. However, we do support

- 1) the mandatory assignment of residential toll-free numbers to the 500 NPA,
- 2) the mandatory assignment of "pager-type" toll-free numbers to an NPA similar to 822.
- 3) the mandatory assignment of "paid toll-free information" and "paid toll-free sexual information services" to their own respective NPAs (880 & 881), and
- 4) the prohibition of any charges at all to the originating customer for calls placed to 800, 888, 822, and 500 NPAs.

We also **oppose** the "auction" of 888 NPA numbers, **oppose** any minimum charge by IXC's per 800, 888, 822, 500, 880 & 881 service number, and **support** the deployment of "protected" 888 numbers except where the same 7-digit number is assigned to a competitor of an existing 800 customer who has requested their 7-digit number be protected (excluding warehouseers of numbers for commercial resale). In such a case, a fee, perhaps \$100 (to separate the serious from the non-serious) payable to the

Comments on 800-type Service Expansion & Deployment: S:03/11/96 01:35: Page 2 of 2

FCC, might be an appropriate way to have the 888 number assigned as a companion to the pre-existing 800 number.

We also support the immediate deployment of 877 and 866 NPAs for additional toll-free customer usage with the same protection restrictions.

Thank you for your inquiry.

Sincerely yours,

Robert Brown

Robert Wade Brown
Telecommunications Coordinator
The Texas Affiliate
American Heart Association

fc: Reed Hundt, Chairman
Federal Communications Commission
202/418-1000, Fax 202/418-2801

Gary Epstein
Latham & Watkins
1000 Pennsylvania Ave, NW Suite 1300
Washington, DC 20004-2505
Fax 202/637-2201

Ann Farhat
Bhechtel & Cole
1901 L St, NW
Washington, DC 20036
202/833-3084

Walen Sessom
Deputy Executive Vice-President
American Heart Association Texas Affiliate
POB 15186
Austin, TX 78761-5186
512/433-7103, Fax 512/433-7200

CC Docket NO 95-155

AMERICAN CHEMICAL RESEARCH LABORATORIES

P O BOX 4856 • STOCKTON, CA 95204 • 209-464-7791 • Fax: 209-463-5601

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RECEIVED
JUN 24 '96
FEDERAL COMMUNICATIONS COMMISSION
SECRETARY

FAX MESSAGE

DATE: February 29, 1996

TO: Reed Hundt
Federal Communication Commission

FROM: Ashraf Chaudhry
Director of Research & Development
American Chemical Research Labs

PAGES: 1 (INCLUDING COVER)

RE: Issuing Toll Free 888 Service

Dear Mr. Hundt:

We oppose the concept of issuing toll free 888 service and want to see it stopped before it is enacted.

Should you have any questions, please do not hesitate to contact us.

Sincerely,
Ashraf Chaudhry
American Chemical Research Labs

AC/ld

cc Docket No. 95-155
RECEIVED
JUN 24 '96
FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE
SECRETARY

Vanity™ International
2020 Lincoln Park West, Suite 16J
Chicago, IL 60614
312-871-6565 312-871-3291 Fax

16 March, 1996

Ms. Regina M. Keeney
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

RE: Docket 95-155, Expiration of FCC order dated 2/29/96

Dear Ms. Keeney:

I want to thank you for your efforts in establishing this interim mechanism to set aside 888 numbers, and urge the FCC to continue the program with whatever refinements DSMI/ NASC deem to be necessary -- provided execution is kept to 24 hours or less.

The concept of direct submission is brilliant. It allows informed 800 subscribers to protect their interests as the 888 numbers plan moves forward. I feel, however, that this program should continue beyond March 15, 1996 as 800 subscribers remain generally uninformed. Neither the popular press nor the RespOrgs have taken an interest in publicizing this program since its announcement February 29, 1996. Further, in light of the RespOrg's prior behavior, this mechanism is vital to 800 users. It allows subscribers to directly and immediately rectify their situations, once informed. The brilliance of the concept is that it hasn't disrupted the roll out of 888 numbers and I applaud the FCC for this innovation.

The recent response to this program demonstrates that significant demand still exists. Further, it is informative to recognize that users continue to set aside the 888 version of their numbers despite the risk of having to buy them back at auction. This alone indicates how strongly 800 subscribers feel about the 888 version of their vanity numbers being unknowingly assigned to someone else.

Yet, I understand that this mechanism has burdened DSMI/ NASC with unexpected work. I trust that with their input, this process can be streamlined to minimize disruption and improve efficiency. However, it is essential that 888 numbers be set aside quickly-- within 24 hours of the request -- especially where just a few numbers are at issue. Without this efficiency, 800 subscribers lose all parity with the competing RespOrgs who can bring numbers into "working status" within minutes to avert loss.

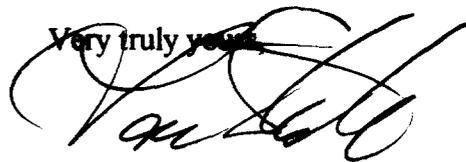
Cont.

Strategy · Positioning · Intellectual Property

Service marks and Copyright 1996, Vanity International

Please consider a continuation of this program until such time as the FCC resolves the issues raised in Docket No. 95-155. Thanks again for your efforts and please don't hesitate to call on me if I can help in any way.

Very truly yours,

A handwritten signature in black ink, appearing to read "Loren C. Stocker", written over the typed name below.

Loren C. Stocker

**CC: Irene Flannery, FCC
Michael Wade, DSMI**

Strategy · Positioning · Intellectual Property

Servicemarks and Copyright 1996, Vanity International

Advertising Ago

July 24, 1995

Crain's International Newspaper of Marketing • In Two Sections • Section 1 • \$3.00 • In Canada \$3.50

INTERACTIVE
Cafes in Cyberspace
Page 17

1-800-Mindshare

Vanity numbers can give marketing edge

by Loren C. Stocker

Since 800 numbers became portable in May, 1993, there's been an explosion in the use of "vanity" numbers -- numbers that translate into words for easy recall.

Vanity numbers can be positioning statements, yet, too little consideration is given to their impact -- good or bad -- on marketing strategy.

If you think of vanity numbers as mere novelties, consider the wake-up call experienced by floral delivery leader FTD. Since 1987, upstart 1-800-Flowers has grown to over \$200 million in sales. According to a Wall Street Journal article, FTD is losing millions trying to break into the 800 delivery service with 1-800-Send-FTD.

And now 1-800-Flowers is adding retail stores, which will, of course, be named after their unforgettable contact number.

Vanity numbers can be viewed in terms of three essential criteria; the *mnemonic*, the *message* and the *numeric* translation.

The Mnemonic

Ideally, a vanity number has just 7 letters. But, this is an imaginary constraint that may obscure the mnemonic's purpose; *instant recall* of the whole number, even years after media exposure. Numbers like 800-BlueCross and 800-MicroSoft serve this purpose well, despite their length.

Contrast these with 800-2-So-Easy, 800-424-EMC2, and other such numbers, which are a pleasure to forget. Others like 800-347-Water will become "something" water within minutes.

Even numbers like 800-2-Diners or 800-Forbes-5 might be easy to recall for a few hours, but most people will quickly lose track of the spare, irrelevant digit.

When numbers are used, they should make sense. Excellent examples include 800-9-Months for a maternity outlet or 800-241-Travel for discount travel.

The Message

The message delivered by your vanity number should be compelling or, at the very least, neutral. Numbers like 800-Get-Results and 800-Do-Lunch have impact and are a cinch to recall. Messages like 800-2-Diners (nonsensical) and 800-IBM-CALL (reversed) detract from the ad copy by presenting an unclear message.

The message delivered by your vanity number should also reflect your long-term positioning strategy. 800-Pick-UPS, recently introduced by UPS, is a brilliant example of a message with enduring value.

The Numeric

The numeric is simply the phone number that translates from the vanity number. Ideally, vanity numbers would be as easy to dial as, say, 800-555-5555. However, there is actually no such thing as a bad numeric. Some are just better than others.

The trouble comes when a vanity number can be translated into more than one numeric, such as 800-For-Video, which could be misinterpreted as 800-4-Video, or misspelled, resulting in misdials and missed opportunity.

Erroneous translations can be minimized or averted all together by proper planning and by securing the relevant numerics.

But creating phone mnemonics is only half the story. How do you know what's truly available?

True Availability

Your phone company may suggest that numbers are unavailable when, in fact, they are available from a competitive carrier. We've found that this misinformation is rarely intentional. It's just that most telecom professionals are naive to the workings of the national 800-database, and to the pre-portability assignments of the 500, 700, 900 and local numbering systems.

There is a subtle priority system which ensures that hundreds of obscure, mostly regional resellers have clout equal to that of the big-name carriers. Vanity number specialists have developed techniques that, in effect, circumvent the priority system that hinders individual carriers.

The Time is Now

Naturally, those who act first will acquire the vanity numbers critical to dominating their respective markets; others will get what's left. In 800-cyberspace, *mindshare* is everything.

That is not to say that thousands of retail outlets are not helpful; just optional. Retail locations mean little when customers can get equal or superior products and services on *impulse*. Why search the phone book for a local florist when you can just dial 1-800-Flowers?

New Numbers To The Rescue?

If you missed out on the best 800 numerics, you may have heard that a new toll-free 888 exchange is planned for April 1996. But, if you think an 888 number will be just as good, think again.

It will take years for consumers to begin thinking of something other than 1-800 for toll-free calls, despite 1-888's functional equivalence. Think of it like this; if an 800-number puts you on *Main Street*, then any new toll-free exchange will be a *Second Avenue* address, at best. Δ

Mr. Stocker is managing partner of Vanity International, a Chicago-based consultancy that creates, secures, and applies vanity numbers. Phone 1-800-Get-Results or 312-871-6565.

What to do Next

An extensive *VanitySearchsm* and *Cyber Searchsm* should be done *prior* to any public disclosure of trade names or promotional intent. Any hint of publicity may send dozens of interested parties scurrying to secure numbers that will pre-empt your domination.

Having the "right" number and address signals your expertise in a particular product or service to prospective customers or clients. Given the resources to back it up, these properties help create an enduring competitive advantage that will, ultimately, translate into revenues and accelerated growth. The stakes are high and **vanity design** should be afforded top priority in your marketing strategy.

The spontaneous recall of a carefully crafted vanity number results in impulse buying and facilitates word-of-mouth advertising better than any other vehicle. A *complementary* Internet address will draw users to your Internet site, as well. Together they create the cornerstone of your business image to the world market.

If you'd like more details, or a *free* evaluation of your existing numbering plan or Internet address, you may contact Loren Stocker at Vanity International; 800-Get-Resultssm or 312-871-6565. Current e-mail address is vanityintl@aol.com.

888 Update

Just after the stroke of midnight eastern time, February 10, 1996, the computer wars began. Within minutes, the hottest and most obvious 888 properties were assigned.

Yet, millions of good, creative 888 vanity numbers still remain available. So, act on this without delay!

Understand, however, that 888 numbers may *never* have the marketing power of 800 numbers. This is simply because 800 numbers have been around for over 25 years and every consumer in America knows that an 800 number is toll free. The 800 habit is so deeply entrenched that, despite ad dollars spent to promote 888 numbers, many callers will continue to call the 800 version.

Further, the largest 800 advertisers, like 800-Flowers, 800-Collect, and others, are likely to secure both numbers, but advertise only the 800 version. This lack of investment will further perpetuate the obscurity of 888 numbers.

Despite these shortcomings, 888 numbers are better than nothing, so grab a few or, better yet,

have us do a *Vanity Searchsm* for you! From there, we can begin to position you as a world-class player and acquire the supporting 800 properties.

Homesteading Ends in Cyberspace

Rumors of the death of the Internet domain ".com" (dot com) may be greatly exaggerated.

When you hear that domain addresses are "running out," what they really mean is that many of the strategic, root-word domains are no longer *free* for the asking. Someone got there first; a homesteader in Cyberspace. Now with annual fees in place, the availability of a good domain address may **actually** improve. These new fees will have two broad effects.

First, it will slow the frenzy to lock-up domain addresses. While speculators may spend free time to secure an address for future use or sale, it's not as likely that they will part with a \$100 fee without a legitimate business plan.

Second, the fees will create turnover; speculators will prune their lists, and others with marginal interest will give up addresses to avoid holding costs, unless they have an immediate business need.

It is essential to recognize that many of the great vanity addresses-- the ones *to die for* -- are being held on speculation and most are inactive. Had these properties not held great potential value, no one would have locked them up in the first place.

But if you're planning to call a suspected speculator directly, think again. That would be equivalent to tipping off the seller that a super highway is about to be run through their front yard. Instead, have Vanity International develop a mediation plan and handle the acquisition -- if necessary.

The first thing to do is a targeted *Cyber Searchsm* to uncover alternative domains. The key advantage of the search is that it will often create surprising alternatives, many of which may turn out to be far more valuable than the obvious one of interest. Alternatives also establish value and give you strength in negotiations.

Finally, you would be wise to explore vanity 500, 800, 888, 900 and other numbers to complement your Internet address. It is essential to recognize that the vast majority of commerce is still done by phone, and will be for some years. Availability of a well-positioned vanity combination -- number and address -- gives you marketing power beyond the sum of its parts.

P.O. Box 1482
Santa Rosa, California
95402-1482
Phone: (707) 527-5864
Fax: (707) 542-6111
1-800-556-6650



DOCKET FILE COPY ORIGINAL

March 11, 1996

RECEIVED
JUN 24 '96
OFFICE OF THE
SECRETARY
COMMUNICATIONS

Mary De Luca
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Dear Ms. De Luca:

The American Lung Association of the Redwood Empire has an "800" information and referral line.

We are opposed to the implementation of the "888" system as we fear it may dilute or damage the goodwill we have built up over the years.

If the "888" system is ultimately established, we would request that our "800" information and referral line be protected from conversion.

Thank you for your consideration.

Sincerely,

Barbara Beedon
Executive Director

BB:cd

cc Docket No. 95-155

Beagle I Inc., 899 El Centro St., So. Pasadena, CA 91030 U. S. A.

Tel: 818-403-8690

Fax: 818-403-8692

Mr. Reed Hundt, Chairman
Federal Communication Commission
1919 M, St. NW Ste. 814
Wash DC 20564

DOCKET FILE COPY ORIGINAL

RECEIVED
JUN 24 1996
FEDERAL COMMUNICATIONS COMMISSION
SECRETARY

Re: 1-888 Vanity Numbers/Registered Trademarks

April 2, 1996

Dear Mr. Hundt,

I manufacture a product called **Barefoot**[®]. Barefoot is a registered trade mark of my company and is associated with a product that has U.S. patents issued and pending.

Acquiring the Vanity Number 1-888 BAREFOO(T) has been a key marketing strategy. I applied for the number in a timely manner.

The number has been suppressed.

The company who holds 1-800 BAREFOOT also wants 1-888-BAREFOOT. This particular company does not have a trade name of Barefoot, nor does it own trade marks or service marks with respect to the word "Barefoot." Moreover, the company receives a low volume of calls.

I think that it is unfair to give to one company both prefixes of a Vanity Number when that company has no registered marks plus a low volume of calls. I think it is especially unfair to deny that number to the new applicant when that applicant holds a registered mark with respect to Vanity Name/ Number in question.

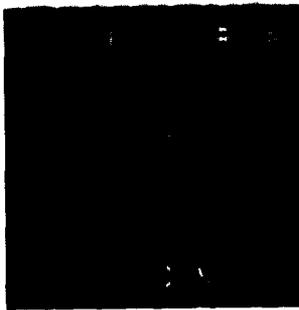
Yours sincerely,



John Austin
President

✓ cc: Irene Flannery

Irene



CKET FILE COPY ORIGINAL

April 9, 1996

RECEIVED
JUN 24 '96
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. Reed Hundt
Chairman, FCC
Washington, D.C. 20554

Dear Mr. Hundt:

I would like to go on record with the FCC as favoring brand protection for current 800 toll free telephone service customers, especially as it relates to the expansion of 888 as the newest toll free prefix. It is my understanding that about 30 percent of current 800 numbers are vanity numbers, and even in the unlikely situation where all vanity number owners elect to duplicate their existing 800 vanity number within the 888 prefix, this still leaves the vast majority of numbers available for new customers.

Much like any brand name, whether it be a trademark, service mark, company name or logo, an 800 vanity number is often an essential asset of a business. In our case, our vanity number spells 1-800-JEOPARDY, and our products are designed for use with, and are advertised on, the popular television game show Jeopardy! Millions of dollars have been invested in the development and promotion of our number, and investors and bond holders would all be at risk if another business were allowed to acquire 1-888-JEOPARDY. Not only would we have extraordinary confusion within the marketplace, we would assuredly be handling numerous calls intended for the other business owner, and they in turn would be handling numerous calls for us.

Beyond the direct expense of mis-directed calls, there is the very real likelihood of extensive and expensive litigation. Given that 800/ 888 numbers exist in an almost "virtual reality," with no physical presence for the consumer other than 10 digits dialed on a telephone, we could easily face the situation where a smaller company pioneers a toll-free 800 service, and before they can benefit from their early efforts, a larger, predatory company with substantially greater resources could acquire the 888 version of the same vanity number. We must avoid this form of brand name infringement. In much the same way that we protect other intellectual property and expect our domestic and global trading partners to respect those barriers, 800 vanity numbers are not trivial matters-- they are major brand names that deserve FCC protection. The best and easiest protection that you could provide could take one of two forms: (1) allow current 800 vanity number owners to acquire the corresponding 888 number, or (2) lock-out current 800 vanity numbers within the 888 prefix. Either of these methods would protect rightful owners from unfair infringement.



Thank you for your time and consideration in this important matter. If I could be of any assistance, it would be my pleasure to help in any manner that I could.

Sincerely,



**Norman Franklin
CEO/ Interactive Television Corporation**

**c.c.: Ms Kathleen Wallman
Chief, Common Carrier Bureau
FCC**

Home of 1-800

RECEIVED

JUN 24 '96

FEDERAL COMMUNICATIONS COMMISSION
DEPT. OF THE SECRETARY

Steve Dawkins
for
THE OLDE HIDE HOUSE

Home Office Fax: (519) 853-4576 ~ Main Office Fax: (519) 853-4514
Phone: (519) 853-1031
49 Eastern Avenue, Acton, Ontario L7J 2E6

DOCKET FILE COPY ORIGINAL

February 29, 1996

Mr. Brad Winner
Common Carrier Bureau
Federal Communications Commission
1919 M Street NW
Washington DC 20554

Dear Mr. Winner:

While I am a Canadian, it seems you are the contact person through whom we are to direct our serious concerns regarding our rights of process wrt the assignment of 1-888-LEATHER.

Background: we are a large consumer leathersgoods merchant keen on further developing our customer service and direct merchandising capabilities. In March of 1995, instantly upon learning of the opportunity, we registered what amounts to a claim on a specific future phone number. Our understanding, through the auspices of Bell Canada, is that legal clouds may surround the use of some set of 888 numbers; while there may well be cause in many specific examples, it completely belies common sense in the case of LEATHER ~ and dozens, if not hundreds of other cases, I'm sure. Quite simply, in our case, a sole leather supplier to the shoe trade has no valid "trading off" worries insofar as our consumer focus is concerned. Moreover, in attempting to further update our information on the folks at 800-LEATHER, three separate calls (made from Vermont ~ it's not even accessible up here in the hinterlands of the telepolitically dwarfed) were not even answered! On February 27 at 4:00 pm (Chicago time) and then at 9:15 am and 11:30 am on February 28 the phone simply rang; honestly, not even an answering machine!

Does developing and exercising our earned claim to 888-LEATHER in any way harm or hinder the holder of 800-LEATHER? No, of course not. We all know that a huge body of case law has evolved to ensure that true Trademark infringements

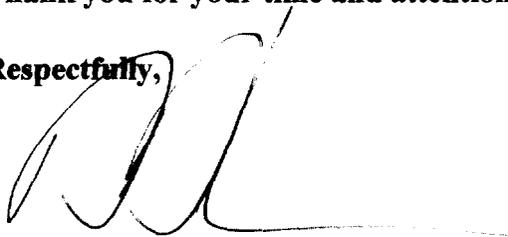
will not stand. Let's not see a blanket application of a "rule" vaporize such a key marketing opportunity (for the numerous affected enterprises ~ and their current and *potential* employees.) Moreover, why deny the telephone companies such high productivity customers, as we here in Acton, Ontario would become?

If I've been misdirected in sending this letter to your attention, Mr. Winner, please contact me by fax (main office#, above) e-mail < steve.dawkins@sympatico.ca > or, of course, telephone at your earliest convenience so that I may redirect ASAP.

Please help us to win this very important argument; we played by the rules, got our request in first with the full support of all at Bell Canada ~ we can't and won't allow unjustifiable obstructions to stand.

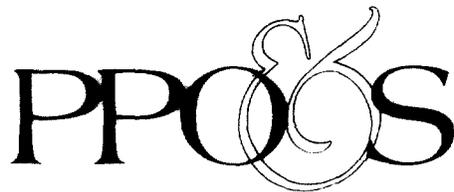
Thank you for your time and attention to this letter; I'll look forward to your reply.

Respectfully,

A handwritten signature in black ink, appearing to be 'SD', written over a horizontal line.

**Steve Dawkins
President**

**cc Alan Darling, Secretary General, CRTC , Ottawa
Honourable John Manley, Federal Minister for Industry Canada, Ottawa
Jean Migneault, Bell Canada, Ottawa**



NSD-407

CC Docket No. 95-155

February 6, 1996

DOCKET FILE COPY ORIGINAL

RECEIVED
JUN 21 '96
FEDERAL COMMUNICATIONS
COMMISSION
SECRETARY

Regina Keeney
Chief, Common Carrier Bureau
Federal Communications Commission
2033 M. Street, N.W.
Washington, DC 20554

Dear Ms. Keeney:

I am writing on behalf of our client, Pennsylvania's Maternal and Child Health Outreach Program, (an initiative within the Bureau of Maternal and Child Health in Pennsylvania's Department of Health), regarding your proposed ruling on protection of vanity numbers when 888 toll-free numbers become available.

For more than two years, the Bureau of Maternal and Child Health has been conducting outreach to low income pregnant women and mothers to encourage them to take the steps necessary to enroll in early prenatal care and to enroll their children in primary, preventive care.

The toll-free numbers used for this outreach are:
1-800-986-BABY and 1-800-986-KIDS

People who call these numbers reach a team of carefully educated counselors who are able to problem-solve with the caller on issues ranging from inability to pay for care, right through to helping callers make emergency arrangements with in-patient drug & alcohol services. The numbers have been heavily promoted in Pennsylvania and have substantial brand equity among all women in Pennsylvania. In the two short years since the helpline introduction, more than 90,000 calls have been placed to the counseling center. In addition, the outreach campaign has built a list of some 4,000 grassroots agencies and individuals who help to promote the service and who have distributed hundreds of thousands of posters and reminder cards in their communities--all with the toll-free numbers clearly displayed.

My concern, as you might imagine, is that the 888 version of these numbers will fall into the hands of completely inappropriate services like a pay-for-modeling service for KIDS, a pro or anti-choice advocacy group for BABY or a catalogue company selling maternity wear. A chain of shopping mall portrait photographers could triple their business by playing on the equity and respect built into 986-BABY or 986-KIDS.

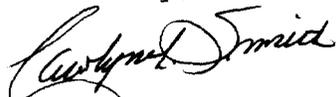
Regina Keeney
Page Two

Please bear in mind that the audience we are reaching is often low-literacy in addition to being low-income. It is critical to the success of this outreach program to keep the system easy, responsive and accessible.

Even worse is the research-based fact that women who have a problem and are searching for help tend not to call a second time if they are frustrated on their first attempt. So, even if a woman understands that she has reached the wrong number, the odds are that we will have lost her forever. This is especially true if the caller is a pregnant teen.

I respectfully request that you consider this issue in your deliberations on the proposed rulings. I am sure that we here in Pennsylvania are not the only ones with the potential for serious damage to a highly respected and successful service.

Sincerely,



Carolyn L. Smith
President

CLS/ks

cc: Reed E. Hundt, Chairman, FCC
Andrew C. Barrett, Commissioner, FCC
James H. Quello, Commissioner, FCC
Rachel B. Chong, Commissioner, FCC
Susan Ness, Commissioner, FCC
Dan Brant, Acting Director Maternal & Child Health
Sharon Niesley, Connect/Direction Service

FISHER WAYLAND COOPER LEADER & ZARAGOZA, L.L.P.

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INTERNET fwclz@fwclz.com

WRITER'S DIRECT NUMBER

(202) 775-5678

RECEIVED

JUN 24 '96

FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE
SECRETARY

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OF COUNSEL
GROVER C. COOPER
JOHN Q. HEARNE

BEN S. FISHER
(1890-1954)

CHARLES V. WAYLAND
(1910-1980)

February 29, 1996

DOCKET FILE COPY ORIGINAL

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Dear Mr. Caton:

On behalf of our client, American Telegram Corporation, we hereby urge the Commission to act expeditiously to order MCI, as the Responsible Organization ("RespOrg"), to place in "unavailable" status the following toll free numbers:

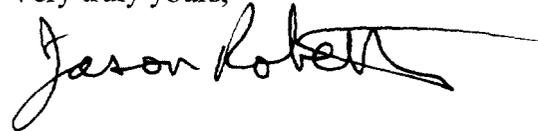
888-774-6748
888-222-5347

These numbers have been in use by American Telegram in the 800 SAC for more than two years. On August 7, Roger J. Meyers, CEO of American Telegram, asked LDDS Worldcom to replicate the above-referenced numbers in the 888 SAC. A copy of Mr. Meyers' letter to LDDS is attached. Mr. Meyers then made the same timely request for replication when he switched service to Sprint Communications. According to LDDS, American Telegram's 800 numbers were submitted for reservation to Database Services Management, Inc. prior to the FCC's February 1st deadline for reservation of replicated numbers. We have learned this week that the two numbers listed above have not been reserved for American Telegram for replication in the 888 SAC and that MCI has reserved the numbers. These two numbers have great importance for American Telegram.

William F. Caton
February 29, 1996
Page 2

American Telegram urges the Commission to act expeditiously in this matter to prevent further harm to all interested parties. The 888 SAC is to be fully operational and deployed on March 1, 1996. The Commission has established the "unavailable" category to handle replication of 800 numbers used by businesses. Therefore, a procedure is in place to preserve the status quo. By acting as soon as possible in this matter, the Commission will prevent MCI and its customers possibly incurring costs that would only make this situation worse.

Very truly yours,

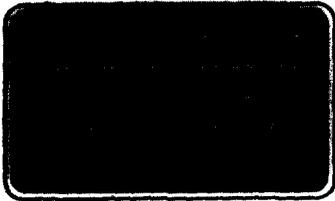


Glenn S. Richards
Jason S. Roberts
Counsel to American Telegram Corporation

Attachment

cc: Regina Keeney, Chief, Common Carrier Bureau
Donald Evans, Esq., MCI
Leonard S. Sawicki, Esq., MCI
Michael Wade, DSMI
Michael Fingerhut, Sprint
Richard Whitt, LDDS Worldcom

cc Docket No. 95-55
CCF
NSD-394



December 27, 1995

AMERICAN FLORAL SERVICES, INC.

Tom Butler
President

Mr. Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RECEIVED
JUN 21 1996
DEPT. OF THE SECRETARY
FEDERAL COMMUNICATIONS COMMISSION

Dear Mr. Hundt:

Our company, American Floral Services, Inc. (AFS), is a worldwide flowers-by-wire service, with over 23,000 subscribing florists in North America, and 50,000 worldwide. I am writing to you today in interest and concern regarding one of our AFS Florists - 1-800-FLOWERS and the events in the telecommunications industry dealing with the 800 service and the pending implementation of the 888 service.

1-800-FLOWERS has been a long time member of AFS. By establishing the 1-800-FLOWERS name and telephone number as a brand, 1-800-FLOWERS has grown from a single retail flower shop, to a national floral company. Through extensive investments in advertising and marketing of the 1-800-FLOWERS brand name and phone number, they have been very successful in doing this, and are continuing their growth to new areas to service their customers.

The implementation of the 888 service, as a solution to the problems facing the telecommunications industry as it relates to number exhaust within the 800 service, gives great concern to our member, 1-800-FLOWERS. If a competitor were to receive the 888 exchange number for 1-800-FLOWERS, it could cause a great deal of confusion, customer dissatisfaction, and loss of market share that 1-800-FLOWERS has invested significant advertising dollars and hard work to earn.

Mr. Hundt, as you and the other members of the FCC discuss the issue, we would appreciate your taking the concerns of 1-800-FLOWERS into consideration. There should be some efforts made to protect companies such as 1-800-FLOWERS who have built a brand around an 800 number. Please feel free to call me at 1-800-456-7890 if I can provide any further information or assistance.

Sincerely,

Tom Butler
President

Member SAF
Participating Member AFMC
Member Flowers Canada
Associate Member Roses, Inc.

Associate Member AIFD
Member The American Floral Endowment
Associate Member WF&FSA
Member World Flower Council

Mailing Address: P.O. Box 12309, Oklahoma City, OK 73157-2309 • Street Address: 3737 N.W. 34th Street, Oklahoma City, OK 73112-3353
U.S. & Canada: 800-456-7890/405-947-3373 • FAX: 405-943-7131

AMBI-TECH INDUSTRIES, Inc.

319 Knickerbocker Avenue
Hillsdale, NJ 07642

CC Docket NO 95-155

Phone:(201)666-0504

FAX: 201 . 666. 0597

C:\AMIPRO\1996-AT
800-NOSA.SAM
1 March 1996

DOCKET FILE COPY ORIGINAL

Reed Hundt, Chairman
Federal Communications Commission
Washington, DC

Fax to: 202-418-2801

RECEIVED
JUN 24 '96
FEDERAL COMMUNICATIONS
COMMISSION
SECRETARY

Dear Mr. Hundt,

Yesterday I received a FAX from **The Stop 888 Commission**, which you are probably familiar with.

I had always thought that the FCC was **capable, competent**, and one of the better run agencies of the Government. If they said we were out of "800" numbers it was so.

If the things the "Stop 888" people say are correct, then a gross miscalculation seems to have been made somewhere. **Businesses** (such as mine) have invested large amounts of effort and money to promote their "800" numbers. (We make motor brakes, and ours comes out as NO COAST, as an example.)

If the pool of "800" numbers is exhausted because of non-business assignments such as pagers and residential customers (users who have not invested in a specific number) then it is these non-business applications that should be moved to a new number group.

If I have mis-understood the situation, please let me know the facts as you see them. If not, I think it is in the **best interest of business and the country** (as well as least confusing to the public in the long run) if the implementation of "888" for business can be rolled back and reversed, and "800" numbers used **only** for businesses.

Please respond to me in either event.

Very truly yours,

AMBI-TECH INDUSTRIES, Inc.



Matthew C. Baum
President