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

**JUN 19 1997**

In the Matter of	)	Federal Communications Commission
	)	Office of Secretary
Administration of the North	)	CC Docket No. 92-237
American Numbering Plan	)	
Carrier Identification Codes (CICs)	)	

**COMMENTS OF WORLDCOM, INC.  
ON  
PETITIONS FOR RECONSIDERATION**

On January 2, 1998, thousands -- possibly hundreds of thousands -- of Americans returning to work from their New Year's holiday will find themselves unable to make any long distance calls solely as a result of the Commission's decision to eliminate the use of five digit Carrier Access Codes ("CACs") as of January 1, 1998.<sup>1</sup> For that reason, WorldCom, Inc. ("WorldCom") submits these comments in strong support of the Petition for Reconsideration filed by the Competitive Telecommunications Association ("CompTel") on May 19, 1997 (hereinafter "Petition").

**I. INTRODUCTION AND SUMMARY**

Thousands of American consumers, primarily businesses, use CACs that are programmed into their telecommunications equipment, either private branch exchanges ("PBXs") or dialers,

<sup>1</sup> Administration of the North American Numbering Plan Carrier Identification Codes (CICs); Petition of VarTec Telecom, Inc., Second Report and Order, CC Docket No. 92-237, 1997 Westlaw 174495, FCC 97-125, Released April 11, 1997 (hereinafter the "Order"). The order also eliminates the use of three digit Carrier Identification Codes ("CICs") on January 1, 1998.

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to access the long distance carrier of their choice. The vast majority of these PBXs and dialers are programmed with five digit CACs and therefore must be reprogrammed with new seven digit CACs in order to function after five digit CACs are eliminated. If a PBX or dialer is not reprogrammed when the five digit CACs are eliminated, the consumer using the PBX or dialer will be unable to place long distance calls. Obviously, it is in the public interest to ensure that consumers have ample opportunity to reprogram their equipment to the new seven digit CACs.

There is, however, another side to the reprogramming of PBXs and dialers that apparently is less obvious to the Commission. A consumer cannot reprogram its equipment to use a seven digit CAC until the consumer's local exchange carrier ("LEC") has converted its switches to use the seven digit CAC. If a consumer reprograms before the LEC converts, the consumer will lose the ability to place long distance calls. Thus, PBXs and dialers cannot be reprogrammed until the relevant LEC has converted its switches to accept the seven digit CACs.

WorldCom's technicians have encountered a number of areas where the local exchange carrier is not capable of accepting the seven digit CAC, and the record in this proceeding indicates a number of smaller carriers have not yet begun to convert their switches. This has hindered WorldCom's efforts to reprogram dialers through a systematic national program and has prevented WorldCom from engaging in mass consumer education

programs to alert consumers to the impending change in CAC dialing patterns.

In many areas of the country, the elimination of five digit CACs on January 1, 1998, will not be the end of a "transition" period as suggested by the Commission. There has been no true transition. Instead, it will be a flash cut from five digit to seven digit CACs. If consumers reprogram their equipment before January 1, they may be out of service until the LEC changes over. If consumers wait until January 1 to reprogram, the resources of vendors and carriers will be strained to the breaking point attempting to accommodate the numerous requests for simultaneous reprogramming.

To remedy this situation, the Commission should require that by January 1, 1998 all LECs modify their switches to allow permissive dialing of either five digit or seven digit CACs. The Commission could then set January 1, 2000, as requested by CompTel, as the date for the end of permissive dialing and the elimination of the five digit CACs. Synchronization on a single date -- January 1, 1998 -- is impossible. A two-step transition -- a true transition -- is the only way to avert disaster for thousands of telecommunications consumers.

**II. THOUSANDS OF CONSUMERS USING PBXs OR DIALERS PROGRAMMED WITH CARRIER ACCESS CODES MAY LOSE THEIR ABILITY TO PLACE LONG DISTANCE CALLS**

Hundreds of thousands of consumers, primarily businesses, use PBXs or dialers programmed with CACs to reach the long distance carrier of their choice. Such use of PBXs and

dialers is particularly prevalent in states that allow intraLATA toll competition but do not permit intraLATA toll 1+ presubscription. In this environment, 1+ intraLATA toll traffic would default to the incumbent LEC. End users can only reach a competing carrier by dialing the carrier's CAC prior to dialing the NPA/NXX-XXXX they sought to reach. For convenience, many consumers programmed their long distance carrier's CAC into their PBX. In addition, as a marketing tool, many carriers provided consumers with dialers that would dial the CAC. In general with respect to both PBXs and dialers, an end user dials a 1+ call in a normal fashion and the PBX or dialer substitutes the CAC for the 1+. Thus, even though it was intraLATA toll that precipitated the need for PBXs and dialers to be programmed with CACs, the PBX or the dialer uses the CAC for all of a consumer's toll traffic. If the CAC ceases to function, it will affect all of a consumer's long distance calls.

Although industry has been reprogramming these PBXs and dialers in anticipation of an eventual move to seven digit CACs, much of this equipment continues to be programmed with five digit CACs, which, pursuant to the Commission's order, are slated to be eliminated on January 1, 1998. A PBX or a dialer that is not reprogrammed by that date will not send a functioning CAC to the LEC. The consumer using the equipment will not be able to make any long distance calls -- interLATA, intraLATA, interstate or intrastate -- until the PBX or dialer is reprogrammed with the seven digit CAC.

To prevent consumers from losing their ability to make long distance calls and the concomitant commercial cost and confusion that will ensue, the Commission should take every step possible to ensure that the transition from five to seven digit CACs is as invisible as possible to the end user. Unfortunately, the schedule set forth in the Order will almost certainly lead to consumer disruption. It will also lead to undue disparagement of long distance carriers just as the BOC are getting ready to enter the long distance market.

**III. LOCAL EXCHANGE CARRIERS MUST ALLOW PERMISSIVE FIVE OR SEVEN DIGIT CARRIER ACCESS CODE DIALING BEFORE A PBX OR DIALER CAN BE REPROGRAMMED**

It does a consumer no good to have its PBX or dialer reprogrammed with a seven digit CAC unless the consumer's LEC is capable of receiving and using the seven digit CAC. If the consumer has its equipment reprogrammed first, the consumer will not be able to make long distance calls until the LEC converts its switches to accept the seven digit CACs. Any transition plan, therefore, must ensure that the LECs convert their switches to permit permissive dialing of five and seven digit CACs for an interim period before limiting CACs to seven digits.

This has not been the case under the existing "transition" to seven digit CACs. WorldCom's technicians who are charged with reprogramming dialers for WorldCom customers continue to encounter LECs whose switches do not yet have the

capability to accept seven digit CACs.<sup>2</sup> The record itself indicates that many of the rural LECs, in asking for extended time to convert, have not begun to move to seven digit CACs.<sup>3</sup> Again, consumers cannot reprogram their telecommunications equipment until their LEC is capable of handling the seven digit CAC.

The fact that not all LECs have converted their switches to allow permissive dialing of five or seven digit CACs has made it very difficult for the industry to reprogram consumers' PBXs and dialers and to educate consumers about the impending change. WorldCom technicians reprogram dialers during routine site visits. When they encounter a dialer in an exchange where permissive dialing has not been enabled, they are forced to schedule that dialer for later reprogramming at an undetermined time. The delay costs WorldCom valuable human resources and will create immense problems for every one in the industry as January 1, 1998 approaches and potentially large numbers of consumers have yet to have their LEC allow seven digit dialing. The resources of PBX vendors and IXCs will be strained as numerous consumers require simultaneous reprogramming.

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<sup>2</sup> The problem appears most frequently in independent telephone company territory, including some exchanges served by GTE.

<sup>3</sup> GVNW Inc./Management urged a six-year exemption for smaller, rural telephone companies in addition to the six-year permissive dialing period proposed by the Commission. The Organization for the Promotion and Advancement of Small Telecommunications Companies ("OPASTCO") supported the Commission's proposed six-year transition. See Order at ¶18.

Marketing efforts designed to educate consumers about the need to reprogram their PBXs and to change their dialing patterns are also hampered by the fact that a number of LECs have yet to enable permissive dialing of seven digit CACs. A national campaign simply cannot be mounted until the new dialing pattern can be used with all LECs lest some consumers change before their LECs are prepared.

**IV. A TWO-PART TRANSITION SHOULD BE ADOPTED BY THE COMMISSION TO REPLACE THE FLASH CUT SET FORTH IN THE ORDER**

The Commission's mistaken belief that there is currently a "transition" underway from five to seven digit CACs creates the consumer reprogramming problem discussed above. In April 1994, the Commission proposed a six-year transition to move from five digit CACs to seven digit CACs (and from three digit CICs to four digit CICs).<sup>4</sup> That proposal was never adopted by the Commission. In the Order, the Commission makes the assumption that a transition -- one never ordered or implemented by the Commission -- began on April 1, 1995, the day that Bellcore began assigning only four digit CICs.<sup>5</sup> But this "transition" was not mandated by Commission order and it is clear that many LECs are still in the process of making their switches seven digit CAC capable.

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<sup>4</sup> See Administration of the North American Number Plan, Notice of Proposed Rulemaking, CC Docket No. 92-237, 9 FCC Rcd 2068 (1994).

<sup>5</sup> Order at ¶6.

This is not an adequate transition and, for many consumers, could result in a flash cut on January 1, 1998. Consumers cannot modify their PBXs or dialers until the LECs have changed their switches. If a LEC waits until January 1 to enable seven digit CAC dialing and simultaneously eliminates three digit CAC dialing, consumers served by that LEC will experience a disruption of their long distance service until their equipment can be reprogrammed by their PBX vendor or interexchange carrier.

A more appropriate transition would have LECs change their switches to accommodate permissive dialing on a specific date, followed by an interim period during which consumers can reprogram their dialers and PBXs. A transition in this fashion will permit consumers to modify their equipment with the knowledge that the LEC has already converted to permissive dialing. It will also allow carriers and PBX vendors to systematically reprogram dialers and PBXs as well as engage in nationwide consumer education programs.

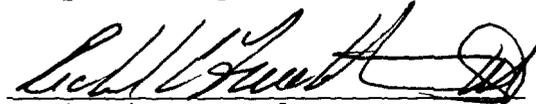
WorldCom recommends that the Commission modify its order to require LECs to convert their switches to permit permissive dialing of five and seven digit CACs no later than January 1, 1998. WorldCom also recommends that this permissive dialing period extend until January 1, 2000 as proposed by CompTel. This two-step transition is the best approach to protect the consumer's continuing ability to place long distance calls.

V. CONCLUSION

For the reasons stated above, WorldCom urges the Commission to adopt CompTel's Petition for Reconsideration with the modifications suggested by WorldCom.

Respectfully submitted,

June 19, 1997

A handwritten signature in black ink, appearing to read "Catherine R. Sloan", written over a horizontal line.

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**CERTIFICATE OF SERVICE**

I, Cecelia Y. Johnson, hereby certify that I have this 17th day of June, 1997, sent a copy of the attached "Comments of WorldCom, Inc. on Petitions for Reconsideration" by hand delivery, or first class mail, postage prepaid, to the following:

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