

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

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OCT 30 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of the Pay Telephone)
Reclassification and Compensation Provisions)
of the Telecommunications Act of 1996)
)
Petitions To Waive Payphone)
Coding Digits Requirements)
_____)

CC Docket No. 96-128

**COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY,
PACIFIC BELL, AND NEVADA BELL**

Southwestern Bell Telephone Company ("SWBT"), Pacific Bell, and Nevada Bell submit these comments on the Commission's *Public Notice* released October 20, 1997 in the above captioned proceeding. The *Public Notice* requested comments on various requests for waivers by local exchange carriers ("LECs") and payphone service providers ("PSPs") that cannot provide payphone-specific digits within the time frame established in the *Payphone Orders*. *Public Notice*, para. 1.

One of the requests for a waiver was filed by the LEC ANI Coalition. SWBT, Pacific Bell, and Nevada Bell are members of that Coalition, and we are filing these Comments as a supplement to the Comments that the Coalition will file. Specifically, in these Comments, we show that the Commission should (1) grant SWBT and Pacific Bell a general waiver of the requirement to provide payphone specific digits until April

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15, 1998 and (2) grant SWBT, Pacific Bell, and Nevada Bell indefinite waivers for certain identified switches and call types.

I. **SWBT And Pacific Bell Should Be Granted A General Waiver Until April 15, 1998**

Pending this proceeding on the waiver requests, the Common Carrier Bureau granted, on its own motion, a limited waiver of five months, until March 9, 1998, for LECs to pass payphone specific digits, in order to ensure that per-call compensation began on October 7, 1997. *Id.* In its waiver request, the Coalition explained that those members for whom Flex ANI is a workable option could generally implement Flex ANI on a ubiquitous basis by April 15, 1998. SWBT and Pacific Bell are committed to implement Flex ANI expeditiously and will do what is reasonably possible to help ensure compliance with the current March 9, 1998 waiver date. That date, however, is extremely aggressive, leaving little or no room for error and requiring a tremendous commitment of resources, including employee time.

For instance, Pacific Bell must translate over 170,100 lines. Pacific Bell estimates that the engineering and translation activities will require approximately 21,000 hours by 28 full time translations personnel, although Pacific Bell is working with vendors to attempt to reduce this time requirement. Prior to switch translations, among other tasks, testing must be completed on all switch types, and Flex ANI software must be purchased and installed for switch types lacking such software. SWBT faces a similar quantity of work to implement Flex ANI.

An extension of the waiver period by approximately five weeks to April 15, 1998 will help reduce possible errors and provide the time needed to help ensure that the

conversion to Flex ANI is done properly. In addition, an indefinite waiver should be granted for those extremely limited switch and call types that cannot work with Flex ANI. See SWBT's, Pacific Bell's, and Nevada Bell's October 1, 1997 letter to John Muleta, attached hereto as Exhibit A, and see Part II of these Comments.

Specifically, because of the large number of switches for which SWBT and Pacific Bell must license and install Flex ANI software (161 for SWBT and 199 for Pacific Bell) and because they must perform switch translations and testing in all switch types (covering 556 switches for SWBT and 452 for Pacific Bell), SWBT's and Pacific Bell's anticipated schedules for implementation of Flex ANI software will take until April 15, 1998 for completion of all lines except a small percentage of lines facing special difficulties.¹ SWBT and Pacific Bell submit that April 15, 1998 is a very aggressive completion date for such a large and difficult task and request that the Commission extend the waiver for SWBT and Pacific Bell until that date.

II. Certain Switches And Call Types Require Indefinite Waivers For SWBT, Pacific Bell, And Nevada Bell

The Commission should grant SWBT, Pacific Bell, and Nevada Bell indefinite waivers for a small percentage of their switches and relevant call types for which Flex ANI will not be a workable option during the foreseeable future because of technological limitations. The ANI lists, and where needed other available call information, can continue to be used to allow per call compensation.

¹ With its smaller number of switches and lines, Nevada Bell's anticipated completion date for all lines except a small percentage facing special difficulties is December 31, 1997.

Those limited situations requiring an indefinite waiver are as follows:

1. SWBT, Pacific Bell, and Nevada Bell have a combined total of 47 DMS 200 and DMS 100/200 Switches that cannot pass the original Flex ANI digits intact to a carrier on "0- transfer" and misrouted calls because of Flex ANI software limitations. This problem affects a very small percentage of the relevant calls.

This problem primarily occurs with 0- calls to the Traffic Operator Position System ("TOPS") operators where the calling customer requests that a call be transferred to other than a presubscribed carrier. Although calls can arrive at the operator identified as "07", "27", "29", or "70", TOPS currently has a design capability on outgoing calls that supports only one ANI ii entry. If the TOPS facilities manager puts "07" as the supported ANI ii code, then all incoming calls with "07" will be forwarded to the carrier with an ANI ii of "07". All incoming calls with any other ANI ii digits will have the ANI ii digits stripped and the ANI ii digits "00" will be sent to the carrier.

2. ANI ii digits cannot be passed on traditional Feature Group B ("FGB") Service used for 950 calls where the customer is connected at the tandem (which is where most FGB calls are connected). These are FGB calls where a seven digit, 950-XXXX, code is dialed. The switching end office does not pass any ANI digits on this type of call. FGB Service was developed prior to FGD, equal access, and ANI, and the signaling protocols that were designed for FGB do not include ANI. We do not currently know of any potential solution for this problem which affects a very small percentage of relevant calls.

3. ANI ii digits cannot be passed on 800 or 888 calls routing to POTS phone numbers. For all outgoing 800 calls, the end office switch launches a query to the 800 data base. If the call is interLATA, the 800 data base returns a carrier identification code ("CIC") and the switch forwards the 800 number and the ANI ii payphone digits to the appropriate carrier. However, if the 800 data base has a POTS routing number, rather than a CIC, the telephone number is returned and the Service Switching Point ("SSP") replaces the ANI ii digits with the digits "24" in order to identify the call as an 800 call. Thus, the ANI ii digits are lost from the call and not sent to the carrier.

Per call compensation on 800 POTS calls can continue to be accommodated by use of the ANI list until a solution to the technological limitation is developed.² The industry and Bellcore are reviewing possible solutions. This problem affects a very small percentage of the relevant calls.

4. Flex ANI ii digits are not received over SWBT's Equal Access Operator Services Signaling ("EAOSS") trunk groups from Digital Multiplexing System ("DMS") end offices. A Request For Feature ("RFF") has been submitted to NorTel.

5. SWBT has 63 DMS-10 switches which are scheduled to be replaced with DMS-100/5ESS remotes by the second quarter of 1998. Pacific Bell has one DMS-10 switch which is scheduled to be replaced with an EXM2000 in October of 1998. It would be a waste of resources to convert these DMS-10 switches to Flex ANI. SWBT and Pacific Bell should be allowed to license Flex ANI software for the DMS-100/5ESS remotes and EXM2000, rather than for the DMS-10 switches.

² On these 800 POTS calls, SWBT has a billing process that will allow per-call compensation to payphone providers for calls handled by SWBT.

6. It appears that Flex ANI ii digits will no longer be able to be passed with 950 calling on Feature Group D ("FGD") from 5ESS switches when the industry moves to mandatory 4-digit CICs in June of 1998. There are two sets of switch translations that can be used at an end office to provide 950 calling on FGD, "transitional" or "interim." Which ever type of translation is used creates problems. For instance, Pacific Bell currently uses transitional translations. Pacific Bell believes, however, that transitional translations will not support 4-digit CICs. If Pacific Bell changes to interim translations to support 950 calling on FGD, the 4-digit CIC problem probably will be solved. However, interim translations will not support Flex ANI on 950 calling on FGD from 5ESS switches. This problem affects a very small percentage of the relevant calls.

In summary, there are technological limitations on the ability of certain switches and call types to pass Flex ANI ii digits:

- "0- transfer" and misrouted calls from DMS 100 and DMS 100/200. (SWBT, Pacific Bell, and Nevada Bell have a combined total of 47 of these switches.)
- Feature Group B 950 calls where the customer is connected at the tandem
- 800 or 888 calls routing to POTS phone numbers
- Calls received over EAOSS trunk groups from DMS end offices
- Feature Group D 950 calls from 5ESS switches (when industry moves to 4 digit CICs in June of 1998)
- Calls from SWBT's 63 and Pacific Bell's one DMS 10 switches until those switches are replaced

The above call types represent a very small percentage of the relevant calls.

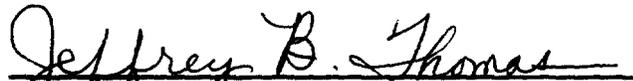
Moreover, per call compensation can be achieved in all cases by continued use of ANI lists and additional call information where needed.

III. Conclusion

For all the above reasons, the Commission should (1) grant SWBT and Pacific Bell a general waiver of the requirement to provide payphone specific digits until April 15, 1998 and (2) grant SWBT, Pacific Bell, and Nevada Bell indefinite waivers for certain identified switches and call types.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY
PACIFIC BELL
NEVADA BELL


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Date: October 30, 1997
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EXHIBIT A

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October 1, 1997

EX PARTE

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No 96-128 - In the Matter of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996

Dear Mr. Caton:

Today, SBC sent the attached letter to John Muleta, Acting Deputy Chief of the Common Carrier Bureau. Please enter into the above mentioned docket file.

In accordance with 47 C.F.R. § 1.1206(a)(1) of the Commission's rules, the original of this letter and one copy are being filed with your office. Acknowledgment and date of receipt are requested. A duplicate of this letter is included for this purpose.

Sincerely,

Chris Jines

Attachment

SBC Communications Inc.
1401 I Street, N.W.
Suite 1100
Washington, DC 20005



October 1, 1997

By Hand

John B. Muleta, Esquire
Acting Deputy Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

Dear Mr. Muleta:

Re: *Pay Telephone Reclassification and Compensation Provisions of the
Telecommunications Act of 1996, CC Docket No. 96-128*

This letter is a follow up to Michael Kellogg's letter to you dated September 30, 1997. Attached are the time schedules of anticipated completion dates for implementation of Flex ANI by Southwestern Bell Telephone Company ("SWBT"), Pacific Bell, and Nevada Bell.

Please call me on 415-542-7661 if you wish to discuss our schedules.

Sincerely,

A handwritten signature in cursive script that reads "Jeffrey B. Thomas".

Jeffrey B. Thomas

Southwestern Bell Telephone Company

Southwestern Bell Telephone Company ("SWBT") will have to license and install Flex ANI software in 161 of its 556 switches and perform switch translations and testing in all its switch types. A tariff filing will be required in order to charge payphone service providers for this service. This tariff filing can take place by the date at which switch translations are completed. SWBT's anticipated schedule for implementation of Flex ANI is as follows:

End of Period	Accumulated Percentage of Total Lines*
12/31/97	30
1/30/98	50
2/28/98	70
3/31/98	90
4/15/98	100*

*SWBT has 63 DMS-10 switches which are scheduled to be replaced with DMS-100/5ESS remotes by the second quarter of 1998. SWBT will license Flex ANI software for the DMS-100/5ESS remotes rather than the DMS-10 switches. In addition, at most 28 of SWBT's 556 switches (i.e., at most 28 combined DMS 200 and DMS100/200 TOPS switches) cannot pass the original Flex ANI digits intact to a carrier on "0-transfer" and misrouted calls because of Flex ANI software limitations. Potential solutions are being explored. ANI digits also will not be able to be passed on FGB service on 950 calls or on 800 routing to POTS #'s because of technological limitations. SWBT believes that these calls represent a very small percent (similar to Pacific Bell's percent, i.e., less than 1 ½%) of the dial around access code and subscriber 800 payphone calls on SWBT's network. Compensation for these calls can continue to be accommodated via ANI lists. Moreover, 950 calling on FGD from 5ESS offices will not support Flex ANI as of January 1, 1998 when we must move to mandatory 4-digit CICs. A vendor solution is required. Again, these calls represent a very small percentage of the relevant calls.

Pacific Bell

Pacific Bell will have to license and install Flex ANI software in 199 of its 452 switches and perform switch translations and testing in all its switch types. A tariff filing will be required in order to charge payphone service providers for this service. This tariff filing can take place by the date at which switch translations are completed. Pacific Bell's anticipated schedule for implementation of Flex ANI is as follows:

End of Period	Accumulated Percentage of Total Lines*
12/31/97	30
1/30/98	50
2/28/98	70
3/31/98	90
4/15/98	100*

*ANI digits will not be able to be passed on FGB service on 950 calls or on 800 routing to POTS #s because of technological limitations. These calls are estimated to represent less than 1 1/2% of the dial around access code and subscriber 800 payphone calls on Pacific Bell's network, and compensation on these calls can continue to be accommodated via ANI lists. In addition, 950 calling on FGD from 5ESS offices will not support Flex ANI as of January 1, 1998 when we must move to mandatory 4-digit CICs. A vendor solution is required. Again, these calls represent a very small percentage of the relevant calls. Moreover, Pacific Bell's 18 DMS-200 TOPS switches cannot pass the original Flex ANI digits intact to a carrier on "0- transfer" and misrouted calls because of Flex ANI software limitations. Potential solutions are being explored.

Nevada Bell

Nevada Bell has Flex ANI software installed in all its switches but must perform translations in all switch types before being able to deliver Flex ANI. A tariff filing will be required in order to charge this service to payphone service providers. This tariff filing can take place by the date at which switch translations are completed. Nevada Bell's anticipated schedule for implementation of Flex ANI is as follows:

End of Period	Accumulated Percentage of Total Lines*
12/31/97	100*

*ANI digits will not be able to be passed on FGB service on 950 calls or on 800 routing to POTS #s because of technological limitations. These calls are estimated to represent less than 1/2 % of the dial around access code and subscriber 800 payphone calls on Nevada Bell's network, and compensation for these calls can continue to be accommodated via ANI lists. A vendor solution is required. Moreover, Nevada Bell's one DMS-100/200 TOPS switch cannot pass the original Flex ANI digits intact to a carrier on "0-transfer" and misrouted calls because of Flex ANI software limitations. Potential solutions are being explored.

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