

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

JAN 12 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Administration of the) CC Docket 92-237
North American Numbering)
Plan, Carrier Identification)
Codes (CICs))

REPLY COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION

MCI Telecommunications Corporation (MCI), by counsel, hereby submits these reply comments on the Federal Communications Commission's (Commission's) Second Further Notice of Proposed Rulemaking¹ in the above-referenced proceeding (Further NPRM). The Commission's Further NPRM sought comment on the timing and implementation of equal access by independent local exchange carriers (LECs).

MCI agrees with comments filed by General Communication, Inc. (GCI), that the Commission should accelerate the timetable for LECs to implement equal access from three years to one year from the date of an order adopted by the Commission in this proceeding.² Nearly thirteen years have passed since the Commission recognized that the differences between non-GTE independent telephone companies and GTE and the Regional Bell Operating Companies (RBOCs) necessitated that they be treated differently with respect to equal access

¹Administration of the North American Numbering Plan, Carrier Identification Codes (CICs), Order on Reconsideration, Order On Application For Review, and Second Further Notice of Proposed Rulemaking, CC Docket 92-237 (rel. October 22, 1997).

²See Comments of GCI, p. 3.

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implementation.³ During that time, much of the software necessary to implement equal access has become increasingly readily available for purchase by all LECs from a variety of switch manufacturers. Thus, there is no good reason to wait three years, after adoption of a Commission order, for all LECs to become equal access capable.

The useful life of most switching systems is between 10 and 15 years. Thus, by now, most of the switching equipment purchased by independent LECs that did not receive bona fide equal access requests a decade ago is well on its way to becoming obsolete, or is already obsolete. In fact, most of that equipment should have been replaced by now, and LECs should have taken advantage of their ability to accelerate depreciation on those switches and replace them with state of the art equal access-equipped digital switches. Thus, there should be no reason for LECs to now be allowed to recover any costs associated with upgrading switches to equal access. If the Commission nevertheless allows LECs affected by its order to recover their costs, they should not be allowed to do so by increasing access charges.

Finally, as pointed out in comments filed by Sprint Corporation, the establishment of minimum switching standards that are followed by all LECs is necessary to minimize customer confusion.⁴ This is particularly important as the industry transitions from 3-digit to 4-digit carrier identification code (CIC) dialing over the next several months. The sooner that all LECs provide equal access and 4-digit CIC dialing, the better for all concerned.

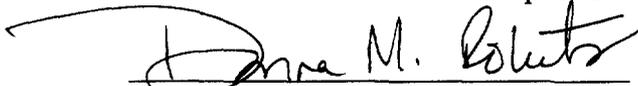
³See In the Matter of MTS and WATS Market Structure Phase III, Report and Order, CC Docket No. 78-72, 100 F.C.C.2d 860 (1985).

⁴See Comments of Sprint, p. 2

It is in the interest of the public and the industry as a whole that the Commission's rules that affect changes to consumers' ability to access the carrier(s) of their choice be implemented smoothly, equitably and as soon as possible in order to minimize customer confusion and disruption to the industry. MCI thus supports the Commission's proposed rule that all independent LECs be required to provide equal access, but strongly urges the Commission to shorten the implementation time frame from three years to one year. MCI also requests that if the Commission orders that LECs can recover the costs associated with the transition, they should not be allowed to recover them costs from or through increased access charges.

Respectfully submitted,

MCI Telecommunications Corporation

A handwritten signature in black ink, appearing to read "Donna M. Roberts", is written over a horizontal line. A long, sweeping horizontal stroke extends to the left from the start of the signature.

Donna M. Roberts

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CERTIFICATE OF SERVICE

I, John E. Ferguson III, do hereby certify that copies of the foregoing Reply Comments of MCI on the Matter of the Administration of the North American Numbering Plan Carrier Identification Codes (CICs) were sent, on this 12th day of January, 1998, via first-class mail, postage pre-paid, to the following:

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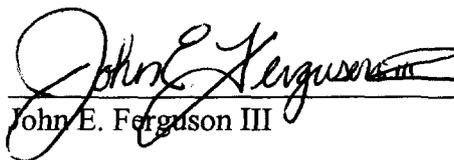
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