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FCC MAIL ROOM

Ms. Renee Alexander  
Network Services Division  
Federal Communications Commission  
2000 M Street, NW, Room 235  
Washington, DC 20554  
Fax No.: (202) 418-2345

Re: Petition of Vitelco for Extension of the Waiver of the Commission's Rules Regarding Transition to Four-Digit CICs, CC Docket No. 92-237

Dear Ms. Alexander:

AT&T provides this response to your July 21, 1998 request for information concerning the above-captioned waiver petition filed by Vitelco. Vitelco asks the Commission to waive its deadline for conversion to four-digit Feature Group D Carrier Identification Codes ("CICs") and the associated July 1, 1998 deadline for blocking of three-digit CICs until Vitelco has implemented seven-digit Carrier Access Code ("CAC") dialing. It is AT&T's position, as expressed in its December 29, 1997 pleading in CC Docket 92-237, that the Commission-determined transition for conversion from three-digit to four-digit CICs should end for all interexchange carriers on June 30, 1998. Accordingly, Vitelco should be required to convert to four-digit CICs at the earliest possible date and should commence blocking calls that are dialed with three-digit CICs as soon as it is capable of recognizing four-digit CICs. To ensure compliance by the earliest possible date, the Commission should require monthly status reports from Vitelco.

Specifically, the FCC seeks information on the following issues:

- 1) Which entity(s) would bear the technical burden of implementing Vitelco's request that the Commission waive its three-digit CIC blocking deadline and allow the use of five-digit CAC dialing until Vitelco has implemented four-digit CIC capability and the resulting seven-digit CAC dialing capability in the Virgin Islands?

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Response: If the Commission waived the three-digit CIC blocking deadline and allowed continued use of five-digit CAC dialing in the Virgin Islands, Vitelco's switch would remain configured to allow completion of calls based on three-digit CIC/five-digit CAC dialing. Any attempt to complete a call based on four-digit CIC/seven-digit CAC dialing (for example, to 1010288) would fail. Thus, to the extent that some interexchange carriers ("IXCs") have only new four-digit CICs, subscribers could not originate calls using the four-digit CICs from the Virgin Islands.

2) Please explain fully the technical effects of Vitelco's request that the Commission waive its three-digit CIC blocking deadline and allow the use of five-digit CAC dialing until Vitelco has implemented four-digit CIC capability and seven-digit CAC dialing in the Virgin Islands. Please discuss the process by which Vitelco could continue to use a three-digit CIC for dial-around traffic routed from the U.S. mainland to the Virgin Islands and from the Virgin Islands to the U.S. mainland.

Response: See Response to Question 1, as to calls originating in the Virgin Islands. Continued use of three-digit CICs should not impact calls terminating in the Virgin Islands.

3) What would it cost to implement Vitelco's request that the Commission waive its three-digit CIC blocking deadline and allow the use of five-digit CAC dialing until Vitelco has implemented four-digit CIC capability and seven-digit CAC dialing in the Virgin Islands? Please describe each cost element.

Response: Given that virtually all U.S. mainland local exchange companies now use four-digit CICs (*i.e.*, seven-digit CACs) IXCs that advertise their CACs nationally would have to develop Virgin Islands-specific advertising because customers dialing seven-digit CACs would not be able to complete calls from the Virgin Islands.

4) Which entity(s) would bear the cost of implementing Vitelco's request? How would these costs be recovered?

Response: If Vitelco's waiver were granted, the only costs to interexchange carriers serving the Virgin Islands would be expenses, if any, relating to Virgin Islands-specific advertising promoting five-digit CACs (see response to Question 3, above). Each IXC should bear its own costs of serving the Virgin Islands and would have to recover them from its general revenues.

Respectfully yours,

*Judy Sello*

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