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

AUG 19 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Administration of the North American	)	CC Docket No. 92-237
Numbering Plan	)	
Carrier Identification Codes	)	
	)	
MCI Petition for Emergency Stay	)	

**OPPOSITION OF GTE**

GTE Service Corporation and its affiliated domestic telephone operating companies<sup>1</sup> (collectively, "GTE") respectfully oppose the Petition for Emergency Stay filed by MCI Telecommunications Corporation ("MCI") on August 12, 1998 in the above-captioned proceeding. In its Petition, MCI asks the Commission to halt LEC end-office conversions to four-digit Carrier Identification Codes ("CICs") alleging a technical deficiency which results in a "prolonged period of ringing" before the intercept announcement if an end user has dialed the old five-digit Carrier Access Code ("CAC"). MCI further alleges that only 16% of the GTE end offices had been converted to four-digit CICs as of August 5, 1998.

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<sup>1</sup> GTE Alaska Incorporated, GTE Arkansas Incorporated, GTE California Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc. and Contel of the South, Inc.

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MCI's unsupported allegations that the conversion process is not being implemented cannot satisfy the requirements for a stay. In fact, as detailed in a letter to the FCC on August 17, 1998, the GTE companies are on schedule to complete their conversion by September 1, 1998.<sup>2</sup> GTE believes that further delay will unnecessarily delay the conversion process and add to the cost of implementing the conversion.

The GTE telephone companies have devoted considerable resources and effort to complete conversion to four-digit CICs in all of their end offices across the country to meet the Commission's September 1, 1998 deadline. As of August 14, 1998, GTE had completed this transition in many of its 28 states. GTE estimates that the process is now between 75% to 80% completed. In those areas where transition has been completed, the appropriate intercept message is promptly being executed if the 5-digit CAC dialing arrangement is used. GTE is not aware of any problems within its areas associated with prolonged ringing before delivery of the intercept message, as alleged by MCI.

GTE opposes any further delay in completing the transition to four-digit CICs (and associated seven-digit CAC dialing). The transition to seven-digit CAC dialing was initially intended to be completed by January 1, 1998. Carriers offering dial-around long distance calling have had ample time to get ready for five-digit CAC blocking since the Commission's initial order issued over 16 months ago. Indeed, Telecom USA and other

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<sup>2</sup> Letter from F. Gordon Maxson, GTE to the FCC, CC Docket No. 92-237, August 17, 1998.

carriers have engaged in extensive advertising of the seven-digit CACs. It seems inconsistent for MCI now to seek a halt in the conversion to four-digit CACs.

For these reasons, GTE urges the Commission to deny MCI's Petition.

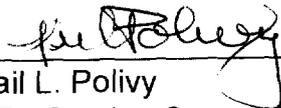
Dated: August 19, 1998

Respectfully submitted,

GTE Service Corporation and its affiliated  
domestic telephone operating companies

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## Certificate of Service

I, Ann D. Berkowitz, hereby certify that copies of the foregoing "Opposition of GTE" have been mailed by first class United States mail, postage prepaid, on August 19, 1998 to the following parties of record:

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