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Before the  
Federal Communications Commission  
Washington DC 20554

In the Matter of the Use of N11 Codes ) CC Docket 92-105  
and Other Abbreviated Dialing Arrangements ) NSD File No. L-98-139

**REPLY COMMENTS OF LOW TECH DESIGNS ON THE NANC  
RECOMMENDATION CONCERNING ABBREVIATED DIALING ARRANGEMENTS**

Low Tech Designs, Inc., through it's President, hereby submits it's reply comments regarding the North American Numbering Council's recommendations concerning abbreviated dialing arrangements. These reply comments are late filed and respectfully requested to be included in the public record of this proceeding <sup>1</sup>.

**INTRODUCTION**

The Comments filed by BellSouth, Bell Atlantic, United States Telephone Association, PrimeCo, AT&T and SBC Communications are monopolist in nature and should be recognized as a blatant attempt to forestall competition in the provisioning of telecommunications and advanced telecommunications services using abbreviated dialing arrangements.

**I. PrimeCo**

The Comments filed by PrimeCo are revealing. They show how a continuing FCC reluctance to impose specific rules on the use of these unique telephone numbering resources has brought on the extreme confusion and cross-purposes evident in the current deployment of these numbers <sup>2</sup>. PrimeCo describes a "Catch-22" situation where wireless carriers are forced by state

<sup>1</sup> Low Tech Designs, Inc., on 1/19/99 via fax and email, contacted Ms. Helene Nankin in the Common Carrier Bureau and formally requested an extension of time to file these reply comments. Ms. Nankin verbally advised Low Tech that it's late filed comments would be accepted if filed by February 10, 1999.

<sup>2</sup> Also, see USTA Comments, page 13, para. 3.

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agencies and competitive pressures to provide \*XX type abbreviated dialing arrangements instead of the wireless friendly leading “#” arrangements the majority report recommends and that the wireless industry agreed to provide in INC Issue #21. See Primeco Comments, page 4.

In the specific Illinois case raised by PrimeCo, the assignment of \*77 (or \*SP, where SP stands for State Police) conflicts with the North American Numbering Plan Administrator’s harmonized assignment of the Anonymous Call Rejection feature, which is also activated by the use of \*77. Anonymous Call Rejection, when activated using \*77, rejects calls from parties who block deliver of their calling number to the called party using Calling Number Delivery Blocking (\*67).

PrimeCo wishes us to believe that PCS licensees, which are not regulated by State Commissions, are somehow forced to implement these \*XX based abbreviated dialing arrangements by state entities<sup>3</sup>. If this is the case, this certainly constitutes a situation where an FCC mandate is required in order to establish needed conformity of a dialing resource that is national in nature<sup>4</sup>.

PrimeCo then warns the FCC, on page 2 of their comments, that the majority recommendation of a leading “#” based abbreviated dialing arrangement would conflict with *“thousands of existing leading “#” codes already implemented by the wireless industry”*. Primeco suggests that the wireless industry be allowed to continue to deploy both their leading

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<sup>3</sup> Was BellSouth Mobility in Atlanta “forced” to provide the \*11 code to WXIA-Channel 11 TV immediately after Low Tech Designs, Inc. requested the wireline assignment of this code as a certificated competitive local exchange carrier? Why wasn’t the #11 code offered, as INC Issue #21 specifies?

<sup>4</sup> The Illinois State Police should have been required to use the 311 Police Non-Emergency N11 code that was recently standardized by the FCC on a nationwide basis. In the alternative, the Illinois State Police could have become the public safety answering point for 911 calls made by wireless subscribers.

“\*” and “#” based abbreviated dialing arrangements on a locally administered and market driven basis.

The admission by PrimeCo to the existence of thousands of leading “#” abbreviated dialing arrangements, along with numerous leading “\*” codes, contradicts the widespread comments of their monopoly brethren that there is no demonstrated need or demand for these type resources<sup>5</sup>. If thousands of wireless specific codes are in use in the wireless industry, using a market driven approach, how can other commentors continue to insist no demand exists for them on a nationwide basis?

## **II. Intranetwork Implementations Justified**

PrimeCo, AT&T and BellSouth both justify current intranetwork implementations of their own abbreviated dialing arrangements by citing the FCC First Report and Order in this instant docket. See AT&T Comments, page 6; BellSouth Comments on N11 codes, page 4, footnote 9; page 10, 2nd para.; and PrimeCo Comments, page 2, footnote 4 (“*no federal policy bars the use of [abbreviated dialing] arrangements for intrastate service offerings*”).

If this is the case, why have BellSouth, Ameritech Illinois, GTE, SNET, New York Telephone and Pacific Bell all denied Low Tech Design’s request, as a requesting telecommunications carrier under the 1996 Act, for the \*11 abbreviated dialing arrangement for use in an intrastate service offering? Also see Low Tech reply comments on AT&T’s Comments, located in Section VII. following herein.

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<sup>5</sup> See also, AT&T Comments, page 6. Quoting, “Indeed, ADAs are presently available on a local intra-network basis in many areas and are especially widespread in wireless networks”.

### **III. BellSouth**

#### **A. Related Obstructionist Behavior**

Notably, and in stark contrast to their own intranetwork use of these numbering resources in several states, BellSouth has repeatedly blocked the attempts of Low Tech Designs, Inc. to deploy the \*11 code on an intranetwork, intrastate basis in the Atlanta, GA local calling area. This constant refusal by BellSouth to assign numbering resources that are clearly within their sole control violates their statutory requirement to provide unbundled and non-discriminatory access to network elements, of which numbering resources are included. It is also indicative of their current attitude towards the deployment of these numbering resources on a nationwide basis.

#### **B. Who May Deploy?**

BellSouth quietly attempts to slip a statement into their Comments that their provisioning of N11 services, on an intra-network basis, does not preclude any other “*facilities based*” carrier from offering its own N11 service. See BellSouth Comments, page 10, para. 2. This assertion somehow implies that one must own a class 5 switch before certificated telecommunications carriers are able to deploy telephone numbering resources on a non-discriminatory basis. However, this does not track with actual post-1996 Act competitive practice in the industry. Most notably XCOM, now a part of Level 3 Communications, has deployed innovative advanced telecommunications networks without owning a class 5 switch in Bell Atlantic territory.

On an ongoing basis, it is now recognized that traditional class 5 switches have already been obsoleted by soft switches and related agnostic approaches to next generation telecommunications systems. These new telecommunications systems resemble Advanced

Intelligent Network Intelligent Peripherals, sitting on the edge of the legacy network and providing advanced telecommunications services using the power of SS7 signaling to simulate a peer connected “switch” to the ILEC.

### **C. Balanced Representation?**

BellSouth attempts to dismiss the minority opinions of Low Tech and MCI WorldCom by declaring the NANC Abbreviated Dialing Working Group as reflecting a “*balanced representation of the industry*”. BellSouth Comments page 7. In doing so, BellSouth attempts to categorize Low Tech Designs as an ISP. As BellSouth acutely realizes, Low Tech is a certificated competitive local exchange carrier and not an ISP.

In fact, no enhanced service providers or information service providers were present during any of the Working Group’s meetings, even though many commentators apparently believe they will be the main users of abbreviated dialing arrangements<sup>6</sup>. Additionally, even though the initial conference call initiating the Working Group formation included representatives from the switch manufacturers (who were strongly urged to participate in the process from the beginning because of the technical issues present), these major switch vendors waited until the last meeting of the Working Group to participate<sup>7</sup>. Hardly an example of “balanced representation of the industry” BellSouth insists upon.

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<sup>6</sup> See BellSouth Comments, page 4, para. 2; USTA Comments, page 5, E.

<sup>7</sup> See USTA Comments, page 12, IV.

**D. Second-Guess Widespread Consensus - Second Bite at the Apple?** BellSouth's Comments, on page 8, A., states that "*the Commission . . . should not . . . second-guess widespread industry consensus merely because individual entities want a second bite at the apple to press their parochial interests*".

The ugly truth of the matter is that BellSouth, and the majority of the participants in this proceeding, are second guessing their own previous conclusions on abbreviated dialing arrangements. This forum provided BellSouth and the other ILECs with their second bite at the apple to make things right concerning abbreviated dialing arrangements. Unfortunately, the BellSouth that (1) appealed to the FCC in 1992 to approve the commercial use of N11 codes, and; (2) co-championed Issue #036 at the ATIS/IILC in 1992 to provide additional abbreviated dialing arrangements, and; (3) agreed that future abbreviated dialing arrangements and Advanced Intelligent Network development work should go hand in hand back in 1994, is now the BellSouth that is fat, dumb and happy, sitting on their own joint venture use of several 511 codes in Georgia and Florida. This is the height of hypocrisy for a company that is responsible for bringing the industry and the FCC to the resolution of this critical numbering resource issue at this point in time.

**E. Minority Views Have No Merit?**

BellSouth dismisses Low Tech's proposed and only legal \*XXXX/11XXXX abbreviated dialing format as "*patently absurd*", without acknowledging that telephone numbers, such as abbreviated dialing arrangements, cannot be telephone numbers if they contain non-numeric characters. BellSouth Comments, page 8, B. In this regard, BellSouth's comments are the ones

that are patently absurd, as they blithely foist upon our telephone numbering scheme dialing formats that are not numeric in nature and that cannot be implemented by dialing time-out.

BellSouth then justifies their wrongheaded position by claiming that rotary dial users are already unable to use interactive voice response (IVR) platforms, as if these devices were required in order to make use of any current or prospective use of abbreviated dialing arrangements. BellSouth is acutely aware that applications exist for telecommunications services that do not require IVR interaction.

This argument also has no basis in BellSouth's own network, as the \*XX/11XX based abbreviated dialing arrangement in use today by BellSouth allow rotary dial phones to provide subsequent input of data (e.g. activate and input a call forwarding telephone number). Most current manufacturers of IVR equipment now also support the detection of dial pulses, and advanced systems allow users to say "yes" or "no" or the numbers "one" through "zero", using the power of voice recognition to obviate the need to even push buttons on a touchtone phone.

Additionally, the North American Numbering Plan Administrator has assigned the \*50/1150 abbreviated dialing arrangement for access to network based voice recognition platforms. It is called Voice Activated Network Control and allows rotary or touchtone customers to dial this code to access VANC so that they can say a name or command that will be activate, deactivate or access a service.

#### **F. Specification of Need Lacking for AIN Based Arrangements?**

BellSouth dismisses Low Tech's assertion that a national abbreviated dialing scheme could be implemented using AIN-based technology, stating that no specification of need has been established upon which an AIN service structure could be built. See BellSouth Comments, page

9. BellSouth ignores their own comprehensive survey on the need for abbreviated dialing arrangements that Cox Communications and BellSouth commissioned as part of their collaborative efforts to advance AIN based abbreviated dialing arrangements in IILC Issue #036. Recall that Cox and BellSouth now jointly enjoy the use of the 511 code in the Atlanta, GA area.

BellSouth also knows better, since their own AIN Toolkit service does not require the AIN service developer, who can be any entity using an abbreviated dialing arrangement in the \*XX/11XXX format, to define beforehand to BellSouth the services to be created. BellSouth has purposefully built into their service creation environment the ability for call flows to be verified by computer in order to eliminate privacy and intellectual property concerns from AIN service developers.

BellSouth asking for a needs statement is an insult to the many good faith non-telco participants the worked on the ATIS/IILC #036 Issue in vain.

**Needs statement requirements in an AIN environment is the equivalent of asking Sun Microsystems to tell Microsoft the details of the next new product they are going to introduce - and then get their approval to introduce it while they're at it.** This makes no sense in a competitive telecommunications world where AIN based abbreviated dialing arrangement activated services are created.

BellSouth also ignores the fact that Nortel and Lucent both acknowledged, in writing to the Working Group, that any new abbreviated dialing arrangements requiring new software development work would most likely be based on AIN technology. These switch manufacturer assumptions agree with the often quoted and widely ignored recommendations that came out of the ATIS/IILC #036 effort.

#### **IV. Existing ILEC \*XX and AIN Based Services.**

BellSouth, Bell Atlantic and Southern New England Telephone Company (owned by SBC) all offer innovative services using AIN and \*XX type abbreviated dialing arrangements.

BellSouth uses \*99 and AIN at the Atlanta Airport as a customized billing system to allow multiple airline carriers to utilize the same telephone lines at different times.

Bell Atlantic uses \*94 and AIN to offer a work-at-home application that automatically routes long distance calls to an employer designated long distance carrier. This application force routes long distance calls to a pre-selected 101XXXX carrier code. In essence, Bell Atlantic uses \*94 as an speed dial arrangement to save customers from dialing four additional digits, an application the majority report says is not an appropriate application for abbreviated dialing arrangements<sup>8</sup>.

Southern New England Telephone Company offers a \*99 activated AIN based service called Star \*99<sup>sm</sup> that promises to offer the best rate for long distance calls. It utilizes the underlying SNET America long distance network and bills calls at the lowest non-discounted rates of the top three long distance carriers.

In another example of illegal monopoly control, all three of these companies have refused Low Tech Designs the ability to use these abbreviated dialing numbering resources and AIN service logic to provide competitive telecommunications solutions to consumers, even though the Telecom Act was suppose to open all telecommunications markets to competition.

It should also be noted that BellSouth has started offering a service called BusyConnect<sup>sm</sup>. Using an AIN 0.2 trigger called *Originate Busy* and applied on a central officewide basis, callers

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<sup>8</sup> Bell Atlantic also stated, in their Comments, page 1, that “abbreviated dialing resources should not be utilized for . . . carrier access applications or for speed calling arrangements”. The \*94 service does both.

now hear an advertising message instead of a constant busy signal. The user is told by a recorded announcement that BellSouth can automatically connect the caller to the busy line when it becomes available, for a \$0.75 fee. If the caller accepts the offer, the AIN service logic dials the \*66 automatic callback code for the caller, something the caller could have done themselves without BellSouth prompting and advertising.

These examples show the hypocrisy of an industry, trying at all costs to block competition in the creation and deployment of new and advanced telecommunications services, while freely allow themselves this valuable right.

#### **V. Bell Atlantic**

Bell Atlantic, on page 2 of their Comments, states *that* “*Low Tech has not committed to buying these service if they are available . . .*”

Bell Atlantic refuses to acknowledge the difficult and protracted mediated negotiations before the New York Public Service Commission, where Low Tech has been trying for over a year to obtain access to the underlying service elements they say Low Tech has not committed to buying. In this regard, Low Tech Designs is attempting to obtain unbundled access to network elements so that it can create a new telecommunications service of its own. Low Tech Designs is not interested in buying abbreviated dialing arrangement services from Bell Atlantic, as they have attempted to offer.

#### **VI. SBC Communications**

SBC Communications, on page 2 of their Comments ***and with no citation***, accuses Low Tech Designs of urging the use of abbreviated dialing arrangements for “*speed dial*” applications.

This is patently false. A careful analysis of Low Tech Designs minority opinion clearly shows a Section 5.5 recommended that:

“the expanded \*XXXX/11XXXX abbreviated dialing numbers only be made available for assignment to telecommunications carriers and enhanced service providers for the purpose of providing telecommunications and advanced hybrid telecom/info services. Other national numbering resources, such as toll-free or 555 numbers, are more appropriate for use by entities simply wishing to connect callers to existing PSTN telephone numbers”.

SBC then goes on to state, in the same paragraph, that customers *would “clearly be confused if a leading “\*” indicator was used for both abbreviated dialing and vertical services”*. This statement reflects the incorrect assumption above that expanded abbreviated dialing arrangements would be used for speed dialing. It also shows a denial of the reality that already exists in the wireless world.

Ask BellSouth Mobility in Atlanta if their customers are confused by the assignment of the \*11 speed dialing code to WXIA-TV Channel 11, co-existing alongside the leading “\*” based vertical services that are also offered by them. Examples of this type dual assignment exist throughout the wireless industry, as PrimeCo’s Comments on \*SP clearly show.

## **VII. AT&T**

The comments of AT&T are also monopolist in nature. One would think AT&T was an RBOC, instead of an IXC, by these comments. For example, AT&T states, on page 2 of their Comments “[a]lmost no parties have proposed a use for such ADAs and it would be a mistake for the Commission to try to predict, with so little guidance, what consumers might want two years from now”.

First of all, these comments fly in the face of the FCC’s own correct observations that “the record shows that there is considerable interest in alternative abbreviated dialing

arrangements”<sup>9</sup> and “that abbreviated dialing could clearly serve many useful purposes...<sup>10</sup>,” (Emphasis added.)

Secondly, AT&T appears to be appealing to the FCC to perform the function of a competition kingmaker, deciding via Commission actions the winning ideas and companies in a competitive telecommunications world. The role of the FCC is to promote competition in all telecommunications markets, as mandated by the Telecommunications Act of 1996, and to let consumers decide if an idea has merit - not the other way around. AT&T and the other majority commentors advocate continued restricted access to the abbreviated dialing arrangement bottleneck, holding back companies like Low Tech Designs that are trying to introduce competition into a space ripe for innovation and investment.

AT&T further wishes the Commission to believe that alternative means exist for potential abbreviated dialing arrangement users by simply “*enter[ing] into contractual arrangements with multiple carriers to achieve, in effect, inter-network ADAs without the expense or time-lag of FCC-mandated national requirements*”.

How Low Tech Designs wishes this were true. Low Tech has attempted to negotiate access to abbreviated dialing arrangements, as a new entrant telecommunications carrier, with GTE, Bell Atlantic, SBC (Pacific Bell and SNET), BellSouth and Ameritech. All attempts have been thwarted and Low Tech Designs has spent over 2 1/2 years of time with no results. This dismal fact alone begs for a national mandate from the FCC for access to these numbering resources.

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<sup>9</sup> See In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements *First Report and Order and Further Notice of Proposed Rulemaking*, CC Docket 92-105, para. 60, rel. Feb. 19, 1997.

<sup>10</sup> See Id., para. 61.

AT&T raises additional red herring issues that Low Tech has already contradicted in comments on other majority participant's filings. Low Tech will not refute them further here.

## **VIII. USTA**

### **A. Section 5.4 "Dialing Protocols"**

On page 4 of their Comments, USTA raises an issue regarding "specific regulatory requirements to prefix a toll indicator" when dialing an abbreviated dialing arrangement. It should be noted that the USTA's major member companies have implemented, on a widespread basis, pay-per-use or pay-per-call vertical service code implementations (e.g. \*66 and \*69) without being required by regulators to have customers dial a toll indicator. Why competitors to USTA's member companies would be required to have customers dial additional digits to activate a service based on an abbreviated dialing arrangement is not explained.

### **B. Section 5.5 "Assignment Practices"**

Low Tech Designs, in Section 5.5 of its minority report, recommended the use of existing industry promulgated assignment guidelines created for 555 numbering resources. (See 555 NXX ASSIGNMENT GUIDELINES, Industry Numbering Committee # 94-0429-002, Reissued July 13, 1998.) The "*considerable task*" USTA expects for development of assignment guidelines on page 4 has already been accomplished for a nationally assigned numbering resource (555), and is therefor a non-issue.

The real issue for concern are the anti-competitive and collusive guidelines the industry has in place for existing vertical service codes. The Vertical Service Code Assignment Guidelines, (INC 96-0802-015, formerly ICCF 92-1127-005, Reissued July 13, 1998) are not appropriate for a competitive telecommunications environment. For example, these current

guidelines require two or more service providers to agree to apply for a national assignment of an internetwork or multinet network vertical service code and to implement the underlying service within 6 months. The current assignment guidelines insure that only switch based applications that are created by the switch manufacturers and approved for use by two or more network providers are allowed a vertical service code assignment.

### **C. Section 6.0 “Intranetwork Applications”**

On page 5 of its Comments, USTA warns about the displacement of existing intranetwork application of abbreviated dialing arrangements by any new arrangements. It should be noted that wireless providers, which have no concerns about the use of the “#” symbol, should have been using this intranetwork numbering format all along. If they have implemented “\*” based formats, it has been done with the understanding that it might conflict with the \*XX and \*2XX vertical service codes and might have to be changed in the future. Recent assignment of the \*11 code by BellSouth Mobility in Atlanta, \*CSP in Colorado and \*SP in Illinois point to the need for national rules for the use of these numbering resources.

It should be noted that Low Tech’s recommendation of an expanded \*XXXX/11XXXX format is the least disruptive on existing intranetwork implementations of all the recommendations presented. Low Tech is also of the opinion that existing \*XX vertical service codes, such as \*69, might be changed to \*6969, rather than \*6900, in order to even further reduce any confusion among current users of this resource.

### **D. Section 7.2 “Vertical Service Codes”**

On page 7 of their Comments, USTA dismisses Low Tech’s “independent research”, just as the majority participants did during the FCC ordered exploration of “how rapidly abbreviated

dialing arrangements could be deployed". Low Tech has provided the FCC with selected details of a letter from BellSouth, indicating that Low Tech's approach might work, but refusing to explore this further. Low Tech will provide additional details to the FCC on a confidential basis that will substantiate Low Tech's claims in this area.

It should be noted that Low Tech is dependent upon the incumbent LEC's provision of information about its network capabilities in order for Low Tech to combine network elements to create new telecommunications services. As of this date, no such cooperation from the ILECs has occurred.

USTA then goes on to warn about additional costs for implementing expanded vertical service codes for use as new abbreviated dialing arrangements. If Low Tech is right about its independent research, and expanded abbreviated dialing arrangements can be implemented on existing switches using AIN capabilities, then previous FCC orders regarding unbundled network elements (which included AIN Service Management, Creation and execution capabilities) has already established the existence of the required infrastructure for expanded abbreviated dialing arrangement deployment.

The only way to determine if Low Tech is correct about its ILEC hindered research is for testing to be done. For some reason, USTA, the switch vendors and the majority commentators have not taken the FCC directive seriously enough to bring this about. The FCC should order such testing, or conduct it itself if the industry continues to block such testing.

Finally, on page 7, USTA states their believes that FCC ordered implementation of expanded abbreviated dialing arrangements "would be counter to Congressional mandates to

lessen regulatory burdens on telecommunications service providers”. USTA evidently forgot to read the Preamble to the Telecommunications Act of 1996.

An Act to promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies.

Reducing regulation is certainly promoted, but at the same time that competition and the rapid deployment of new telecommunications technologies is promoted and encouraged. The deployment of expanded abbreviated dialing arrangements will bring about competition, lower prices, the rapid development of new telecommunications technologies and higher quality services for consumers. The imposition of needed regulations to accomplish this goal is minuscule compare to the benefits such deployment would bring.

Also, keep in mind that in 1994, the largest members of USTA, Bellcore, and switch manufacturers agreed to have abbreviated dialing arrangement capability incorporated into AIN 0.1 and 0.2 development work as a result of the two year study of the issue in IILC #036. No development work was done, but now the same companies want to complain about MCI Worldcom and Low Tech insisting upon them making good on their previous study and commitment.

#### **E. Section 8.0 “Alternatives”**

On page 8, USTA brings up the development of a new signaling protocol to pass “\*” or “#” on inter-switch links. They also raise issues regarding per code blocking, with the attendant cost and deployment issues they claim incumbents must shoulder.

First of all, only the non-numeric implementation of a leading or trailing “#” symbol would require extensive development work. The proponents of such a non-numeric abbreviated

dialing sequence are acutely aware that this raises development issues, since no such capability exists today for switch to switch internetwork usage. Since the “\*” symbol can be represented by a “11” digit sequence, no non-numeric code passing between switches occurs if this number sequence is used for expanded abbreviated dialing, and development issues become minimized.

In the preferred implementation of expanded abbreviated dialing arrangements using the Advanced Intelligent Network, USTA’s per code blocking issue at the switch level goes away. The AIN service logic is capable of providing end users the ability to block themselves, or if desired, this function can be done by service provider personnel using the AIN service management capability.

It is not necessary for the switch manufacturers to build new blocking capability into the Operation Support System and switch management software. This is similar in concept to how providers of 1010XXX carrier access codes block access to their networks without local switch provider intervention.

#### **F. Section 10.0 “Additional Considerations”**

What would the objections of a gaggle of monopolist telephone companies be without the obligatory “billing considerations” issue? USTA dutifully points this out in on page 8 of their Comments. Once again, if the obstructionist majority, Bellcore and the switch manufacturers had done their homework over four years ago at the conclusion of IILC #036, we wouldn’t have to be hearing the same old whining. This is a contractual issue more than technical, similar to the billing arrangements between 976, long distance. 1-900 and other similar service providers.

#### **G. Additional USTA Comments**

##### **1. The NANC Working Group Process**

USTA claims, on page 10 of their Comments, that the majority report is a “valid result from the best minds in the industry”. Low Tech can only say they must have been the best closed minds in the industry, as they never showed any desire to see the FCC’s Orders in this matter truly addressed.

## **2. Insistence on the use of the “#” Symbol**

USTA dismisses, on page 10, millions of rotary dial users that would find themselves unable to dial a new telephone number that didn’t contain a valid dialable number. Not only does the introduction of a non-numeric symbol into a dialing sequence introduce end user problems for rotary dial users, many of which are elderly and continue to rent their phones at outrageous rates from the incumbent LEC, but as the USTA tells us in their Comments on page 8, the current inter-switch signaling protocols don’t recognize the “#” sign and would have to be modified. USTA also makes a totally unsubstantiated claim that anyone accessing services of this type would have at least one telephone that could be used to generate the “#” symbol. USTA does not address the legal aspect, raised by Low Tech, of creating telephone numbers that don’t contain numbers, as it knows this argument cannot be refuted.

## **3. AIN Development Work and Planning**

On page 11, USTA once again asks for service descriptions for abbreviated dialing arrangements, a decidedly anti-competitive request. USTA then states that “[D]evelopment of an AIN capability that could be deployed on a national basis over many different types of equipment is not a trivial task”. USTA fails to mention that the U.S. Government has already deployed the Government Emergency Telephone Service, or GETS, on a nationwide basis, across many

different types of equipment, using AIN capability. If this application can be deployed, then so can abbreviated dialing using AIN capability.

USTA then says that “[t]o charge that the LECs should engage in development activity to support capabilities that cannot be defined, and whose value is unknown is ludicrous”. How quickly USTA forgets the fact that if the industry consensus recommendations of IILC Issue #036 had been implemented into the AIN 0.1 and 0.2 planning process, USTA members would already have implemented the capabilities at issue.

The industry never followed through on their IILC recommendations, and now wants to be let off the hook for the development work they agreed to and that ratepayers have already paid for many times over. This attitude, and not Low Tech’s insistence on the delivery of industry promises, is what is ludicrous.

### **CONCLUSION**

Low Tech Designs has identified and recommended the only legal abbreviated dialing arrangement available based on “\*” code expansion to a \*XXXX format.

Low Tech Designs, Inc. supports MCI WorldCom’s recommendation that the Commission (1) explicitly direct NANC to develop national abbreviated dialing guidelines, (2) open a NPRM to establish rules necessary to fully implement uniform national abbreviated dialing arrangement, and (3) direct ILEC’s to immediately provide access service arrangements to support 555 service. See MCI WorldCom reply comments at page 1 and 6.

Low Tech Designs also urges the Commission to adopt its recommendations regarding abbreviated dialing arrangements and the Advanced Intelligent Network contained within Low Tech’s minority report. It is important that the switch manufacturers, Bellcore and the ILECs be

required to implement the recommendations they agreed to provide that are contained within IILC Issue #036. Most important in this regard is to insure AIN 0.2 functionality with abbreviated dialing arrangements using the inherent intelligent peripheral capability contained within AIN 0.2 software.

Low Tech Designs additionally urges that the Commission order testing of the unbundled network element combination Low Tech will be disclosing under a confidential ex parte submission. This combination of network elements promises to provide intranetwork abbreviated dialing arrangement on an expedited basis.

Respectfully submitted,



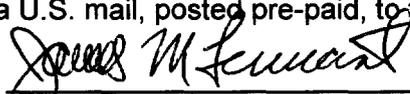
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Dated: February 4, 1999

CERTIFICATE OF SERVICE

I, James M. Tennant, do hereby certify that on this 4th day of February, 1999, that I have served a copy of the foregoing document via U.S. mail, posted pre-paid, to the following parties listed below:

  
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