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NO. 711 P. 2/3
NO. 0873 P. 2/3
Frontier Corporation

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frontier

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December 17, 1998

BY OVERNIGHT MAIL

CC DOCKET 95-155

Ms. Anna M. Gomez
Chief
Network Services Division
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RECEIVED

MAR 23 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: 800/888 Set-Aside Process

Dear Ms. Gomez:

I am writing on behalf of the Frontier entities identified as Responsible Organizations ("RespOrgs") in your letter of November 24, 1998, to Mr. Michael Wade of Database Services Management, Inc. ("DSMI"). In your letter, you ask for an explanation of how the identified companies are in compliance with the Commission's policies regarding the set-aside 888 number right of first refusal process.

Frontier has complied with the Commission's set-aside process and has done so in a manner fully consistent with industry guidelines and practices in this area. Thus, the Commission can be assured that Frontier is not warehousing 888 numbers in violation of applicable Commission regulations.

First, Frontier does not fully understand the attachment to the Commission's letter. The chart is entitled "RespOrg Compliance with Right-of-First-Refusal Process" and lists corresponding percentages. It is not clear to us what the percentages indicate or how a response rate of less than 100 indicates non-compliance. It could merely indicate that percentage of customers that actually responded to the notices regarding the set-aside process. In that event, a low response rate would not be surprising, as many customers failed to respond to these notices. That, however, is not an indication that a particular RespOrg has failed to comply with the Commission's policies or is warehousing 888 numbers.

The companies identified in the Commission's letter are: Frontier Communications, Inc., Frontier/Allnet Communications, Frontier/Execultra of Sacramento, Frontier Communications International Frontier/Schnelder Communications, Frontier/American Sharecom Inc., and Frontier/West Coast Telecommunications.

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Second, Frontier did, in fact, notify its subscribers of their rights to request that qualifying 888 numbers be set-aside in accordance with Commission directives and it did so within the time frames specified by the Commission. Frontier also notified DSMI of the results of its notifications in the manner that DSMI directed. Those numbers that were subject to the Commission's set-aside policy, but for which Frontier received no response, were retained in "unavailable" status, pending further Commission direction as specified in its letter of May 15, 1998.

At each step of the process, Frontier complied with applicable Commission requirements and industry guidelines as formulated by DSMI. If I can be of further assistance, please do not hesitate to contact me.

Very truly yours,



Michael J. Shortley, III