

=====
_883. ----- Part 4, RULEMAKING AND GOVERNMENTS -----
=====

884. --- RULEMAKING ---
=====

885. ISSUE - ELECTRONIC PUBLISHING: Since this rule making discussion is of particular interest to the general public, elected officials and the rest of the world, both to those on the list and many not on it; order all materials to be submitted both in printed form as is done now, and additionally, in electronic form to the Office of Internet Publications, within the Web masters function. All papers will be published within 3 working days on the CPUC web site using the HTML code <pre> and </pre>, and on a CONTENT PAGE of R98-12-014, which shall be created and kept up to date, listing all such entries, date, and a brief description as they are published. Use the email address: <R98-12-014@CPUC.CA.GOV>, to make all electronic submissions.

886. Ruling and Electronic Publishing Order: From time to time on basis of complaint, or as a rule of general good housekeeping, examine web site for proper and complete postings, confirming that they are up to date and complete in every way.

887. ISSUE - ORIGINAL TOUCH TONE / DTMF: Pacific Telephone to research and produce and publish the original Touch-Tone / DTMF proposal that was submitted to CPUC and FCC and who paid for what and what digits were included.

888. Ruling and Electronic Publishing Order: What was paid for and by whom and what possible fee impact, if any, is anticipated. Phone company wants to charge for what we already paid for way back then.

889. NOTE: These old records may be faxed using the Fine Setting and captured electronically, then made into image.gif then posted on the web site along with today's response of typed materials in electronic form.

890. ISSUE - PHONE NUMBER RECEIVERS: What precisely is the phone number translations we now use. DTMF to be defined precisely and in relation to what we already know to be 10 pulses and 11 pulses as in 0 and * and #. These represent buttons on the dial phones. What if any deviations are in use. Responsible switch room engineers claim differences.

891. Ruling: What are the official definitions for PUBLIC DECIMAL Phone number digits and their digital and tone patterns. What are the official definitions for PUBLIC HEXADECIMAL Phone number digits and their digital and tone patterns. What are the official definitions for PRIVATE HEXADECIMAL Phone number digits and their digital and tone patterns.

892. ISSUE - CURRENT AREA CODE LOADS: Phone companies to submit and verify and publish on the Internet, all of the following information for all California Area Codes and each of their supporting prefixes in full number form:

893. Area Code/Prefix : 310/221 Date 6/12/99-03:45:12

894. Available Numbers : 10,000 Holder: Pacific Telephone

895. Distribution : 10,000 Pacific Telephone

896. Numbers in use : 5,478 52%

897. Numbers in suspense: 468 7%

898. Numbers available : 4,089 32%

899. Area Code/Prefix : 310/765 Date 6/19/99-08:23:54

900. Available Numbers : 10,000 Holder: General Telephone

901. Distribution : 9,000 General Telephone

902. Numbers in use : 5,478 59%

903. Numbers in suspense: 468 1%

904. Numbers available : 4,089 32%

905. Distribution : 1,000 Jose Communications
 906. Numbers in use : 478 42%
 07. Numbers in suspense: 8 2%
 908. Numbers available : 520 55%

909. Area Code/Prefix : 619/231 Date 6/19/99-08:23:54
 910. Available Numbers : 65,536 Holder: General Telephone

911. Distribution : 9,000 General Telephone
 912. Numbers in use : 5,478 59%
 913. Numbers in suspense: 468 1%
 914. Numbers available : 4,089 32%

915. Distribution : 1,000 Jose Communications
 916. Numbers in use : 478 42%
 917. Numbers in suspense: 8 2%
 918. Numbers available : 520 55%

919. Distribution : 4,096 Digital Dan Communications
 920. Numbers in use : 78 3%
 921. Numbers in suspense: 0 0%
 922. Numbers available : 4,018 97%

923. Ruling: Phone companies to submit, verify, and publish on the Internet, all of the following information for all California Area Codes and each of their supporting prefixes regarding number loads every 6 months

924. ISSUE - PLAINT EQUIPMENT TO COMPLETE INSTALLATION - All installation of equipment and preliminary testing of HEXADECIMAL phone number lines in San Diego, 619/231 shall be completed by December 31, 1999. Only the following will be required for 231-1110 to 111F as in 10 , 1A, 1B, 1C, 1D, 1E, 1F, total of 7 lines, variations acceptable.

925. Ruling: Pacific Telephone is ordered to provide public industry

HEXADECIMAL testing facility, on line by 01Jan2000 for Switches Nortel DMS and Lucent 5ESS.

926. ISSUE - HEXADECIMAL SUCCESS RECORDED ANNOUNCEMENT - Included on all test lines are audio recordings telling of the successful completion of the HEXADECIMAL calls, as follows:

927. (Delay for 3 or so rings, then answer)

928. "You have reached the HEXADECIMAL test line set,

929. Your call was successful for HEX B,

930. Your call was successful for HEX B,

931. Your call was successful for HEX B,

932. Your call was successful for HEX B." (Hang up). The same audio recording format is to be used on all lines. No charge is to be made for long distance calls to these numbers.

933. Ruling: Pacific Telephone is ordered to provide public industry HEXADECIMAL-testing facility, on line by 01Jan2000.

934. ISSUE - WARNING ISSUED TO ALL INDUSTRIES - Notice is hereby given to the public and all industries projected to be included in pending changes in service numbers and surcharges to be imposed.

935. Ruling: All phone companies will produce and insert a bill flyer to inform all recipients of the surcharges and number availability without a surcharge. Announce Industry class of service.

936. ISSUE - REQUEST A LEGAL OPINION BY FCC / CPUC ATTORNEY - The issue of what is the maximum possible extent we may reasonably push the envelope of rulings on the immediate use of HEXADECIMAL Phone numbers must be established. This issue may come to court as a case to be decided on the appellate level or even go to the Supreme Court. This will surely set a nationwide precedent, allowing other sister state's authorities to move on similar issues. It may be that this issue is considered local by FCC standards and therefore the local authorities (CPUC) have the power to determine whether these proposed changes are within jurisdiction. It may

be that the superior courts will decide that it is not their roll to
_second guess the findings supporting the decision to impose whatever
.reasonable action may be taken to relieve the area code dilemma already
granted to California by FCC.

937. Ruling: Request a Legal Opinion from the FCC / CPUC staff
attorney, with the hope that this is within the rights of the local
authorities and the consequences of defiant rulings.

938. ISSUE - BEGIN A NEW INVESTIGATION AND RULEMAKING - This issue of
HEXADECIMAL Dialing must be pursued. The ALJ should create the proper
forum for further action.

939. Ruling: Create a new forum ASAP.

940. WHAT THE RULES OUGHT TO BE COMMISSION CREATES INDUSTRY CLASS OF
SERVICE

941. RULE MAKING REQUESTED - The FCC / CPUC is requested to order the
following:

942. Establish a HEXADECIMAL PHONE line test center in San Diego
within 30 days of order.

943. Establish an Internet reporting site to report problems within
30 days of order.

944. Establish an Internet page to update information to
manufacturers within 30 days of order.

945. Order the creation of the INDUSTRY class of PHONE service,
effective with order.

946. Order that INDUSTRY class of service will address PHONE NUMBERS
that are not limited to HEXADECIMAL PHONE NUMBERS.

947. Order all plant equipment in all prefixes to demonstrate HEXADECIMAL proof of on line operation, and report it to CPUC within 30 days of the order.

948. Order fines for noncompliance of not less than one thousand dollars per incidence per day.

=====

949. --- GOVERNMENTS ---

=====

950. Existing federal regulations prohibit an area code from being assigned based solely on the provision of a specific type of telecommunications service or use of a particular technology.

951. The area code was not assigned based SOLELY on specific type of service or technology BUT we can use those parts as in 34*-1234 for this very reason

952. FEDERAL BROUHAHA IS BREWING - On the national level, we have several elected officials that are under the gun to produce legislation that has the appearance of satisfying the constituent cry for help to stop the area code expansion. What is this legislation and how will it affect this issue is another matter.

953. The bill in congress is SB 765, sponsored by Senator Collins of Maine and Senator Toricelli of New Jersey. This bill seeks to ??? No reply!

954. PHONE COMPANIES IN PERSPECTIVE PHASORS DRAWN AND SET ON STUN - There is no ax to grind with the phone companies other than just to express the results of numerous contacts made and ignored over the years. Time after time, questions of interest were asked and either ignored or replied to by totally incompetent respondents. Needless to say, this pattern is being repeated even today. During the last year I have

contacted every major phone company in America with the same result: nothing! Even when given an inquiry number or making friends with the secretary to an executive of the company, nothing ever comes of a proposal to expand the use of HEXADECIMAL numbers. Does it shock you to find such a closed mouth position? Or as a friend points out, it should really alarm us!

955. In the final analysis, anything done to the phone company is well deserved and late in coming; truly they are the companies we all love to hate, and for very good reason!

956. I have requested a tour of the Hillcrest Facility in San Diego. I want to hold a line card in my hand and examine the equipment that detects the "tones to digits" when a number is dialed. I want to see the computer that provides service to this area. It does no good to request; they cite proprietary reasons or need to know as excuses for never allowing the fox in the chicken house.

957. Then there is the closed nature of this entire industry. I am reasonably good at getting inside a company, but nothing works with the Phone Company or its suppliers. For example, the computers being used for prefix service are of interest to me. I posed as the American Company hired to provide equipment for phone installation in an Arab country that is filthy rich and wants to replace existing equipment and services with all new stuff. In each case, they never returned my calls. Repeatedly, I attempted to get inside and got no response. This closed atmosphere is dangerous and I suspect I know why it exists in the first place. It's money, money, and money! If your pulling a fast one, your best position is don't let them in at all.

958. I firmly believe the Phone Company has inflated the costs for computers and not properly applied cost benefits derived by multiple prefixes being provided by a single computer. All things considered, this points to fraud on the line! Because the phone company has adopted the concept that a fair return on capitol investment is 10%, the question is,

what is the true value of the investment considering all aspects of the way business is done today. This does include the over inflated costs that are used to keep the phone bills outrageously high in contrast to other industries that are all considerably lower than they were just a very few years ago.

959. COMPETENT CONSULTANTS COUNT AND IT SHOWS - Examining the AB818, a bill of Assemblyman Knox, reveals the lack of a good understanding of the problem and the solution. I am glad Mr. Knox took some action, but it is obvious he had no competent, degree, seasoned, experienced communications consultant to advise him of what action was to be taken. This shows as a lack of professionalism when dealing with an issue that affects every person in California and even the nation.

960. The idea of identifying the paging and faxing industries as the culprits is ludicrous. Any person with a lick of sense would know about and advise the law maker of the other industries that use even more of the decimal numbers than do these industries, combined!

961. For example, we have a REFERENCE LIST OF GOOD CONSERVATION CATEGORIES - The list:

- 962. 800/888 Toll Free Translator Numbers
- 963. Alarms, Fire, Burglary, Holdup Systems
- 964. ATM Systems
- 965. Automatic Paging Systems
- 966. Bulletin Board Computer Systems
- 967. Call Box Signaling Systems
- 968. Computer Access Phone Numbers as for AOL etc.
- 969. Computer Access Second Line at Home
- 970. Corporate Systems
- 971. Credit Card Verification and Approvals
- 972. Elevator Phones
- 973. Emergency 911 System Phones
- 974. Freeway Emergency Phones
- 975. Internal Voice Mail

- 976. Military Communications
- 977. Pager Phone Services
- 78. Pay Phone Service
- 979. Phone Company Business Offices and Repair Service
- 980. Point of Sale Transactions
- 981. Public Voice Mail
- 982. Rotary Lines Second and Above (2-??) (UAL: 1 decimal, 999 HEXADECIMAL)
- 983. All of the above should be HEXADECIMAL NUMBER based.

984. So you can see, the old adage is still true: garbage in, garbage out! This applies to law making as well as other endeavors. But with a little luck, the California Senate will seek the sage advice of knowledgeable persons, hopefully, wiser than me, before proceeding further with this bill.

=====
 985. ----- Part 5, PRAYER AND SUBMISSION -----
 =====
 986. --- PRAYER ---
 =====

987. INTERVENOR OFFERS PRAYER - Intervenor offers this as a Prayer and thanks you for your time:

HE WHO WALKS
 WITH THE WISE
 GROWS WISE, BUT
 A COMPANION OF
 FOOLS SUFFERS HARM.

PROVERBS 13:20.

988. I hope you have enjoyed our little walk, until next time,
 "Ad Astra Per Aspera."

=====

89. --- SUBMISSION ---

=====

990. These requirements place an additional burden on members of the public that want to participate in the functioning of the FCC. A people without a voice, cannot be heard, but we need to apply some common sense here as well.

991. HEXADECIMALS HERE TO STAY - Hexadecimals are taught in several high schools and junior colleges and is required in the sophomore year in college as Number Set Theory. Hexadecimals are well-defined and settled as to purpose and use and are widely used in a multitude of industries, including the alarm, computer, communications, and telephone industries. Education is power, get some!

992. STANDARD NOT NOVEL - Let me assure you all, nothing in my proposal is NOVEL. On the contrary, all dialing is normal and standard and fully complies with the planed applications that history documents in many published books available in any quality scientific library. Had anyone taken a moment to consult with the non existent electronics communications engineers or computer engineers on FCC staff or do even the most minor research in the Library, this would have been very apparent. Furthermore, this information is published on my web site in substantial detail, and in all cases, THE NEILL PLAN is fully compliant with NANP from the word GO, and since the public already paid for this system more than 20 years ago, it is absolutely FREE and begs to be used!!!!

993. REQUEST FOR NEW PROCEEDING - Please, in the public interest, order a new proceeding immediately! Let us examine this HEXADECIMAL issue.

994. HISTORICALLY AND OFFICIALLY - Bellcore Notes on the Network (1990 p 6-183) describe a 16 digit number system, 1-9, 0,*,#,A,B,C,D. The fourth vertical column at the frequency of 1633 Hertz per second is the main subject of this writing. Note that the lower row shows that we have been using HEXADECIMAL digits for a long time, 0 from the very start, and also * and #, all from when we all first paid for this system! Today's switches have provision for their use and the network handles them every day. Has any discussion considered using the A-F digits to extend the life of the current 10 digit dialing plan?

995. Hexadecimal dialing is amenable to any proposal that involves Decimal Dialing since Decimal Dialing digits are a sub set of Hexadecimal digits and all are compatible with the network and switches.

996. CONCLUDING REMARKS - I have complied with, to the extend reasonably possible, all the items and I hope for the best, knowing that I have done the right thing.

997. CHALLENGE OF POWER - I must inform all who will read this writing that I have done as well, under the circumstances that I find myself, as can be expected. Make NO mistake about it, this writing needs a lot of work to meet MY STANDARD, but I am forced to meet the requirements of the order, so I do not have control of the due date. Their is this schedule somebody made that dictates procedurally when everything is to happen, even at the expense of an old point: Why is it that we have time to do it over, but not time to do it correctly in the first place.

998. I am embarrassed to have to release this without cleaning it up and making it flow properly and organizing the topics.

999. This writing is however, the essence of the issue. HEXADECIMAL NUMBERS and their relationship to the TELEPHONE NETWORK are presented well enough for you to get the idea and proceed with it on your own.

SUBMISSION -

_1000. These COMMENTS ABOUT AND PROPOSAL are Respectfully submitted by:



Prof Bill Neill, In Pro Per
PRIVATE Citizen, Professional Engineer
P. O. Box 33666, San Diego, California 92163-3666
Telephone: 619/231-1313, Email: proev@mill.net

Pro Per Attorney for
Prof Bill Neill

Dated: July 27, 1999

VERIFICATION

I swear that the information provided herein is true and correct to the best of my knowledge.



Prof Bill Neill

July 27, 1999.

CERTIFICATE OF SERVICE

hereby certify that I have this day served the document titled:

COMMENTS ON AND DIALING PROPOSAL FOR THE EXPANDED USE OF HEXADECIMAL PHONE NUMBERS UNDER A NEW "INDUSTRY" CLASS OF SERVICE THAT WILL ALLEVIATE THE AREA CODE ASSIGNMENT CRUNCH AND PROVIDE SUBSTANTIAL EXPANSION OF ALREADY AVAILABLE NUMBERS IN ALL LOCATIONS AND IN ALL AREA CODES AND ALL AT NO COST TO ANYONE

on the Federal Communications Commission by each of the following identified methods:

PAPER ORIGINAL AND COPIES for FORMAL PLUS CIRCULATION filing

If you would like your formal comments to be circulated to the Commissioners, an original and nine (9) copies must be submitted, by mailing 1 original and 9 copies properly addressed by first-class mail with postage prepaid to Magalie Roman Salas, Office of the Secretary, Federal Communications Commission, 445 Twelfth Street, S.W. Room TW-B204F, Washington, D.C. 20554.

ELECTRONIC FILE ON DISK:

By mailing 1 data disk containing file copy named BNEILLCP in Macintosh MSWord format, labeled and addressed by first-class mail with postage prepaid in care of the Clerk of FCC, Washington, D.C. 20554.

ELECTRONIC FILE VIA INTERNET:

By electronic transmission of file copy named BNEILLCP, in Macintosh MSWord format, labeled and addressed to
<<http://www.fcc.gov/e-file/ecfs.html>>.
the electronic address for the Clerk of FCC.

ELECTRONIC INTERNET:

Collections contained herein should be submitted to Judy Boley, Federal Communications Commission, Room 1-C804, 445 12th Street, S.W., Washington, D.C. 20554, or ELECTRONIC via the Internet to <jboley@fcc.gov>

ELECTRONIC INTERNET

APER to Timothy Fain, OMB Desk Officer, 10236 NEOB, 725 - 17th Street, N.W., Washington, D.C. 20503 or ELECTRONIC via the Internet to <fain_t@al.eop.gov>.

ELECTRONIC FILE ON DISK:

choose to file by paper should also submit their comments on diskette.

These diskettes should be submitted to:

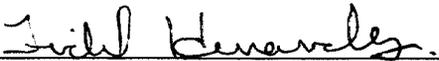
Alvin McCloud, Common Carrier Bureau, Network Services Division, 445 Twelfth Street, S.W., Room 6-A423, Washington, D.C. 20554.

ELECTRONIC FILE ON DISK:

In addition, commenters must send diskette copies to the Commission's copy contractor,

International Transcription Service, Inc., 1231 20th Street, N.W., Washington, D.C. 20037.

Executed on July 27, 1999, at San Diego, California:



Fidel Hernandez

ACKNOWLEDGMENTS AND CREDITS

In recognition of the civic duty of these companies and individuals that have contributed to the success of this adventure and deserve credit for doing their part, above and beyond the call of duty, the author wishes to thank:

Macintosh Quadra 840 AV by Apple Computer, without their intuitive interface we'd all go nuts.

MillenniaNet, my ISP, at www.mill.net for allowing me to exceed the allotted time limits without complaint.

The San Diego County ELECTRIC VEHICLE Consortium for allotting space in the public interest.

Webcom Com, America's small business web site hosts at www.webcom.com, for hosting.

WEBexpress, a PacifiCraft department of Pacific Software, for site programming. Serving the computer industry since 1967.

Kinko's Copies, Hillcrest, San Diego, for kind and special assistance of Linda Roberts with duplication and assembly.

Fidel Hernandez, encouragement when you least expect it, and George Myrick, just keep on writing, and the inspiration of Donna Paoli, Rudy and all the gang.

And the best companion a keyboard ever had, Bandit, all 15 pounds worth, occasionally pawing at those flying fingers, always there, but mostly just sleeping or purring or hungry!

1001.

© COPYRIGHT 1999 by Prof Bill Neill.

Permission to use in whole or part is granted provided credit line is given. Questions to [<proev@mill.net>](mailto:proev@mill.net). end.