

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of

Petition by the United States Department of)	
Transportation for Assignment of an Abbreviated)	NSD-L-99-24
Dialing Code (N11) to Access Intelligent)	
Transportation Systems (ITS) Services Nationwide)	CC Docket No. 92-105

REPLY COMMENTS OF LOW TECH DESIGNS, INC.

Low Tech Designs, Inc., (LTD) through its President, James M. Tennant, respectfully submits the following reply comments in the above captioned proceeding.

LTD will concentrate on the Comments filed by Cox Enterprises, Inc. (Cox), and BellSouth Corporation (BellSouth).

1. Cox and BellSouth Bring Obvious Biases to This Discussion

A. Cox

In their July 20, 1999 Comments, Cox, a current user of the 511 code in Atlanta, Georgia, through a joint venture with a BellSouth subsidiary, opposes the use of the 511 code. 511 is the obvious candidate for assignment by the instant petition. Cox Comments, pg. 3.

Cox was fully aware that the assignment of the 511 code to them by the Georgia Public Service Commission was subject to recall if the Federal Communications Commission (Commission) were to assign this code for nationwide purposes. This recall requirement is also a tariff provision in the BellSouth Telecommunications, Inc.

Georgia N11 Tariff through which Cox receives this service. Cox was also aware that the Georgia Public Service Commission required them to convert to more plentiful abbreviated dialing arrangements in the future.

Cox now essentially argues that these recall provisions should be disregarded and that they have an “entitlement” to the 511 number due to a claim of having a “very popular” or “long-established” service being provided. Cox Comments, pg. 3.

The Commission should view these arguments as the lonely pleadings of an obviously threatened incumbent hoping to change the previously agreed upon rules of the abbreviated dialing code game. Cox and other 511 users, mainly located in BellSouth Telecommunications, Inc. territory, have no entitlement to the 511 code by virtue of any previous use. The Commission must not allow these arguments to cause it to hesitate to assign the 511 code, or any other available N11 code, for new nationwide purposes.

B. BellSouth

In their July 20, 1999 Comments, BellSouth makes a completely **unfounded** statement regarding the availability of alternative abbreviated dialing arrangements.

“Nor, at this time, does there appear to be an alternative abbreviated dialing arrangement available for current N11 users.” BellSouth Comments, pg. 4. Footnote omitted.

LTD has been involved in extensive negotiations with BellSouth since October of 1995 regarding the use of alternative abbreviated dialing arrangements. LTD has established, through these negotiations, the technical capabilities of the current

BellSouth Telecommunications, Inc. network. This network is mainly comprised of Nortel DMS and Lucent #5 ESS central office switches.

Through its extensive negotiations with BellSouth, LTD has been able to establish the following facts regarding the assignment and central office translations of N11 and *XX(XX) based abbreviated dialing arrangements.

1. N11 and *XX(XX) codes are capable of being assigned and translated, on a central office wide basis, to point to central office trunk groups.

2. BellSouth has repeatedly insisted that current 211 and 511 code assignments in the Atlanta area are implemented using the central office translation capability outlined in #1 above, and not through the use of the Advanced Intelligent Network (AIN) Release 0.1 or 0.2 N11 Trigger.

3. Since both N11 codes and *XX(XX) codes can be translated to point to a trunk group after being dialed by an end user, current N11 code recipients could easily convert to *XX(XX) alternative abbreviated dialing arrangements, if BellSouth were inclined to pursue such available alternatives.

2. CONCLUSIONS

Unfortunately, just as Cox believes it has squatters rights to the 511 code, BellSouth apparently believes it must protect theirs and Cox's beneficial joint use of this number by refusing to expand upon the available number of abbreviated dialing arrangements.

This is in direct contradiction to their own technical capabilities and the desires of the Georgia Public Service Commission to see the introduction of expanded abbreviated dialing arrangements.

It is also in direct contradiction to the expanded need for abbreviated dialing codes that BellSouth and Cox promoted for enhanced service providers in their Alliance for Telecommunications Industry Solutions (ATIS) Information Industry Liaison Committee (IILC) Issue #036, jointly initiated on April 23, 1992.

Obviously, Cox and BellSouth have no desire to upset their status quo use of the 511 dialing code, and BellSouth has no desire to see additional technically feasible abbreviated dialing arrangements implemented.

Both attitudes must be rejected by the Commission. The Commission must independently establish the technical capabilities of the currently installed switching systems to establish alternative abbreviated dialing arrangements, using both central office translations and AIN based solutions.

LTD urges the Commission to adopt a comprehensive long range solution to the needs of competitive local exchange carriers and enhanced service providers regarding the use of abbreviated dialing arrangements.

LTD has filed extensive comments and reply comments in this instant Docket with the Commission, and has participated in the Commission mandated NANC Ad Hoc Working Group on Alternative Abbreviated Dialing Arrangements. LTD refers the Commission to these previous filings for additional details regarding a preferred pro-competitive solution to the abbreviated dialing issues before it at this time.

Respectfully Submitted,

/s/

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August 20, 1999

Filed Electronically - Paper copies sent to Cox Communications, Inc. and BellSouth Corporation.