

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of Application of MCI
Communications Services Inc. d/b/a
Verizon Business Services to Discontinue
Domestic Telecommunications Services

WC Docket No. 08-14
Comp. Pol. File No. 851

**RESPONSE OF MCI COMMUNICATIONS SERVICES INC. D/B/A/ VERIZON
BUSINESS SERVICES**

The proposed discontinuance of MCI Communications Services Inc.'s ("Verizon") telex service will not impair the public convenience or necessity. Accordingly, the Commission should deny Mr. Garrett's request to delay the proposed discontinuance.

Mr. Garrett of Telex Americas, who does not appear to be a subscriber of Verizon's telex service, is the only party that has filed comments objecting to the timing of the proposed discontinuance.¹ As explained below, Mr. Garrett's Objections lack merit because Verizon's telex subscribers were provided sufficient notice of the proposed discontinuance and have had ample time to transition to another service provider. Additionally, Verizon is not required to port its telex numbers to other providers and cannot do so voluntarily because of technical limitations. Therefore, there is no justification for delaying the proposed discontinuance.

¹ Phil Garrett, Telex Americas' Objection to Section 63.71 January 2nd 2008 Application of MCI Communications Services Inc. d/b/a Verizon Business Services to Discontinue the Provision of Service on March 1st, 2008, WC Docket 08-14, at 1 (Feb. 8, 2008)("Mr. Garrett's Objections").

BACKGROUND

As explained in Verizon's discontinuance application, Verizon's telex service permits subscribers to send real-time teletype messages interstate and internationally.² Telex service was originally designed as an alternative to the telegraph. Since the 1980's, the use of telex services has steadily declined.

When Verizon filed its 63.71 application to discontinue providing domestic telex service, there were approximately one hundred subscribers of that service. Verizon has no record that Mr. Garrett or Telex Americas are subscribers of Verizon's telex service. Given the low subscribership for Verizon's telex service, the expense of maintaining that service exceeds the revenue that it generates.

There are several significant differences between telex service and telephone service. Unlike telephone calls, telex messages are transmitted over a separate dedicated telex network rather than the public switched telephone network (PSTN). Therefore, telex numbers cannot be dialed using a telephone connected to the PSTN. Instead, telex numbers must be dialed using a telex machine (or its equivalent) that is connected to the telex network.

Additionally, telex numbers, unlike telephone numbers, are not based on or part of the North American Numbering Plan, which is administered by the North American Numbering Plan Administration. The Commission has not created or designated an impartial agency or entity to administer telex numbers.

Telex numbers are not uniform and can range in size from five to ten digits. Verizon's telex numbers are typically six digits long. The telex network is designed to

² See Section 63.71 and Section 63.19 Application of MCI Communications Services Inc. d/b/a Verizon Business Services, ¶ 4 (January 2, 2008).

route domestic telex messages based on the starting digit (or starting digits) of the dialed telex number. In the United States, each starting digit (or starting digits) corresponds with a particular telex provider.

Verizon's telex numbering plan is comprised of telex numbers starting with a "6," "2," or "82." When a telex number beginning with one of these numbers is dialed (*e.g.*, 669720), the first digit indicates that the message recipient is one of Verizon's telex customers, and the telex network routes the message accordingly. The telex network identifies all other starting digits as either a telex country code (*e.g.*, 42 for France) or another providers' telex customer and routes the telex message accordingly. Verizon has informed the industry that it is decommissioning its telex service, placing other telex providers on notice that telex messages cannot be sent to Verizon's telex numbers after March 1, 2008. Verizon is not aware of any system that could be used to port individual telex numbers to other providers or any industry efforts to develop such a system.

ARGUMENT

I. Verizon's Telex Subscribers Were Provided Sufficient Notice of the Proposed Discontinuance.

Contrary to Mr. Garrett's assertions, subscribers of Verizon's telex service were given sufficient notice of the proposed discontinuance and have had sufficient time to transition to an alternative provider.³ Therefore, it is unnecessary for the Commission to delay the proposed discontinuance.

Under Section 63.71 of the Commission's rules, a carrier seeking to discontinue a domestic telecommunications service is required to provide customers with written notification of the proposed discontinuance at least thirty days before the proposed

³ Mr. Garrett's Objections at 1.

discontinuance. *See* 47 C.F.R. § 63.71. In compliance with this requirement, Verizon sent its customers written notifications of the proposed discontinuance on December 27, 2007 and January 18, 2008.⁴ Verizon also provided its telex subscribers with an informal written notice of the proposed discontinuance between November 30, 2007 and December 23, 2007. This notification period, which is longer than the thirty days' notice required under section 63.71, has provided ample time for Verizon's telex subscribers to transition to alternative service providers.

Given the relative ease with which telex services can be established and implemented, Mr. Garrett's allegation that the proposed discontinuance is premature is unfounded. Based on Verizon's experience, it takes between twenty-four to forty-eight hours to activate telex service with another provider. That provider can then rapidly and inexpensively broadcast their customer's new telex number (or other contact information) to that customer's contacts by broadcasting that information in telex or facsimile messages. Mr. Garrett's Objections ignore these facts, all of which demonstrate that the notification period has provided sufficient time to establish and implement service with a new provider.

II. Verizon is Not Required to Port Telex Numbers and Cannot Do So Voluntarily Because of Technical Limitations.

Verizon is not required to and cannot voluntarily port its telex numbers to other providers. First, the Commission's number portability rules do not extend to telex

⁴ Verizon recently learned that one of its telex subscribers may not have been mailed a written notification. On February 12, Verizon provided that subscriber with a copy of the written notification. To comply with the thirty days notice requirement, Verizon is making arrangements with this customer to ensure that their service is not discontinued until they have had thirty days' notice of the proposed discontinuance. However, this should not impact Verizon's ability to discontinue this service on March 1 for the remaining customers who received the notice before January 18, 2008.

numbers. Second, Verizon is not aware of any system that could be used to port individual telex numbers to other providers.

Section 251(e) of the Act requires local exchange carriers to “provide to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission.” 47 U.S.C. § 251(e). Section 153 (30) of the Act and Section 52.21(k) (l) of the Commission’s rules define number portability as “the ability of users of telecommunications services to retain, at the same location, existing *telecommunications numbers*.” 47 U.S.C. § 153 (30); 47 C.F.R. § 52.21(k)(1) (emphasis added). Section 251(e) of the Act further provides that the Commission “shall create or designate one or more impartial entities to administer telecommunications numbering ...” 47 U.S.C. § 251(e).

To comply with Section 251(e) of the Act, the Commission created the NANPA, which administers telephone numbers *but not* telex numbers. However, the Commission has not created or designated a similar entity to administer telex numbers. The Commission’s decision not to create or designate an impartial entity to administer telex numbers demonstrates that the Commission does not consider telex numbers to be part of “telecommunications numbering.” Therefore, telex numbers are not “telecommunications numbers.” Accordingly, telex numbers are outside the scope of the number portability requirements.

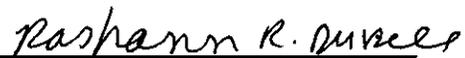
Additionally, technical limitations prevent Verizon from porting individual telex numbers to other providers. As explained above, the telex numbering plan and the routing of telex messages is completely different from the North American Numbering Plan and numbers administered under that plan. Verizon is not aware of any method that

has been developed or implemented for the porting of telex numbers. Nor is Verizon aware of any efforts to develop or implement such a system. Absent such a system, Verizon is unable to port its telex numbers to other providers.

CONCLUSION

For the foregoing reasons, Verizon's proposed discontinuance will not impair the public convenience or necessity. Accordingly, the Commission should authorize Verizon to discontinue providing telex service on March 1, 2008.

Respectfully submitted,



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