In the Matter of Provision of Access for 900 Number Service

COMMENTS OF AMERITECH

Ameritech\(^1\) submits these comments in response to the petition for rulemaking filed by Teleservices Industry Association ("Teleservices"). In its petition, Teleservices has requested that the Commission institute a rulemaking proceeding proposing to adopt rules that would require 900 number portability. In support of its petition, Teleservices argues that the costs of implementing 900 number portability “should be relatively minimal.”\(^2\) Teleservices assumes that 900 number portability can be easily accommodated by simple software changes to the current 800 database system.

Ameritech neither opposes nor supports Teleservices’ petition. While Ameritech generally supports the concept of number portability, no regulatory requirement should be imposed prior to a determination that there will be demand sufficient enough to defray the cost of implementing the service. Moreover, Teleservices’ assumption that the cost of implementing 900 number portability would be minimal is flawed. For example, Ameritech estimates that it would take approximately $1-1.5 million in hardware costs plus an estimated $4.5-7 million in additional software costs per database owner to create the required architecture for 900 number portability. In addition, because the network is migrating away from centralized databases toward localized AIN databases, there may be additional costs associated with implementation of 900 number portability because of structural differences among AIN databases.


\(^2\) Petition at 15.
updated by the SMS. Without proper updating of these databases, nationwide uniform routing of 900 calls to the correct terminating locations cannot be assured.

In short, industry consensus must be had on a method for implementing 900 portability in today's environment and portability should not be required unless it is determined that the market will support the associated costs.

Respectfully submitted,

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Dated: November 23, 1994
CERTIFICATE OF SERVICE

I, Deborah L. Thrower do hereby certify that a copy of the foregoing Comments of Ameritech has been served on the party listed below, by first class mail, postage prepaid, on this 23rd day of November 1994.

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