MCI Telecommunications Corporation (MCI) hereby offers its initial comments in response to the Commission’s Public Notice herein dated October 25, 1994. Therein, the Commission sought comment on a petition filed by Teleservices Industry Association (TIA) requesting that the Commission initiate a rulemaking proceeding, with a view toward adopting rules and policies to require local exchange carriers to replace the current "NXX" system of screening 900 numbers with a ten-digit database system for screening such numbers. The adoption of such rules and policies would cause 900 numbers to be "portable," thus enabling the movement of 900 numbers among interexchange carriers, as 800 numbers are moved today.

MCI supports in principle the notion of 900 portability and, accordingly, suggests that the Commission initiate the requested rulemaking; however, MCI disagrees with many of the underlying premises of the TIA petition, particularly its assertions that the 900 market is not competitive and that rates for 900
transport service are unreasonably high. As a pioneer in the competitive interexchange telecommunications market, MCI has long been an advocate of policies which give choice to consumers with regard to their selection of services. In both the short and long terms, these policies serve the public interest.

In view of the foregoing, the Commission should institute the requested rulemaking in order to gather and create a record upon which it might rely in proposing 900 number portability.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

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November 23, 1994
CERTIFICATE OF SERVICE

I, Vernell V. Garey, do hereby certify that on this 23rd day of November, 1994, copies of the foregoing "MCI COMMENTS" in RM No. 8535 were served by first-class U.S. mail, postage paid, upon the parties listed on the attached list.

Vernell V. Garey

*HAND-DELIVERED

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