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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Commission Investi-)
gation Into the Allocation of Abbreviated) Case No. 93-1799-TP-COI
Dialing Arrangements, Such as N-1-1)

AMERITECH OHIO'S INITIAL COMMENTS

1. Introduction

Ameritech Ohio, by its attorney, submits these initial comments in response to the Entry adopted March 23, 2000 in the captioned case. In that Entry, the Commission made certain preliminary findings relating to the continued use of the 2-1-1 code in an existing Ohio Department of Transportation ("ODOT") sponsored pilot project in the Cincinnati area. It also made preliminary findings relating to the 2-1-1 code's proposed use by the Ohio Council of Information and Referral Providers and the 211 Ohio Collaborative ("the I & R joint applicants") for use by a human services information and referral service. The I & R joint applicants propose eventual statewide use for the code. The Commission preliminarily approved a two-year pilot based on their proposal. March 23, 2000 Entry, p. 5.

In these comments, Ameritech Ohio raises several important issues that need to be addressed before Ohio's 2-1-1 experiment is extended to other entities and to other areas of the state.

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Under the ODOT pilot program, people in Cincinnati and Northern Kentucky can dial 2-1-1 for traffic information in the area. The system provides real-time information to motorists or others who are interested in highway and traffic conditions. The ODOT application seeks to extend this pilot program.

The I & R joint applicants have requested the Commission's authority to use 2-1-1 as a state-wide referral assistance information line, first in the central, northeast and the western areas of the state, and eventually on a statewide basis. I & R Application, p. 1. The I & R joint applicants assert that both their proposed project and the ODOT project could co-exist on a temporary basis.

The Commission has made preliminary findings that it will (1) grant ODOT's application for a one-year extension of its 2-1-1 pilot project in the Cincinnati area; and (2) permit the I&R joint applicants to establish, within all areas of the state not already covered by ODOT's existing program, use of the 2-1-1 service code for the purpose they proposed. The Commission would also permit the I & R joint applicants to expand their program on a statewide basis after one year. Entry, p. 6. This would, as indicated, require ODOT to seek permission to use another N-1-1 code if it wished to continue its pilot program.

2. The I&R Joint Applicants' Proposal Should Not Be Granted Prematurely

While Ameritech Ohio acknowledges that it is the Commission's responsibility to determine the best use of the N-1-1 service codes for local use, Ameritech Ohio believes

that it would not be prudent for the Commission to assign further use of any N-1-1 code without federal authorization. In addition, Ameritech Ohio believes the Commission should consider and resolve several operational, technical, economic, and administrative concerns before adopting the order it proposes. These are as follows:

1. The I & R joint applicants do not provide a detailed description of how the proposed service application will function or how it will be configured within a local exchange carrier's network;
2. The I & R joint applicants do not state if the calls to 2-1-1 will be local or interLATA;
3. It is not stated where the calls will be routed. Will there be one gateway or will alternative routing be required?
4. Who will operate the gateway(s) and respond to the calls?
5. Will detailed calling party information (such as customer name and address) need to be delivered?
6. How will costs be recovered?
7. What, if any, charges will apply to the calling party? How will the calling party be advised of these charges, if any?
8. What are the timeframes and procedures for implementation of this code?

3. The Allocation Of A Scarce Resource Must Be Approached With Care

In its Entry, the Commission restated its 1997 conclusion that N-1-1 codes are an extremely limited numbering resource and cannot be utilized in situations where the FCC has designated them for national use. Entry, p. 1. The Commission also recognized that

the FCC has a pending docket (NSD-L-98-80) concerning a joint petition filed by several parties (similar to the I & R joint applicants) to have the 2-1-1 code nationally assigned for public access to community service organizations. Entry, p. 3. If that petition is approved, ODOT's use of this code for traffic and travel management information services would need to be terminated or transitioned to a different N-1-1 code. Since Ameritech Ohio is not a participant in the ODOT pilot program, it would not be directly affected by any such change in access. However, Ameritech Ohio is concerned that different uses of the same N-1-1 code in use by ODOT in the Cincinnati area, albeit in different areas of Ohio, will result in customer confusion and misdialed calls.

In comments filed in the FCC docket, both Ameritech and SBC noted the scarcity of N-1-1 codes and stated that regulators must provide a clear and unequivocal definition both as to the use of an N-1-1 code and the entities to which its use is being assigned¹. Of particular concern is the manner in which the service will be provided, as noted in some of the issues identified above. Moreover, it is not clear why the I & R joint applicants' proposal should be selected by the Commission, to the exclusion of other worthy organizations and entities. While it appears that no similar applications have recently been filed, it is also the case that the Commission has not solicited applications or even made the potential availability of the code publicly known. The Commission should consider a more open selection process and not simply rely on a single application filed

¹ NSD-L-98-80, Comments of Ameritech, page 1, Comments of SBC Communications Inc., page 3

by a single party in allocating this important resource, even on a pilot basis.² At the same time, the Commission should consider seeking FCC approval of the proposed use of the code in light of that Commission's activities in this area.

An example of the level of detail needed by telecommunications providers to support the deployment of such services may be found in Ameritech Illinois' Baseline 3-1-1 Service tariff, which is attached³. This description clearly delineates how the service will be provided, what charges will be applied, and the responsibilities of all parties involved. Since the I & R joint applicants do not provide information in similar detail, it is difficult to determine the feasibility of their proposal.

4. The Danger Of Premature Action Allocating The 2-1-1 Code

Based on the foregoing, it should be obvious that there are many dangers associated with a premature allocation of the 2-1-1 code to any particular user. The potential for conflicting uses is real, as is the potential for conflict with federal actions or guidelines. In lieu of granting the application filed by the I & R joint applicants, Ameritech Ohio recommends that the Commission defer making a final decision on their application until all interested parties have had an opportunity to meet and discuss all aspects of the provisioning requirements. The Commission should also consult closely with the FCC on this issue and should consider an appropriate selection process once the feasibility of the allocation of the 2-1-1 code has been established.

² It should be noted that the I & R joint applicants served their application on only one party to this proceeding, ODOT.

5. **Conclusion**

Ameritech Ohio believes that the assignment of N-1-1 codes should be limited to public interest purposes, that such purposes be uniformly applied and approved by the FCC, and that the responsibilities of all parties involved in the provisioning of services associated with these codes, as well as the method of cost recovery, be defined "up front" and clearly understood. Since only the narrow public interest aspect is addressed in the I & R joint applicants' filing and in the Commission's Entry, final action on the I & R application should be deferred until the many issues identified in these comments are addressed and resolved.

Respectfully submitted,

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³ Illinois Bell Telephone Company, Tariff Ill. C.C. No. 19, Part 6, Section 9

1. BASELINE 3-1-1 SERVICE

(N)

A. DESCRIPTION

Baseline 3-1-1 non-emergency service is an intraMSA local service that will provide the local government entity ("customer") the ability to terminate all 3-1-1 dialed incoming calls to a central location or to alternate customer-defined location(s) based on the originator's Calling Party Number (CPN) and associated nine-digit zip code.

Baseline 3-1-1 Service will recognize, route and deliver 3-1-1 dialed calls to Customer Provided Equipment which either (i) originate from Ameritech end offices serving the customer, or (ii) originate from non-Ameritech end offices, provided that the customer, Ameritech and other service providers have reached an agreement as to the interconnection and processing of 3-1-1 calls originating from non-Ameritech end offices.

Calls to "3-1-1" will be routed via the Ameritech public switched network utilizing Advanced Intelligent Network platforms and features to route the call to customer designated location(s).

B. DEFINITIONS

Advanced Intelligent Network (AIN)

AIN is a telecommunications network that is software controlled. The network "intelligence" is located in computer nodes which are distributed throughout the network, rather than being confined to the originating and terminating switching offices. Before calls (either outbound or inbound) are sent to their final destination, the network queries a database for disposition of the call.

Calling Party Number (CPN)

The ten digit telephone number of the calling party.

(N)

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By D. H. Gebhardt, Vice President - Regulatory Affairs
225 West Randolph Street
Chicago, Illinois 60606

1. BASELINE 3-1-1 SERVICE

(N)

B. DEFINITIONS (cont'd)

Service Management System

A computerized database containing relational customer data information that is utilized to route 3-1-1 calls.

SecurID

A security application to be utilized by authorized personnel to access the Service Management System.

Signaling System No. 7 (SS7)

The telecommunications signaling system using protocols recommended by the International Consultative Committee for Telegraphy and Telephony (ICCTT) used by Ameritech to route calls over the public switched network.

C. TERMS AND CONDITIONS

In addition to the general regulations found in ILL. C. C. No. 20, Part 2, Section 2, the following regulations apply to Ameritech 3-1-1 Service:

1. A prospective Baseline 3-1-1 Service subscriber must make separate arrangements for business Local Exchange Access Service prior to establishment of Baseline 3-1-1 Service.
2. Baseline 3-1-1 Service is available where facilities permit.
3. Baseline 3-1-1 Service is only available on a thirty-six (36) month term payment plan basis. The thirty-six (36) month term period will begin on the completion date of the Service Order.

(N)

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PART 6 - Central Office Services
SECTION 9 - Other Central Office Services

Original Sheet No. 3

1. BASELINE 3-1-1 SERVICE (cont'd)

(N)

C. TERMS AND CONDITIONS (cont'd)

4. Applicable charges for local calls placed to Baseline 3-1-1 will be billed to the originating party.
5. Baseline 3-1-1 Service is compatible with Caller ID Service network functionality when used in conjunction with basic exchange services. Caller ID Service is available where facilities permit at the applicable tariff price.
6. With establishment of Baseline 3-1-1 Service, the subscriber will be provided with a SecurID access card. Additional or replacement SecurID cards will be available for a separate fee to be agreed upon by Ameritech and the subscriber.

SecurID cards provide the subscriber with access to the Baseline 3-1-1 Service network system in order to maintain or modify the subscriber Routing Table or Database, and to access standard Baseline 3-1-1 Service reports.

Upon receipt of the SecurID card(s), the subscriber assumes responsibility for safeguarding the use of their assigned card(s) and for any breaches to security resulting from the loss or misuse of the SecurID card(s).

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PART 6 - Central Office Services
SECTION 9 - Other Central Office Services

Original Sheet No. 4

1. BASELINE 3-1-1 SERVICE (cont'd)

(N)

D. FEATURES

1. Standard Feature(s)

Call Routing

3-1-1 dialed calls can be terminated to a customer defined location or to alternate locations.

Management Reports

Baseline 3-1-1 Management Reports can be accessed via dial-up access. Reports available include the Default Number Report and Summary Report.

2. Optional Feature(s)

Day of Year and Time of Day Routing

Allows a Baseline 3-1-1 Service subscriber to select the location to which calls will be routed based upon the time of day and day of year (specific date) that calls originate.

Day of Week and Time of Day Routing

Allows a Baseline 3-1-1 Service subscriber to select the location to which calls will be routed based upon the time of day and day of week that calls originate.

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ILLINOIS BELL
TELEPHONE COMPANY

Ameritech
Tariff

ILL. C.C. NO. 19
PART 6 SECTION 9

PART 6 - Central Office Services
SECTION 9 - Other Central Office Services

Original Sheet No. 5

1. BASELINE 3-1-1 SERVICE (cont'd)

(N)

E. PRICES

1. Service Elements

Description /Billing Code/	Nonrecurring Charge	Monthly Payment
		Term Payment Plan 36 Months
Baseline 3-1-1 Service per customer, per MSA	\$5,500.00	\$250.00
Routing Table Development/Updates First 500 records	100.00	-
Each additional 500 records, or fraction thereof	70.00	-
Routing Table Maintenance Charges per Subscriber Route to Number	-	15.00
Distribution/Routing Criteria per subscription		
NPA or NPA/NXX	75.00	50.00
NPA/NXX with Zip +4	125.00	75.00
Additional Routing Options Day of Year and Time of Day	50.00	25.00
Day of Week and Time of Day	50.00	25.00

(N)

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ILLINOIS BELL
TELEPHONE COMPANY

Ameritech
Tariff

ILL. C.C. NO. 19
PART 6 SECTION 9

PART 6 - Central Office Services
SECTION 9 - Other Central Office Services

Original Sheet No. 6

1. BASELINE 3-1-1 SERVICE (cont'd)

(N)

E. PRICES (cont'd)

1. Service Elements (cont'd)

Description /Billing Code/	Price Per Call
Query/Routing Charge	
per 3-1-1 Call, per MSA	
0 - 50,000 calls	\$0.10
50,001 + calls	0.08
Additional Minutes of Use	
per minute, for each minute of use beyond the first twenty (20) minutes of each message.	
	<u>Price Per Minute</u> \$0.04

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PART 6 - Central Office Services
SECTION 9 - Other Central Office Services

Original Sheet No. 7

1. BASELINE 3-1-1 SERVICE (cont'd)

(N)

E. PRICES (cont'd)

2. Payment Plans

• **Term Payment Plans**

Baseline 3-1-1 Service is only offered under a Term Payment Plan for a period of 36 months.

3. Termination Charges

In the event that a subscriber initiates a Service Order request for Baseline 3-1-1 Service, and subsequently cancels the Service Order prior to full operational establishment of service, the subscriber remains liable for all non-recurring service establishment charges specified in this Tariff.

Subscribers that cancel their Baseline 3-1-1 Service before the term expiration date will be billed a termination liability which consists of a lump sum equal to the non-usage sensitive monthly recurring charges specified in this tariff times the number of months remaining on the term period, rounded up to the nearest whole month.

Any cancellation or termination liability lump sum payment will become due and payable in its entirety immediately upon calculation and presentation of the lump sum bill statement.

At the expiration of the thirty-six (36) month term period, subsequent monthly billing will revert to the Baseline 3-1-1 Service monthly prices in effect at that time, as specified in this Tariff. Termination liability charges are no longer applicable once the term period has expired.

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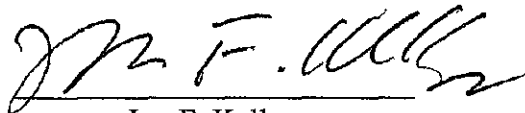
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Certificate of Service

I hereby certify that a copy of the foregoing Initial Comments of Ameritech Ohio has been served this 14th day of April, 2000, by first class mail, postage prepaid, on each of the parties shown on the attached service list.

A handwritten signature in black ink, appearing to read "Jon F. Kelly", written over a horizontal line.

Jon F. Kelly

SERVICE LIST

Case No. 93-1799-TP-COI

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