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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission Investigation )  
Into the Allocation of Abbreviated Dialing )  
Arrangements, Such as N-1-1 )

Case No. 93-1799-TP-

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REPLY COMMENTS OF  
AT&T COMMUNICATIONS OF OHIO, INC.  
AT&T WIRELESS PCS, LLC

On March 23, 2000, the Public Utilities Commission of Ohio ("Commission") issued a preliminary finding regarding the Ohio Department of Transportation's (ODOT) Extension-of-Time Application for its use of 2-1-1 for traffic management services offered in the greater Cincinnati-Northern Kentucky Metropolitan Area and the petition filed by The Ohio Council of Information & Referral Providers and the 211 Ohio Collaborative (collectively "I&R") for Assignment of the 2-1-1 Dialing Code for informational and referral services (the "Petition"). AT&T Communications of Ohio, Inc. and AT&T Wireless PCS, LLC (collectively "AT&T"), hereby file their reply comments.

In general, AT&T agrees with the ultimate recommendation reached by GTE, Ameritech and Sprint in this proceeding that the Commission should await the Federal Communications Commission's ("FCC") decision in the matter of 2-1-1 code assignment. GTE and Sprint voice concerns regarding the scarcity of N-1-1 codes.

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Technician Anna M. K... Date Processed May 1, 2000

These concerns are consistent with those voiced by the FCC.<sup>1</sup> In the wake of the FCC's First Report and Order, only two usable N-1-1 codes – 2-1-1 and 5-1-1 – remain available for national use. AT&T does not believe that these two remaining dialing codes should be employed on a state-by-state or, as proposed by the Commission in their preliminary findings, for two separate services in different regions of the state. AT&T strongly believes that in order to achieve the maximum public benefit from the allocation of 2-1-1 to certain services, they must be allocated in a consistent manner on a nationwide basis. AT&T believes that any other approach will only serve to confuse customers -- especially since, as the Commission recognizes in its preliminary findings, any state specific designations of the 2-1-1 code are subject to any conditions that the FCC may come to adopt pertaining to the nationwide use of 2-1-1. Entry at paragraph 6(b) and (c). Therefore, the Commission should not expand the adoption of the 2-1-1 code in Ohio at this time and in fact should closely examine whether it is beneficial to permit the ODOT to continue using 2-1-1 in the Cincinnati area.

The Commission should also be aware of the effect the proposed dialing code assignment may have on wireless carriers. It is unclear from the Petition whether I&R is requesting that wireless carriers be required to connect their customers that dial 2-1-1 within all parts of Ohio other than Cincinnati to I&R. For wireless carriers to implement an N-1-1 code on this basis would entail extremely difficult and costly switch translation and routing issues. As the Commission is aware, wireless carriers' markets are not delineated based on city boundaries; cell sites have the potential to serve customers in

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<sup>1</sup> In the Matter of The Use of N11 Codes and Other Abbreviated Dialing Arrangements, First Report and Order and Further Notice of Proposed Rulemaking, 12 FCC Rcd 5572 at 5607, CC Docket No. 92-105, FCC 97-51 (rel. Feb. 19, 1997) ("First Report and Order") ("N11 codes are a scarce resource.").

more than one city or across state boundaries. Wireless providers are currently unable to determine the exact location of customers dialing 2-1-1 and therefore would not always be able to route customers dialing 2-1-1 to the correct phone number. In addition, if wireless carriers were required to translate the N-1-1 code to multiple phone numbers, this may require multiple 2-1-1 translations in a single switch, which is a costly and operationally burdensome process.

The Petition also does not explain whether the number to which the proposed 2-1-1 code would be translated should be toll-free (*e.g.*, an 800- or 888 number), so callers will not unexpectedly receive toll charges on their phone bills. If the Commission adopts these uses of 2-1-1, it should require I&R and ODOT to provide local or toll free numbers for the translations so that neither the carrier nor the customer incurs any toll charges. Given the current uses of N-1-1 codes (*i.e.*, 9-1-1), callers might reasonably assume that they would not incur toll charges for such a call.

Finally, if the Commission adopts the Petition by I&R and requires wireless carriers to implement 2-1-1, it should not attempt to restrict wireless carriers from charging their customers for "air time" for I&R 2-1-1 calls (or for that matter 2-1-1 calls to the ODOT) even if the service is otherwise toll-free for callers, as any other result would constitute prohibited state regulation of commercial mobile service providers' rates in contravention of federal law.<sup>2</sup>

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<sup>2</sup>47 U.S.C. § 332(c)(3). In addition, the First Report and Order permitted wireless carriers to charge callers for placing calls to 311 services. *See id.*, ¶ 43.

Dated: April 28, 2000

Respectfully submitted,

AT&T COMMUNICATIONS OF OHIO, INC.  
AT&T Wireless PCS, LLC

By: 

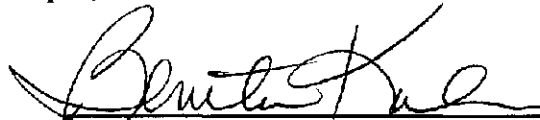
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Comments of  
AT&T Communications of Ohio, Inc. was served by U.S. mail, postage prepaid, on all  
parties on the service list, this 28<sup>th</sup> day of April, 2000.

  
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