

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Part 68 Waiver Requests of)	File Nos.:
)	
Atlinks USA, Inc.)	NSD-L-01-23
Atlinks USA, Inc.)	NSD-L-01-24
Vtech Telecommunications Limited)	NSD-L-01-26
Atlinks USA, Inc.)	NSD-L-01-27
Atlinks USA, Inc.)	NSD-L-01-28

ORDER

Adopted: February 6, 2001

Released: February 7, 2001

By the Chief, Network Services Division, Common Carrier Bureau:

1. The Commission has received petitions for waiver of 47 C.F.R. section 68.312(i) of its rules from the following parties who wish to register, under Part 68 of the rules, devices that detect the presence of a stutter dial tone:¹

- Atlinks USA, Inc. on January 24, 2001 for Models Alcatel 28460CXX-C, Ameritech 28460AXX-C, Atlinks 28460LXX-C, Bell Atlantic 28460BXX-C, Frontier 28460FXX-C, GE 28460GXX-C, GTE 28460TXX-C, Hello Kitty 28460HXX-C, MCI 28460MXX-C, Pacific Bell 28460PXX-C, RCA 28460RXX-C, SBC 28460EXX-C, Southern New

¹ Stutter dial tone is a series of short separate tones produced by the telephone company's central switching office that alerts a voice mail subscriber that he or she has voice mail. The Petitioners' devices automatically check for the presence of stutter dial tone and, if detected, cause a light to blink to alert the subscriber of the waiting voice mail message.

England Telephone 28460NXX-C, Southwest Bell 28460SXX-C, Sprint 28460KXX-C, US West 28460UXX-C, Verizon 28460VXX-C, Walgreens 28460WXX-C;

- Atlinks USA, Inc. on January 24, 2001 for Models Alcatel 28460CXX-A, Ameritech 28460AXX-A, Atlinks 28460LXX-A, Bell Atlantic 28460BXX-A, Frontier 28460FXX-A, GE 28460GXX-A, GTE 28460TXX-A, Hello Kitty 28460HXX-A, MCI 28460MXX-A, Pacific Bell 28460PXX-A, RCA 28460RXX-A, SBC 28460EXX-A, Southern New England Telephone 28460NXX-A, Southwest Bell 28460SXX-A, Sprint 28460KXX-A, US West 28460UXX-A, Verizon 28460VXX-A, Walgreens 28460WXX-A;

- Vtech Telecommunications Limited on January 31, 2001 for Models Ameritech 1734, Bell Atlantic 1734, Bell South 1734, Cincinnati Bell 1734, GTE 1734, Nevada Bell 1734, Pacific Bell 1734, Qwest 1734, SBC 1734, Sprint 1734, US West 1734, Verizon 1734, Vtech 1734;

- Atlinks USA, Inc. on February 2, 2001 for Models Ameritech 26975AXX-C, Bell Atlantic 26975BXX-C, Frontier 26975FXX-C, GE 26975GXX-C, GTE 26975TXX-C, MCI 26975MXX-C, Pacific Bell 26975PXX-C, RCA 26975RXX-C, SBC 26975EXX-C, Southern New England Telephone 26975NXX-C, Southwest Bell 26975SXX-C, Sprint 26975KXX-C, US West 26975UXX-C, Walgreens 26975WXX-C;

- Atlinks USA, Inc. on February 2, 2001 for the products listed in Appendix A.

For the reasons discussed below, we grant these petitions, subject to the conditions in this Order.

2. Part 68 Registration Process. All terminal equipment sold in the United States and connected to the public switched telephone network (PSTN) must be registered under Part 68 of the Commission's rules.² The Part 68 registration process requires testing of a device to demonstrate that it conforms to specifications designed to prevent harm to the PSTN.³ If tests show that an applicant's device meets these Part 68 requirements, the Commission issues a registration number for it, thereby permitting its sale and connection to the PSTN in the United States. A waiver of Section 68.312(i), as requested by the above-mentioned Petitioners, would allow them to submit their stutter tone devices for Part 68 registration despite the fact that the devices do not meet the limitations of section 68.312(i). A waiver of one or more requirements of Part 68 does not, however, excuse an applicant from this testing process.

3. Waiver Standard. The Commission will not waive any provision of its rules unless good cause is shown.⁴ Under the relevant case law, the applicant has the burden of showing good cause for a waiver: "[a]n applicant [for a waiver] faces a high hurdle even at the starting gate."⁵ Nevertheless, an agency must take a "hard look" at applications for waiver⁶ and

² 47 C.F.R. § 68.2.

³ See FCC Form 730, Application Guide, Revision C - 273 (March 1997).

⁴ 47 C.F.R. § 1.3.

⁵ *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969).

must consider all relevant factors.⁷ An agency must adhere strictly to its rules unless a party can show "reasons why in the public interest the rule should be waived."⁸ Finally, "[t]he agency must explain why deviation better serves the public interest and articulate the nature of the special circumstances to prevent discriminatory application and to put future parties on notice as to its operation."⁹

4. Streamlined Stutter Dial Tone Waiver Process. On September 28, 1995, the Commission's Common Carrier Bureau released an order granting eight parties waivers of Section 68.312(i) of the Commission's rules to offer similar devices.¹⁰ The waivers were granted subject to eight conditions (Alameda conditions).¹¹

5. On August 9, 1999, the Common Carrier Bureau released an Order on Reconsideration (*Reconsideration Order*) in response to petitions filed by VoiceWaves, Inc. and Southwestern Bell Telephone Company (SBC).¹² In the *Reconsideration Order*, the Commission granted VoiceWaves' request and eliminated the requirement that the stutter dial tone check occur no later than 30-seconds after a voice mail subscriber terminates a call. The second performance condition now reads: "(2) makes an off-hook stutter dial tone check no more than once after a subscriber completes a call, and complete the check no earlier than 4 seconds after the subscriber hangs-up."¹³ We also applied the same logic to the third performance condition and eliminated the four-minute maximum following the termination of a subscriber's call, so that it now reads: "(3) makes an off-hook stutter dial tone check after an unanswered incoming call no more than once."¹⁴

⁶ *Id.*

⁷ *Citizens to Preserve Overton Park, Inc. v. Volpe*, 401 U.S. 402, 416 (1971).

⁸ *FPC v. Texaco Inc.*, 377 U.S. 33, 39 (1964).

⁹ *Northeast Cellular Telephone Company, L.P. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

¹⁰ Part 68 Waiver Request of Alameda Engineering, Inc., *Order*, 10 FCC Rcd 12135 (Com. Car. Bur. 1995) (*Alameda Order*).

¹¹ Stutter dial tone detection devices must: (1) perform no periodic testing for stutter dial tone; (2) make an off-hook stutter dial tone check no more than once after a subscriber completes a call, and complete the check no earlier than 4 seconds and no later than 30 seconds after the subscriber hangs-up; (3) make an off-hook stutter dial tone check after an unanswered call no more than once and do so within 4 minutes after the call; (4) perform no off-hook stutter dial tone checks after an unanswered incoming call if the visual message indicator is already lit; (5) take the line off-hook for no more than 2.1 seconds per stutter dial tone check; (6) synchronize off-hook checks when multiple stutter dial tone detection and visual signalling devices are attached to the same line so that only one check is made per calling event for a single line; (7) not block dial tone to a subscriber attempting to initiate a call as an off-hook stutter dial tone detection check is occurring; and (8) not use more than 8 micro-amperes of direct current (DC) from subscriber line loop, except that the devices may draw loop DC sufficient to make authorized off-hook checks. *Id.* at 12141.

¹² Part 68 Waiver Request of Alameda Engineering, et al., *Order on Reconsideration*, NSD-L-98-154, DA 99-1542 (rel. August 9, 1999).

¹³ *Id.* at ¶ 22.

¹⁴ *Id.* at ¶ 23.

We denied the rest of VoiceWaives and SBC's Petitions.¹⁵ Finally, we ordered that all parties already in receipt of stutter dial tone waivers issued pursuant to the *Alameda Order* are not required to file a new Part 68 Registration for equipment covered by those waivers as a consequence of the *Reconsideration Order*.¹⁶

6. The *Alameda Order* established a streamlined process for Part 68 waivers of stutter dial tone devices, eliminating the usual public notice and comment procedures if a petitioner certifies that the eight conditions, as amended, are met. The Commission determined that we could rely on these conditions in establishing a streamlined waiver process that provides manufacturers and carriers the stability afforded by our Part 68 rules without the expense and delay associated with the rule making process.

7. The Commission invited other parties able to meet the Alameda conditions to file petitions for waiver of Section 68.312(i) in order to register stutter dial tone devices.¹⁷ Further waivers, we determined, would facilitate the market availability of such equipment, thus serving the public interest through increased innovation, consumer choice, and value. By serving the public interest, stutter dial tone waiver applications satisfy part one of the two-part analysis that the Commission has used in evaluating Part 68 waiver requests. By not harming the PSTN in accordance with the Alameda conditions, they also satisfy the second part.

8. Discussion. All Petitioners cited above have certified that their devices are stutter dial tone devices that comply with the eight conditions specified in the *Reconsideration Order*. Thus, we conclude, for the same reasons as in that order, that Petitioners have shown good cause for granting the requested waivers. Applications to register these devices under Part 68 of our rules may be submitted with this waiver.

ORDERING CLAUSES

9. Accordingly, IT IS ORDERED, pursuant to authority delegated in Sections 0.91 and 0.291 of the Commission's rules, 47 C.F.R. §§ 0.91, 0.291, and Section 1.3 of the Commission's Rules, 47 C.F.R. § 1.3, that the requests for waiver of Section 68.312(i) of the rules, 47 C.F.R. § 68.312(i), by Atlinks USA, Inc., and Vtech Telecommunications Limited ARE GRANTED to the extent stated herein.

10. IT IS FURTHER ORDERED that the petitions for waiver ARE GRANTED SUBJECT TO THE FOLLOWING CONDITIONS: that the stutter dial tone detection devices (1) perform no periodic testing for stutter dial tone; (2) make an off-hook stutter dial tone check no

¹⁵ *Id.* at ¶ 2.

¹⁶ *Id.* at ¶ 24.

¹⁷ *Id.* at 12141 n.73.

more than once after a subscriber terminates a call, and complete the check no earlier than 4 seconds after the subscriber hangs up; (3) make an off-hook stutter dial tone check after an unanswered incoming call no more than once; (4) perform no off-hook stutter dial tone checks after an unanswered incoming call if the visual message indicator is already lit; (5) take the line off-hook for no more than 2.1 seconds per stutter dial tone check; (6) synchronize off-hook checks when multiple stutter dial tone detection and visual signalling devices are attached to the same line so that only one check is made per calling event for a single line; (7) do not block dial tone to a subscriber attempting to initiate a call as an off-hook stutter dial tone detection check is occurring; and (8) do not use more than 8 micro-amps of direct current (DC) from subscriber line loop, except that the devices may draw loop DC sufficient to make authorized off-hook checks.

FEDERAL COMMUNICATIONS COMMISSION

L. Charles Keller
Chief, Network Services Division
Common Carrier Bureau

Appendix A

Products of Atlinks USA, Inc.

26925AXX-C	"AMERITECH" BRAND 2-Line 900MHz CORDLESS PHONE
26925BXX-C	"BELL ATLANTIC" BRAND 2-Line 900MHz CORDLESS PHONE
26925EXX-C	"SBC" BRAND 2-Line 900MHz CORDLESS PHONE
26925FXX-C	"FRONTIER" BRAND 2-Line 900MHz CORDLESS PHONE
26925GXX-C	"GE" BRAND 2-Line 900MHz CORDLESS PHONE
26925KXX-C	"SPRINT" BRAND 2-Line 900MHz CORDLESS PHONE
26925MXX-C	"MCI" BRAND 2-Line 900MHz CORDLESS PHONE
26925NXX-C	"SOUTHERN NEW ENGLAND TELEPHONE" BRAND 2-Line 900MHz CORDLESS PHONE
26925PXX-C	"PACIFIC BELL" BRAND 2-Line 900MHz CORDLESS PHONE
26925RXX-C	"RCA" BRAND 2-Line 900MHz CORDLESS PHONE
26925SXX-C	"SOUTHWEST BELL" BRAND 2-Line 900MHz CORDLESS PHONE
26925TXX-C	"GTE" BRAND 2-Line 900MHz CORDLESS PHONE
26925UXX-C	"US WEST" BRAND 2-Line 900MHz CORDLESS PHONE
26925WXX-C	"WALGREENS" BRAND 2-Line 900MHz CORDLESS PHONE
21000AXX-A	"AMERITECH" BRAND 2.4GHz MULTI-HANDSET PHONE
21000BXX-A	"BELL ATLANTIC" BRAND 2.4GHz MULTI-HANDSET PHONE
21000EXX-A	"SBC" BRAND 2.4GHz MULTI-HANDSET PHONE
21000FXX-A	"FRONTIER" BRAND 2.4GHz MULTI-HANDSET PHONE
21000GXX-A	"GE" BRAND 2.4GHz MULTI-HANDSET PHONE
21000KXX-A	"SPRINT" BRAND 2.4GHz MULTI-HANDSET PHONE
21000MXX-A	"MCI" BRAND 2.4GHz MULTI-HANDSET PHONE
21000NXX-A	"SOUTHERN NEW ENGLAND TELEPHONE" BRAND 2.4GHz MULTI-HANDSET PHONE
21000PXX-A	"PACIFIC BELL" BRAND 2.4GHz MULTI-HANDSET PHONE
21000RXX-A	"RCA" BRAND 2.4GHz MULTI-HANDSET PHONE
21000SXX-A	"SOUTHWEST BELL" BRAND 2.4GHz MULTI-HANDSET PHONE
21000TXX-A	"GTE" BRAND 2.4GHz MULTI-HANDSET PHONE
21000UXX-A	"US WEST" BRAND 2.4GHz MULTI-HANDSET PHONE
21000WXX-A	"WALGREENS" BRAND 2.4GHz MULTI-HANDSET PHONE
21010AXX-A	"AMERITECH" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21010BXX-A	"BELL ATLANTIC" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21010EXX-A	"SBC" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21010FXX-A	"FRONTIER" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21010GXX-A	"GE" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21010KXX-A	"SPRINT" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21010MXX-A	"MCI" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21010NXX-A	"SOUTHERN NEW ENGLAND TELEPHONE" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21010PXX-A	"PACIFIC BELL" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21010RXX-A	"RCA" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21010SXX-A	"SOUTHWEST BELL" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21010TXX-A	"GTE" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21010UXX-A	"US WEST" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE

21010WXX-A	"WALGREENS" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE
21090AXX-A	"AMERITECH" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090BXX-A	"BELL ATLANTIC" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090EXX-A	"SBC" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090FXX-A	"FRONTIER" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090GXX-A	"GE" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090KXX-A	"SPRINT" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090MXX-A	"MCI" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090NXX-A	"SOUTHERN NEW ENGLAND TELEPHONE" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090PXX-A	"PACIFIC BELL" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090RXX-A	"RCA" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090SXX-A	"SOUTHWEST BELL" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090TXX-A	"GTE" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090UXX-A	"US WEST" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21090WXX-A	"WALGREENS" BRAND 2.4GHz MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21210AXX-A	"AMERITECH" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210BXX-A	"BELL ATLANTIC" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210EXX-A	"SBC" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210FXX-A	"FRONTIER" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210GXX-A	"GE" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210KXX-A	"SPRINT" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210MXX-A	"MCI" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210NXX-A	"SOUTHERN NEW ENGLAND TELEPHONE" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210PXX-A	"PACIFIC BELL" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210RXX-A	"RCA" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210SXX-A	"SOUTHWEST BELL" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210TXX-A	"GTE" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210UXX-A	"US WEST" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21210WXX-A	"WALGREENS" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE
21290AXX-A	"AMERITECH" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE

21290BXX-A	"BELL ATLANTIC" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21290EXX-A	"SBC" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21290FXX-A	"FRONTIER" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21290GXX-A	"GE" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21290KXX-A	"SPRINT" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21290MXX-A	"MCI" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21290NXX-A	"SOUTHERN NEW ENGLAND TELEPHONE" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21290PXX-A	"PACIFIC BELL" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21290RXX-A	"RCA" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21290SXX-A	"SOUTHWEST BELL" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21290TXX-A	"GTE" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21290UXX-A	"US WEST" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21290WXX-A	"WALGREENS" BRAND 2.4GHz 2-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490AXX-A	"AMERITECH" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490BXX-A	"BELL ATLANTIC" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490EXX-A	"SBC" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490FXX-A	"FRONTIER" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490GXX-A	"GE" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490KXX-A	"SPRINT" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490MXX-A	"MCI" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490NXX-A	"SOUTHERN NEW ENGLAND TELEPHONE" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490PXX-A	"PACIFIC BELL" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490RXX-A	"RCA" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490SXX-A	"SOUTHWEST BELL" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE

21490TXX-A	"GTE" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490UXX-A	"US WEST" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
21490WXX-A	"WALGREENS" BRAND 2.4GHz 4-LINE MULTI-HANDSET SPEAKERPHONE WITH INTEGRATED ANSWERING MACHINE
27673AXX-A	"AMERITECH" BRAND 2.4GHz PHONE
27673BXX-A	"BELL ATLANTIC" BRAND 2.4GHz PHONE
27673EXX-A	"SBC" BRAND 2.4GHz PHONE
27673FXX-A	"FRONTIER" BRAND 2.4GHz PHONE
27673GXX-A	"GE" BRAND 2.4GHz PHONE
27673KXX-A	"SPRINT" BRAND 2.4GHz PHONE
27673MXX-A	"MCI" BRAND 2.4GHz PHONE
27673NXX-A	"SOUTHERN NEW ENGLAND TELEPHONE" BRAND 2.4GHz PHONE
27673PXX-A	"PACIFIC BELL" BRAND 2.4GHz PHONE
27673RXX-A	"RCA" BRAND 2.4GHz PHONE
27673SXX-A	"SOUTHWEST BELL" BRAND 2.4GHz PHONE
27673TXX-A	"GTE" BRAND 2.4GHz PHONE
27673UXX-A	"US WEST" BRAND 2.4GHz PHONE
27673WXX-A	"WALGREENS" BRAND 2.4GHz PHONE
27674AXX-A	"AMERITECH" BRAND 2.4GHz SPEAKERPHONE
27674BXX-A	"BELL ATLANTIC" BRAND 2.4GHz SPEAKERPHONE
27674EXX-A	"SBC" BRAND 2.4GHz SPEAKERPHONE
27674FXX-A	"FRONTIER" BRAND 2.4GHz SPEAKERPHONE
27674GXX-A	"GE" BRAND 2.4GHz SPEAKERPHONE
27674KXX-A	"SPRINT" BRAND 2.4GHz SPEAKERPHONE
27674MXX-A	"MCI" BRAND 2.4GHz SPEAKERPHONE
27674NXX-A	"SOUTHERN NEW ENGLAND TELEPHONE" BRAND 2.4GHz SPEAKERPHONE
27674PXX-A	"PACIFIC BELL" BRAND 2.4GHz SPEAKERPHONE
27674RXX-A	"RCA" BRAND 2.4GHz SPEAKERPHONE
27674SXX-A	"SOUTHWEST BELL" BRAND 2.4GHz SPEAKERPHONE
27674TXX-A	"GTE" BRAND 2.4GHz SPEAKERPHONE
27674UXX-A	"US WEST" BRAND 2.4GHz SPEAKERPHONE
27674WXX-A	"WALGREENS" BRAND 2.4GHz SPEAKERPHONE
27675AXX-A	"AMERITECH" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27675BXX-A	"BELL ATLANTIC" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27675EXX-A	"SBC" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27675FXX-A	"FRONTIER" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27675GXX-A	"GE" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27675KXX-A	"SPRINT" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27675MXX-A	"MCI" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27675NXX-A	"SOUTHERN NEW ENGLAND TELEPHONE" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY

27675PXX-A	"PACIFIC BELL" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27675RXX-A	"RCA" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27675SXX-A	"SOUTHWEST BELL" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27675TXX-A	"GTE" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27675UXX-A	"US WEST" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27675WXX-A	"WALGREENS" BRAND 2.4GHz SPEAKERPHONE WITH VOICE MAIL SCREENING CAPABILITY
27676AXX-A	"AMERITECH" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676BXX-A	"BELL ATLANTIC" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676EXX-A	"SBC" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676FXX-A	"FRONTIER" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676GXX-A	"GE" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676KXX-A	"SPRINT" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676MXX-A	"MCI" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676NXX-A	"SOUTHERN NEW ENGLAND TELEPHONE" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676PXX-A	"PACIFIC BELL" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676RXX-A	"RCA" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676SXX-A	"SOUTHWEST BELL" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676TXX-A	"GTE" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676UXX-A	"US WEST" BRAND 2.4GHz 2-LINE SPEAKERPHONE
27676WXX-A	"WALGREENS" BRAND 2.4GHz 2-LINE SPEAKERPHONE
29093AXX-A	"AMERITECH" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093BXX-A	"BELL ATLANTIC" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093EXX-A	"SBC" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093FXX-A	"FRONTIER" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093GXX-A	"GE" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093KXX-A	"SPRINT" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093MXX-A	"MCI" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093NXX-A	"SOUTHERN NEW ENGLAND TELEPHONE" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093PXX-A	"PACIFIC BELL" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093RXX-A	"RCA" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093SXX-A	"SOUTHWEST BELL" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093TXX-A	"GTE" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093UXX-A	"US WEST" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX
29093WXX-A	"WALGREENS" BRAND SWITCHABLE STUTTER-TONE ADJUNCT CALLER-ID BOX