

Before the
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of)	
)	
Nationwide Number Portability)	WC Docket No. 17-244
)	
Numbering Policies)	
for Modern Communications)	WC Docket No. 13-97
)	

REPLY COMMENTS OF JAMES C HULCE

Dated January 26, 2018

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I, James C Hulce, respectfully file these reply comments in response to the Federal Communications Commission's ("FCC" or "Commission") Notice of Proposed Rulemaking and Notice of Inquiry regarding Nationwide Number Portability ("The Notice").¹ I ask the Commission to proceed with Nationwide Number Portability so that all Americans can realize its benefits, but ensure that the transition be made in a cautious manner that retains the reliability, quality, and cost efficiency of our public telephone network.

In the Notice, the Commission proposes eliminating the N-1 query requirement. As explained in the Notice and in the ATIS Report², the N-1 query requirement poses conflicts with Nationwide Number Portability approaches. The Commission instituted the N-1 query requirement to ensure the success of Local Number Portability. Removing the requirement altogether could create confusion as to which carrier(s) involved in a call have to make the query, potentially erasing earlier portability gains. While the N-1 query requirement may no longer make sense when National Number Portability is implemented, the Commission needs to study this issue further and continue to require that a LNP query is performed on all calls.

One of the National Number Portability alternatives identified in the Notice, iconectiv's GR-2982-CORE specification, is overly complex to implement and should be rejected.

Another alternative identified in the Notice, Non-Geographic LRN (NGLRN), makes use of a non-geographic area code. While the Notice talks about this code as a new code, such a code already exists as 5XX-NXX (formerly 5YY) codes. NANPA explains these codes as "5XX-NXX codes are to be used for applications which are non-geographic in nature, are not assigned to rate centers and may or may not traverse the PSTN, but do require an E.164

¹ Nationwide Number Portability, WC Docket No. 17-244, Numbering Policies for Modern Communications, WC Docket No. 13-97, Notice of Proposed Rulemaking and Notice of Inquiry, FCC 17-133 (rel. Oct. 26, 2017)

² See generally Alliance for Telecomm. Indus. Sols., ATIS Standard – ATIS-1000071, Technical Report on a Nationwide Number Portability Study, Technical Report (2016) (ATIS Report), https://apps.fcc.gov/edocs_public/attachmatch/DOC-340865A1.pdf.

addressing scheme³. This existing numbering resource appears to meet the non-geographic area code requirement of the NGLRN alternative.

In a continuation of earlier reform efforts, The Commission should take further steps to modernize regulation of the telephone network, better reflecting the network that exists today and the network that will exist in the future. As a relic of the rapidly fading TDM history of the PSTN, our country is still divided into more than ten thousand rate centers (sometimes called exchanges), where every carrier must establish an interconnection if they want to serve local customers and/or numbers. The Notice explains that “A “rate center” is a geographic area that is used to determine whether a call is local or toll”. This obsolete system limits the service provider choices that consumers have available, especially in rural areas. In an era of regional IP-based interconnection, eliminating rate centers entirely or merging them along LATA boundaries would establish a much more reasonable point of interconnection. This change to numbering administration, and related rule modifications, would facilitate wider portability, eventually including NNP, through simplifying our telephone network. Many other benefits would be realized by rate center elimination, including a reduction in telephone network complexity, lower administration costs, and area code conservation. Based on the principles in the *ICC Reform Order*, the Commission has the regulatory authority and should move expeditiously to conduct further modernization of our nation’s telephone network.

³ https://www.nationalnpanpa.com/number_resource_info/5XX_codes.html