

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Wireline Competition Bureau Seeks Comment on)	
New Hampshire Public Utilities Commission)	
Petition for Additional Delegated Authority to)	
Implement Individual Telephone Number Pooling)	
in the 603 Area Code)	

COMMENTS OF CTIA

CTIA provides these comments in response to the Petition filed by the New Hampshire Public Utilities Commission (“NHPUC”) requesting additional delegated authority to implement individual telephone number (“ITN”) pooling in the 603 area code.¹

I. INTRODUCTION AND SUMMARY.

CTIA supports the goal of efficient and consumer-friendly telephone number administration. Indeed, CTIA’s member companies have been industry leaders in implementing highly efficient, automated systems to utilize telephone numbering resources, which depend upon the national uniformity and scope of the Commission’s telephone number administration policies. The Commission should deny the Petition because consumers currently benefit from the efficient telephone number administration process where voice service providers can quickly assign telephone numbers to new services based on available inventory from pooled thousands-

¹ Petition by the New Hampshire Public Utilities Commission for Additional Delegated Authority to Implement Number Optimization Measures in the 603 Area Code, CC Docket No. 99-200 (filed April 26, 2019) (“Petition”); *see also Wireline Competition Bureau Seeks Comment on New Hampshire Public Utilities Commission Petition for Additional Delegated Authority to Implement Individual Telephone Number Pooling in the 603 Area Code*, Public Notice, DA 19-495 (rel. May 31, 2019) (“Public Notice”).

blocks of numbers. The Petition would undermine the goal of an efficient, national telephone number administration system by requiring voice service providers to develop New Hampshire-specific procedures and mandating functionalities and processes that are untested and for which no industry standards exist.

The NHPUC has not shown that granting it additional authority to require ITN pooling is necessary at this time. The North American Numbering Plan Administrator (“NANPA”) currently projects that New Hampshire’s 603 area code will not exhaust until 2030 – more than a decade from now.² Although there is no indication that additional numbering conservation measures are needed at this time, if the Commission wishes to consider ITN pooling, the appropriate first step would be to request that the issue be considered anew by expert bodies such as ATIS’s Industry Numbering Committee (“INC”) and the North American Numbering Council (“NANC”) – not allowing it to be implemented mandatorily in a single state before the necessary work has been done to determine the impact of ITN pooling on numbering administration efficiency and consumers. There is no indication, however, that such measures are necessary. Moreover, there is no apparent policy reason to do so, as state commissions have successfully implemented area code relief without ITN pooling in area codes facing number exhaust nearly fifty times in the past decade.³ For all of these reasons, the Petition should be denied.

² See NANPA, NRUF and NPA Exhaust Analysis (April 2019), available at https://www.nationalnanpa.com/reports/2019-1_NPA%20Exhaust_Projections_Final.pdf. NANPA’s exhaust projections for area code 603 have fluctuated over the past three years between 2029 and 2034. *Id.*

³ See NANPA, NPAs Introduced Over the Last 10 Years, (April 2019), available at https://www.nationalnanpa.com/reports/2019-1_NPA%20Exhaust_Projections_Final.pdf

II. THE PETITION WOULD UNDERMINE THE CONSUMER BENEFITS OF AN EFFICIENT TELEPHONE NUMBER ADMINISTRATION SYSTEM AND REQUIRE THE DEVELOPMENT OF NEW, UNTESTED PROCEDURES AND STANDARDS

The FCC's number conservation measures – centering on thousands-block number pooling – unquestionably have been a success. In early 2000, before thousands-block pooling was implemented, NANP exhaust was projected to occur potentially early as 2006,⁴ but today the NANP is not projected to exhaust until a date “beyond 2049.”⁵ Thousands-block pooling has been a success in New Hampshire as well. As the Petition notes, when the NHPUC implemented thousands-block pooling over 15 years ago, the 603 area code was in jeopardy and expected to require relief even if thousand-block pooling was implemented.⁶ It is now not expected to exhaust until at least 2030.⁷

Consumers benefit from the current efficiencies in telephone number administration. Voice service providers can quickly provision new services to consumers using available inventories of telephone numbers. For example, subscribers of wireless voice services purchasing new lines can almost immediately get new services turned on with a working telephone number. Requiring wireless voice service providers to obtain individual telephone numbers from a state-designated administrator for each new customer, as the Petition suggests, would slow down the current provisioning process to the detriment of consumers.

⁴ See *Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574, 7579 ¶ 6 & n.9 (2000).

⁵ NANPA, April 2019 North American Numbering Plan (NANP) Exhaust Analysis at 2 (April 2019), available at https://www.nationalnanpa.com/reports/April_2019_NANP_Exhaust_Analysis_Final.pdf.

⁶ See Petition at 2.

⁷ See *supra* note 2.

In order to meet consumer demand for wireless voice services, wireless providers have developed and deployed highly automated systems to implement thousands-block pooling and other numbering conservation measures. If the Petition were granted, however, providers serving New Hampshire would have to put aside these highly efficient systems and develop new systems for use exclusively in New Hampshire. These new processes may be manual due to the one-off nature of a state-specific number administration process. This would eliminate the efficiency that has been gained by nationwide telephone numbering optimization policy, thereby increasing costs and introducing greater potential for delays or errors to the detriment of consumers.

Significantly, there is no consensus on what the ITN pooling processes would look like. There has been no significant consideration of this issue since some preliminary ATIS and NANC reports over 20 years ago, which were incomplete at the time and are now out of date.⁸ As the Petition demonstrates, the use of ITN pooling would create impacts on existing systems and processes, including voice call routing⁹ and number portability.¹⁰ Precisely because of concerns about these and other technical issues, the Commission has consistently declined to grant any state the authority to implement ITN pooling. When it last considered this issue, the Commission cited “the lack of final technical and administrative standards for this methodology”

⁸ In addressing a limited trail of ITN pooling or similar new numbering methods in 2013, AT&T acknowledged that significant changes would have to be made to existing numbering assignment and routing procedures. *See* Comments of AT&T, GN Docket No. 13-5, at 37-42 (filed July 8, 2013). In response to AT&T’s proposal, the entity then serving as the NANPA and the PA stated that ITN pooling “would require national standards, which could be developed by the appropriate industry numbering committees with guidance from the FCC.” Reply Comments of Neustar, Inc., GN Docket No. 13-5, at 8-9 (filed July 19, 2013).

⁹ *See, e.g.*, Petition at 6 (noting that changes would be necessary to the Local Exchange Routing Guide).

¹⁰ *See, e.g.*, Petition at 5 (noting impacts on assignment of Location Routing Numbers, which are used for number portability).

and ongoing concerns “with ITN [pooling]’s potential impact on companies’ switching systems and [operational support systems’] mapping logic.”¹¹ The Petition does not show that anything has changed since that time in terms of the industry’s or administrators’ preparedness to deploy ITN pooling; it remains an untested optimization measure lacking consensus-based standards.

In sum, the Commission should deny the Petition because the implementation of ITN pooling in New Hampshire would obviate the consumer benefits of an efficient, national telephone numbering administration system that voice service providers have deployed for thousands-block number pooling and other existing numbering optimization processes. Moreover, the Commission should deny the Petition because it is unclear whether implementation of ITN pooling is even technically feasible at this time or, if so, precisely how it would be accomplished.

III. GIVEN EXISTING PROJECTIONS, IT WOULD BE PREMATURE TO CONSIDER DRASTIC NEW NUMBERING MEASURES IN NEW HAMPSHIRE AT THIS TIME

Beyond the consumer benefit, efficiency and technical feasibility arguments discussed above,¹² there is no reason to undertake the significant risks of implementing ITN pooling in New Hampshire because the Petition makes no showing that ITN pooling is needed to forestall premature exhaust of area code 603.

As the Petition acknowledges, current estimates show that the 603 area code will not exhaust for over a decade.¹³ Many factors will affect the actual date of exhaust, including significant factors that may take place over the next three to five years. For example, as the

¹¹ *Numbering Resource Optimization, et al.*, 15 FCC Rcd 23371, 23397 ¶ 58 (2000).

¹² *See supra* Section II.

¹³ *See supra* note 2.

Commission has noted, demand is declining for legacy circuit-switched services that rely upon telephone numbers for addressing and routing while voice service providers are replacing them with next-generation, Internet protocol (“IP”) based services that may use other means for addressing and routing.¹⁴ The on-going transition to IP based services may ultimately decrease the demand for NANP telephone numbers. It is therefore far too early to consider deploying additional numbering resource optimization measures in New Hampshire, such as granting the state the authority to implement an unproven numbering assignment methodology.

Further, if for some reason the Commission wishes to consider the feasibility of ITN pooling – in the 603 area code or elsewhere – the appropriate first step would be to request that the issue be considered anew by expert bodies such as the Commission’s NANC and ATIS’ INC. The Commission’s numbering resource optimization efforts have been successful in large part because the Commission has consistently implemented them pursuant to consensus-based standards, which (as discussed above¹⁵) have not been developed for ITN pooling. Even if the 603 area code were facing exhaust (which it is not), other relief options are available that are consistent with established numbering resource optimization practices and procedures.¹⁶

Given that there is no indication that New Hampshire’s 603 area code will exhaust for at least a decade, and potentially longer, there is no basis to require all users of numbers in New Hampshire to deploy a unique and untested number allocation methodology at this time.

¹⁴ See, e.g., *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Second Report and Order, 33 FCC Rcd 5660, 5661-62 ¶ 5 (2018).

¹⁵ See *supra* Section II.

¹⁶ For example, state commissions have successfully implemented area code relief in area codes facing number exhaust nearly fifty times in the past decade. See NANPA, *NPAs Introduced Over the Last 10 Years*, (April 2019), available at https://www.nationalnanpa.com/reports/2019-1_NPA%20Exhaust_Projections_Final.pdf

IV. CONCLUSION

For all of these reasons, the Petition should be denied.

Respectfully submitted,

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