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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Petition of the National)
Association of Regulatory)
Utility Commissioners for a)
Notice of Inquiry Addressing)
the Administration of the)
North American Numbering Plan)

**COMMENTS OF THE PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA**

The Public Service Commission of the District of Columbia (D.C. PSC), pursuant to the Federal Communications Commission's (FCC's) Public Notice, DA 91-1307, issued October 18, 1991, hereby files its comments in support of the Petition of the National Association of Regulatory Utility Commissioners (NARUC) for a Notice of Inquiry concerning the North American Numbering Plan (NANP).

I. INTRODUCTION

In its petition, NARUC pointed out that Bell Communications Research Corporation (Bellcore) administers the NANP, which is of critical importance to the telecommunications industry and contended that the pending exhaustion of a number of these codes is causing the communications industry to spend millions of dollars. NARUC Petition at 3. NARUC requested an FCC inquiry because the plan ultimately implemented may favor particular industry players, because of the potential impact on ratepayers, and because of the need for broad industry-wide input into Bellcore's plans. Id. at 7-8.

The D.C. PSC agrees with NARUC and sets forth below its views as to the need for an inquiry.

II. AN INQUIRY INTO THE NANP IS NEEDED

In the D.C. PSC's view, the NANP is a vital national resource which is being severely stressed by ongoing telecommunications developments.

The D.C. PSC is aware that there are many new needs for telephone numbers. These stem from a number of services. For example, direct inward dialing requires telephone numbers to be assigned to various groups within a business. Selective ringing permits two telephone numbers to use the same subscriber loop. The use of computers and facsimile machines has increased the demand of telephone numbers dedicated to their use. The Integrated Services Digital Network (ISDN) has the potential of eight (8) individual telephone numbers for each basic line. Further, the introduction of 700, 800, 900, 950 and 976 numbers, call forwarding, cellular telephones, 911, PCN/PCS and 800 database services will free telephone numbers from a geographical address and result in demand of their own.

In the D.C. PSC's view, federal and state regulators have a responsibility to oversee the development of a new numbering plan to meet this demand which will balance the competing business interests of the Bell Operating Companies, interexchange carriers, independent local exchange carriers, and enhanced service providers, and yet protect the ordinary business and residential ratepayers. In order to do that, the regulators must be provided

with information as to the use of numbers, both current and projected; the need for relaxing or tightening the restrictions on numbers; and the effect on ratepayers both in financial terms and in terms of difficulties in learning new numbers and dialing procedures.

CONCLUSION

For all these reasons, the D.C. PSC submits that the FCC should grant NARUC's petition and institute a Notice of Inquiry.

Respectfully submitted,

PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA

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Of Counsel
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Date: December 20, 1991

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December, 1991, a copy of the foregoing "Comments of the Public Service Commission of the District of Columbia" was mailed, postage prepaid, to the parties below:

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DIVISION OF APPEALS
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Public Service Commission

December 18, 1991

VIA FEDERAL EXPRESS

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

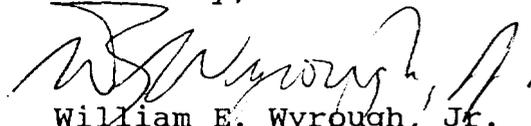
Re: In the Matter of The Administration of the North American
Numbering Plan - National Association of Regulatory Utility
Commissioner's Petition for Notice of Inquiry Addressing
Administration of the North American Numbering Plan
DA 91-1307

Dear Ms. Searcy:

On behalf of the Florida Public Service Commission, please
find enclosed an original and five copies of the Commission's
Comments. An extra Copy is also enclosed with a stamped, self-
addressed envelope; please date stamp and return.

Please contact me should you have any questions concerning
this matter.

Sincerely,


William E. Wyrrough, Jr.
Associate General Counsel

WEW/cjp
drsfcc.cjp

Enclosures

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C.

In the Matter of)

THE ADMINISTRATION OF THE NORTH)
AMERICAN NUMBERING PLAN)

DA 91-1307

National Association of Regulatory)
Utility Commissioner's Petition)
for Notice of Inquiry Addressing)
Administration of the North)
American Numbering Plan)

**COMMENTS OF THE
FLORIDA PUBLIC SERVICE COMMISSION**

BACKGROUND AND INTRODUCTION

At the National Association of Regulatory Commissioners (NARUC) 1991 Summer Meetings, a resolution was adopted by the Executive Committee which resolved that NARUC petition the Federal Communications Commission (FCC) to issue a Notice of Inquiry (NOI) to seek information regarding the many considerations and issues relevant to the administration of the North American Numbering Plan (NANP). NARUC subsequently filed a petition with the FCC on September 26, 1991, requesting that the NOI be initiated. On October 18, 1991, the FCC established a comment date of December 20, 1991, and a reply date of January 17, 1992, for all interested

The Florida Public Service Commission (FPSC), through its undersigned attorney, hereby files its comments in support of the NARUC petition seeking a Notice of Inquiry in the matter of the administration of the NANP. Economical and equitable implementation of the NANP is vitally important to the telecommunications industry, and to ratepayers who ultimately bear the burden of funding the project. Therefore, it is reasonable and appropriate for the FCC to provide a forum for all interested persons to express their concerns and ideas.

**WIDESPREAD INPUT AND COOPERATION IS ESSENTIAL
TO THE ADMINISTRATION OF A MODERN NANP**

Technology is rapidly outgrowing and pushing the limits of the current NANP. As new services and technologies are developed, administrative requirements to deploy, operate, and maintain the telecommunications networks become more complex. The number of codes needed to utilize the services is limited under the present Numbering Plan Area (NPA) scheme, and those limits are of great concern to the telecommunications industry as a whole. Therefore, long range planning and implementation of new dialing plans, which affect industry, national security, and consumers, should not rest with one industry group, such as Bellcore, without input from a broad base of knowledgeable parties.

The FPSC shares the concerns of NARUC which are outlined in petition to the FCC. The issues listed in the petition are comprehensive enough to warrant the establishment of an inquiry by the FCC. However, we would like to emphasize some areas which may

or may not be inherently included in NARUC's petition such as:

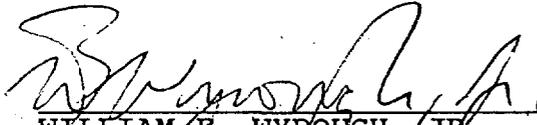
1. Sustaining universal service, particularly by smaller local exchange companies, in a manner that is economical and equitable. --- Whether it will be necessary to consider a funding mechanism to compensate the independent LECs for anticipated additional costs to implement a revised NANP?
2. Determining the impact of international telecommunications on the NANP. --- Whether there are advantages to having the NANP integrated as nearly as possible on a world-wide basis?
3. Establishing measures to minimize the manufacturing cost of the equipment necessary to upgrade the NANP, including customer owned equipment. --- Whether standardization should be encouraged?

The issues associated with the administration of the NANP are national and international in scope. A broad forum, which gives all interested persons a chance to participate in the development and resolution of these issues, should be established. This forum should be ongoing in order to ensure that an efficient and comprehensive plan is developed as technology evolves.

CONCLUSION

Florida, as a rapidly growing state, has a great public interest in the equitable, economic, and timely implementation of a new NPA scheme as part of the NANP. Accordingly, the FPSC supports NARUC's request that the FCC issue a Notice of Inquiry on the subject. The inquiry should seek information and comment regarding the many issues and considerations discussed in NARUC's petition, outlined in this comment, and all other concerns and questions relevant to NANP administration.

Respectfully submitted,



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FLORIDA PUBLIC SERVICE COMMISSION
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Tallahassee, Florida 32399-0850

Dated: December 18, 1991

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