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

Federal Communications Commission  
Office of the Secretary

In the Matter of )  
 )  
Administration of the ) Undocketed  
North American Numbering Plan )

COMMENTS OF THE  
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION

The National Telephone Cooperative Association ("NTCA") submits these Comments in response to the October 18, 1991, Public Notice establishing Pleading Cycles for Comments on a Petition for Notice of Inquiry filed by the National Association of Regulatory Utility Commissioners ("NARUC") on September 26, 1991. NTCA is a national association of over 490 small exchange carriers "ECs" providing telecommunications services to subscribers and interexchange carriers ("IXCs") throughout rural America. Its members are not client companies of Bellcore but have an interest in the efficient and fair administration of the North American Numbering Plan ("NANP").

NARUC's Petition requests that the Commission institute a Notice of Inquiry to seek information and comment on issues surrounding the exhaustion of a number of NANP codes. NARUC states that exhaustion is a concern with respect to Numbering Plan Area ("NPA") codes dialed by ratepayers, Automatic Number Identification Information (II) digits used in the processing of telephone calls, and Carrier Identification Codes ("CIC") digits dialed by ratepayers to reach specific purchasers of access

services. NARUC correctly points out that ratepayers are impacted by hardware and software changes necessitated by NANP exhaustion. The changes impose financial burdens and have the potential of imposing other burdens in the form of delays and service disruptions.

NTCA supports NARUC's request for a Notice of Inquiry. The shortage of NANP codes is an important issue upon which the Commission should remain adequately informed. While it is not yet clear whether any Commission intervention is needed to address NANP code exhaustion, NTCA believes that the public will benefit from an inquiry in which the Commission obtains specific information about issues surrounding exhaustion and administration of the plan.

The institution of an inquiry is consistent with the Commission's authority to obtain information about management, technical developments and improvements in wire and radio communications from carriers and others.<sup>1</sup> Accordingly, NTCA

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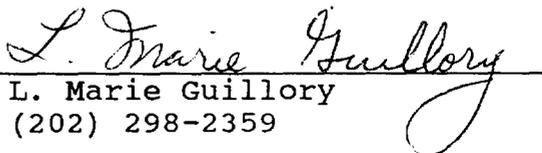
<sup>1</sup> See, Section 218 of the Communications Act of 1934 ("ACT"), 47 U.S.C. § 218, C.F.R. Section 7 of the Act, 47 U.S.C. § 157.

supports NARUC's request that the Commission begin a Notice of Inquiry to obtain information about the administration of the NANP and issues surrounding the potential exhaustion of some NANP codes.

Respectfully submitted,

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December 20, 1991

CERTIFICATE OF SERVICE

I, Rita H. Bolden, certify that a copy of the foregoing Comments of the National Telephone Cooperative Association regarding Administration of the North American Numbering Plan was served on this 20th day of December 1991, by first-class, U.S. Mail, postage prepaid, to the following persons on the attached service list:

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INFORMATION ANALYSIS  
SECTION

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

In the Matter of

National Association of  
Regulatory Utility Commissioners'  
Petition Addressing Administration  
of the North American Numbering  
Plan

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DA 91-1307

COMMENTS OF THE  
NYNEX TELEPHONE COMPANIES

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COMMENTS OF THE  
NYNEX TELEPHONE COMPANIES  
DA 91-1307

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## SUMMARY

The NYNEX Telephone Companies hereby comment on NARUC's request to the FCC to launch a Notice of Inquiry on a multitude of broad-ranging issues associated with the North American Numbering Plan. NARUC commendably raises an array of important numbering issues which merit examination, but those issues are so expansive and multifaceted that a single NOI would not be the suitable vehicle to address all of them. Those issues generally fall into three categories: already resolved (e.g., interchangeable NPAs and the expansion of Feature Group B Carrier Identification Codes); tentative resolution being sought with later FCC proceedings probably appropriate (e.g., central office code assignment guidelines); or premature to address in formal NOI since other issues must be resolved first (e.g., numbering with respect to Personal Communications Services). A number of the subjects posited by NARUC are currently being pursued in industry forums, e.g. standards bodies, with deliberation processes open to regulators and others. Procedurally, it would be preferable for the FCC to issue a series of NOIs and/or NPRMs as the industry groups complete the groundwork on various numbering issues. Each individual FCC docket should be specifically designed to cover well-defined issues.

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

In the Matter of )  
 ) DA 91-1307  
National Association of )  
Regulatory Utility Commissioners' )  
Petition Addressing Administration )  
of the North American Numbering )  
Plan )

COMMENTS OF THE  
NYNEX TELEPHONE COMPANIES

I. INTRODUCTION

New England Telephone and Telegraph Company and New York Telephone Company (the NYNEX Telephone Companies or NTCs) submit these Comments in response to the Commission's Public Notice issued October 18, 1991, in the above-captioned matter. That Public Notice solicited comment on a petition filed September 26, 1991, by the National Association of Regulatory Utility Commissioners (NARUC). The NARUC petition requested the FCC to establish a Notice of Inquiry (NOI) to seek information and comment on issues surrounding the North American Numbering Plan (NANP).

NARUC listed various numbering codes "of critical importance to the telecommunications industry in North America," including Numbering Plan Area (NPA) codes, Automatic Number Identification Information (II) digits, Carrier Identification Codes (CICs), Telecommunications Credit Card Issuers Identification codes (CIIDs), Interexchange Carrier Operator

access codes, Service Access Code 800 and 900 central office codes, and Signaling System 7 (SS7) signaling point codes (pp. 3-4). NARUC further described new codes required to be administered in North America for Signaling Network Identifier (ISNI), Public Switched Digital Service (PSDS), Personal Communications Services (PCS) and 800 Database (p. 4). NARUC indicated that the pending exhaust of a number of the codes raises a plethora of financial and customer service issues (pp. 4-5). Moreover, NARUC articulated ten other issues that it believes require the interest and attention of regulators, including: "[t]he costs . . . of . . . deploying interchangeable NPA codes"; "[t]he costs that may be appropriately allocated to a telecommunications service that consumes a limited resource"; "[t]he potential strategies for the deployment of telephone numbers and other NANP codes required to implement new services"; "[t]he examination of equitable plans for assigning NANP codes," etc. (pp. 5-7).

II. NARUC IS TO BE COMMENDED FOR IDENTIFYING MANY IMPORTANT NUMBERING ISSUES, AND CAREFUL THOUGHT SHOULD BE GIVEN TO THE BEST MEANS PROCEDURALLY TO EXAMINE THIS BROAD RANGE OF ISSUES

We commend NARUC for raising an array of important numbering issues deserving of consideration. But the breadth of those issues is so great that it would not be effective or efficient to launch a single NOI to address all of them. Several issues, such as those relating to interchangeable Numbering Plan Area Codes and the expansion of Carrier Identification Codes used with Feature Group B (FGB) service,

have been resolved in other proceedings or forums under the aegis and/or with the participation of regulators.<sup>1</sup> These issues relate to codes that are pending exhaust and for which the industry has devised, and is implementing, plans for code relief. An NOI at this point could inject uncertainty and jeopardize the timely provision of code relief.

Some of the other issues raised by NARUC are currently being pursued in industry bodies (e.g., Industry Carriers Compatibility Forum [ICCF] and T1 Committee of the Exchange Carrier Standards Association [ECSA]), with deliberation processes open to regulators and others. While these issues may well become ripe for future FCC consideration, it would be premature to begin formal proceedings now. Involvement by regulators in these bodies is substantial and welcome. Historically, the NTCs have valued the input of, and have worked closely with, their regulators with respect to numbering-related matters. For example, a task force under the leadership of the New York Public Service Commission Staff -- and including New York Telephone, various governmental and industry segments affected by numbering, and the NANP Administrator (NANPA) -- earlier this year resolved various issues surrounding the introduction of a new area code (917) to New York City.<sup>2</sup>

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1 See, e.g., letter dated October 4, 1991 from FCC Chief, Common Carrier Bureau to NYNEX presenting several questions on the NTCs' plans for implementing four-digit FGB CICs; and our October 31, 1991 response.

2 NY PSC Case 90-C-0347.

We stand ready to continue similar efforts, and the FCC should continue to encourage the industry-wide consensus approach to issue resolution. As the FCC's Common Carrier Bureau has observed with respect to numbering: "the complex technical issues could be solved best by cooperative efforts within the telecommunications industry."<sup>3</sup>

In the remainder of these Comments, the NTCs specifically address the status of the principal numbering issues raised by NARUC. Procedurally, the best course for the FCC to follow would be to issue a series of NOIs and/or NPRMs as the industry groups complete the groundwork on various numbering issues. Each individual docket should be tailored to selected, specific items.

### III. ISSUE-BY-ISSUE DISCUSSION

#### A. Conserving NPAs; Introduction Of Interchangeable NPAs

In 1947, when the country was divided into distinct NPAs utilizing ten-digit telephone numbers, there were 152 NPAs (i.e., area codes) available of the required format N(0 or 1)X.<sup>4</sup> Now, only three of these NPAs are left for assignment. The plan to increase the number of NPA codes as

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<sup>3</sup> Letter dated June 21, 1991 from Richard M. Firestone, Chief, Common Carrier Bureau to Thomas A. Saunders, Vice President, Operations Technology, Bellcore.

<sup>4</sup> N is any digit 2-9. X is any digit 0-9. The N00 NPA codes were reserved for other uses, such as the well-known 800 service numbers. The N11 codes were reserved for uses such as 911 emergency calling.

well as central office codes,<sup>5</sup> via interchangeable codes, was developed by AT&T in the early 1960s.<sup>6</sup> Interchangeable CO codes, i.e. of the same format as NPA codes, were introduced in the early 1970s. Interchangeable CO codes have forestalled NPA code exhaust from the 1970s to 1995. There are presently 30 NPAs utilizing interchangeable CO codes.

The NANPA notified the industry, in 1984, that Interchangeable NPAs (INPAs) -- i.e., of the same format as CO codes -- would need to be implemented by July 1995 in order to prevent exhaust and extend the supply of ten-digit telephone numbers for North America well into the next century. INPAs will make available an additional 640 area codes for assignment. Since this notification, many industry organizations such as the United States Telephone Association (USTA) have used various methods of informing and educating their members on INPAs. Based on the current demands being placed on the NANP, it has become necessary to implement INPAs by January 1, 1995. The telephone companies throughout North America, in addition to switch manufacturers, have been preparing for INPAs for quite some time.

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5 CO codes or NXXs.

6 This plan was designed to increase available telephone numbers of the ten-digit format in North America. Any change in the number of digits would mean implementing new numbering plans, a truly monumental change that the NANPA has sought to put off until sometime well into the 21st century. Virtually every type of data base in the NANP area and every data base in the world that stores a NANP address would have to be modified to accept a lengthened telephone number format.

It should be emphasized that INPAs represent the type of numbering change that must be arranged for well in advance. In order to not jeopardize the required expansion of NPAs, all industry participants must continue making all the necessary arrangements for INPA implementation. Therefore, to establish an NOI on INPAs would be unnecessary and might delay the implementation steps that are even now being taken to relieve the NPA exhaust.

B. Carrier Identification Codes

Any entity purchasing Feature Group B and/or D Trunk Side Access Service under the provisions of a local exchange carrier (LEC) Access Tariff is assigned a Carrier Identification Code (CIC).<sup>7</sup>

CICs were created prior to divestiture in an effort to respond to requests from Other Common Carriers (OCCs) for improvements in interconnection arrangements. CICs were subsequently used to meet the Equal Access requirements of the Modification of Final Judgment.

CICs are presently administered by the NANPA based upon guidelines developed through industry consensus at the ICCF. The ICCF has addressed the need to deal with the pending

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<sup>7</sup> Currently, the CIC is a three-digit code of the format XXX. The CIC is the last three digits of the customer-dialed Carrier Access Code (CAC). The CAC for Feature Group B (FGB) is 950-0XXX or 950-1XXX. The entity purchasing the access service may choose either a 1 or 0 in the 950 dialing scheme to precede the CIC. The CAC for Feature Group D (FGD) is 10XXX.

exhaust of CICs through several ICCF-sponsored workshops begun in April 1988. The NANPA has continually advised the FCC of developments in these workshops. A two-phase plan has been developed (with industry consensus) to forestall the exhaust. The first phase will split the administration of the FGB and FGD assignments and expand the FGB CIC to four digits. Three-digit FGB-only CICs can then be used for FGD CICs so that the exhaust date of FGD CICs will be delayed. Phase one will be implemented in the First Quarter of 1993. The second phase will expand the FGD CICs to four digits and will be implemented in the First Quarter of 1995.

The NANPA has developed reports, which also include FCC-required data on CIC conservation, that are submitted by the LECs and all the entities that receive CIC assignments. These reports provide needed information which allows the NANPA to track the actual usage of these codes and to reclaim codes as appropriate.

An ICCF-sponsored "CIC Workshop" is now developing the new CIC assignment guidelines which will be used by the NANPA to administer the assignment of the four-digit CICs. The participants include interexchange and local exchange carriers in both the United States and Canada. The NANPA has continued to keep the FCC informed of progress in the CIC expansion project. When the ICCF has completed its work, it will probably be appropriate for the FCC to issue an NOI to address CIC conservation issues that should apply to the new, four-digit CICs.

C. NXX Assignment Criteria

In response to a request by the FCC's Common Carrier Bureau, the NANPA is providing technical leadership in an industry effort to develop guidelines for NXX assignments administered by local telephone companies. The first phase of this effort is the development by February 1992 of "strawman" guidelines to serve as a basis for discussion by the industry in open forums. The "strawman" will be based upon informal contributions in December 1991 from major sectors of the industry that were solicited by the NANPA through ICCF. The second phase of the effort will be a series of meetings for detailed and open industry review, discussion and modification of the strawman proposal. The NANPA anticipates delivering a completed document to the FCC by July 1, 1992, for its analysis and action. The NANPA will, of course, make periodic informal progress reports to the Commission and Carrier Liaison Committee.

Thus, a full and open industry proceeding is already underway regarding NXX assignment guidelines. State regulators and all other interested parties are involved. The appropriate time for the FCC to establish any public comment proceeding in this context would be after the Commission receives the July 1992 NANPA submission.

D. Bellcore As NANPA

As NARUC noted (p. 3), under the judicially approved plan of the Bell System divestiture, Bellcore replaced AT&T as the NANPA. Under that plan, Bellcore has conscientiously exercised its role on numbering-related issues and other

matters. The NANPA function at Bellcore has been independent, and not controlled by any or all of its owners, the regional Bell companies. The NANPA has been very effective and impartial over the years, as reflected in NPA assignments, future NANP planning, CIC assignments and the FCC's current inquiry on NXX assignment guidelines, to name just several work efforts.

As numbering issues become more complex and the industry evolves, the Commission should set the necessary telecommunications numbering policies to guide the NANPA. But Bellcore as the NANPA has distinguished itself with its technical expertise, knowledge and experience in telecommunications numbering matters. With the FCC setting the policy direction, Bellcore is highly qualified to discharge the administration function for the numbering plan, and there is no need for an NOI in this area.

E. New Codes For PCS

Personal Communications Services (PCS) is in the very early stages of development, and has not yet been completely defined. Numbering for Universal Personal Telecommunications (UPT), which is closely related to PCS, is currently being addressed by standards organizations. At a national level, committee T1P1 -- which is part of the Standards Committee T1-Telecommunications -- is analyzing numbering alternatives. At the international level, the United States Department of State is working with the industry in order to reach agreement on the U.S. position. Upon establishment of a U.S. position, it

will be presented to the International Telegraph & Telephone Consultative Committee (CCITT) in an effort to finalize the international standards for UPT numbering.

The FCC has an open docket on PCS issues, and very recently held an en banc hearing, one goal of which was to more precisely define PCS. Given the evolving nature of PCS, it would be premature to initiate an NOI on PCS numbering. The above standards activities should continue and the FCC, if necessary, could conduct formal proceedings in the context of CC Docket No. 90-314.

F. II (ANI Information Digits)

Contrary to NARUC's belief (p. 4), there is no pending exhaust of II codes. The ICCF should continue to be the forum for addressing II code issues, and an NOI is not warranted on this point.

G. Methods To Reduce Demand For Scarce NANP Codes

The NTCs agree that an NOI could fruitfully explore this area at this time. Among other things, technical and administrative innovations based on SS7 capabilities may prove effective in facilitating the "split" of existing NXX codes as a means to recapture codes within NPAs. Furthermore, such an NOI could examine the CIC conservation issues noted earlier. And, the Commission could consider whether any additional monitoring reports are needed regarding the conservation of NANP resources.

IV. CONCLUSION

The FCC should recognize that effective mechanisms are underway to investigate many of the numbering issues posited by NARUC. The Commission should review numbering in a series of proceedings as individual issues become ripe for its action.

Respectfully submitted,

New England Telephone and  
Telegraph Company  
and  
New York Telephone Company

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Dated: December 20, 1991

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PACIFIC  TELESIS...  
Group - Washington

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DEC 20 1991

Federal Communications Commission  
Office of the Secretary

December 20, 1991

Donna R. Searcy  
Secretary  
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1919 M Street, N.W., Suite 222  
Washington, D.C. 20554

Dear Ms Searcy:

Re: *Administration of the North American Numbering Plan*

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "*Comments To The National Association of Regulatory Utility Commissioners' Petition For Notice of Inquiry Addressing Administration of the North American Numbering Plan (Common Carrier Bureau Public Notice, DA 91-1307, October 18, 1991)*" in the above proceeding.

Please stamp and return one copy to confirm your receipt. Please contact me should you have any questions concerning this matter.

Sincerely,



Enclosures 7