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UNITED TELECOMMUNICATIONS, INC.  
1850 M STREET, N.W., 11th FLOOR / WASHINGTON, DC. 20036 / (202) 857-1030

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JAY C. KEITHLEY  
VICE PRESIDENT - LAW / EXTERNAL AFFAIRS

DEC 20 1991

December 20, 1991

Federal Communications Commission  
Office of the Secretary

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

RE: In the Matter of Administration of the North American Numbering Plan  
DA-1307

Dear Ms. Searcy,

Attached are the original and five copies of the Comments of United Telecommunications, Inc. in the proceeding referenced above.

Sincerely,



Jay C. Keithley  
Vice President  
Law and External Affairs

Attachments

JCK/mlm

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DEC 20 1991

Federal Communications Commission  
Office of the Secretary

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

In the Matter of ) DA 91-1307  
 )  
Administration of the )  
North American Numbering Plan )

COMMENTS OF UNITED TELECOMMUNICATIONS, INC.

United Telecommunications, Inc. ("UTI") on behalf of the United Telephone System companies and US Sprint Communications Company Limited Partnership, hereby comments on the National Association of Regulatory Utility Commission's ("NARUC") Petition for a Notice of Inquiry.<sup>1</sup>

I. INTRODUCTION

NARUC has requested that the Commission institute an Inquiry concerning administration of the North American Numbering Plan ("NANP"). NARUC has identified several issues which it believes merit regulatory attention.

UTI supports NARUC's request for an inquiry into administration of the NANP. However, this inquiry should be limited to a review of the appropriateness of the administrative guidelines that are currently being drafted by Bell Communications Research ("Bellcore") at the direction of the FCC. In UTI's view, many of

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1. Public Notice, National Association of Regulatory Utility Commissioners Seeks Notice of Inquiry Addressing Administration of the North American Numbering Plan, DA 91-1307, released October 18, 1991.

the important issues which NARUC has identified are already being publicly examined by interested parties through participation in appropriate fora. Regulatory intervention at this stage in the development of solutions to NANP problems, absent a showing by some aggrieved party that proposed NANP solutions are unreasonable, would be untimely and would delay the ongoing critical process of developing solutions to pressing problems. Because Bellcore numbering assignment guidelines will govern the assignment and use of numbering resources, the Commission's focus should be on ensuring that such guidelines are unbiased and reasonable.

## II. DISCUSSION

UTI accepts the fact that the Commission has plenary jurisdiction over matters such as the NANP. However, UTI believes that as issues surrounding the NANP have surfaced in the past, the industry has acted responsibly in formulating solutions.<sup>2</sup> As long as the industry continues to act responsibly, a need for more active regulatory involvement, which could slow the development process, will not exist.

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2. The Commission, at times, has asserted its jurisdiction and has asked the industry to develop standards or solutions to identified problems. See, e.g., letter from Richard M. Firestone Federal Communications Commission, to Thomas A. Saunders, Bell Communications Research (June 21, 1991) (discussion of assignment to develop standards for the reservation of central office codes).

The industry has provided fora for public, industry, and user input into the development process surrounding NANP changes. For instance, the Exchange Carrier Standards Association ("ECSA") through its Carrier Liaison Committee provides three public fora which deal with issues related to the NANP: Industry Carriers Compatibility Forum ("ICCF"); Network Operations Forum ("NOF"); and Ordering and Billing Forum ("OBF"). Bellcore is also active in the industry and assists in standards leadership.<sup>3</sup>

UTI recognizes NARUC's concern that changes to the NANP will be costly,<sup>4</sup> especially to those LECs with a large amount of cross-bar switching. UTI believes that cross-bar switches will need to be replaced in order to implement interchangeable NPA ("INPA") codes. This requirement is not unreasonable because INPA code capability is now in the development phase and is scheduled to be ready for installation by the time changes to the NANP are needed. Because of the time needed to develop and implement changes to the NANP, UTI asserts that "alternative plans" are not timely and could not be developed and implemented in time

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3. Bellcore is owned by the seven Regional Bell Operating Companies. However, Bellcore does not operate in a vacuum and does consider the opinions and needs of others. For example, United and GTE recently expressed concerns with a Bellcore proposal dealing with network sectorization for carrier identification code ("CIC") expansion. Bellcore changed its proposal to recognize this industry input.

4. The costs which must be incurred in changes to the NANP may be allocated among jurisdictions. If questions concerning changes to existing allocation schemes arise, they could be addressed by the Joint Board recently proposed for access change allocation purposes.

to avert a NPA code exhaust. Thus, the industry should continue to implement INPA codes as currently planned.

While there is always a possibility that an industry will conceive plans which do not meet the needs of all participants or customers, absent a showing that consensus on problem solutions has not been reached, regulators should continue to abstain from intrusive exercise of their power over NANP matters. As long as industry fora concerned with NANP administration solicit and use input from all interested parties, including LECs, IXCs, other telecommunications providers, regulators and customers, to devise and implement an equitable solution, additional regulatory intervention is unnecessary.

UTI thus believes that regulators have sufficient access to information through the forum process and do not need to burden either themselves or the industry with additional monitoring reports regarding NANP administration.

By action of the FCC,<sup>5</sup> Bellcore, in consultation with representatives from various industry segments, has undertaken the preparation of guidelines that would govern the administration of the numbering resource. In monitoring the number assignment

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5. See infra fn. 2.

guidelines, the Commission must remain watchful that the following principles are applied:

1. NANP numbering resources are to be assigned on the basis of sound public policy.
2. All affected parties will be given the opportunity to provide input regarding the public policies, principles, and guidelines which govern the assignment and use of numbering resources.
3. The principles and guidelines pertaining to assignment and use of numbering resources will be published and available to all affected entities.
4. Principles, guidelines, and rules pertaining to the assignment and use of numbering resources will be fair to all affected parties.
5. Principles, guidelines, and rules pertaining to the assignment and use of numbering resources will be unbiased and applied to all affected parties equally.

6. Principles, guidelines, and rules pertaining to the assignment and use of numbering resources will not disadvantage or favor any specific group or class of affected entities.
7. While every attempt will be made to conserve numbering resources and minimize the cost and need to expand the availability of the resource, the goal of conservation will not be permitted to unduly impede the introduction of new services, capabilities, and features.

Upon completion and publication of the Bellcore guidelines, a Notice of Inquiry with the limited scope of ensuring that all stakeholders have recourse before the FCC to see that these principles are upheld is the most practical way to proceed in oversight of the NANP.

#### CONCLUSION

The Commission should initiate a limited Notice of Inquiry to review the Bellcore Numbering Assignment Guidelines, ensuring the full and fair treatment of all stakeholders. Overall, the current process of planning NANP changes is working well and need not be changed. Unless a significant lack of consensus develops, regulators should

not chill the current NANP development process through intrusive and time-consuming proceedings.

Respectfully submitted,  
UNITED TELECOMMUNICATIONS, INC.

By Jay C. Keithley  
Jay C. Keithley  
Leon Kestenbaum  
1850 M Street N.W.  
Suite 1100  
Washington, DC 20036  
(202) 857-1030

Norina Moy  
1850 M Street N.W.  
Suite 1110  
Washington, DC 20036  
(202) 828-7444

Its Analyst

W. Richard Morris  
P. O. Box 11315  
Kansas City, MO 64112  
(913) 624-3096

Its Attorneys

December 20, 1991

**CERTIFICATE OF SERVICE**

I, Melinda L. Mills, hereby certify that I have on this 20th day of December, 1991, sent via hand delivery a copy of the foregoing "Comments of United Telecommunications, Inc." DA-1307, filed this date with the Secretary, Federal Communications Commission, to the persons listed below:

Mary Green  
Industry Analysis Division  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W., Room 538  
Washington, D.C. 20554

Downtown Copy Center  
1919 M Street, N.W.  
Room 246  
Washington, D.C. 20554

  
Melinda L. Mills