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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 PACIFIC BELL AND NEVADA BELL TO THE
NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS'
PETITION FOR NOTICE OF INQUIRY ADDRESSING ADMINISTRATION
OF THE NORTH AMERICAN NUMBERING PLAN

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SUMMARY

The Pacific Companies support the Commission's consideration of numbering issues concerning the exhaust of scarce resources in the future, (1996 and beyond), and the cost recovery mechanisms, either to forestall exhaust or to compensate the local exchange carriers for the cost involved in avoiding exhaust. The Pacific Companies do not, however, believe the Commission needs to consider NPA exhaust. The industry has already addressed that issue in various industry forums, and the industry has spent time, energy, and dollars in implementing the solutions. Commission involvement now would be duplicative of industry efforts and would delay implementation efforts already in progress.

Since the NANP provides numbering resources to areas outside the United States, Commission involvement in many of the issues raised by NARUC could only be addressed on a piecemeal basis. That approach would result in a piecemeal solution which would upset the international coordination of numbering resources. For these reasons and the others raised herein, we do not believe the Commission would be wisely using its resources by opening a broad inquiry on numbering issues as suggested by NARUC in its Petition.

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I. INTRODUCTION.

Pursuant to the Commission's Notice, Pacific Bell and Nevada Bell (the "Pacific Companies") file these comments in response to the National Association of Regulatory Utility Commissioners' ("NARUCs'") Petition to Open a Notice of Inquiry on various numbering issues. In general, we do not believe such an inquiry is necessary concerning most of the issues raised by NARUC. However, the issues relating to future, (1996 and beyond), exhaust of codes and cost recovery should be examined by the Commission.

A. Background of NANP.

The North American Numbering Plan ("NANP") was devised by AT&T in the 1940s. At divestiture responsibility for administering the NANP was assigned to Bellcore by the Court in Amendment 33 of the Plan of Reorganization. Although NANP administration currently resides at Bellcore, the Pacific Companies believe that the NANP has always considered itself an independent arm of Bellcore and not subject to Bellcore or Bell Operating Companies ("BOC") control.

NARUC seeks a Notice of Inquiry to address various issues relating to the NANP, especially the responsibility for administering the assignment of various codes used by the telecommunications industry. Because these codes are a scarce resource, many of which are exhausting or threatening to exhaust, NARUC petitions the Commission to open an inquiry into various issues. The Pacific Companies do not believe a broad inquiry is necessary, and we will address each of the issues raised by NARUC.

As a preliminary matter, the Commission should note that the jurisdiction of the NANP is broader than the jurisdiction of the Commission. The NANP covers the United States, Canada, Bermuda, Puerto Rico, and some Caribbean nations; the Commission is responsible only for communications which originate and/or are received within the United States.¹ Therefore, the Commission's investigation into many of the issues raised by

¹ 47 U.S.C. 152.

NARUC could only offer partial solutions because its jurisdiction is less than the reach of NANP, which coordinates international numbering plans. For this reason, the industry should continue to manage these issues as it has in the past.

II. THE INTERCHANGEABLE NUMBERING PLAN AREA SOLUTION TO PREVENT EXHAUST IS CURRENTLY BEING IMPLEMENTED AND THE COMMISSION DOES NOT NEED TO SUBSTITUTE A NEW SOLUTION.

In 1962, AT&T, as administrator of the NANP, recognized that the limited supply of Numbering Plan Area ("NPA") codes would eventually exhaust. The concept of interchangeable codes was developed to maintain the existing numbering plan, and thus prolong the current 10-digit telephone number format (NPA-NXX-XXXX). A plan was established to minimize impacts on telecommunications users and the industry while increasing the supply of NPA and central office codes. This plan was disseminated to the industry.

In 1984, the NANP administrator notified the telecommunications industry that the supply of NPA codes was exhausting and announced that, by July 1, 1995, all telecommunications service providers must have completed preparations for the introduction of interchangeable NPAs ("INPA"). Subsequently, switching system requirements were defined in detail in Bellcore document TR-TSY-000064, Section 5.

In February 1991, NANP notified the industry that shifts in population and growth of new services were draining the supply of NPA codes more rapidly than anticipated in 1984. In

November 1991, the NANP administrator advised the industry to prepare for INPA by January 1, 1995.

One aspect of the interchangeable code concept, interchangeable central (CO) office codes, has already been effectively introduced in five California NPAs. This concept allows central office codes to be in the format of N-0/1-X, a format which traditionally was associated only with NPAs. The implementation of this solution in California has postponed the split of NPAs by two to four years.

The next phase of the interchangeable code plan is INPA. Like interexchangeable CO codes, INPA is a reasoned, practical approach to the problem of NPA exhaust. Customers will continue to recognize the 10 digit format, a standard currently embedded in IC networks and customer premises equipment (CPE). Also, some of the costs of INPA have already been expended as switch vendors have incorporated the INPA format into existing switch software upgrades.

The exhaust of NPAs is rapidly approaching, and the industry needs the available time to implement the solutions it has adopted. If an alternate design was now to be mandated by the Commission, it is possible that exhaust would occur prior to implementation of that alternate design. This is due to the relatively long planning, ordering, installing, and testing intervals necessary for taking action which affects all switches

and most CPE in the network. In the Pacific Companies, once a solution has been agreed upon, there is at least a two-year implementation period for ordering, installing and testing of switches and generics. Therefore, a mandated solution would throw the industry into turmoil by tossing out the industry solution and substituting a new solution that probably could not be implemented before exhaust occurs.

III. A NEW NUMBERING SCHEME IS NOT NECESSARY AND THE NANP CAN ACCOMMODATE NEW TECHNOLOGIES LIKE PCS.

NARUC seeks to have the Commission examine the effects of a new numbering scheme upon existing CPE and existing dialing patterns. It is unclear from the Petition what numbering scheme NARUC is referring to. However, the Pacific Companies continue to be proponents of uniform dialing and the existing NANP which can accommodate current and new technologies, such as PCS. As we stated in our reply comments in Docket 90-314,² the NANP is flexible enough to handle all new technologies and services. Important benefits of the continuing use of existing NANP resources are the full utilization of the existing telecommunications infrastructure, modernization of the infrastructure, and ubiquitous connectivity between PCS and other public switched network services.

² Reply Comments of Pacific Bell, Amendment of the Commission's Rules to Establish New Personal Communications Services, Gen. Docket No. 90-314, RM-7140, 7175.

NARUC also addresses the issue of dialing plans and their effect on ratepayers. The reasons there are not uniform dialing plans throughout the country are 1) technological limitations among various switch types (e.g., step-by-step switches), and 2) different rules on the implementation of dialing plans permitted by public utility commissions throughout the various states. The Commission would probably have difficulty solving these problems at the federal level. Therefore, although we support uniform dialing plans, we do not believe it would be efficacious for the Commission to open a proceeding to examine them.

IV. THE COMMISSION DOES NOT NEED TO INVESTIGATE THE NANP ADMINISTRATOR.

The Pacific Companies work closely with various industry participants regarding numbering issues. The NANP administrator also works closely with these groups. It is our experience that the NANP administrator seeks industry involvement and consensus on numbering issues. For example, the administrator attends various United States Telephone Association meetings regarding numbering, leads an ad hoc group under standards committee TI, co-chairs with the State Department an ad hoc group on UPT/PCS numbering, and acts as rapporteur of a International Telephone and Telegraph Consultative Committee ("CCITT") question on numbering. These activities demonstrate that the NANP administrator solicits and uses industry input in its processes. Consequently, there is no need for the FCC to investigate the NANP administrator.

V. THE NANP ADMINISTRATOR ASSIGNS CODES ON AN EQUITABLE BASIS.

NARUC seeks examination of NANP administrator's role in "equitable plans for assigning NANP codes" (including NPA codes, CIC codes, CIID codes, SAC codes, etc.). We do not believe that this is an area which the Commission needs to examine since the NANP administrator currently assigns codes on an equitable basis.

Consistency and uniformity are essential when assigning numbering resources. To that end, the industry has developed guidelines and procedures for the NANP administrator's use in assigning most of the codes listed by NARUC on p. 3 of its Petition. Because of the broad base of industry input to these assignment guidelines, all players in the industry are treated fairly. The NANP administrator administers codes in accordance with these guidelines. Further, as large users of many codes, particularly NPA codes, we know that the NANP administrator will not assign an NPA code unless various requirements are met. These requirements convince the NANP administrator that a new NPA is necessary. All of these procedures ensure the orderly, efficient, and equitable assignment of numbering resources.

VI. THE COMMISSION SHOULD PARTICIPATE IN DEVELOPING EXHAUST SOLUTIONS APPLICABLE BEYOND 1995. THE CURRENT INPA SOLUTION IS SATISFACTORY AND WILL MEET INDUSTRY NEEDS.

NARUC suggests that the Commission should examine methods that can be used to reduce the demand for scarce NANP

resources. We agree that the Commission should be involved to analyze and to implement methods for avoiding number exhaust. Number exhaust causes the industry to spend millions of dollars. For example, switches need to be reconfigured, or even replaced; software needs to be modified, and in some cases customer dialing patterns need to be changed. The Pacific Companies support any efforts which the Commission might undertake to address these costly problems.

However, while the Pacific Companies support the Commission's involvement in exhaust problems in the future, we do not think the Commission needs to address the impending exhaust of NPAs. As stated earlier, planning and implementing that expansion takes a number of years and a large commitment of capital. Therefore, the method the industry has chosen to remedy an exhaust should not be changed at the 11th hour. For example, the INPA proposal has been pending for many years and is being implemented nationwide. The Pacific Companies anticipate a two-year timeline for implementing INPA, including software modifications and installations. These two years do not include the years involved in planning, the discussions with vendors for software and generic modifications, and the other planning processes involved. Since the exhaust date for NPAs, and the implementation date for INPA, is calculated to be January 1, 1995, the Commission could not adequately address this issue in the very short timeline between now and January 1995.

In the Pacific Companies' case, planning and engineering disciplines have been addressing implementation of INPA for the last 3 years. The various network switching systems have been assessed for any required vendor software upgrades and, in fact, some switch types are compatible today with INPA due to previous planning by the vendors for local exchange carrier ("LEC") requirements. The current solution is satisfactory, and the Commission does not need to change it.

VII. THE COMMISSION SHOULD PARTICIPATE IN DEVELOPING COST RECOVERY SOLUTIONS.

Along with discussions relating to forestalling exhaust of numbering resources, the Pacific Companies also support the Commission's consideration of cost recovery issues. As stated above, number exhaust usually causes LECs to expend millions of dollars. Especially now, in the era of price cap regulation, the Pacific Companies must carefully monitor each and every cost.

One cost recovery mechanism could include a charge for the scarce resource, such as, a cost per code. Or, cost recovery could focus on the implementation costs expended by the LEC for expansion efforts. Perhaps several cost recovery mechanisms are worthy of the Commission's consideration. The Pacific Companies support such consideration as soon as possible.

VIII. ADDITIONAL MONITORING REPORTS ARE UNNECESSARY.

We do not believe the Commission needs additional monitoring reports of numbering resources. Currently, the NANP administrator monitors all phases of numbering which the NANP administers. An additional Commission reporting requirement would simply duplicate information currently submitted by the LECs to the NANP. The NANP administrator could share the current information with the Commission if the Commission feels that it is necessary. Additional and duplicative monitoring reports should not be required from the LECs.

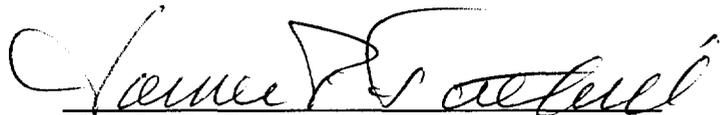
IX. CONCLUSION

The Pacific Companies support the Commission's consideration of numbering issues concerning exhaust of scarce resources beyond 1995, and cost recovery mechanisms, either to forestall exhaust, or to compensate the local exchange carriers for the cost involved in remedying an exhaust. We do not believe, however, the Commission needs to examine NPA exhaust, since the industry has already addressed that in various industry forums, and the industry has already spent time, energy, and dollars in implementing the solutions.

For the foregoing reasons, the Pacific Companies do not support a general notice of inquiry on numbering issues suggested by NARUC in its Petition.

Respectfully submitted,

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