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92-237

December 24, 1991

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

Federal Communications Commission
Office of the Secretary

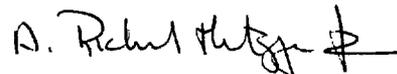
Re: Public Notice (DA)91-1307
Petition for Notice of Inquiry
Addressing Administration of
the North American Numbering Plan

Dear Ms. Searcy:

In accordance with my transmittal letter dated December 20, 1991, enclosed is the original of the comments of Telecom Canada in the above-referenced proceeding.

If you have any questions, please contact the undersigned.

Respectfully submitted,



A. Richard Metzger, Jr.

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OTTAWA, Ontario K1P 6H5

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Telecom  **Canada**
Nationwide Communications

P.G. Jollymore
Vice-President
(Network Development & Operations)

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Federal Communications Commission
Office of the Secretary

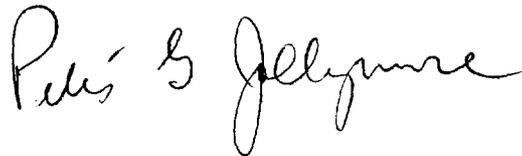
Federal Communications Commission
1919 M Street N.W.
Washington, D.C. 20554

Subject: Comments on FCC Public Notice DA 91-1307

Telecom Canada has actively participated in the North American Numbering Plan (NANP) since its inception in the late 1940's by interfacing with the NANP administration for legitimate Canadian NANP numbering requirements and representing its members on NANP issues in various U.S. fora. The existing industry processes have adequately addressed Telecom Canada's numbering requirements.

To the extent that the Federal Communications Commission (FCC) concludes that any Notice of Inquiry should be issued, Telecom Canada encourages the FCC to take into account the sensitivities of those NANP users that are under separate government and regulatory environments. To this end, Telecom Canada would like to participate in any further proceedings dealing with this issue.

Sincerely,



AGT
Bell Canada
B.C. Tel

Island Tel, PEI
Manitoba Telephone System
Maritime Tel & Tel
NBTel

Newfoundland Telephone
Sasktel
Telesat Canada

Schlichting POC
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Suite 301
Staten Island, New York
10311-1011
718 983 2000

Teleport Communications Group

FEDERAL BUREAU OF INVESTIGATION

DEC 23 3 21 PM '91

December 20, 1991

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Ms. Donna Searcy
Secretary
Federal Communications
1919 M St.
Room 222
Washington, D.C. 20554

Dear Ms. Searcy:

Attached is an original and five copies of the comments of Teleport Communications Group regarding the Petition of NARUC for a Notice of Inquiry regarding the administration of the North American Numbering Plan.

Sincerely,



J. Scott Bonney
Director Regulatory Affairs

1 Teleport Drive
Suite 301
Staten Island, New York
10311-10110
718 983 2000

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December 20, 1991

Teleport Communications Group

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

Re: Request for Comments regarding the Petition for Notice of Inquiry on the administration of the North American Numbering Plan file by the National Association of Regulatory Utility Commissioners.

Dear Ms. Searcy:

Teleport Communications Group (TCG) fully supports the request for a Notice of Inquiry regarding the future administration of the North American Numbering Plan (NANP) filed by the National Association of Regulatory Utility Commissioners (NARUC).

TCG currently operates seven separate local fiber optic networks providing high quality, reliable telecommunications service to users who rely critically on telecommunications for their business success. TCG agrees fully with NARUC that the current administration of the NANP is anachronistic and needs serious review in order to become effective for today's modern, competitive telecommunications marketplace. NARUC is correct in questioning whether the public interest is served by having Bellcore, which is financed and controlled by the Bell Operating Companies, remain the administrator of essential and scarce resources such as telephone numbers in an emerging competitive environment. The popular phrase "the fox guarding the hen-house" comes to mind immediately.

TCG recommends that the Commission solicit comments on whether Bellcore should continue to administer the assignment of telephone numbers in an increasingly competitive environment, and, if so, how to do so in a manner which does not prejudice or discriminate against competitors.

TCG urges the Commission to move forward expeditiously to address the numbering issues outlined by NARUC. Early resolution of these issues will send positive signals to the investment community and thereby stimulate investment in the nation's telecommunications infrastructure. Delay in resolving numbering

issues will dampen the investment interest in our nation's telecommunications sector and place at risk an efficient, modern, public telecommunications network.

NARUC is absolutely correct in emphasizing the importance of this numbering issue. Not only are telephone numbers a scarce commodity, but continued Bell Operating Company control over number assignments presents grave competitive risks as well. Truly competitive local telephone service, for example, will not occur unless consumers have a fair measure of sovereignty over their phone numbers. Number portability, where a consumer can assign his existing telephone number to the competitive local carrier of his choice is unlikely to occur under the present numbering administration scheme.

An analogy exists in the postal delivery business where federally assigned postal addresses and zip codes can be used by consumers to receive and send mail either through the U.S. Postal service or through a competitive delivery source such as Federal Express. Consumers do not need a "different" zip code or address to receive mail from a competitor of the Postal Service. Similarly, telecommunications consumers should be able to assign their existing phone numbers to a competitive local communications provider.

We urge the Commission to quickly initiate a Notice of Inquiry on this important issue, and to specifically consider the need for revisions to the existing number assignment system in light of developing competition for local telecommunications services.

Sincerely,


Robert C. Atkinson
Senior Vice President
Regulatory and External Affairs

cc: J. Schlichting
R. Pepper