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

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DEC 20 1991

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

DA 91-1307

Federal Communications Commission
Office of the Secretary

**COMMENTS IN SUPPORT OF
NARUC PETITION FOR NOTICE OF INQUIRY**

Allnet Communication Services, Inc ("Allnet"), supports the request of NARUC to begin an inquiry into which entity should properly administer the North American Numbering Plan (NANP). In addition to the ratepayer issues raised by NARUC, Allnet believes that the Commission should also address the antitrust questions that a Bellcore NANP raises -- particularly in light of the recent FCC proceeding involving local interconnection, CC Docket No. 91-141. Specifically, Bellcore's owners are all potential or actual competitors -- under the MFJ each is legally allowed to compete with the other for intraLATA business in any LATA in the country. However, ownership of Bellcore is limited exclusively to the BOCs and operates under the direction of the BOC "client companies." As a result, many of the Bellcore NANP proposals contain implicit bans on local competition between the various client companies, and between the client companies and alternative access providers. In effect, the NANP activities can, and are, used to maintain the intraLATA monopoly telecommunications market for each BOC. By NANP actions (and other Bellcore standards activities), the BOC's, by design, do not compete with each other.

Finally, the NOI should address the possibility of either the Commission

or a Joint Board handling the NANP policy decisions, with execution of that policy being handled by a Commission or Joint Board staff. Parallels to this type of government activity are found at the US State Department for similar international matters. It is time for the BOC's monopoly on NANP activities to end.

Respectfully submitted,
ALLNET COMMUNICATION SERVICES, INC



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Dated: December 20, 1991

Certificate of Service

I, Angela Ford, hereby certify that I have caused to be served on this date, December 20, 1991 a true copy of the forgoing Allnet Reply by postage-prepaid first class mail to the parties on the attached service list.

Angela Ford

December 20, 1991

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Washington, D.C. 20044

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Administration of the)
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COMMENTS OF AMERICAN TELEPHONE
AND TELEGRAPH COMPANY

Pursuant to the Commission's October 18, 1991 Public Notice,* American Telephone and Telegraph Company ("AT&T") submits these comments in support of the National Association of Regulatory Utility Commissioners' ("NARUCs'") petition for a notice of inquiry concerning the administration of the North American Numbering Plan ("NANP").

Since 1984, Bell Communications Research Corporation ("Bellcore"), a wholly owned subsidiary of the seven Regional Bell Holding Companies, has been the administrator of the NANP. In that capacity, Bellcore's responsibilities have included the assignment and management of various numbering codes and numbering schemes used in the telecommunications industry. For example, Bellcore has assigned and administered area codes, Carrier Identification Codes, and 800 service NXX codes, among others. As NARUC correctly recognizes

* Public Notice, DA 91-1307, dated October 18, 1991.

(p. 4), in the near future, a number of significant developments will require active consideration and resolution under the NANP, including, for example:

- the expansion of the NANP from 160 NPAs to 800 NPA/SACs;
- number assignments for new personal communications services and public switched digital services;
- issuance and management of 800 numbers in the new database access environment;
- the assignment of codes used to identify various Signaling System 7 networks as telecommunications services increasingly require the interconnection of these networks and the ability (using codes) to identify the originating, intermediate, and terminating networks for transmitted signals;
- coordination of NANP administration with international numbering plan management; and
- the potential exhaustion of certain codes.*

In light of these and other concerns, AT&T strongly supports NARUC's request that the Commission, in exercise of its oversight authority over the NANP, begin

* The Commission is aware, for example, of the potential depletion of available Carrier Identification Codes and is monitoring industry progress in developing recommendations for dealing with this concern. See, e.g., In re Application of OTI Corporation and MCI Communications Corporation for Consent to the Transfer of Control of Overseas Telecommunications, Inc., 6 FCC Rcd. 1611, 1614 (1991).

an inquiry into the NANP administration process and number and code assignment procedures.* Interested parties should be requested to provide comments on these concerns and to identify any other issues that could affect NANP administration. In addition, the Commission should solicit comments regarding the adoption of efficient nondiscriminatory procedures for the NANP administrator to follow in discharging its responsibilities.** Procedures for expeditious Commission resolution of NANP administration conflicts among industry participants or between industry participants and the NANP administrator should also be established.***

* The Commission has specifically found, for example, that it "has plenary jurisdiction over the allocation of NXX codes." In the Matter of the Need to Promote Competition and Efficient Use of Spectrum for Radio Common Carrier Services, 2 FCC Rcd. 2910, 2912 (1987) ("Cellular Interconnection Order").

** In the past, the Commission has, for example, recognized the use of inter-industry discussions as a possible means to resolve number assignment concerns. See, e.g., In the Matter of Provision of Access for 800 Service, 4 FCC Rcd. 2824, 2835 (1989) ("800 Access Order"). Inter-industry discussions can, however, be contentious and in the absence of an established process to handle disputes, may lead to no resolution at all or may achieve resolution only after unnecessary delay. The Commission has held that it has jurisdiction over such discussions and can mandate that they be conducted in good faith. Cellular Interconnection Order, 2 FCC Rcd. at 2912-13.

*** The Commission has also recognized its role as the ultimate arbiter of NANP administration conflicts using, for example, the complaint process. See, e.g., 800 Access Order, 4 FCC Rcd. at 2846 n.182.

Promptly formulating and adopting appropriate NANP administration and conflict resolution procedures will enable the Commission to ensure impartial and effective NANP administration, which will result in equitable availability of adequate numbering resources to all carriers in a competitive market. This, in turn, will further the Commission's statutory obligation to effectuate "a rapid, efficient, Nation-wide, and world-wide wire and radio communication service with adequate facilities at reasonable charges,"* and will ensure the uninterrupted provision of quality service to customers and the timely introduction of new services by all carriers.

* 47 U.S.C. § 151.

* * *

For all these reasons, the Commission should grant NARUC's petition and establish a notice of inquiry concerning future administration of the NANP and other vital numbering and code resources.

Respectfully submitted,

AMERICAN TELEPHONE AND TELEGRAPH COMPANY

By /s/ Francine J. Berry

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