

NANPA performs its number administration activities in a fair and even-handed fashion that, by intent and in practice, does not competitively advantage its owners over others, relying on available published guidelines and procedures that have been the subject of comment by the industry. NANPA works with the industry in domestic and international standards bodies and forums such as the Industry Carriers Compatibility Forum (ICCF), to gain consensus on number administration approaches, guidelines and procedures. NANPA's number administration decisions are public and can be challenged in the industry forums and before regulators. In this latter regard, the FCC has asserted plenary jurisdiction over numbering, which would include jurisdiction to entertain and resolve complaints, thus providing a remedy for any claimed inconsistency of NANPA activities and the public interest. Significantly, the Commission has not had to resolve such complaints.

In its numbering proposals in the industry bodies, and in its number administration activities generally, NANPA's primary objective has been to conserve limited numbering resources and to delay or avoid their exhaustion where possible, in recognition that expansion of numbering resources can be costly, with the costs of such expansion ultimately borne by ratepayers.

There appears to be an implication in several of NARUC's proposed subjects for the inquiry that NANPA is not adequately seeking to minimize costs and conserve numbering resources, that it is improperly conferring competitive advantages on its owners, or that NANPA is not considering the needs of all sectors of telecommunications.* These concerns have no basis in fact.

As noted NANPA seeks input and comment from interested industry participants on proposed approaches and procedures. Examples of this include: seeking comment on the Interim 800 NXX Assignment and CIC Assignment guidelines NANPA follows when assigning 800-NXX and CIC codes; working in ICCF committees to gain consensus on revised CIC Assignment guidelines to govern expanded CICs in the future; and working with the industry to prepare a framework for the long range evolution of the NANP.** These open processes have provided and continue to provide the public, the industry and regulators an opportunity for their concerns on cost, conservation, competitive advantage, and numbering needs to be made known to and accommodated by NANPA. Furthermore, NANPA operates "in a fishbowl," with its decisions

* NARUC Petition, 5-7.

** To prepare the long range framework, NANPA has been soliciting significant input from all major sectors of the telecommunications industry, as a basis for a proposed long range plan to address evolution of the NANP through the year 2025. A proposed plan will be made available in the near future to the industry and regulators as a basis for discussion, comment, further work and refinement.

known by affected industry participants who can readily seek remedies from regulators. Thus, there is no need or basis for instituting a broad inquiry to address issues such as these, as proposed in the NARUC Petition. The existing procedures and regulatory remedies adequately address these concerns.

On the other hand, a numbering-related inquiry could prove salutary for other reasons. For example, as the Commission is aware, although AT&T before divestiture, and NANPA since 1984, publicized for more than ten years plans to institute in 1995 interchangeable NPA codes (that is, area codes that can have any digit as the second digit, rather than today's zero or one), until fairly recently smaller Independent telephone companies may not have been aware of such plans.

At least one such company, Whidbey Island Telephone Company, complained informally to NARUC about the long-planned introduction of interchangeable NPAs (although we understand that Whidbey is quite capable of implementing them in its stored program controlled switches) and this may be the basis for the Independent telephone company-related subjects in the NARUC petition.* NANPA is working to improve coordination with Independent telephone companies, and is seeking their participation in the industry forums and consensus processes. An

* E.g., NARUC Petition, 7 (Independent telephone companies' switching equipment and reconfiguration costs).

FCC inquiry could serve to heighten the interest of Independents in so participating.

Similarly, while NANPA has on request briefed FCC and NARUC personnel on pending numbering issues and proposals for their resolution that are under consideration by NANPA and the industry, this may not have provided some NARUC members the opportunity they appear to be seeking to have input to numbering decisions. To the extent that numbering decisions are national in scope and ultimately within the jurisdiction of the FCC, state regulatory views can be made known to the Commission through comments in FCC proceedings. However, for those issues that are resolved by industry consensus, NARUC has not participated in the informal industry processes that NANPA uses to gain consensus and may regard the periodic briefings its staff receive from NANPA as insufficient. An FCC inquiry could serve as a vehicle for NARUC members to articulate views on numbering issues more explicitly, but without unduly bogging down number administration in overregulation.

Analogously, the Commission in the mid-1980s opened an inquiry into Integrated Services Digital Networks in part to stimulate broad-based participation in ISDN decisionmaking by United States interests that were potentially affected, to provide a clearinghouse for dissemination of ISDN developments, and to provide a forum in which the FCC and its staff might be sensitized to ISDN policy ramifications that might not otherwise be readily apparent. The Commission noted that industry bodies

and State Department advisory committees provided a forum for governmental and private sector entities to participate in ISDN decisions, but that many entities that could be significantly affected by ISDN planning may have been unaware of the nature and importance of these processes and may not have committed resources for effective participation. The ISDN inquiry was intended to stimulate and promote more effective participation in the informal processes by those who would ultimately be affected by their outcome. Integrated Services Digital Networks, 98 FCC2d 249, 252-53 (1984).* The ISDN inquiry apparently achieved these goals, since the FCC has not been called upon to resolve ISDN-related issues since then while domestic and international ISDN planning has proceeded.**

In the view of NANPA, a numbering inquiry could serve a comparable function. It is important, however, to structure any such inquiry so that during its pendency there is no impediment to the ability of the industry to plan for and implement those changes that are needed. CIC codes and NPAs, for example, will be exhausting, and plans for CIC expansion and introduction of

* While some commenters wished the Commission explicitly to regulate the development of ISDN and supplant the less formal industry processes then underway, the Commission wisely decided to promote the effectiveness of these informal processes instead. See, 98 FCC2d at 285-88.

** In its 1984 report, the Commission decided not to terminate the ISDN proceeding, to provide a procedural vehicle for future inquiry on significant issues raising policy concerns that might arise. 98 FCC2d at 288-89.

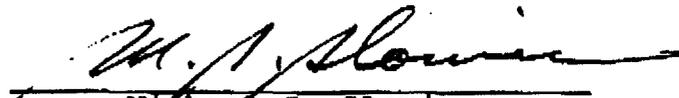
interchangeable NPAs must be made and begin to be implemented years in advance if exhaustion is to be avoided.

In summary, NARUC has presented no basis for instituting an inquiry to address speculative (and baseless) concerns that NANPA may not be adequately seeking to minimize costs and conserve numbering resources, that it may be improperly conferring competitive advantages on its owners, or that it may not be considering the needs of all sectors of telecommunications. NANPA denies that any such bases exist. NANPA takes very seriously its mission to promote the public's broad interest by conserving numbering resources when possible, and by administering them in a fair, even-handed manner, as it has done since divestiture. As outlined previously, it may be appropriate to institute an inquiry for other reasons, and NANPA is prepared to file detailed substantive comments should the Commission decide to do so.

Respectfully submitted,

BELL COMMUNICATIONS RESEARCH, INC.

By:


Michael S. Slomin

Its Attorney

VERIFICATION

STATE OF NEW JERSEY)
) ss:
COUNTY OF ESSEX)

Ronald R. Conners, being duly sworn, deposes and says:

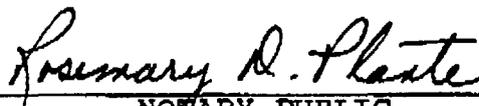
1. I am Director, NANP Administration of Bell Communications Research, Inc. (Bellcore) and supervise administration of the North American Numbering Plan and related numbering resources.

2. I have read the foregoing "Comments of Bell Communications Research, Inc. (Bellcore) as Administrator of the North American Numbering Plan" and, based on my own personal knowledge and on information provided to me, I believe that all statements of fact therein are true.



RONALD R. CONNERS

Sworn to before me this 20th day of December, 1991.



NOTARY PUBLIC

ROSEMARY D. PLANTE
Notary Public of New Jersey
My Commission Expires 12/17 1995

(SEAL)