

14M 92-237  
DA 91-1307

ORIGINAL

ORIGINAL RECEIVED

FILE

SEP 26 1991

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

Federal Communications Commission  
Office of the Secretary

In the Matter of  
Administration of the  
North American Numbering Plan

Undocketed

NATIONAL ASSOCIATION OF  
REGULATORY UTILITY COMMISSIONERS'  
PETITION FOR NOTICE OF INQUIRY ADDRESSING ADMINISTRATION OF THE  
NORTH AMERICAN NUMBERING PLAN

PAUL RODGERS  
General Counsel

CHARLES D. GRAY  
Assistant General Counsel

JAMES BRADFORD RAMSAY  
Deputy Assistant General Counsel

National Association of  
Regulatory Utility Commissioners

1102 ICC Building  
Post Office Box 684  
Washington, D.C. 20044

(202) 898-2200

September 26, 1991

NATIONAL ASSOCIATION OF  
REGULATORY UTILITY COMMISSIONERS'  
PETITION FOR NOTICE OF INQUIRY ADDRESSING ADMINISTRATION OF THE  
NORTH AMERICAN NUMBERING PLAN

In the Matter of Administration of the  
North American Numbering Plan

Undocketed

TABLE OF CONTENTS

I.	INTEREST OF NARUC.....	2
II.	NEED FOR ACTION.....	2
III.	REQUESTED FCC RESPONSE AND CONCLUSION.....	7
VI.	APPENDIX A.....	9

RECEIVED

SEP 26 1991

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

Federal Communications Commission  
Office of the Secretary

In the Matter of  
Administration of the  
North American Numbering Plan

Undocketed

NATIONAL ASSOCIATION OF  
REGULATORY UTILITY COMMISSIONERS'  
PETITION FOR NOTICE OF INQUIRY ADDRESSING ADMINISTRATION OF THE  
NORTH AMERICAN NUMBERING PLAN

Pursuant to Sections 1.41, 1.49, and 1.401 of the Federal Communications Commission's ("FCC" or "Commission") Rules of Practice and Procedure, 47 C.F.R. Sections 1.41, 1.49, and 1.401 (1991), the National Association of Regulatory Utility Commissioners ("NARUC") respectfully requests that the Commission establish a Notice of Inquiry ("NOI") to seek information and comment concerning the issues surrounding the North American Numbering Plan ("NANP"). In support of this request, NARUC states as follows:

I.

**INTEREST OF NARUC**

NARUC is a quasi-governmental nonprofit organization founded in 1889. Members include those governmental bodies responsible for regulating carriers and utilities in all fifty States, the District of Columbia, Puerto Rico, and the Virgin Islands. NARUC's mission is to improve the quality and effectiveness of public utility regulation in America. Specifically, NARUC is composed of, inter alia, State and territorial officials charged with regulating telecommunications common carriers within their respective borders. These officials have the obligation to assure that telecommunications services and facilities required by the public convenience and necessity are established, and that service is furnished at just and reasonable rates.

The serious and unresolved issues concerning the current plan's future implementation will, if left unresolved, seriously impact upon NARUC members' ability to adhere to their respective mandates to serve the public interest.

II.

**NEED FOR ACTION**

In 1983, as a result of federal court approval of a consent decree settlement of a Department of Justice antitrust suit against

the American Telephone and Telegraph Company ("AT&T"), AT&T, inter alia divested itself of its local exchange operations and the Bell Communications Research Corporation ("Bellcore") was created. Under the approved plan of divestiture, Bellcore replaced AT&T as administrator of the NANP for the telephone industry.

Currently, Bellcore administers the assignment of various numbering codes that are of critical importance to the telecommunications industry in North America. In some cases, administrative guidelines are provided by industry groups such as the Industry Carrier Compatibility Forum ("ICCF"). These numbering codes include:

- 1 - Numbering Plan Area ("NPA") codes dialed by ratepayers;
- 2 - Automatic Number Identification Information (II) digits used in the processing of telephone calls;
- 3 - Carrier Identification Codes ("CIC") dialed by ratepayers to reach specific purchasers of access services;
- 4 - Telecommunications Credit Card Issuers Identification codes ("CIID") used in the routing of credit card calls;
- 5 - Interexchange Carrier Operator access codes;
- 6 - Service Access Code 800 central office codes;
- 7 - Service Access Code 900 central office codes;
- 8 - Signaling point codes used as addresses in Signaling System 7 ("SS7") signaling messages; and

It is also clear that Bellcore or some other organization will have to assume the responsibility for administering the assignment of new codes required by the telecommunications industry in North America, including:

- 1 - Intermediate Signaling Network Identifier ("ISNI") codes used to identify the SS7 signaling network required to carry some SS7 messages;
- 2 - Number assignments for the Public Switched Digital Service ("PSDS") offerings;
- 3 - Number assignments for personal communications services, e.g., numbers will be assigned to individuals rather than locations; and
- 4 - Number assignments and administration of the 800 Database pending approval by the FCC.

The pending exhaustion of a number of the codes, including the NPA codes, CIC codes, and II codes, is causing the communications industry to spend untold millions of dollars to devise and eventually implement the chosen solutions. Indeed, many state commissions, with their undeniable interest in and control over local dialing procedures, have already had to go through the process of converting to interchangeable office codes. [Prior to

divestiture, local telephone companies administered assignment of NXX codes with state commission oversight. Thus, Bellcore did not acquire this responsibility and local companies have continued to deal with NXX code changes.] This stopgap measure has been used in NPA's that are running out of office codes because there are no additional NPA's.

The financial burden of administering the NANP and making hardware and software changes throughout the industry to accommodate changes in the NANP ultimately falls on business and residential ratepayers. These ratepayers face confusion and disruption in adapting to changes in the NANP caused by the exhaustion of various numbering codes. For example, among the likely disruptions if interchangeable NPAs and NXXs are implemented are (i) delays in processing intra-NPA calls and (ii) an increased likelihood of wrong numbers due to customer dialing patterns or procedures, e.g., customer hesitation between dialing the digits of a phone number could result in a wrong number. Aside from the ultimate impact on ratepayers, other critical considerations and issues surrounding the exhaustion of the present NANP codes necessitate regulators' interest and attention including:

- 1 - The costs to the telephone companies and the ratepayers of creating and deploying a system of interchangeable NPA codes or any alternative plan to address the NPA code exhaust;

- 2 - The costs that may be appropriately allocated to a telecommunications service that consumes a limited resource, such as a telephone number or CIC code, that will eventually cost many millions of dollars to replenish;
- 3 - The effects a new numbering scheme may have upon the differing types of existing customer premises equipment and the dialing patterns familiar to ratepayers;
- 4 - The potential strategies for the deployment of telephone numbers and other NANP codes required to implement new services including PCSs;
- 5 - The possible competitive advantage to the Regional Bell Operating Companies of having Bellcore as the NANP Administrator;
- 6 - The examination of equitable plans for assigning NANP codes among the competing interests such as the Bell Operating Companies, the Independent Operating Companies, the Interexchange Carriers, the Enhanced Service Providers, Cellular Mobile Carriers, and emerging PSC providers;
- 7 - The examination of methods that may be used to reduce the demand for scarce NANP codes, or to augment the existing supply of telephone numbers, such as central office

code-sharing and reclaiming unused telephone numbers, or some combination of the above;

- 8 - The establishment of additional monitoring reports that could be used by regulators to exercise oversight, decide public policy, and inform the public;
- 9 - The examination of technically feasible alternatives, available today or in the future to the plan developed in the 1960's for the exhaust of the current NPA coding scheme; and
- 10 - The examination of any final proposal to assure that it includes an appropriate consideration of the independent telephone companies' switching equipment and reconfiguration costs.

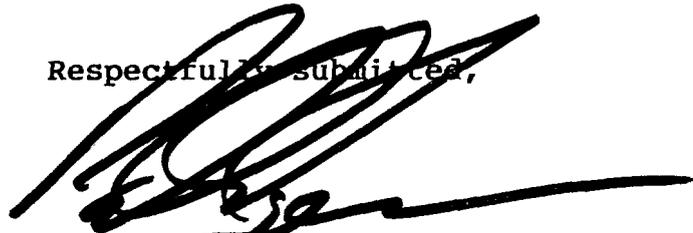
### III.

#### CONCLUSION AND REQUEST FOR ACTION

Accordingly, (1) because it is possible that the plan ultimately implemented may promote or favor particular industry players, [e.g., the Bell Operating Companies or particular equipment/software manufacturers], in cellular, paging, bypass, personal communications systems, or even local service - when and if that becomes truly competitive, (2) because of the potential impact on ratepayers and the clear need, which even Bellcore acknowledged in its July 19, 1991 letter to the FCC, for the

"...views of state regulators..." user and other affected telecommunications industry groups to "...be taken in account in any industry-wide efforts [Bellcore] undertake[s], and (3) because the FCC entertains complaints and concerns regarding industry decisions which have been made and are being made with respect to the national numbering plan, NARUC respectfully requests that the FCC issue a Notice of Inquiry, seeking information and comment regarding the many considerations and issues discussed above as well as any additional concerns and questions relevant to NANP administration.

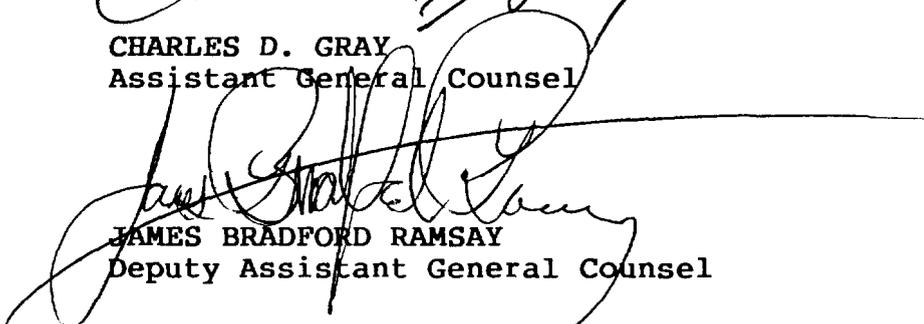
Respectfully submitted,



PAUL RODGERS  
General Counsel



CHARLES D. GRAY  
Assistant General Counsel



JAMES BRADFORD RAMSAY  
Deputy Assistant General Counsel

National Association of  
Regulatory Utility Commissioners

1102 ICC Building  
Post Office Box 684  
Washington, D.C. 20044

(202) 898-2200

September 26, 1991

**NATIONAL ASSOCIATION OF  
REGULATORY UTILITY COMMISSIONERS'  
PETITION FOR NOTICE OF INQUIRY ADDRESSING ADMINISTRATION OF THE  
NORTH AMERICAN NUMBERING PLAN**

**In the Matter of Administration of the  
North American Numbering Plan**

**Undocketed**

**APPENDIX A**

**NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONER'S**

**JULY 24, 1991**

**RESOLUTION REQUESTING THE FEDERAL COMMUNICATIONS COMMISSION TO  
INITIATE AN INQUIRY INTO THE ADMINISTRATION OF  
THE NORTH AMERICAN NUMBERING PLAN**

**Resolution Requesting the Federal Communications Commission  
to Initiate an Inquiry into the Administration of the  
North American Numbering Plan**

**WHEREAS**, The Bell Communications Research Corporation (Bellcore) was created in 1983 as a result of the Modified Final Judgement (MFJ) between AT&T and the United States Department of Justice; and

**WHEREAS**, The Plan of Reorganization stipulated that Bellcore should be in charge of administration of the North American Numbering Plan (NANP) for the telephone industry; and

**WHEREAS**, Bellcore (NANP group and other groups) administers the assignment of various numbering codes that are of critical importance to the telecommunications industry in North America. In some cases, administrative guidelines are provided by industry groups such as the Industry Carrier Compatibility Forum (ICCF). These numbering codes include:

- 1-Numbering Plan Area (NPA) codes dialed by ratepayers;
- 2-Automatic Number Identification Information (II) digits used in the processing of telephone calls;
- 3-Carrier Identification Codes (CIC) dialed by ratepayers to reach specific purchasers of access services;
- 4-Telecommunications Credit Card Issuers Identification codes (CIID) used in the routing of credit card calls;
- 5-Interexchange Carrier Operator access codes;
- 6-Service Access Code 800 central office codes;
- 7-Service Access Code 900 central office codes;
- 8-Signaling point codes used as addresses in Signaling System 7 (SS7) signaling messages; and

**WHEREAS**, Bellcore (or some other organization) will be responsible for administering the assignment of new codes required by the telecommunications industry in North America, including:

- 1-Intermediate Signaling Network Identifier (ISNI) codes used to identify the SS7 signaling network required to carry some SS7 messages;
- 2-Number assignments for the Public Switched Digital Service (PSDS) offerings;
- 3-Number assignments for developing personal communications services (PCS) so that telephone numbers will be assigned to individuals

rather than locations;

4-Number assignments and administration of the 800 Database pending approval by the FCC and the MFJ court; and

**WHEREAS**, The pending exhaust of a number of the codes, including the NPA codes, CIC codes, and II codes, is causing the telecommunications industry to spend untold millions of dollars to devise and eventually implement the chosen solutions; and

**WHEREAS**, The financial burden of administering the NANP and making hardware and software changes throughout the industry to accommodate changes in the NANP ultimately flows to the ratepayers; and

**WHEREAS**, Both business and residence ratepayers face confusion and disruption in adapting to changes in the NANP caused by the exhaust of various numbering codes; and

**WHEREAS**, There are critical considerations and issues surrounding the exhaustion of the present NANP codes that necessitate regulators' interest and attention such as:

- 1-The costs to the telephone companies and the ratepayers of creating and deploying a system of interchangeable NPA codes or any alternative plan to address the NPA code exhaust;
- 2-The costs that may be appropriately allocated to a telecommunications service that consumes a limited resource, such as a telephone number or CIC code, that will eventually cost many millions of dollars to replenish;
- 3-The effects a new numbering scheme may have upon the differing types of existing customer premises equipment and the dialing patterns familiar to ratepayers;
- 4-The potential strategies for the deployment of telephone numbers and other NANP codes required to implement new services including PCSs;
- 5-The possible competitive advantage to the Regional Bell Operating Companies of having Bellcore as the NANP Administrator;
- 6-The examination of equitable plans for assigning NANP codes among the competing interests such as the Bell Operating Companies, the Independent Operating Companies, the Interexchange Carriers, the Enhanced Service Providers, Cellular Mobile Carriers, and emerging PSC providers;
- 7-The examination of methods that may be used to reduce the demand for scarce NANP codes, or to augment the existing supply of telephone numbers, such as central office code-sharing and reclaiming unused telephone numbers, or some combination of the above;

8-The establishment of additional monitoring reports that could be used by regulators to exercise oversight, decide public policy, and inform the public;

9-The examination of technically feasible alternatives, available today or in the future to the plan developed in the 1960's for the exhaust of the current NPA coding scheme;

**WHEREAS**, The FCC entertains complaints and concerns regarding industry decisions which have been made and are being made with respect to the national numbering plan; now, therefore, be it

**RESOLVED**, That the Executive Committee of the National Association of Regulatory Commissioners (NARUC), convened at its Summer Meeting in San Francisco, California, requests that the FCC issue a Notice of Inquiry, seeking information and comment regarding the many considerations and issues surrounding the NANP expressed herein; and be it further

**RESOLVED**, That the Notice of Inquiry also invite comment on any additional concerns and questions that may be relevant to the administration of the NANP.

---

Sponsored by the Committee on Communications

Adopted July 24, 1991

Reported NARUC Bulletin No. 31-1991, pages 3-5 (August 5, 1991).

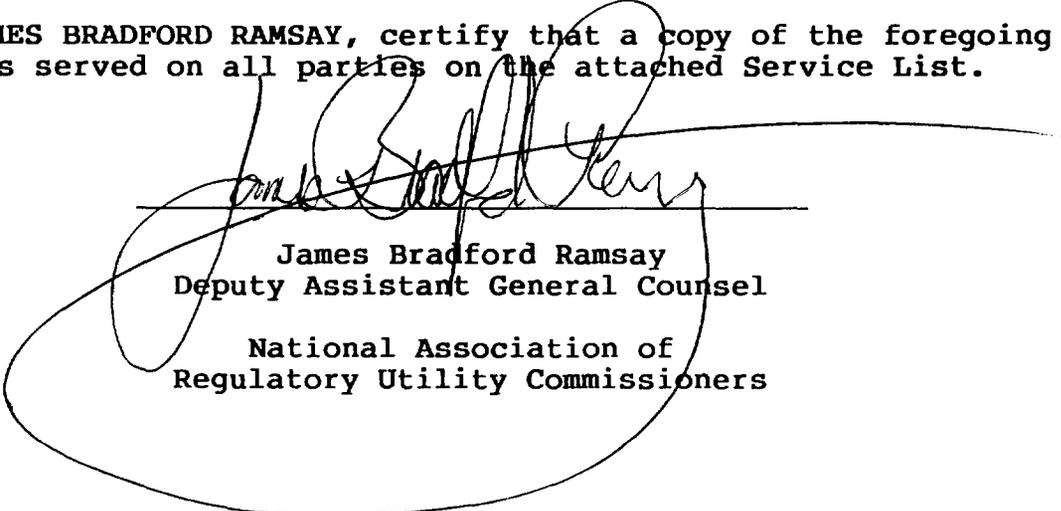
**NATIONAL ASSOCIATION OF  
REGULATORY UTILITY COMMISSIONERS'  
PETITION FOR NOTICE OF INQUIRY ADDRESSING ADMINISTRATION OF THE  
NORTH AMERICAN NUMBERING PLAN**

**In the Matter of Administration of the  
North American Numbering Plan**

**Undocketed**

**CERTIFICATE OF SERVICE**

**I, JAMES BRADFORD RAMSAY, certify that a copy of the foregoing  
was served on all parties on the attached Service List.**



**James Bradford Ramsay  
Deputy Assistant General Counsel**

**National Association of  
Regulatory Utility Commissioners**

**September 26, 1991**

In the Matter of the Administration of LEC Interstate Access  
Revenue Pools

Undocketed

SERVICE LIST

BY HAND DELIVERY

FCC COMMISSIONERS

Chairman Alfred C. Sikes  
Federal Communications Commission  
1919 M Street, N.W., Room 844  
Washington, D.C. 20554

Commissioner James H. Quello  
Federal Communications Commission  
1919 M Street, N.W. Room 802  
Washington, D.C. 20554

Commissioner Andrew C. Barrett  
Federal Communications Commission  
1919 M Street, N.W., Room 844  
Washington, D.C. 20554

Commissioner Sherrie P. Marshall  
Federal Communications Commission  
1919 M Street, N.W. Room 826  
Washington, D.C. 20554

Commissioner Ervin S. Duggan  
Federal Communications Commission  
1919 M Street, N.W., Room 832  
Washington, D.C. 20554

OTHER FCC PERSONNEL

Richard Firestone  
Chief  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W., Room 500  
Washington, D.C. 20554

James W. Spurlock (632-6910)  
Special Assistant to the Chief  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W. Room 500  
Washington, D.C. 20554

BY FIRST CLASS UNITED STATES MAIL, POSTAGE PREPAID:

FCC's Document Service

Downtown Copy Center  
1114 21st Street, N.W.  
Washington, D.C. 20036

## Courtesy Service List

### STATE COMMISSIONS

Mary Newmeyer (205-242-5209)  
Advisory Staff  
Alabama Public Service Commission  
One Court Square, Suite 313  
P.O. Box 991  
Montgomery, AL 36101-0991

Samuel Loudenslager (501-682-1453)  
Arkansas Public Utility Commission  
1000 Center Street  
P.O. Box 400  
Little Rock, Arkansas 72203-0400

Ellen LeVine\* (415-557-2381)  
Mark Fogelman (415-557-2563)  
California Public Utility Commission  
505 Van Ness Avenue  
San Francisco, California 94102

Commissioner Nancy M. Norling (302-652-5377)  
2409 Willard  
Wilmington, Delaware 19806

Peter G. Wolfe,\* Attorney (202-626-5100)  
D.C. Public Service Commission  
450 Fifth Street, N.W.  
Eighth Floor  
Washington, D.C. 20001

David E. Smith, Director of Appeals  
Mr. Bill Wyrrough,\* Attorney (904-488-7464)  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0862

Mark A. Jamison (515-281-5611)  
Utility Specialist  
Iowa Utilities Board  
Lucas State Office Building  
Des Moines, Iowa 50319

Elisabeth H. Ross (202-659-5800)  
Washington Counsel for IUB  
Birch, Horton, Bittner, & Cherot  
1155 Connecticut, N.W. # 1200  
Washington, D.C. 20036

William H. Smith, Chief (515-281-5469)  
Allan Kniep, Esquire\*  
Mary J. Street, Senior Analyst  
Bureau Rate & Safety Evaluation  
Iowa Utilities Board  
Lucas State Office Building  
Des Moines, Iowa 50319

John M. Glynn, Esquire  
Maryland People's Counsel  
231 East Baltimore Street  
Ninth Floor  
Baltimore, MD 212020

Ronald G. Choura\* (517-334-6240)  
Marilyn M. Moore  
Office of Planning, Policy & Evaluation  
Michigan Public Service Commission  
6545 Mercantile Way  
P.O. Box 30221  
Lansing, Michigan 48909

Gordon L. Persinger (314-751-3234)  
Paul Pederson  
Missouri Public Service Commission  
P.O. Box 360  
Truman State Office Building  
Jefferson City, Missouri 65102

William J. Cowan, General Counsel  
Penny Rubin,\* Assistant Counsel (518-474-1585)  
Public Service Commission of the State of New York  
Three Empire Plaza  
Albany, New York 12223

Rowland Curry  
Texas Public Utility Commission  
7800 Shoal Creek Boulevard  
Suite 400 M  
Austin, Texas 78757

OTHER GOVERNMENT AGENCIES

Janice Obuchowski (202-377-1816)  
Assistant Secretary for Communications & Information  
Phyllis E. Hartsock\* - Deputy Chief Counsel  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
Room 4717  
14th Street and Constitution Avenue, N.W.  
Washington, D.C. 20230

INDUSTRY GROUPS

Albert Kramer, Esq. (202-296-9800)  
Counsel for American Public Communications Council  
Keck, Mahin & Cate  
2000 M Street, N.W.  
Suite 550  
Washington, D.C. 20036

Ms. Cynthia T. McCoy (908-953-9455)  
AT&T  
131 Morristown Road, Room B1344  
Baskins Ridge, New Jersey 07928

Mr. Sean Looney\* (202-392-1275)  
Bell Atlantic Network Services, Inc.  
State Government Relations  
1133 20th Street, N.W., Suite 800  
Washington, D.C. 20036

Ms. Cynthia R. Preston (202-463-4104)  
BellSouth  
Director, State and Agency Relations  
1133 21st Street, N.W., Suite 900  
Washington, D.C. 20036

Thomas J. Moorman (301-459-7590)  
General Counsel, Regulatory and Industry Affairs  
John Staurulakis, Incorporated  
6315 Seabrook Road  
Seabrook, Maryland 20706

Frank W. Krogh (202-887-2372)  
Mary Wand  
MCI Telecommunications Corporation  
1133 19th Street, N.W.  
Washington, D.C. 20036

Lisa Zaina (202-659-5990)  
General Counsel  
OPASTCO  
2000 K Street N.W.  
Washington, D.C. 20006

Martin T. McCue, General Counsel (202-835-3100)  
Kathleen Woods (202-835-3145)  
Patricia Daly (202-835-3265)  
United States Telephone Association  
900 19th Street, N.W., Suite 800  
Washington, D.C. 20006-2105

PRESS

Art Brodsky (202-872-9202/ext. 252)  
Communications Daily  
2115 Ward Court, N.W.  
Washington, D.C. 20037

Kathleen Killelte (202-383-4797)  
Communications Week  
Suite 1222  
National Press Building  
Washington, D.C. 20045

Karen Kinard (202-842-3006)  
Telecommunications Reports  
1333 H Street, N.W.  
11th Floor-West Tower  
Washington, D.C. 20005

Kimberly Rhinehart  
Telephone News - Phillips Publishing  
7811 Montrose Road  
Potomac, Maryland 20854

Deborah Eby (703-759-4787)  
TE&M, Telephone Engineer & Management  
P.O. Box 943  
Great Falls, Virginia 22066

Mr. Charles Mason (202-872-0465)  
Telephony Division  
National Press Building  
529 14th Street, N.W. Room 962  
Washington, D.C. 20045

Bill Birch (517-726-1401)  
BOC Week - State Telephone Regulation Reports  
1101 King Street  
Suite 444  
Alexandria, Virginia 22314