



UNITED TELECOMMUNICATIONS, INC.
1850 M STREET, N.W., 11TH FLOOR / WASHINGTON, D.C. 20036 / 202-857-1030

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JAN 17 1992

Federal Communications Commission
Office of the Secretary

January 17, 1992

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

RE: In the Matter of Administration of the North American Numbering Plan
DA-1307

Dear Ms. Searcy,

Attached are the original and five copies of the Reply Comments of United Telecommunications, Inc. in the proceeding referenced above.

Sincerely,

Richard D. Lawson
Director
Federal Regulatory Relations

Attachments

RDL/mlm

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JAN 17 1992

Federal Communications Commission
Office of the Secretary

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

In the Matter of)
Administration of the) DA 91-1307
North American Numbering Plan)

REPLY COMMENTS OF UNITED TELECOMMUNICATIONS, INC.

United Telecommunications, Inc. ("UTI") on behalf of the United Telephone System companies and US Sprint Communications Company Limited Partnership, hereby provides reply comments on the National Association of Regulatory Utility Commissioners' ("NARUC") Petition for a Notice of Inquiry.¹

Comments from regulators, trade groups, LECs, IXC's, CAPs, and cellular carriers were filed in this proceeding. The weight of the comments indicates that the fora process² which deals with technical issues surrounding the NANP is working reasonably well. UTI continues to support this process, and the industry consensus which it creates, as the appropriate vehicle for development of technical solutions to NANP issues.

However, as the comments also indicate, the fora process does not work either well or quickly when public policy de-

1. Public Notice, National Association of Regulatory Utility Commissioners Seeks Notice of Inquiry Addressing Administration of the North American Numbering Plan, DA 91-1307, released October 18, 1991.

2. See UTI Comments at 3.

velopment is the subject.³ Thus, many commenting parties suggested a limited investigation which would focus on public policy development concerning rights to use the NANP resource.

UTI proposed guidelines in its comments which the Commission should follow when establishing public policy. These guidelines should also be the foundation for review of any complaints concerning the decisions which arise from industry fora consideration of technical issues or from decisions by the NANP administrator process. Several commenting parties strongly support public policy development and, when a party is aggrieved by a decision, review of decisions based on unbiased application of NANP administration standards which are fair to all telecommunications providers. An appeal process that involves the Commission is especially important because the fora process does not encompass any enforcement powers or actual control over the NANP administrator.

UTI does not support any regulatory action which would slow the implementation of interchangeable NPA ("INPA") codes, carrier identification code ("CIC") expansion, or central office code

3. For example, the fora process encountered significant problems when it considered the non-LEC ISDN numbering issue. Lacking any concrete public policy statements, the fora process floundered for nearly five years dealing with an issue where no technical problem was presented. The issue could have been resolved more quickly if public policy guidance had been provided by the Commission.

assignment guidelines. The NANP NPA resource supporting NPA codes, CIC codes, and CO codes is nearing exhaust and action, as currently planned by the industry, should proceed so that new INPA codes are available when actual exhaust of the current resource occurs. The Commission should establish public policy concerning fair access to and assignment of NANP resources. Technical considerations should be primarily left to the fora process and the Commission should provide an appeal forum when a party is aggrieved by the decisions arising from the industry fora process, or unilateral NANP administration decisions.

Respectfully submitted,
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January 17, 1992

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 17th day of January 1992, sent via hand delivery or U.S. First Class Mail, postage prepaid, a copy of the foregoing "Reply Comments of United Telecommunications, Inc." in the matter of Administration of the North American Numbering Plan, DA-1307, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.


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