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

JAN 17 1992

Federal Communications Commission  
Office of the Secretary

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

REPLY COMMENTS OF THE BELL ATLANTIC TELEPHONE COMPANIES

The comments filed in response to NARUC's petition show that the Commission should not disrupt the industry's plans to implement interchangeable area codes ("NPAs") and to expand Feature Group B Carrier Identification Codes ("CICs") to four digits. However, Bell Atlantic<sup>1</sup> urges the Commission to examine several of the numbering issues raised in NARUC's petition.

**1. Implementation of Interchangeable NPAs and Plans for Expansion of Feature Group B Carrier Identification Codes Should Be Allowed To Proceed.**

The industry must be allowed to move ahead with its plan to implement interchangeable NPAs. Without interchangeable NPAs, the last NPA will be assigned in 1995. The industry has acted responsibly in determining that interchangeability is the best way to avoid running out of NPAs.

Contrary to the implication in NARUC's petition,<sup>2</sup> this plan was adopted after full consideration of the alternatives, and the industry knew at least as early as 1984 that interchangeable NPAs would have to be fully implemented by July 1995.

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<sup>1</sup> The Bell Telephone Company of Pennsylvania, the four Chesapeake and Potomac telephone companies, The Diamond State Telephone Company and New Jersey Bell Telephone Company.

<sup>2</sup> Petition at 5 and Appendix A at 12.

Exchange carriers and others have made substantial expenditures to accommodate interchangeable NPAs, and work to complete this transition must continue if the 1995 deadline is to be met. A formal inquiry to decide whether to adopt some entirely different solution to NPA exhaust would surely cause confusion and delay and could cause the industry to be without NPAs when they are needed.

Plans to expand three-digit Feature Group B CICs to four-digit codes are also well advanced. Because of the rate at which three-digit codes are being used up, this process must be completed by the first quarter of 1993 if there is to be no interruption in the availability of these codes. The Commission should not delay this process by including it in an NOI.

**2. The Commission Should Consider the Necessity For Expansion to Four-Digit Feature Group D Carrier Identification Codes.**

The expansion of Feature Group D CICs to four digits will not be completed until at least 1995. The transition to these four-digit codes will require Bell Atlantic alone to spend approximately 30 million to 50 million dollars. Other exchange carriers will spend at least as much, and interexchange carriers also will have to make substantial investments.

It is questionable whether these expenditures will produce corresponding benefits to consumers. In fact, Feature Group D CIC expansion would make access code dialing more cumbersome. Expansion would require callers to use a seven-digit access code, rather than today's five-digit code, to reach the

carrier of their choice.<sup>3</sup> Bell Atlantic urges the Commission to investigate whether the industry should undertake this project.

**3. The Commission Should Study the Recovery of Costs Incurred in Making Numbering Plan Changes.**

Bell Atlantic agrees that the Commission should consider the treatment of the costs exchange carriers incur in expanding numbering resources. The logical approach is to treat the cost of implementing interchangeable NPAs, four-digit CICs and the like as exogenous under the Commission's price cap rules. If the Commission declines to do so, then it must prescribe a means to allow exchange carriers to recover these costs.

**4. NXX Assignment Guidelines Will Be Ripe For Review After July 1992.**

The Commission has jurisdiction over the allocation of NXX codes,<sup>4</sup> and the Common Carrier Bureau recently asked the North American Numbering Plan Administrator (NANPA) to solicit suggestions for NXX assignment guidelines. The NANPA is scheduled to deliver a proposal to the Bureau in July, and Bell Atlantic would welcome formal Commission review of that proposal and the

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<sup>3</sup> An access code based on a four-digit CIC must start with "101" instead of "10" to tell the switch to route on the next four digits.

<sup>4</sup> Cellular Interconnection Order II, 2 FCC Rcd 2910, 2912 (1987).

Commission's adoption of a set of assignment guidelines at that time.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Reply Comments of the Bell Atlantic Telephone Companies" was served this 17th day of January, 1992, by delivery thereof by first class mail, postage prepaid, to the parties on the attached list.

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