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JAN 17 1992

Before the
Federal Communications Commission
Washington, D. C. 20554

Federal Communications Commission
Office of the Secretary

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

**Reply Comments of the
The Ameritech Operating Companies**

I. Introduction and Summary

The Ameritech Operating Companies¹ file their reply comments in opposition to the request for a general inquiry into the administration of the North American Numbering Plan ("NANP") filed by the National Association of Regulatory Utility Commissioners ("NARUC").

The Companies believe that a general inquiry into the NANP at this time is unwarranted and would be counter productive for several reasons. The existing informal industry forum process is working well and is resolving numbering issues as they arise through industry consensus agreements without the need of regulatory intervention. Most of the issues raised by the NARUC Petition and the comments arise from the expansion of Carrier Identification Codes ("CIC") and Numbering Plan Area ("NPA") codes [called "INPA"], which already have been resolved. An inquiry into the CIC and INPA expansion plans at this late date could disrupt the implementation of the expansion of the supply of these codes before they exhaust. The remaining issues raised by NARUC and the comments are either resolved or

¹ The Ameritech Operating Companies are: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

are being addressed in international standards bodies and national industry forums, under regulatory oversight.

In their comments, the Companies fully presented the reasons why a general inquiry into numbering is not appropriate. They will not repeat those explanations here. Rather, they will establish that the comments of the other parties fail to support the contention that there is a need for a general inquiry. To the contrary, the comments present additional compelling reasons why a general inquiry should not be conducted.

Twenty-six parties filed comments in this proceeding, including six Regional Bell Operating Companies ("RBOCs"),² four other local exchange carriers ("LECs"),³ two alternate access providers,⁴ four interexchange carriers ("ICs"),⁵ four cellular/mobile and paging carriers ("Cellular/Mobile"),⁶ two state regulators,⁷ two LEC industry associations,⁸ the North American Numbering Plan Administrator ("NANPA"), Telecom Canada and Unitel.

²The Companies, BellSouth Corporation ("BellSouth"), NYNEX Telephone Companies ("NYNEX"), Pacific Bell and Nevada Bell ("Pacific"), Southwestern Bell Telephone Company ("SWBT") and U S West Communications, Inc. ("U S West").

³Centel Corporation ("Centel"), GTE Service Corporation ("GTE"), Rochester Telephone Corporation ("Rochester"), and United Telecommunications, Inc. ("United").

⁴Metropolitan Fiber Systems, Inc. ("MFS") and Teleport Communications Group ("Teleport").

⁵Allnet Communication Services, Inc. ("Allnet"), American Telephone and Telegraph Company ("AT&T"), MCI Communications Corporation ("MCI"), and United.

⁶GTE, McCaw Cellular Communications, Inc. ("McCaw"), Rogers Centel, Inc. ("Centel"), Telocator.

⁷Public Service Commission of the District of Columbia ("DC PSC") and Florida Public Service Commission ("Florida PSC").

II. Issues That Have Been Resolved

The comments generally address numbering issues and concerns of particular interest to each entity and industry segment, with the RBOCs and GTE generally opposing a general inquiry⁹ and the other industry segments seeking review of specific issues that would further their interests. However, when viewed as a whole, the comments establish that most of the issues raised by NARUC have been correctly resolved and need not be re-reviewed.

A. The CIC and INPA Expansion Plans Are Settled.

The comments demonstrate that CIC and INPA expansion plans already have been adopted after extensive industry discussion and implementation should continue without further review or delay, for several reasons.

First, the four-digit CIC and INPA expansions plans are public knowledge, have been thoroughly discussed with the Commission's staff and in industry forums, and enjoy industry consensus support.¹⁰ More importantly, the plans are the optimal solutions to the pending exhaustion of telephone numbers and codes. While several parties support an inquiry, few identified the CIC and INPA plans as an appropriate subject of that inquiry.¹¹

⁸National Telephone Cooperative Association ("NTCA") and United States Telephone Associations ("USTA").

⁹BellSouth supports a limited inquiry.

¹⁰See, NANPA 3; NYNEX 2-3; SWBT 1-2; GTE 2 and 4-5; and United 2-3.

¹¹For example, AT&T, Allnet, DC PSC, Florida PSC, McCaw, United, and Teleport, all support a general inquiry, but did not specifically identify the CIC and INPA plans as requiring review.

Even those parties who specifically mentioned the CIC and INPA plans, do not propose an alternative plan or represent that the current industry plans are flawed or unreasonable.¹²

Second, no party presented any evidence refuting the Companies' conclusion that the CIC and INPA conversion dates cannot be deferred without creating a risk of a hiatus. Rather, the comments clearly substantiate that the CICs and NPAs are exhausting and timely relief is required to avoid an exhaust.¹³

Third, no party advocates a temporary or permanent shortage of telephone numbers and codes so that reconsideration of the expansion plans can take place. Rather, efforts to avoid a hiatus should be made.¹⁴ Thus, the Commission should take no action that could interrupt the implementation of the expansion of the supply of numbers and codes.

Fourth, the Companies point out in their comments that the CIC and INPA expansion plans are massive undertakings that must be completed in a very short period of time. Meeting the current conversion dates is a formidable task that can be accomplished only through the successful and timely completion of the multitude of intricate interrelated steps that must be taken by the entire industry to implement these plans. Even then, a shortage can be avoided only if the current conservation and reclamation efforts are successful and no unforeseen increase in demand occurs. If all steps occur as planned, implementation of the plans in time to avoid a hiatus is challenging, but achievable.

¹²See, for example, BellSouth 2-4; MCI 7-8; NTCA 2; and Rochester 2.

¹³The Companies 2-3; NANPA 7-8; NYNEX 3; GTE 2; and SWBT 4.

¹⁴See, NYNEX 3; Pacific 4; GTE 2; USTA 5; and NANPA 8.

The comments of the other RBOCs and LECs confirm that the Companies are not alone in that delays in the installation of equipment, facilities, software and translations in their network necessary to support INPA and CIC would jeopardize the planned conversion dates, and would lead to an hiatus.¹⁵ As several parties pointed out, due to long design, planning, ordering and testing intervals, the plans must be finalized well in advance of the conversion dates.¹⁶ For that reason, several RBOCs and LECs joined the Companies in asking that the Commission not make changes to the CIC and INPA expansion plans or take any other action which could introduce uncertainty into the implementation process. Any such action could cause delay in the availability of new numbers.¹⁷

B. The Industry is Already Utilizing Reasonable Conservation Measures.

The comments confirm that there is no need for a general inquiry into the conservation of numbers and codes. The parties who address conservation all support it in principle.¹⁸ Moreover, no party opposed the concept that effective conservation of codes and numbers is essential to avoid undue customer disruptions and costs resulting from NPA splits and code expansions. Moreover, the current conservation plans are sufficient (if complied with) to meet the objective of deferring number and code exhausts while meeting customer service expectations. Again, no party presented any

¹⁵NANPA 8; NYNEX 6; Pacific 4; BellSouth 9; GTE 2; and USTA 5.

¹⁶NANPA 8-9; NYNEX 6; and Pacific 4.

¹⁷The Companies 2-3; NYNEX 6; Pacific 5; GTE 3; NANPA 9; and USTA 5.

¹⁸See, USTA 5; GTE 8-9; and MCI 6.

contrary evidence. Rather, one party simply speculates that there may be a need "for relaxing or tightening the restrictions on numbers",¹⁹ and another asserts that the RBOCs assign codes "with no assurances to the industry that they are being used in an effective manner."²⁰ However, this unsupported speculation hardly is a basis for an inquiry.

Three parties specifically address the burden caused by NPA splits and revisions in code formats, but then complain when conservation measures are applied to them.²¹ Apparently, they want it both ways. However, in order for conservation to be effective, it must apply uniformly to all carriers and customers. No party has presented reasonable grounds for an exception for themselves.

For example, two Cellular/Mobile carriers correctly note that NPA splits pose a particular burden for them.²² The Companies agree and seek to minimize NPA splits to the extent feasible consistent with meeting the reasonable service needs of customers and carriers. In order to minimize the burden of NPA splits, the Companies have implemented the comprehensive CO code and telephone number conservation measures discussed in their comments.²³

Ironically, these same Cellular/Mobile carriers complain when they are asked to cooperate with measures designed to conserve telephone numbers

¹⁹DC PSC 3.

²⁰MCI 6.

²¹MCI 6; McCaw 4; and 8-9; and Telocator 5-6.

²²McCaw 8-9; and Telocator 5-6.

²³Sec. 16-17.

and CO codes. These measures include the provision of code utilization data, and the meeting of certain minimum utilization levels before additional codes are assigned.²⁴

Cellular/Mobile carriers do create a significant demand for CO codes and, in some instances, in order to avoid a premature exhaustion of NPAs, the Companies have taken reasonable steps to see that additional CO codes are not assigned to these carriers until actually needed. Utilization information supplied by these carriers is treated as proprietary. Moreover, allegations of discrimination are groundless, since utilization requirements are uniformly applied within each company for all carriers and telephone companies, including the Companies themselves.

The same Cellular/Mobile carriers also state that in order to minimize their burden, they should receive advance notice of NPA splits.²⁵ The Companies again agree and have adopted a policy of notifying Cellular/Mobile operations personnel of NPA splits long before the planned split date, so they have sufficient time to accommodate the change. For example, Illinois Bell notified its Cellular/Mobile carriers of the split of the 312 NPA over two years prior to the split and well in advance of the public announcement of the split.

²⁴See, McCaw 8-9; and Telocator 5-6. These carriers also complain that some LECs require them to share underutilized codes. The Companies have never required cellular or mobile carriers to share codes, and, therefore, will not address the validity of this practice.

²⁵McCaw 5-6; and Telocator 6.

C. CO Codes are Assigned on a Reasonable Nondiscriminatory Basis.

McCaw and Telocator allege that some unidentified RBOCs are engaging in unreasonable and unfair CO code assignment practices.²⁶ These allegations are without merit.

McCaw and Telocator specifically assert that they are subject to discriminatory treatment because their applications for CO codes are received by a different group within the RBOCs from the one that handles requests from telephone companies.²⁷ While it is true that Cellular/Mobile carrier CO code applications to the Companies are received by specialists for that industry, it is not true that discrimination results. In the Companies' experience, customers and carriers are best served if they deal with specialists trained to work with their industry, and those specialists coordinate their service requests within the company. However, in each of the Companies, once a CO code application is received, it is processed on the same basis as all other requests.

McCaw, also complains that it must pay "exorbitant" charges for CO codes.²⁸ However, the rates charged by the Companies for codes are either specified in tariffs or established in contracts between the Cellular/Mobile carrier and the Companies. The rates established by the Companies in contracts are within the range of the corresponding tariff rates in the other states. In all cases, the rates are modest and reasonable. This proceeding is not an appropriate forum to review specific rate levels.

²⁶McCaw 8-9, Telocator 5-6.

²⁷Supra..

²⁸McCaw 7.

McCaw also complains about the installation intervals for CO codes.²⁹ However, the Companies provide national CO codes assignments within 90 to 120 days. This is the minimum time required to distribute the LERG documents nationwide to LECs and ICs, and to permit then a reasonable opportunity to activate the codes in their switches. In some cases, as an accommodation, the Companies have activated a CO code on an emergency basis, within thirty to forty days for local use.

D. Adequate Monitoring Reports Are Already Being Provided.

The Companies have already demonstrated in their comments that extensive monitoring reports already are being provided and that there is no need for a formal inquiry into this issue.³⁰ The parties seeking an inquiry do not even acknowledge these reports and thus, present no evidence that they are inadequate. In fact, only one party specifically identifies this issue and that party simply states that "regulators must be provided with information as to the use of numbers . . ." ³¹

III. The Remaining Issues Are Being Resolved in Other Forums and Proceedings

Several parties address emerging issues which they feel must be resolved in the next several years. The Companies generally agree that there are several emerging numbering issues which must be resolved over the next five years. However, these issues are being dealt with in standards bodies, other forums and Commission proceedings. Those bodies, forums and

²⁹McCaw 7.

³⁰See, 17.

³¹DC PSC 2-3.

proceedings should be allowed to be complete their work. There is no need to duplicate or usurp that effort. After these efforts are complete, the Commission could review the resulting plans and standards and address any unresolved issues.

**A. The Industry Is Developing Consensus
CO Code Assignment Guidelines.**

Some parties ask for uniform nondiscriminatory guidelines for the assignment of CO codes.³² As discussed in their comments and earlier in these reply comments, nondiscriminatory guidelines are already being utilized by the Companies.³³ In addition, these parties ignore the current industry effort to develop consensus uniform guidelines, which is being coordinated by NANPA under the aegis of the Commission. This effort is discussed in detail in the comments of the Companies.³⁴ There is no reason to duplicate that effort in this proceeding or to assume that the effort to reach a voluntary consensus agreement will not be successful.

**B. PCS Numbering Standards Are Being Developed in the
Appropriate International and National Standards Bodies.**

Several parties express interest and concern over the need to develop numbering standards for Personal Communications Services ("PCS"). The Companies agree that this is an important aspect of the development of PCS, but do not feel that this proceeding is the proper forum to address this need.

³²See, for example, McCaw p. 9; and MCI 6.

³³See, 14.

³⁴See, McCaw 12; Telocator 8-9.

PCS standards are being developed by international and national standards bodies. It is expected that the CCITT will complete its work and release international PCS numbering standards in late 1992, or early 1993. The CCITT Study Group 2 is meeting in February, 1992 to continue its work on this issue. The development of the United States' position before the CCITT is being coordinated by the U. S. State Department, through an industry Ad Hoc committee. It is expected that the final United States' position will be completed this month.

In addition, implementation of PCS numbering in World Zone 1 (including North America) is being considered by a subcommittee of the ECSA T1 Committee. This industry forum subcommittee has identified several PCS numbering issues that it is currently working to resolve. The subcommittee met earlier this month.

These various international and national standards bodies should be permitted to conclude their work before the Commission decides if there is a need to investigate this issue.

C. The Future of Numbering After Implementation of INPA Is Being Addressed in a New Industry Forum.

Several parties express interest in the long term plans for the NANP and the manner in which it will be administered.³⁶ These issues also are being addressed through a new industry processes and are not appropriate subjects of an inquiry at this time.

On January 2, 1992, the NANPA released, for industry comment, its "Proposal on the Future of Numbering in World Zone 1". This proposal addresses, among other items, allocation of NANP resources after the

³⁶See, for example, MFS 6-8; MCI 6; and McCaw 10-12.

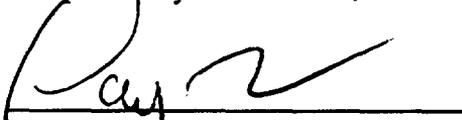
implementation of INPA codes, the long-term goals and predictions for the NANP, and the evolution of numbering.

A one hundred twenty day industry comment cycle has been established on this comprehensive forty-two page document. At the end of the comment cycle, NANPA will review and consolidate the industry comments, and utilize them to prepare a revised document within sixty (60) days. If necessary, NANPA will utilize an industry forum process to reach industry consensus. NANPA will continue meet with the industry forum, as long as there is progress toward consensus.

IV. Conclusion

In the reasons discussed above, a general inquiry is unnecessary, duplicative of industry efforts and counter productive. NARUC's Petition should be denied.

Respectfully submitted,



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Date: January 17, 1992

CERTIFICATE OF SERVICE

I, Diana M. Lucas, do hereby certify that copies of the foregoing opposition of the Ameritech Operating Company were sent via first class mail, postage paid, on this the 17th day of January 1992:

By: *Diana M. Lucas*
Diana M. Lucas

DATED: January 17, 1992