

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Administration of the North American)
Numbering Plan)
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CC Docket No. 92-237

Comments of the
Cellular Telecommunications Industry Association
on the Notice of Inquiry

The Cellular Telecommunications Industry Association ("CTIA") is the trade association of the cellular industry. Its members include over 90% of the licensees providing cellular service to the United States and Canada. CTIA's membership also includes cellular equipment manufacturers, support service providers, and others with an interest in the cellular industry.

On September 26, 1991, the National Association of Regulatory Utility Commissioners ("NARUC") filed a petition asking the Commission to initiate a proceeding to consider certain issues related to the administration of the North American Numbering Plan ("NANP"). The Commission subsequently issued a Public Notice, DA-1307, October 18, 1991, officially soliciting comments on the NARUC petition. On December 20, 1991, initial comments were filed in response to the Public Notice and on January 13, 1992, reply comments were filed, including those of CTIA. Subsequently, on October 29,

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1992, the Commission issued a formal Notice of Inquiry to address the issues raised by NARUC and others. Administration of the North American Numbering Plan, 7 FCC Rcd 6837 (1992) ("NOI").

Administration of the NANP is broken. The diffuse nature of the process, coupled with a lack of non-discriminatory policy guidelines, delays and frustrates the development of a coherent numbering policy. Unrelated forums have assumed responsibility for establishing numbering policy as each new issue arises.¹ Today, the development of numbering policy is mired in a bureaucratic morass, and the proliferation of policy bodies can lead only to more and more ad hoc number administration. CTIA believes that the Commission must act to prevent the crisis in NANP policy development from threatening the development and growth of new telecommunications services.² These comments respond to Phase One of the NOI: Overall Administration of the NANP.

NOI PHASE ONE: Overall Administration of the NANP

Phase One of the NOI is focused on who should administer the NANP and how the administration might be improved. CTIA believes that administration of the NANP requires two very different groups.

¹CTIA has identified 26 specific numbering issues and twelve separate forums. See Attachment A. Each forum often represents different segments of the telecommunications industry.

²As noted in the NOI, cellular carriers have experienced difficulty obtaining NXX codes; cellular and LEC requests for new NXX assignments are subjected to different administrative procedures; and cellular carriers have only a very limited opportunity to participate in the decision-making process to split area codes, even though every cellular phone affected by the change must be physically reprogrammed with the new number. See NOI, ¶ 26.

First, a single forum, the NANP "Policy Group," must be created to develop the policies for numbering issues and codes assignment, as well as the guidelines that should govern the actual administration and assignment of numbers and codes. A second group, the "administrative organization," is then needed to actually assign codes upon a carrier's request. Code assignments must be impartial and must follow the NANP Policy Group's numbering policies and implementation guidelines.

The NANP "Policy Group"

The NANP Policy Group must include all telecommunications providers as members.³ Only a fully inclusive independent body can develop fair numbering policies and guidelines. This group also will be responsible for drafting the numbering policy guidelines that must govern the actual administration and assignment of numbers and codes. To insure the impartial development and resolution of all numbering and code assignment policies, the "Policy Group" must be created outside of Bellcore.⁴

³NANP policy decisions affect local exchange carriers, competitive access providers, interexchange carriers, and wireless carriers. The governing board of the NANP Policy Group must reflect the diversity of the telecommunications industry, and all interested carriers must have the opportunity to participate fully in NANP Policy Group activities and decision-making.

⁴Bellcore's suggestion of an "advisory council" is an implicit admission that, without structural reform, it cannot represent all segments of the North American telecommunications industry. Unlike CTIA's proposal to create a governing body that reflects the diversity of telecommunications industry, an "advisory council" would merely perpetuate the problems caused by the lack of any true oversight of Bellcore's activities.

The Commission should direct the NANP Policy Group to develop broad, inclusive numbering policies based on two principles. First, that numbers are available for use in an efficient and effective manner, and must meet the current and future needs of the telecommunications industry. Second, that numbers remain in the public domain and are to be administered and assigned in a fair, uniform, and impartial manner. Based on these principles, ad hoc policy-making on NANP issues should cease, and the single NANP Policy Group should develop NANP policies and guidelines that:

Reflect input on numbering issues from all segments of the telecommunications industry;

Recognize that all telecommunications service providers require equal access to numbering resources, including both geographic and non-geographic numbers;

Enable all telecommunications providers to request and obtain any combination of numbering resources necessary to offer their service(s). Requests and assignments must be handled in a uniform, fair, and impartial manner according to predefined guidelines;

Assign numbering resources for non-geographic wireless personal communications services throughout World Zone 1;

Insure, through clear and specific guidelines, that the assignment of numbering resources are uniform for all geographic and non-geographic services; and

Permit carriers, without restriction, to implement telecommunications services using either geographic or non-geographic numbering resources.

The NANP Policy Group also must clearly define an administrative review process that will insure an immediate and direct appeal to the Policy Group by any party aggrieved by a code assignment decision (or a failure to act) made by the administrative organization.

If the Commission directs the telecommunications industry to create the NANP Policy Group, much as it directed the local exchange carriers to establish the National Exchange Carriers Association, there are at least two alternatives for establishing the new numbering forum. Either a new organization could be chartered for numbering policy, or an existing industry forum voluntarily could chose to broaden its charter and governing board to centralize NANP policy issues in a single forum that reflects the broad diversity of the North American telecommunications industry. In either instance, the NANP Policy Group could be financed by assessing telecommunications service providers an annual fee based on their use of NANP numbering resources.

The "Administrative Organization"

The "administrative organization" is the entity that actually assigns codes in response to requests by telecommunications service providers. As noted above, code assignments must be impartial and strictly adhere to the NANP Policy Group's policies and implementation guidelines. If the NANP Policy Group is created, and the principles and policies suggested by CTIA are implemented, the administrative organization can continue to reside in Bellcore. CTIA also would accept putting the NANP administration function out for competitive bid. The user fees assessed to finance the NANP Policy Group could be applied to the costs incurred by the administrative organization.

Conclusion

Implicit throughout the text of the NOI is the recognition that the current administration of the NANP is flawed. CTIA believes that the Commission must act to prevent the crisis in NANP policy development from threatening the development and growth of new telecommunications services. The Commission must direct the telecommunications industry to establish a single NANP Policy Group to take charge of NANP policy development and to supervise the implementation of non-discriminatory numbering policies. To insure fairness, all segments of the telecommunications industry must be represented in the governing body of the NANP Policy Group. With the single NANP Policy Group in charge of NANP policy development, Bellcore can continue to be responsible for the actual administrative function.

Respectfully Submitted,

Cellular Telecommunications
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ATTACHMENT A

INDUSTRY NUMBERING ACTIVITIES REGISTER

Issue No	Issue/Activity	Forum
1	NANP Administration	NARUC/NANPA/FCC
2	Long Range Numbering Plan	NANPA
3	Vertical Service Codes	ICCF WS/TR45
4	PCS NOO Guidelines	ICCF WS
5	N11 Codes	IILC/FCC NPRM
6	Interchangeable NPA Codes	NARUC/NANPA
7	CIC Expansion	ICCF WS
8	UPT Numbering	T1P1/SG-II/TR45
9	NPA Code Split Notification	ICCF WS/NANPA
10	Single Number Service	IILC
11	CO Code Guidelines	NANPA/FCC/COCGF
12	Global Virt. Net. Services	T1S1/T1E1
13	Time "T"	NANPA
14	Uniform Dialling Plan	NARUC/NANPA
15	Abbreviated Dialling	NARUC/NANPA
16	Data Network Ident. Codes	FCC
17	SS7 Point Codes	T1S1/NANPA
18	ANI II Digits	ICCF WS/NANPA
19	900 SAC	ICCF
20	800 SAC	CLC Ad Hoc
21	700 SAC	NANPA
22	NOO Code Assignment	NANPA
23	Inbound International	ICCF/NANPA
24	610 SAC	NANPA/CSCN
25	710 SAC	NANPA/DOD
26	Wireless Svc. Access Code	TR45/WIF/CSCN

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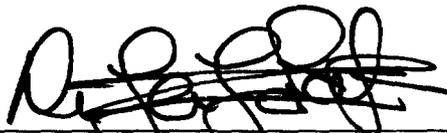
NARUC	National Association of Regulatory Utility Commissioners (USA)
NANPA	North American Numbering Plan Administrator (Bellcore)
FCC	Federal Communications Commission (USA)
NPRM	Notice of Proposed Rule Making
ICCF WS	Industry Carriers Compatibility Forum Workshop
SG-II	CCITT/Study Group II
COCGF	Central Office Code Guidelines Forum
IILC	Information Industry Liaison Committee
CLC	Carrier Liaison Committee
CSCN	Canadian Steering Committee on Numbering
DOC	Department of Communication
WIF	Wireless Interconnection Forum

CERTIFICATE OF SERVICE

I, Darren Lewis LaPorte, hereby certify that on this 28th day of December, 1992, copies of the foregoing Comments of the Cellular Telecommunications Industry Association were served by hand-delivery upon the following parties:

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