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

---

[29]McCaw 7.

[30]See, 17.

[31]DC 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.

---

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

[33]See, 14.

[34]See, 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

[36]See, 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,

Floyd S. Keene
Larry A. Peck
Attorneys for the
Ameritech Operating Companies
2000 W. Ameritech Center Drive
Room 4H86
Hoffman Estates, IL 60196-1025
(708) 248-6074

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