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OFFICE OF THE SECRETARY

December 23, 1992

OFFICE OF SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET NW
ROOM 222
WASHINGTON DC 20554

Gentlemen:

Please find enclosed three copies of North Pittsburgh Telephone Company's comments in the matter of North American Numbering Plan, CC Docket No. 92-237.

Sincerely yours,

G. A. Gorman
Executive Vice President and
General Manager

GAG:mh

Enclosures

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

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

COMMENTS
OF THE
NORTH PITTSBURGH TELEPHONE COMPANY

The following comments from North Pittsburgh Telephone Company (North Pittsburgh) are in response to the Federal Communications Commission's (Commission) Notice of Inquiry in CC Docket 92-237 in the matter of Administration of the North American Numbering Plan (NANP).

With regard to Phase I of this inquiry, concerning the overall administration of the NANP, we note that the Commission has a good understanding of the issues and we are satisfied that the Commission recognizes the concerns of all parties in this matter.

As the Commission points out, under the present system, it takes a long time to resolve numbering issues and this process clashes with the demand for numbering resources by Competitive Service Providers (CSP) who depend upon quick response to customer demand in order to remain in business. Obviously, these CSP's will complain the loudest. However, they should realize that they are taking advantage of a well organized system that they do not pay for. It is understandable that these users would have the perception that the system favors the Regional Bell Operating Companies (RBOCs) but the RBOCs have created and funded the system that the Commission calls "the envy of the rest of the world".

From the perspective of Local Exchange Carrier (LEC), transferring administration of the NANP to another organization does not seem to be the answer. The start up delay time required to establish procedures for handling requests for numbers will cause a whole new set of problems and delays that will involve all of the users of numbering resources, including the LECs. Bellcore has clearly demonstrated exceptional skill and foresight in administration of the NANP. It would be a mistake to discard this system in favor of a totally new administration and our primary concern is retention of a system that works.

However, the concerns of non-LEC users of the NANP do deserve fair treatment. Since the expertise and a working system exists within Bellcore, perhaps Bellcore would consider establishing a spin-off organization designed to administer the NANP for all users.

This concept may well be compatible with Bellcore's client-oriented structure, with all users of the NANP as the "clients" of this organization. All of the existing administration and expertise could be transferred to this company, providing a smooth transition and retention of the basic system that has worked so well for many years. In addition, the administration of NNX codes could also reside within this group, removing the appearance of control by the LEC industry.

Oversight would be administered by an industry committee comprised of all of the users of the NANP. This should address the concerns of those groups who feel that they do not have input into the decision-making process.

The costs of administration of this new organization could be funded by all users of the numbering plan. The amount of annual funding provided by each organization could be based upon the amount of numbers controlled by each company.

Although it may be cumbersome and unpopular, the Commission should establish itself as the final oversight for resolution of deadlocks. The fact that an industry group would be forced to ask the Commission to resolve a deadlock may be enough to encourage compromises within the industry forum.

The Personal Communication Services (PCS) numbering issue appears to us to be somewhat overwrought. With the impending addition of new area codes under the interchangeable code plan, PCS should be allocated a number of non-geographic based Numbering Plan Area (NPA) codes. Although the demand for these codes may occur prior to availability, the industry must recognize that we are dealing with a limited resource and long-term planning. This may be a simplistic approach but simple solutions are usually the best.

The matter of local number portability immediately causes alarm in the LEC community. Although this concept is feasible, the disadvantages of such a system appear to far outweigh the possible advantages. First, the destruction of the geographic indication of the current NPA-NNX plan would be a rather large imposition on those customers who are not concerned with the ability to move across the country and keep their number. We believe these customers constitute the majority of the customer base. Additionally, the cost of such a system could be enormous. From North Pittsburgh's

perspective, 800 traffic accounts for approximately 7% of our total originated calls. Under local number portability, every call, not just 800 calls, would require a database look-up. Although we cannot quantify the costs of a system capable of this operation, we feel that it would far exceed the benefits of full number portability, at least in the near-term.

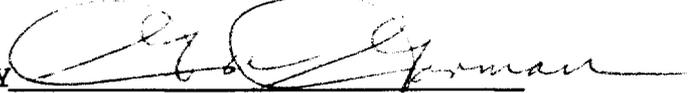
Again, the simple solution to this would be to establish a group of NPA codes that would be portable across the country. This would allow the customers to decide the utility of this service and, as the demand increases, more numbers could be allocated to this plan and removed from the geographic-based plan.

With regards to the Phase II issues of Feature Group D (FGD) access codes, North Pittsburgh expects the expansion of the FGD code to four digits to cost approximately \$100,000 for our network of 50,000 lines. We feel that this is a questionable expense when other options exist; specifically, stricter code conservation and the possible establishment of a pool of regional carrier codes that could be reused across the country by smaller carriers. It hardly seems possible that there will be 1,000 interexchange carriers that operate nationwide. The vast majority of these carriers appear to be local and could operate with a code that was shared across the country and assigned by region.

As the Commission points out, it does not seem to be worthwhile to have a carrier access code that is seven digits long with the benefits of this conversion are not very evident.

Respectfully submitted,

NORTH PITTSBURGH TELEPHONE COMPANY

BY 

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