

ORIGINAL
RECEIVED FILE

DEC 28 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Administration Of The
North American Numbering Plan

)
)
)
)
)

CC Docket No. 92-237
Phase I

COMMENTS OF THE NYNEX TELEPHONE COMPANIES

I. INTRODUCTION AND COMPANY POSITION

New England Telephone and Telegraph Company and New York Telephone Company (the NYNEX Telephone Companies or NTCs) submit these Comments in response to the Commission's Notice Of Inquiry (NOI) released October 29, 1992, in the above-captioned matter.¹ We respond to the Commission's request for comment on the long range issues of who should administer the North American Numbering Plan, and how the administration might be improved.² The NOI was prompted by a petition to the FCC from the National Association of Regulatory Utility Commissioners (NARUC).³

1 Comments on Phase II of the NOI, concerning the expansion of Carrier Identification Codes (CICs) used for Feature Group D (FGD) access, are being submitted by the NTCs under separate cover today.

2 NOI para. 3.

3 See NOI para. 3 and n.1.

No. of Copies rec'd
List A B C D E

0+6

As discussed herein, while Bellcore has appropriately performed the NANP Administrator (NANPA) role and has the requisite expertise, the NTCs would be willing to consider any alternatives that meet the specified attributes for effective and efficient ongoing NANP administration. In any case, the existing industry consensus approach and forums are appropriate means to provide advice and guidance to the NANPA under telecommunications policy direction from the FCC, and with input from state regulatory authorities. Further, there should be equitable industry funding of the NANPA. These Comments also briefly address certain additional topics in the NOI concerning Personal Communications Service (PCS) numbering and local number portability.⁴

II. DISCUSSION

A. Identity Of NANPA

Under the judicially approved plan of reorganization which implemented the Bell System divestiture, Bellcore replaced AT&T as the NANPA.⁵ Since that time, Bellcore has been responsible for numbering administration and related numbering issues for World Zone 1. The Commission invites comment "on the advisability of transferring NANP administration to an administrator other than Bellcore."⁶

⁴ See NOI paras. 40-41.

⁵ See NOI para. 4.

⁶ NOI para. 28.

To address the advisability of transferring NANP administration, we should first define the role of the administrator and determine what attributes are required to properly fulfill that role.

NANP administration requires effective and efficient action to ensure the continued availability of numbering resources for telecommunications use. Equally important, the NANPA should ensure the logical evolution of numbering capabilities to support the telecommunications industry. The NANPA must be prepared to coordinate the day-to-day activities associated with NANP-related numbering resources such as Numbering Plan Area (NPA) codes, CIC codes, Service Access Codes (SACs) and vertical service codes associated with new services. NANPA's primary objective should be to meet the industry's current and future needs for numbering resources in a way that conserves limited numbering resources and avoids or delays code exhaust. A NANP administrator must be prepared to provide leadership, planning and effective management, as well as continual communication with the telecommunications industry, to support the industry's evolving needs for numbering resources. The NANPA should also be responsive to regulators and carry out national telecommunications policy set by the FCC.

Any entity which undertakes NANP administration must have the right qualifications to adequately fulfill that role. The required attributes include the following:

- technical expertise/access to industry experts;
- knowledge about the use and allocation of telecommunications numbering resources;

- openness to industry input and oversight;
- access to the FCC, Canadian/Caribbean authorities, domestic/international standards organizations, and other regulatory bodies;
- sufficient funding and staffing to assure adequate NANP administration; and
- long-term commitment.

Bellcore has the attributes required for proper NANP administration. It works effectively with governmental, regulatory and standards bodies. Also, it brings to bear substantial technical expertise, knowledge and experience in telecommunications numbering matters.⁷

From the time Bellcore assumed the NANPA function (almost a decade ago), the telecommunications industry has rapidly changed and the industry's needs for numbering resources continue to evolve. For example, new types of communications services have arisen from modern technologies, and additional entrants to the marketplace continue to request expanded capabilities. Despite all of this change, the NTCs believe Bellcore has competently performed the administration function, and can be counted on to do so in the future. To the

⁷ See, e.g., the NANPA's expert long-term planning for Interchangeable NPAs (INPAs). In the NOI (paras. 18, 23-24), the FCC commends the efforts of the NANPA, stating that the North American Numbering Plan:

"has been administered over a long period of time with considerable skill and foresight.... [T]he North American Numbering Plan is the envy of the rest of the world.... [T]he administration of the numbering plan by the Bell System and, subsequently, Bellcore, seems to have served the nation well."

extent there is a decision to pursue alternatives to Bellcore that will satisfy the aforementioned criteria, we are certainly agreeable to considering such options.⁸

B. Effective Oversight Of And Funding For Numbering Administration

The FCC seeks comment on improvements, funding and how to provide effective oversight to NANP administration, whoever the NANPA ultimately may be.⁹

The NTCs think that some form of oversight of the number administration process is proper. The complex technical issues can best be resolved by cooperative efforts within the telecommunications industry, where the primary numbering expertise resides. Accordingly, the NTCs support an industry-wide consensus approach to resolution of issues through established mechanisms, all under FCC and, as appropriate, state regulatory policy guidance. See, e.g., the work and process of the Central Office Code Assignment Guidelines Forum (COCGF).¹⁰ In the COCGF, industry participants have been working together under the aegis of the FCC to jointly develop a uniform set of central office code assignment guidelines, to be submitted to and approved by the Commission. The agenda has progressed with all industry

⁸ The significant changes scheduled for the very near future (regarding INPA, CIC codes for FGB and FGD) should proceed unencumbered by any change in the administration of the NANPA.

⁹ NOI paras. 29, 32-33.

¹⁰ See NOI para. 15.

segments represented and able to express their concerns. Oversight of NANP administration could be fashioned in a similar vein.

The FCC should establish the national numbering policy direction and be available to resolve any situations lacking industry consensus. With the FCC providing policy guidance to the industry, and overseeing the industry consensus process, disputes will hopefully be minimized.¹¹

With respect to the Commission's invitation for comment on funding issues, today the costs of NANPA are shared by the RBOCs, Cincinnati Bell and Southern New England Telephone. Thus, a handful of local exchange carriers bears the costs of administration for all users of numbering resources. However, as the FCC observes: "It is at least questionable whether we can continue to expect these costs to be incurred by private firms without compensation."¹²

Future funding of NANPA remains a major consideration as the use of numbering resources expands and becomes more complex, necessitating greater expenditures. Funding must be carried out on a fair and cost-causative basis. All industry participants that utilize NANP resources should share the costs of administration. On the other side, the NANPA should be cognizant of the costs that flow from its actions.

11 In certain instances, disagreements may turn on policy instead of technical issues, and only the FCC may be able to break the impasse.

12 NOI para. 33.

C. PCS Numbering

The Commission seeks comment (para. 40) on what actions should be taken by it to foster PCS. As noted by the Commission,¹³ PCS numbering schemes are currently being addressed in several industry forums. Work is progressing in the International Telegraph and Telephone Consultative Committee (CCITT) and the U.S. Department of State in the formulation of international standards. The Standards Committee T1 - Telecommunications of the Exchange Carrier Standards Association is preparing standards for World Zone 1, and the Industry Carriers Compatibility Forum (ICCF) is developing assignment guidelines. The above-mentioned industry organizations are very adequately developing the necessary World Zone 1 standards and guidelines to accommodate PCS within the NANP.

It should be emphasized that the proliferation of PCS will be dependent on the development and implementation of new technology, major capital investment by the industry and market demands. Numbering schemes utilizing the existing NANP structure for PCS are not the driver for this service and will not hinder the growth of PCS.¹⁴

13 NOI para. 40 and n.50.

14 On August 14, 1992, the FCC released two Notices Of Proposed Rulemaking on PCS captioned: "In the Matter of Amendment of the Commission's Rules to Establish New Personal Communications Services." The two dockets address wideband PCS in the 2GHz band (Gen. Docket 90-314) and narrowband PCS in the 900 MHz band (ET Docket 92-100). One hundred and sixty parties filed comments on November 9, 1992; replies are due January 8, 1993.

Accordingly, the NTCs do not recommend any action by the FCC at this time with respect to PCS numbering. Rather, the Commission should monitor the ongoing standards efforts and be available to resolve policy disputes should industry participants reach an impasse.

D. Local Numbering Portability (NOI para. 41)

Local number portability, for purposes of having the ability to move the same telephone number from one local service provider to another within a geographic area, is not technically feasible at the present time.

Currently, telephone numbers identify geographic locations within a network, specifically the physical "location" of the central office serving the customer to whom that telephone number is assigned. The structure of the network and its operations are built around this convention. The relationship of the telephone number to a particular network location provides the basis for routing of traffic. The Local Exchange Routing Guide (LERG) contains the information used by carriers to route traffic. To the extent this convention is modified, significant network changes would have to be implemented; such changes would have a substantial impact on network operations and our customers.

Local number portability for the purposes above would require switches to determine the appropriate service provider for each call handled before routing the call to its destination. This would require either a complete number translation within the switch or, alternatively, a query at a

data base within the network. Either of these approaches would have a major impact on call handling as we know it today.

Calls within an NPA would require a seven digit translation in order to determine the appropriate service provider and routing instructions. Calls destined to leave the NPA would require ten digit translations. InterLATA calls could be delivered to an interexchange carrier, and that carrier could reach the NPA within which the call would terminate, but the interexchange carrier would then be faced with the same problem of determining the appropriate service provider in order to terminate the call. As an alternative, the provision of complete routing information at the originating end would require the equivalent of a national data base containing every number for the U.S. Obviously, this task would require a monumental effort on the part of the telecommunications industry.

Local number portability would also have a significant impact on customers and raise many policy questions. Today, for example, customers associate telephone numbers not only with geographic areas, but with the rates charged to make calls. The potential for customer confusion to the extent that calls could cost more than what customers have traditionally associated with calling areas would be significant. Over and above technical issues, these matters would require in-depth investigation and analysis before local number portability could be implemented. Such activities would need to involve appropriate regulatory agencies and include industry-wide participation.

III. CONCLUSION

It would be appropriate for the FCC to continue to gather information and carefully examine alternative entities that may meet the NANPA qualifications described herein.

Respectfully submitted,

New England Telephone and
Telegraph Company

New York Telephone Company

By: Campbell L. Ayling
Mary McDermott
Campbell L. Ayling

120 Bloomingdale Road
White Plains, N.Y. 10605
914-644-5245

Their Attorneys

Dated: December 28, 1992