

Gina Harrison
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

January 3, 1995

EX PARTE

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

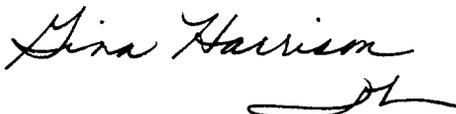
Re: *IAD File No. 94-102, Request for Declaratory Ruling and Interlocutory Order on Numbering Plan Area Code Relief Plan of Ameritech; IAD File No. 94-104, Request for Declaratory Ruling on Pacific Bell Area Code Numbering Plan; CC Docket No. 92-237, Administration of the North American Numbering Plan*

On behalf of Pacific Bell, enclosed is a letter to William F. Kennard, General Counsel, relating to the above proceedings. Please associate this material with these proceedings.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Attachment

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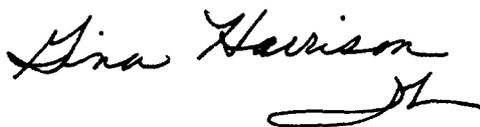
Mr. William F. Kennard
General Counsel
Federal Communications Commission
Mail Stop 1400
1919 M Street, N.W., Room 614
Washington, D.C. 20554

Dear Mr. Kennard:

Re: *IAD File No. 94-102, Request for Declaratory Ruling and Interlocutory Order on Numbering Plan Area Code Relief Plan of Ameritech; IAD File No. 94-104, Request for Declaratory Ruling on Pacific Bell Area Code Numbering Plan; CC Docket No. 92-237, Administration of the North American Numbering Plan*

As you requested, we are attaching a brief overview of the presentation Pacific Bell plans to make to you and your staff tomorrow at 2:30 p.m. We look forward to discussing these issues with you then.

Sincerely,



Attachment

cc: Christopher J. Wright, Deputy Counsel
Sara Seidman, Special Assistant

Overview of Presentation

**Pacific Bell
January 3-4, 1995**

IAD 94-102: Request for Declaratory Ruling re: Ameritech overlay plan in Illinois

Ameritech's plan: wireless only in overlay

requires takeback of wireless numbers

IAD 94-104: Petition for Declaratory Ruling re: Pacific Bell overlay plan in Los Angeles

- Comments due January 30, 1995

- Reply Comments due February 27, 1995

California plan: 15-month lag between tandem and end office implementation, due to technical issues

strive for no number changes or takeback of numbers

Issue: If FCC issues order which requires Pacific to perform a geographic area code split rather than an overlay, Pacific will be unable to comply with the order before codes run out because of state statutes mandating notice, public hearings and opportunity to be heard regarding introduction of any new area code plan. FCC would need to preempt California statute and that would likely be contested.