



**United States Telephone Association**

1401 H Street, N.W., Suite 600  
Washington, D.C. 20005-2136  
(202) 326-7300  
(202) 326-7333 FAX

September 8, 1995

**RECEIVED**

SEP - 8 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: CC Docket 92-237  
Administration of the North American Numbering Plan

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Attached is the nomination of Paul K. Hart for membership in the North American Numbering Council Advisory Committee (NANC), submitted pursuant to the FCC Public Notice of August 9, 1995.

Your consideration of this nomination is greatly appreciated. Please contact me at (202) 326-7249 if you have any questions concerning this matter.

Sincerely,

Charles D. Cosson  
USTA Attorney

cc: Mike Specht  
Scott Shefferman  
Elizabeth Nightingale

Mary McDermott, Esq.  
Paul K. Hart

Attachment

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

0 + 2

RECEIVED

SEP - 8 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of: )  
)  
Telephone Number Portability )  
)  
)  
)  
)

CC Docket No. 95-116  
RM 8535

DOCKET FILE COPY ORIGINAL

---

**Nomination of Paul K. Hart for Membership on the North American Numbering Council**

The United States Telephone Association (USTA), on behalf of its member companies, hereby submits this application for membership on the North American Numbering Council ("NANC"), in response to the Commission's Public Notice, DA 95-1721, dated August 9, 1995, in the above-referenced proceeding.<sup>1</sup>

USTA is the principal trade association of the local exchange carrier (LEC) industry. USTA represents over 1100 LECs, with a wide variety of company sizes within its membership. Accordingly, USTA represents both a significant level of technical expertise with respect to local exchange operations, including numbering, and a broad set of perspectives on numbering policy.

**BASIS FOR USTA PARTICIPATION**

The Public Notice describes the NANC's role as assuring that administration of the North American Numbering Plan ("NANP") supports several policy objectives, including assuring that the NANP facilitate entry into the communications marketplace by making numbering resources available on a timely and efficient manner, that NANP does not unduly favor or disfavor any particular industry segment or group of customers, that the NANP does not unduly favor one technology over another, and that it give consumers easy access to existing switched telephone network facilities. Public Notice at 2.

---

<sup>1</sup>In the Matter of Telephone Number Portability, Notice of Proposed Rulemaking, CC Docket No. 95-116, FCC 95-284, (Released July 13, 1995) ("NPRM").

Participation by a USTA representative would assist the NANC, and consequently the Commission, in achieving these goals. Participation by a representative of a broad set of perspectives, i.e. small rural telephone companies, mid-size local exchange companies, holding companies, and Regional Bell Operating Companies, would assist the NANC in seeing that no particular industry segment, group of customers is unduly favored or disfavored. USTA perspectives and policy positions are developed and adopted by a specific procedural structure, including two committees tasked with numbering issues.

USTA participation would similarly assist in seeing that no one network technology is favored, since USTA members utilize a wide variety of equipment vendors, network technologies, and network configurations, and have different levels of technical capabilities in their networks. USTA's broad membership also permits USTA to gather a significant amount of technical information with respect to planning and operations of both numbering resources and network facilities. Indeed, USTA members represent a significant portion of the local exchange network facilities presently deployed. Accordingly, USTA participation would assist in seeing that the NANP is able to give consumers easy access to local exchange network facilities, and that the NANP can make numbering resources available to service providers.

#### **NOMINATION OF PAUL K. HART**

USTA hereby nominates Paul K. Hart, USTA Vice President for Technical Disciplines, for membership on the NANC. Mr. Hart will represent the interests of the local exchange carrier industry, in support of the public interest goals associated with effective NANP administration. Mr. Hart is an interested party for the reasons discussed above, and because of his experience and expertise in both telecommunications policy and the NANP and its applications. He hereby commits to actively participate in good faith in the objectives of the NANC.

Paul Hart has been employed for 33 years in manufacturing and technical positions in the telephone industry. Before joining USTA, he was employed by Continental Telephone, resolving many regulatory issues with the FCC and interworking arrangements between Continental and AT&T. After joining USTA (then USITA) in 1982, he represented the non-AT&T segment of the exchange carrier industry in developing the agreements and conditions for reaching consensus and developing technical standards in the post-divestiture environment. These agreements were

significant in formation of the Exchange Carriers Standards Association, which, with expanded membership and representation, is now ATIS.

Since joining USTA in 1982, he has managed USTA's technical program, including management of the association's activities in industry standards and consensus development activities. USTA's technical disciplines department assists USTA members in implementing the technical changes to the local exchange network associated with the introduction of new services, new regulatory policies, and other developments which benefit from collective action among local exchange service providers. A primary purpose of the technical disciplines department is to serve as a resource for the many USTA member companies who do not possess the number of internal technical staff available to larger companies.

Mr. Hart's address and telephone are as follows:

Paul K. Hart, Vice President, Technical Disciplines  
United States Telephone Association  
1401 H Street, N.W. Suite 600  
Washington, D.C. 20005-2136

(202) 326-7291  
(202) 326-7333 (FAX)

E-mail address: [pkhart@usta.org](mailto:pkhart@usta.org)

Should there be any questions concerning this application, please contact the undersigned.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

BY 

Mary McDermott  
Linda Kent  
Charles D. Cosson

Its Attorneys

U.S. Telephone Association  
1401 H Street, NW  
Suite 600  
Washington, DC 20005  
(202) 326-7249