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Before the
Federal Communications Commission
Washington, D.C. 20554

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JAN 28 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	N.D. File No. L-98-03
	)	
Implementation of the Local Competition Provisions of the Telecommunications Act of 1996	)	CC Docket 96-98
	)	
Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers	)	CC Docket 95-185
	)	
Area Code Relief Plan for Dallas and Houston, Ordered by the Public Utility Commission of Texas	)	N.D. File No. 96-8
	)	
Administration of the North American Numbering Plan	)	CC Docket No. 92-237
	)	
Proposed 708 Relief Plan and 630 Numbering Plan Area Code and Ameritech-Illinois	)	AID File No. 94-102

REPLY COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION

MCI Telecommunications Corporation (MCI), by counsel, hereby files these reply comments in opposition to the Petition of the State of New York Department of Public Service (DPS) For Expedited Waiver of 47 C.F.R. § 52.19(3)(c)(ii) (DPS Petition), filed on January 12, 1998.[1]

It is important to note at the outset that the Federal Communications Commission (Commission) has plenary jurisdiction over numbering matters.[2] It has delegated to the states the

[1] *Public Notice*, Common Carrier Bureau Seeks Comment On The New York State Department of Public Service Petition For Expedited Waiver of 47 C.F.R. § 52.19(3)(c)(ii) (rel. Jan. 13, 1998).

[2] *See* 47 U.S.C. § 251(e)(1).

task of overseeing the introduction of new area codes, "subject to the Commission's numbering administration guidelines."[3] The Commission's 10-digit dialing requirement does not in any way interfere with the DPS' authority, delegated by the Commission, to implement an overlay or a split. Indeed, the DPS and all state commissions are free, depending on specific circumstances in their jurisdictions, to implement either. If a state believes that 10-digit dialing is undesirable, it retains the ability to implement an area code split. Thus, the Commission's rule fully recognizes that states can consider state-specific factors when deciding how to address area code exhausts scenarios, while also recognizing that if an overlay is chosen, 10-digit dialing must also be implemented in order to protect local competition.

It is undisputed that the Commission's 10-digit dialing requirement serves legitimate, sound pro-competitive goals of the Telecommunications Act. As stated by WinStar Communications, Inc. (WinStar), in its comments, waiver of the rule "would stifle competition, would create unnecessary and harmful customer confusion, and would prove technically infeasible for a significant number of new entrants and end users.[4]

The importance of the 10-digit dialing requirement is also underscored by the fact that most of the parties that commented on the DPS Petition,[5] whether they supported it or not,

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[3] *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Second Report and Order and Memorandum Opinion and Order, FCC 96-333 (rel. Aug. 8, 1996), ¶ 281 (Second Report and Order).

[4] Comments of WinStar, pp. 1-3. WinStar also points out that implementation of an overlay without 10-digit dialing will require some central offices, which can support an overlay only with 10-digit dialing, and carriers using some routing systems, to quickly implement plans to purchase new equipment to support the new dialing format in their switches. *See* WinStar Comments, pp. 4-5.

[5] Comments in this proceeding were filed by WinStar Communications, Inc., the Public Utilities Commission of Ohio, SBC Companies, Bell Atlantic and RCN Telecom Services, Inc..

recognize the pro-competitive value of the Commission's 10-digit dialing requirement in area code overlays. For example, Bell Atlantic states that it "favors ten-digit dialing with area code overlays, ..."[6] SBC Companies make clear in their comments that they are not "expressing unqualified support for delay of ten digit dialing in every instance."[7] WinStar states that absent 10-digit dialing, most communities of interest will be inconvenienced and/or harmed by an overlay.[8] Finally, the Public Utilities Commission of Ohio (PUCO) states that 7-digit dialing in area code overlays should be considered "if it can be determined that [it] will not unduly impede competition."[9] Thus, PUCO recognizes the fact that overlays without 10-digit dialing should be implemented only where it is determined that they will not unduly impede competition.

In light of the legitimate concerns about the granting of a waiver of the 10-digit dialing rule that are raised by the parties in this proceeding, the Commission should deny the DPS Petition. To do otherwise would set a dangerous precedent, particularly in parts of the country where overlays without the assurance that all carriers' customers would dial the same number of digits to complete calls, would not only impede local competition, but would kill it before it had a chance to start.

An overlay implemented with 7-digit dialing could only be completely competitively neutral under the following conditions: 1) full, telephone line-level pooling in place, where all carriers have equal access to any unassigned telephone number; and 2) the overlay area code is as equally populated with working telephone numbers as the old area code, such that there are as

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[6]Bell Atlantic Comments, p. 2.

[7]SBC Comments, p. 3.

[8]*See* WinStar Comments, p. 2.

[9]*See* PUCO Comments, p. 3.

many customers placing calls from the new area code as the old area code. Only under these conditions would new carriers have an equal opportunity to serve customers with numbers that remain or become available in the 212 area code, and would new entrants' customers have the same opportunity to place calls dialing 7-digits as incumbents' customers will.

The above conditions, however, are nowhere near being in place in the Manhattan area, and will not be for many years to come. The industry, neither in New York nor nationally, has not begun to address requirements for telephone line-level number pooling, and there are no plans to do so until 1,000s block pooling is in place. In the meantime, while 1,000s block pooling has tremendous potential as a number conservation measure, it is only the first step toward affording all carriers equal access to the full numbering resource. In the 212 area, for example, the DPS pointed out in its Petition that NYNEX has an 80 percent utilization rate.[10] That means that even with 1,000s block pooling, new entrants would gain virtually no access to any NYNEX 212 numbers. Stated another way, at an 80 percent utilization rate, one could not reasonably expect that NYNEX would have empty 1,000s blocks to contribute to the pool.

In addition to needing the truly equal access to numbering resources that line-level pooling provides, the overlay code would have to be fully populated before 7-digit dialing within the old and new area codes would not disadvantage customers with numbers in the new overlay code. Until that point (which certainly will not occur for some number of years), customers with the new area code (disproportionately new entrant customers) will have to do more 10-digit local dialing than customers in the more fully populated 212 code (disproportionately incumbent customers). The bottom line here is that New York remains years away from the time where allowing 7-digit dialing with an overlay will not disadvantage competition.

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[10] *See* DPS Petition, p. 6.

In the event that the Commission decides to grant the DPS Petition, it should consider doing so only under certain carefully tailored conditions designed to minimize the considerable disadvantages to local competition. First, 1,000s block number pooling must be available within a very short time frame (*i.e.*, within three months) after implementation of the overlay. Second, until such time as telephone line-level number pooling is available, 1,000s block number pooling must be initiated with a maximum level of contamination of the block, and in no event less than a 90 percent contamination level. Third, the DPS must commit to implementation of telephone line-level number pooling within 12 months of initiation of 1,000s block number pooling. Only under these specific conditions will new entrants have even a minimally equal opportunity to serve customers with numbers that remain or become available in the original area codes, and will their customers have anywhere near the same opportunity as incumbents' customers to place a call by dialing 7 digits.

WHEREFORE, for the foregoing reasons, MCI respectfully requests that the Commission deny the DPS' request for expedited waiver of section 51.23(c)(3)(ii). If, in the event the Commission grants the DPS Petition, it should do so only while requiring implementation of other measures designed to protect location competition, as specifically outlined above.

Respectfully submitted,

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