

APPENDIX Q

APPENDIX R

MINORITY STATEMENT

INTRODUCTION

This Minority Statement is submitted and supported by the companies identified on the last page of this document who will be referred herein as the "Minority Parties". The Minority Parties also contributed to the process and information which led to the submission of the Majority Statement, entitled the NRO Report. However, it is the opinion of the Minority Parties that the result of the process has not resulted in an entirely credible document. Further, the document, although perhaps minimally meeting the terms of the FCC's assignment does not do so in a manner which provides a road map to the expeditious implementation of solutions to the NPA relief problems that threaten the success of the competitive local exchange service market. Rather, it continues the stranglehold that the incumbent local exchange companies have on the publicly owned resource most essential to competition, telephone numbers, and does so for a period long enough (4 to 6 years) to curtail if not eliminate competition. We therefore cannot support the Majority Statement with respect to the issues identified below and are providing our views through this submission.

In order to best serve the reader this document approximately follows the issue flow in the Majority Statement so that ready contrasts of the positions can be easily made.

THE MINORITY PARTIES SUPPORT THE FCC'S INTENTION BUT DO NOT SUPPORT ASPECTS OF THE NRO REPORT.

- A. The 1000 Number Block NRO Recommendations are Wrong in Five Major Ways

STATEMENT OF THE MINORITY PARTIES

The Minority Parties wholeheartedly supports the FCC's goal of implementing telephone number pooling as one contribution to the optimal use of the North American Numbering Plan (NANP) and to the enhancement of competitively neutral telephone number administration. Unfortunately, the recommendations developed under the Numbering Resource Optimization Working Group ("NRO") for 1000 block pooling fall far short of its potential to; maximize efficient and competitively neutral allocation of telephone numbers, to support increased consumer choice of numbers, and to reduce the accelerating pressures on state public service commissions for Number Plan Area (NPA) relief.

As framed by the NRO, 1000 block number pooling is "too little - too late" to have any appreciable impact on near to intermediate term number resource exhaust and will have a discriminatory, and thus anti-competitive, effect on competitive LECs (CLECs). For these reasons, as detailed below, the Minority Parties believed it necessary to withhold support from the 1000 block pooling section of the NRO's report to NANC. In addition, other pooling or "pooling like" solutions have not been adequately addressed by the NRO report and will be addressed in this document.

If implemented in an optimal fashion, 1000 block pooling could result in a marked improvement in number utilization efficiency and in competitive access to the entire number resource the huge quantity currently warehoused by the incumbents and those new and minimal resources currently being made available. Instead, the recommendations for 1000 block pooling developed for the NRO report would create a competitively biased number aggregation and allocation system and would undermine the effectiveness of 1000 block pooling as a means of improving number utilization. The issues are:

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1. "Contamination" Levels

The ten percent contamination level (the percent of an NXX above which 1000 number blocks escape pooling) accepted by NRO mean that the carriers holding most of the current inventory of 1000 block assignments, namely incumbent ILECs (ILECs), will not be required to contribute any significant proportion of their unused and warehoused numbers to the industry pool. By setting block contamination at 10%, the NRO recommendation will significantly limit the total ILEC contribution to the pool, thus reducing the overall effectiveness of pooling on NPA exhaust. This will result in a disproportionate contribution of CLEC inventories to the block pool, and virtually eliminate the potential offered by pooling to provide improved competitive access to the embedded base of unassigned numbers in any NPA and rate area. The contamination level should be set at 50% as a minimum and perhaps higher in some localities depending on the present and forecast number requirement growth rates.

2. Inventory Size

The service provider and industry inventories recommended by the, NRO report are so large - indeed, greater than presently in use in the industry - that they contradict the objective of reducing the current inefficiency of assigning full NXX (10,000 number) blocks to specific carriers. The recommendation for 18 months of inventory (9 month carrier inventories plus an additional 9 month pool inventory), applicable to each switch in each rate area, will reduce potential number optimization benefits by pre-maturely draining the NPA resource and increasing the potential for permanently stranded resources in carrier inventories. In addition, these large inventories will reduce competitive access to available numbers by protecting more numbers than necessary for individual carriers, rather than leaving them available to all carriers via their access to the industry pool.

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3. Block Assignment

The intention of number resource optimization is to be able to allocate numbers where they are needed and can be used efficiently and effectively. Currently, because of billing considerations, that allocation should be at the rate center and proper management of the number resource requires matching allocations to the growth requirement for numbers on a rate center by rate center basis irrespective of the number of ILEC and CLEC switches in those rate centers. When managed optimally the need for telephone numbers is determined by the requirement for new dial tone lines, not by the number of switches being installed.

The NRO report, by assigning 1000 number blocks to each carrier's switch rather than to the rate centers, could and very likely will, unnecessarily deplete 1000 number block resources. The assumption that 1000 number blocks will be assigned to carriers on a per-switch basis, rather than on a per rate area basis, ignores the ability of carriers to share these blocks among multiple switches within a rate area using LNP.

The failure to consider this fundamental aspect of effective telephone number utilization competitively advantages carriers who have the largest number of switches in each rate area because they will obtain more numbers in totality. This is primarily true of course for the ILECs, with their multiple switches per rate area, and it may significantly increase the number of blocks required by all carriers for a given rate area. This NRO recommendation can easily lead to even greater sub-optimal use of numbering resources than exists now.

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4. Exemptions for Some ILEC Switching Systems

The blanket exemption from pooling for certain switch types will dramatically reduce ILEC participation in pooling, especially where some of the most commonly used electronic switches (e.g. ,5ESS and DMS 100) may qualify for exemption. If there are valid technical constraints for some switches, the question of whether or not such constraints justify a more extended schedule for pooling implementation, let alone the broader relief of a complete exemption or waiver, is a policy question appropriately decided by the FCC.

5. The Schedules are Exaggerated

The schedules presented in the report which defer pooling as a real solution for four to six years are simply not realistic. They do not solve the problem presented by the FCC but merely defer the solution. Rather than to adopt a reasonable time-table for pooling implementation and finding a solution that fits into it, the NRO Report postulates a solution that appears to have maximized cost, complexity, and time to implementation.

B. THE NRO REPORT RECOMMENDATIONS DELAY THE INEVITABLE

The NRO Report does not emphasize and support pooling and "pooling like" solutions that can be quickly implemented and that will bring badly needed relief quickly, such as the porting of unassigned numbers and rate center consolidation. The Minority Parties believe that greater emphasis should be put on these solutions. If it is not done by the FCC it will be done by the states because they have no choice and they are on the front line in combating the number use optimization problem.

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THE POSITION OF THE MINORITY PARTIES

As emphasized above the Minority Parties enthusiastically and fully support the FCC's goal of implementing telephone number pooling as one of the means to optimize efficient use of the North American Numbering Plan (NANP) and enhance competitively neutral administration. Although recognizing that 1000 number block pooling, when properly designed and implemented unlike the NRP Report recommendation, is one potential pooling solution it is clear that Individual telephone number (ITN) pooling clearly represents the best potential method for improving number utilization. ITN pooling will also optimally relieve NPA exhaust and allow competitive parity in access to numbering resources. If implemented correctly, ITN pooling would result in a maximization of administration efficiency within a rate area and allow completely neutral access to the entire number resource. Comments on ITN and other Minority Party recommendations follow.

1. Number Optimization Benefits of ITN Pooling

It is extremely disappointing that the NRO was, in their report, reluctant to reflect the full benefits of ITN pooling in improved number utilization, competitively neutral access to the number resources, and consumer choice of numbers. While the exact benefits of either ITN or 1000 number block pooling cannot be quantified, and no quantification is attempted by NRO, it is both an obvious and logical conclusion that administering numbers on an individual basis would provide substantial improvements over administration in larger number blocks. ITN pooling also increases the ability of the NANPA to accurately forecast depletion and exhaustion of available numbers in NPAs. Under ITN pooling, number administrators can maintain current, accurate data on actual number utilization instead of relying on carrier reports and estimates which may count every newly required line once for each carrier intending to market to the

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consumer needing that line. This improved accuracy will increase the reliability of area code projections and further reduce the costs, organizational burdens and public confusion associated with NPA relief.

2. Realistically Extended Implementation Schedules are Required

The 4-6 year time frame projected for ITN implementation by the NRO Report is grossly exaggerated. Force fitting the ITN solution into that time frame will significantly delay the date by which number administration would become competitively neutral. No other industry effort of comparable magnitude (LNP, 800 portability and equal access as but a few examples) has required such a lengthy interval. MCI, one of the Minority Parties, has determined through an internal assessment, that with a firm regulatory deadline and resource prioritization, ITN pooling could be accomplished in as little as 3 years and perhaps less. Indeed, as ITN pooling would be built on the existing LNP databases and resources, its implementation will likely prove far simpler than prior industry changes that required the development and deployment of new, interconnected database systems.

3. Inventory Levels

Modest inventory levels may be acceptable for reasons of carrier and customer convenience, but because the promise of ITN is near real-time access to any number, by any customer and carrier, inventories must be held to an absolute minimum in order to realize the full potential benefits of ITN. Further, inventory sizes should be based on forecasts done by NANPA wherein the counting of every potential new customer by each carrier's forecast is minimized. The NRO Report does not adequately address this issue of exaggerated forecasts.

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4. The Porting of Unassigned Numbers

The porting of unassigned numbers from the existing warehouse of numbers in rate centers will contribute immediate savings of the assignment of thousands of 10,000 number NXX blocks and provide immediate relief to NPA exhaust situations. This implementation can take place in a matter of months and will bring the immediate benefits of number utilization optimization required while the debate over other relief mechanisms rages on.

5. Rate Center Consolidation - A "Pooling Like" Solution

Many states have implemented Rate Center Consolidation to provide relief to NPA exhaust. When rate center areas are consolidated all of the NXX codes previously designated to each rate center are now "pooled" and the telephone numbers from this pool serve the single rate center area which results from the consolidation.

Many of the problems associated with the initial consolidations efforts, such as maintaining the integrity of the 911 and E911 systems have now been solved. At this time a national policy is required which will mandate Rate Center Consolidation as a required NPA relief mechanism when it is possible to do so. The policy should provide for a "statement of proof" for situations wherein it is claimed consolidation is not feasible.

CONCLUSION AND RECOMMENDATIONS

The Minority Parties recognize that ITN pooling may appear aggressive to some dominant firms in the industry, and that regulators may fear that ITN pooling is too "radical" a change in the manner of telephone number administration. These

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concerns can be addressed directly, because carriers and policy makers must understand that efficient number utilization and competitively equal access to numbering resources cannot be achieved with incremental "tweaks" to current industry practices. Number assignment and utilization, as developed in the local exchange industry over several decades, was not based on a competitive industry model. It was and is based on a monopoly model which when applied to more than one carrier in an area incurs tremendous waste of finite numbering resources. The monopoly model does not fit nor will it adequately support the competitive industry.

Unless and until industry state and federal policy makers are willing to take a radically new approach and implement a major overhaul of number administration and utilization, the tremendous costs of relief for repetitive NPA exhaust situations will continue to be imposed on all telecommunications carriers and consumers in the United States and throughout North America. The way to accomplish this critically needed transition from the monopoly model to the competitive model is by an immediate start of development of an ITN pooling solution. Delaying such fundamental change with other, less effective approaches to number pooling will merely prolong the status quo.

In conjunction with complementary long-term measures such as rate center consolidation and independent and more accurate forecasting, ITN pooling can serve as a key element, perhaps the most important, in conservation of numbering resources and the promotion of truly competitive telecommunications markets. The Minority Parties urge the FCC to step forward and establish a three step process for the development and implementation of ITN pooling. First the process should use as a starting point the immediate implementation of a national requirement for the porting of unassigned numbers within existing rate centers. Second, the FCC should require Rate Center Consolidation wherever and whenever code relief is required and it is possible to do so. A "statement of

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proof" from the incumbent carrier should be required if it is claimed that rate center consolidation is not practical or feasible. Third, the development of a system for ITN pooling and pool administration should be started immediately. The development should be conducted with NANPA oversight and industry participation.

Instructions

CELL ADDRESS	LABEL IN A6	INSTRUCTIONS
R1C5		CODE HOLDER NAME
R2C5		CODE HOLDER TELEPHONE NUMBER
R7C1- R16C1	(NPA)NXX-#	LIST EACH THOUSAND BLOCK, BEGINNING WITH 0000 THRU 9000. ALL BLOCKS ARE REPORTED IF ZERO, POPULATE CELL WITH ZEROS THROUGH
R7C2- R16C2	WORKING	PROVIDE THE TOTAL QUANTITY OF WORKING INDIVIDUAL TELEPHONE NUMBERS IN EACH THOUSAND BLOCK. VALID ENTRIES RANGE FROM 0 - 1,000. THE DEFINITION FOR WORKING IS ANY TELEPHONE NUMBER WORKING TO ANY END USER--THIS INCLUDES POTS, OFFICIAL SERVICES, BUSINESS, TYPE 1 WIRELESS, DID, PLEXAR, ETC. IF A BLOCK OF 500 NUMBERS IS ASSIGNED BY A LANDLINE PROVIDER TO A WIRELESS PROVIDER FOR TYPE 1 SERVICES, REPORT ALL 500 AS WORKING
R7C3- R16C3	RESERVED	PROVIDE THE TOTAL QUANTITY OF RESERVED TELEPHONE NUMBERS WORKING WITHIN EACH THOUSAND BLOCK. A RESERVED NUMBER IS ANY NUMBER THAT IS MARKED IN THE PROVIDER'S NUMBER ASSIGNMENT DATA BASE AS RESERVED A SPECIFIC CUSTOMER'S NEEDS. THIS NUMBER DOES NOT REPRESENT FUTURE ANTICIPATED NEEDS OF THE PROVIDER--FUTURE NEEDS ARE SPARE.
R7C4- R16C4	AGED	THE TOTAL QUANTITY OF TELEPHONE NUMBERS WITHIN EACH THOUSAND BLOCK THAT ARE IN AN "AGING "STATE. ANY TELEPHONE NUMBER THAT HAS DISCONNECTED NORMALLY IS NOT RE-ASSIGNED UNTIL SOME MONTHS HAVE PAST. THIS TOTAL REPRESENTS THESE AGED NUMBERS.
R7C5- R16C5	TEST	THE TOTAL QUANTITY OF NUMBERS WITHIN EACH THOUSAND BLOCK ASSIGNED TO SOME TYPE OF PROVIDER TEST SERVICE. THE USE OF NUMBERS FOR TEST PURPOSES IS NORMALLY RATHER SMALL
R7C6- R16C6	TOTAL	THE SUM OF EACH CATEGORY FOR EACH THOUSAND BLOCK. THIS COLUMN IS POPULATED BY THE FORMULA IN SPREADSHEET.
R7C7- R16C7	RATE CENTER	THE RATE CENTER NAME TO WHICH THE REPORT NXX IS ASSIGNED. THIS RATE CENTER NAME MUST BE THE EXACT SPELLING OF RATE CENTERS PROVIDED

Instructions

EXAMPLE	
	(214)222-0
UT.	
	R7-156
G.	
	R7-55
OR	
ES	
	R7-45
	R7-0
D	R7- 256
NPA-	APPOLLO
MATCH	
AN	

End User Questionnaire

Question	A <\$5K	B \$5K- \$10K	C \$10K- \$50K	D \$50K- 100K	E \$100K- \$500K	F \$500K- \$1M	G \$1M- \$10M	H > \$10M	unknown	N/A
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Area Code Split										
Out-of-pocket costs, etc.					(Note 1),					
Intangible costs										
Implementation effort										
Miscellaneous costs				(Note 2)						

Numbering Changes, Additions, etc.										
Costs imposed upon organizations that maintain data bases, etc.										

10-Digit Dialing										
Costs of dialing pattern/protocol changes			(Note 3),							

Rate Center Consolidation										
Cost of reprogramming CPE to accommodate local calling area changes	(note 4),									

Specialized Overlays										
Cost if existing/cellular/PCS phone numbers were assigned to a new area code	(Note 5),									
Cost if any new cellular/PCS phone numbers were assigned to a new area code	(Note 5),									

NOTES:

The questions, as shown in the matrix, are abbreviated. Please see Attachment C for the complete questions

1. The respondent estimated an average cost of \$20 per employee for time spent deciding how to deal with a number change and for expenses for executing those changes.
2. The respondent estimated a cost of \$40.00 per phone to reprogram wireless phones (based upon an estimate of 2 hours per phone times \$20 per hour).
3. The respondent identified costs to reprogram fax machines, autodialer modems, and various program throughout the business
4. Per PBX, if all done simultaneously, in the \$100,000 - \$500,000 range
5. "Expect cellular carrier would provide this service."
6. One respondent stated that "to avoid the substantial costs associated with telephone number changes, solutions should be adopted which do not require consumers to change their telephone number."

RESPONDENT INFORMATION

Total - 5	Access Lines	Employees	Database records containing telephone numbers
1. Large Businesses	45,000	120,000	> 30-million
2. Consumer advocates agencies estimating their constituents' costs	2-million	N/A	unknown
3. Consumer Advocate Agencies estimating their own agencies' costs	100, 8163, 23	30, 7673, 57	10,000, unknown, between 5,000 and 10,000

End User Questionnaire

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Intangible costs										
Implementation effort										
Miscellaneous costs				(Note 2)						
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Costs imposed upon organizations that maintain data bases, etc.										
10-Digit Dialing										
Costs of dialing pattern/protocol changes			(Note 3),							
Rate Center Consolidation										
Cost of reprogramming CPE to accommodate local calling area changes	(note 4),									
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Cost if existing/cellular/PCS phone numbers were assigned to a new area code	(Note 5),									
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ATF Cost Questionnaire Overview

Introduction

The ATF developed and distributed three questionnaires intended to gather data on various number optimization measures. Specifically two questionnaires requested cost and timing information on implementing various number optimization measures. A third questionnaire also sought information on end user cost for implementing a new area code. The questionnaires were sent in early August to selected entities within the following three groups: network service vendors, service providers, and end users. Responses were requested by August 28th, with a subsequent extension to September 4th. The three cost questionnaires and the accompanying cover letters are provided as background information.

The ATF committed that the information provided by respondents would be treated as confidential. Therefore, the actual responses are not provided here in order to respect the confidential nature of the information. The attached matrix is a summary of those responses that were submitted to and reviewed only by the two ATF Co-Chairs. Because the NRO has not completed its analysis of all the number optimization alternatives this matrix is limited by necessity to summarizing data on only ITN and Thousand block pooling.

Overview of Three Questionnaires

The Vendor Questionnaire (Attachment A) includes questions about seven different optimization measures. For each of these questions, the respondent was requested to select from among 11 cost ranges, as well as provide implementation time requirements. This questionnaire was sent to ten vendors, and responses were received from six. However those responses indicated they would only provide relevant cost information to their customers (e.g. Service Providers). Therefore vendor costs may have been included in some service provider responses.

The Service Provider (SP) questionnaire (Attachment B) includes eight categories of cost for all fourteen number optimization measures. Respondents were asked to provide data within a sample MSA. They were requested to select from six cost ranges within each of these categories as well as to identify an implementation time frame. In addition, respondents were requested to provide an estimated quantity of subscribers they serve within the MSA. The Service Provider Questionnaire was distributed through the NRO Co-Chairs and the Chairman of NANC. Six responses were received, however one response simply recommended that the FCC seek such information directly and then afford such responses confidential treatment.

The end user questionnaire (Attachment C) primarily focuses on gathering information on the cost of introducing a new area code. The ATF generally agreed that many of the optimization measures would not present end user cost impacts and, therefore, with limited exceptions, questions were not asked of end users relative to the specific measures. Demographic information on each respondent was also requested. This questionnaire was distributed to NASUCA members (i.e., consumer counsel/advocate agencies in each of the states), members of the Ad Hoc Telecommunications Users Committee, and various national

organizations including the Consumer Federation of America, the National Emergency Number Association, the United States Chamber of Commerce, the National League of Cities, and the National Safety Council. Four responses were received. To the extent that the implementation of any of the 14 number optimization measures avoids or delays the need for area code relief, end users would avoid certain costs. The end user cost questionnaire matrix summarizes the responses to the end user cost questionnaire.

ATF members felt that given the low response rate for all three questionnaires, little if any conclusion can be drawn from the data and as such it is offered for information purposes only.

The ATF intends to submit a second cost matrix covering the other optimization measures as they are analyzed.

North American Numbering Council (NANC)
Executive Summary of the Report of the
Numbering Resource Optimization Working Group (NRO-WG)
SEPTEMBER 23, 1998

In a letter dated March 23, 1998, the Common Carrier Bureau asked the NANC to provide a report "sufficiently detailed to support, both technically and operationally, a uniform, nationwide system for pooling by December 1999. It would also be helpful to the Bureau if the NANC would give number conservation solutions, other than pooling, a very high priority." In response, the NANC created the NRO-WG. The purpose of the NRO-WG is to assess and recommend strategies that ensure adequate and competitively neutral availability of numbering resources to all end users and service providers while optimizing the use of numbering resources. These strategies should be technically feasible, practical and should minimize costs to all.

The task for the NRO-WG was to develop a report to the NANC. In preparing the report, the NRO-WG was to coordinate with other industry fora, collaborate with state commissions, and collect the necessary data to evaluate number optimization alternatives.

The NRO-WG identified 14 alternatives that potentially could increase the efficiency of the use of numbering resources. The NRO-WG subsequently created three task forces to address specific tasks:

State Issues Task Force (SITF)
Individual Telephone Number Task Force (ITN TF)
Analysis Task Force (ATF)

The State Issues Task Force was charged with providing clarification regarding the needs and preferences of state regulatory bodies in the area of number resource optimization. Specifically the SITF was charged with surveying individual states regarding the NRO-WG's identified optimization techniques. The SITF was also charged with developing a model data request for use by state commissions for obtaining number utilization data from service providers.

Two of the alternatives -- Individual Telephone Number pooling (ITN pooling) and Unassigned Number Porting (UNP) -- were directed by the NRO-WG to the ITN TF for more detailed analysis. The ITN TF was tasked with conducting a detailed analysis of ITN pooling, including the selection of an architecture, as well as an analysis of UNP. The ITN TF addressed ITN pooling in significant detail, but due to time constraints has not finished its analysis of UNP. The UNP analysis is expected to be done by early October 1998, and will be submitted by the NRO-WG to the NANC at that time to complete the report.

The ATF was charged with identifying common criteria, gathering data and analyzing data based on the set of common criteria as they apply to the NRO-WG identified optimization measures. The NRO-WG specifically assigned thousands-block pooling for analysis. That analysis is complete and contained herein. Analysis of the remaining 11 alternatives is underway but is not ready for inclusion. It is, however, expected to be finished by early October and will also be submitted by the NRO-WG at that time to complete the report.

The SITF reported that states recognize the importance of national guidelines, but seek the flexibility to require carriers to make the most efficient use of a limited and important public resource. States also responded that they will support the efforts of the NRO-WG, NANC and FCC should they lead to reasonable number resource optimization guidelines and prefer that they be detailed and include supporting rationale. The states' goal is more efficient use of numbering resources.

No one state has experience with all the optimization measures but, together, they have tested or implemented many of them. Specifically, they have first-hand experience with rate center consolidation, overlays, splits, extended local calling areas, inconsistent rate centers, elimination of protected NXX codes, thousands-block number pooling, code sharing, and altering the CO Code assignment guidelines in jeopardy situations. Some have performed studies on individual telephone number pooling and thousands-block pooling.

The SITF proposed a standardized state data request format to aid in the collection of data from service providers. The data request format offered, when combined with utilization data, will allow the states to make informed decisions about NPA relief. While the SITF recognizes that the needs of each state are unique, and decisions about what measures to implement are best left to the appropriate regulators, utilization and forecasting of NXX codes in high growth areas can assist with difficult NPA relief and planning decisions in the immediate future.

The NRO-WG and its task forces sought to assess qualitative and quantitative benefits of number pooling alternatives. Although potential qualitative benefits of thousands-block and ITN pooling are identified, there was insufficient data available to measure or predict quantitative benefits. In addition, an attempt was made to assess costs associated with the pooling alternatives. The ATF distributed cost questionnaires to service providers, vendors, and end users, and summarized the responses in an attachment to this report. Given the low response rate to the questions, few if any conclusions can be drawn from the data and, as such, the responses are provided for informational purposes only.

Of the two number pooling alternatives addressed, the NRO-WG concluded that thousands-block pooling could be implemented in a significantly shorter time-frame. As LRN-LNP is implemented, it is estimated that thousands-block pooling could be initially implemented sometime within 10 to 19 months after a regulatory order, and ITN pooling would require four to six years. Some components of the pooling timelines require regulatory guidance. It should also be noted that these implementation timeframes are dependent upon the availability of the required hardware/software changes from vendors.

Based on the work of the NRO-WG to date, as documented in this report, thousands-block pooling is the only number pooling alternative that potentially meets the FCC's December 1999 date for deployment of number pooling in LNP areas in accordance with a consistent nationwide plan. Many of the additional number resource optimization methods that the NRO-WG has yet to address in detail should provide the industry and regulators with number optimization results that are valuable and warrant their future use either individually, or in combination. While the NRO-WG recognizes the importance of cost/benefit analysis, this analysis has not been fully

addressed in this report. Further, the important issues of cost allocation and cost recovery remain to be addressed by regulators.

Chairman Alan C. Hasselwander
North American Numbering Council
4140 Clover Street
Honeoye Falls, NY 14472-9323

Dear Chairman Hasselwander:

Thank you for your letters of November 5, 1997 and December 22, 1997, reporting to the Common Carrier Bureau (Bureau) on the North American Numbering Council's (NANC's) progress in developing a recommendation for the Federal Communications Commission (Commission) on national standards for number pooling. The NANC's recommendation will be an important step in the development of national standards for number pooling that will benefit telecommunications carriers and consumers. The Bureau is looking forward to receiving this recommendation.

In recent months, the Bureau has received inquiries from state public utility commissions and others regarding implementation of number conservation methods that will decrease the frequency of the need for area code relief. In your letters, you state that the NANC has tentatively concluded that the adoption of number pooling is in the public interest and could mitigate the problem of number exhaust. The NANC also has concluded that national guidelines for number pooling architecture, implementation, and administration are appropriate. You also note in your letter that some state public utility commissions have adopted or are considering adopting number pooling requirements and that is the NANC's position that states taking those actions do so at the risk that their decisions may have to be modified to be consistent with national guidelines on number pooling. The Bureau is monitoring these developments and is also aware that some state commissions have established task forces to examine the feasibility and utility of number pooling.

As you know, the NANC plays an important role in facilitating the development of an industry consensus on how number pooling should be implemented and the Bureau fully supports NANC's current efforts in studying pooling and preparing a report for the Commission's consideration. We also believe that efforts by state commissions will provide useful information that should help further the development of this capability. It is our hope that the NANC and the state commissions will work cooperatively on these issues. The NANC is encouraged to respond to state commission requests for information regarding the NANC's work in studying pooling, and, where possible, to use information obtained from state commissions in developing the NANC report. The NANC's report on national number pooling standards will be critical to the implementation of a technology that may alleviate the recurring problem of area code exhaust. For this reason, we request that NANC submit its report to the Commission six months from the date of this letter. It would be most helpful for the Bureau if the NANC's report could be sufficiently detailed to support, both technically and operationally, a uniform, nationwide system for pooling by December, 1999. It would also be helpful to the Bureau if the NANC would give

number conservation solutions, other than pooling, a very high priority.

Thank you, as always, for your continued efforts on these complex and important issues. Increased availability of numbering resources for all telecommunications carriers will promote competition, and the NANC's endeavors to that end are invaluable.

Sincerely,

A. Richard Metzger, Jr.
Chief, Common Carrier Bureau

APPENDIX S

Case File

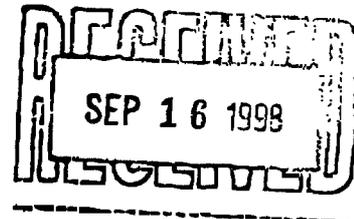
BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Own Motion Into Competition for Local Exchange Service	R.95-04-043 (Filed April 26, 1995)
Order Instituting Investigation on the Commission's Own Motion Into Competition for Local Exchange Service	I.95-04-044 (Filed April 26, 1995)

FILING OF PACIFIC BELL (U 1001 C) PURSUANT TO ORDERING PARAGRAPH 2 OF DECISION 98-08-037

Ordering Paragraph 2 of Decision 98-08-037 states:

By September 13, 1998, Pacific Bell (Pacific) and GTE California Incorporated shall file and serve on parties a report identifying all rate centers in their service territories which they believe can be consolidated with adjacent rate centers without serious impact.



Pacific Bell has examined the rate centers in its service territories, and, as a result of that review and a review of rate center consolidation undertaken in other areas, believes that none of its rate centers can be consolidated with an adjacent rate center without serious impact. Given the current local rate structure in the State of California (the 12 mile local calling scope and 12-15 mile ZUM zones), and the size of our rate centers, any consolidation of our rate centers would affect the rating of calls as local or toll, and thereby would necessarily affect rates for our local services.

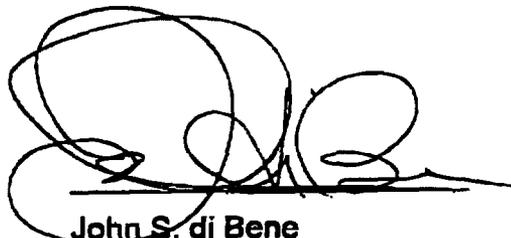
Obviously, any affect on local service rates would involve a serious impact. In the Texas PUC Number Conservation Task Force Report that we provide with our comments on code conservation, the Task Force recommended (and the Texas Commission ordered) rate center consolidation in only two of six rate center

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consolidation proposals. In both situations, consolidation did not affect local rates.¹ In this State, however, due to the unique local rate structure, there are no situations in California that are equivalent to the rate center consolidation recommended in the Texas Task Force Report.²

Respectfully submitted,



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Dated: September 14, 1998.

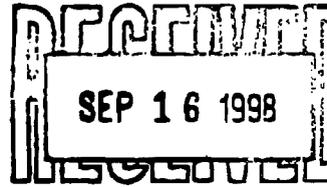
¹ See Comments of Pacific Bell (U 1001 C) Regarding Development of NXX Code Conservation Measures & Notice of Availability (filed Feb. 25, 1998). The two options recommended by the Texas Task Force were "Options 1 and 3", which both involved situations where consolidation did not affect local exchange calling scopes. See Texas Number Conservation Task Force Report, at 20, 27, 55.

² There is another rate center issue that the Commission should consider as part of its consideration of rate center consolidation, and that is inconsistent rate centers. Although the Commission has permitted inconsistent rate centers, this option generally has not been used by CLECs, and it creates serious implementation problems for long term number portability and number pooling. To the extent that the Commission considers consolidation of industry-standard rate centers, it should prohibit inconsistent rate centers.

APPENDIX T

Case File

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA
-oOo-



Order Instituting Rulemaking
on the Commission's Own Motion
into Competition for Local
Exchange Service.) R.95-04-043

Order Instituting Investigation
on the Commission's Own Motion
into Competition for Local
Exchange Service.) I.95-04-044

RESPONSE OF GTE CALIFORNIA INCORPORATED (U 1002 C)
TO DECISION 98-08-037 REQUIRING IDENTIFICATION OF
CERTAIN RATE CENTERS

~~This filing is in response to Commission Decision 98-08-037,~~

which provided that GTE California Incorporated (U 1002 C) (GTE) should identify all rate centers in its service territory which it believed could be consolidated with adjacent rate centers without serious impact. (Pacific Bell was required to file this information with respect to its service territory as well.) This information was to be filed by September 13, 1998.¹

GTE has supported rate center consolidations when it can be done in such a way so as to avoid changes to existing rate structures or customer rates. Other GTE telephone companies have

¹September 13 is a Sunday, thus extending the required filing date to September 14.

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completed the consolidation of a number of rate centers in Minnesota and Texas. Unfortunately, GTE does not believe that it has any rate centers in California that can be consolidated "without serious impact". While on the surface rate center consolidation appears to be a simple solution that would reduce the initial code requirements for new entrants, there are many issues that must be addressed. Rate centers must be accomplished in a revenue neutral way. Assumptions and criteria that will govern the consolidations must be identified. A thorough assessment of the impact to end user customers must be made, technical issues must be addressed, and other impacts identified.

In the following sections, GTE identifies some of the many issues that are raised, or criteria that must be decided in order to accomplish rate center consolidations. GTE believes that before identification can be made as to which rate centers might otherwise be consolidated more readily than others (recognizing that no consolidations can be accomplished without any significant impacts), criteria or assumptions that will govern the consolidations must be identified.²

A. RATE CENTER CONSOLIDATION MUST BE REVENUE NEUTRAL

The differing calling scopes of GTE's rate centers in California raises a serious issue for consolidation. GTE's

²The Commission's order did not identify criteria to be used or considered in such consolidations.

)

current rate structure provides that calls from 0-12 miles from the rate center are considered local; calls from 13-16 miles are considered ZUM calls, and calls beyond 16 miles are considered toll calls. (See: GTE Schedule Cal. P.U.C. No H-1, Sheet 2.1, Section A and Sheet 9, Section D) GTE has no adjacent rate centers with the same calling scopes. Attachment 1 provides an example of the problem this raises. The calling scopes of three adjacent GTE rate centers in the 310 area code are shown, with their respective calling scopes. As can be seen, local, ZUM and toll scopes differ. For example, while all three show Beverly Hills as a local call, Canoga Park is currently a local call for Santa Monica, a ZUM call for West Los Angeles, and a toll call for Mar Vista. Compton is a toll call for West Los Angeles and Santa Monica, but a ZUM call for Mar Vista.

It is GTE's position that rate center consolidation must be accomplished in a revenue neutral manner. Since GTE's rate centers do not have the same local, ZUM, and toll calling scopes, this will require that calling scope and associated rate impact issues be addressed as part of the consolidation process.

B. GTE ASSUMPTIONS FOR RATE CENTER CONSOLIDATION

As indicated above, rate center consolidation must be accomplished in a revenue neutral manner. The following further defines the conditions that GTE believes are necessary for consolidation of rate centers:

a. The rate centers to be consolidated must have identical local area calling scopes, including the same extended calling areas (EAS), unless the ILEC's calling scope(s) and associated rates may be equalized through the consolidation process. (As noted above, the calling scopes of GTE's existing rate centers are inconsistent.)

b. The rate centers must have identical local exchange service rates, unless the local service rates may be equalized through the consolidation process. (Today, GTE's exchanges that are former Contel exchanges have different local service rates than the rest of GTE's exchanges.)

c. Rate centers that are consolidated should be contiguous and all associated wire centers must currently be or are scheduled to be capable of local number portability, in order to conform to the capability of porting numbers within a rate center.

d. The consolidation of two (or more) rate centers into one larger center should not affect the local area calling scopes, associated rates and local service rates of any other rate center unless the ILEC associated with the other rate center can equalize any rate impacts at the time of consolidation.

e. Consolidation must not create undue technical implementation complications for service providers without establishing sufficient cost recovery mechanisms that are defined

as part of the consolidation process.

f. Contiguous rate centers separated by a LATA boundary should not be consolidated.

g. Contiguous rate centers in differing NPAs (area codes) should not be consolidated.

C. CRITERIA FOR CONSOLIDATING RATE CENTERS MUST BE IDENTIFIED

The impacts of consolidating rate centers cannot be studied until certain criteria are determined as to how the consolidation will take place. For example, if two rate centers are consolidated, does one of the prior rate centers become the rate center for the combined rate center, or is a "new" location within the two rate centers selected as the "rate center".

Criteria must be established as to how the local, ZUM, and toll calling scopes will be defined after consolidation. How revenue impacts to provide for a revenue neutral consolidation will be addressed must be determined.

D. OTHER CUSTOMER IMPACTS

As discussed above, one serious issue that is raised by consolidation of rate centers is the revenue impacts to end users and the resulting changes in calling scopes after consolidation. In addition, there will be other affects on customers resulting from rate center consolidation. For example, customer CPE such as PBXs and automatic dialing equipment may be affected to the

extent that customers' toll boundaries are changed. Bills following consolidation may be confusing. Currently, customers calling an exchange would have that location shown on their toll bill itemization. After consolidation (depending on "where" the new rate center is designated for the consolidated rate center) the call detail may no longer reflect the actual place name called. Thus, in order to minimize the impact to customers, customer education will be needed before consolidation, both to alert them to possible impacts to their CPE (and changes they will be required to make) and to changes that may be experienced to their telephone bills after consolidation.

E. TECHNICAL ISSUES

Consolidation of rate centers will involve a number of technical issues, including impacts on and require changes to GTE's network and billing systems.

The consolidation of rate centers requires new data entries in all industry and service provider databases/tables that use rate centers in their processes (including switch translations). A major change in billing and routing tables will be required as a result of consolidating rate centers. Billing and routing tables will need to be redefined in each central office in the entire LATA where consolidation(s) take place.

Without more information on how rate centers will be consolidated, it is not possible to estimate at this time the

effort and expense that will be required to make necessary changes to the Company's billing systems if one or more rate centers are consolidated. However, it is anticipated that both hardware and software changes will be needed. Currently changes requiring such effort require 6 months to a year to complete.

~~Additional hardware may be required to handle changes in the way~~ call records are handled. If calling routes move from ZUM or toll to local, the Universal Measured Service (UMS) system will be impacted. Trunking changes would be required in the switch mechanisms, and adjustments in the capacity and polling of data devices.

Consolidation will have a significant affect on code billing and routing tables, requiring a monumental effort to redefine each central office within the entire LATA. It will require research on every code in an office to be made and changed as necessary to the new billing and routing requirements. In fact, the overall impact on switch software is very similar to the effort that is required to establish a new switch.

In addition to the billing systems, other network changes may be required, such as trunking rearrangements for operator service, local dialing plans, and toll recording equipment. Analysis would have to be made of all customers using services like remote call forwarding and foreign exchange lines to determine affect on these services. Local number portability

(LNP) may also be impacted.

F. OTHER CONCERNS

There are other concerns that must be addressed. For example, as indicated above, rate consolidation will impact other service providers, who may need to change their billing system data to reflect the new rate centers. Interconnection agreements and GTE-CLC billing arrangements may be affected by rate center consolidations. Certain services that are provided to wireless customers that are rate center dependent (such as Pager Alert and Voice Mail) would be impacted by rate center consolidations. There could be impacts to other carriers' equipment and/or agreements. Direct trunking with CLCs may be affected if rate centers close to LATA boundaries are consolidated.

F. CONCLUSION

There are no rate centers that can be consolidated without serious impact in GTE's service territory, given the differences in calling scopes of the existing rate centers. Certain criteria

or assumptions must be made before impacts, including time needed to make necessary changes can be determined.

DATED: September 14, 1998

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By 
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EXAMPLE OF LOCAL CALLING SCOPES

September 14, 1998

RATE CENTER	WEST LOS ANGELES			SANTA MONICA			MAR VISTA		
	V 9218 H 7914			V 9227 H 7920			V 9229 H 7907		
	LOCAL	ZUM	TOLL	LOCAL	ZUM	TOLL	LOCAL	ZUM	TOLL
BEVERLY HILLS	X			X			X		
BURBANK		X			X			X	
CANOGA PARK		X		X					X
COMPTON			X			X		X	
CULVER CITY	X			X			X		
EL SUGUNDO	X			X			X		
GARDENA		X			X		X		
GLENDALE		X			X			X	
GRANADA HILLS		X				X			X
HAWTHORNE	X			X			X		
INGLEWOOD	X			X			X		
LA DA 1	X				X		X		
LA DA 2	X				X		X		
LA DA 3		X				X		X	
LA DA 4		X				X		X	
LA DA 5		X				X		X	
LA DA 6		X			X		X		
LA DA 7	X				X		X		
LA DA 8	X				X		X		
LA DA 9	X			X			X		
LA DA 10	X				X		X		
LA DA 11	X			X			X		
LA DA 12	X			X			X		
LA DA 13	X			X			X		
LA DA 14	X			X			X		
LOMITA			X			X		X	
MAILIBU	X			X				X	
MAR VISTA	X			X			X		
NO. HOLLYWOOD	X					X		X	
NORTHRIDGE		X			X				X
PACOIMA		X				X			X
REDONDO		X			X		X		
RESEDA	X			X				X	
SANTA MONICA	X			X			X		
SEPULVEDA		X			X				X
SUN VALLEY		X			X			X	
TORRANCE			X			X		X	
VAN NUYS	X			X			X		
WEST L.A.	X			X			X		

Example shows local calling scopes of 3 adjacent rate centers in the 310 area code.

ATTACHMENT 1

CERTIFICATE OF SERVICE

I, Mark Fogelman, hereby certify that I have today caused a true and correct copy of the foregoing PETITION OF THE CALIFORNIA CABLE TELEVISION ASSOCIATION FOR RECONSIDERATION to be served on all known parties of record by serving a copy on each party on the attached list in the manner indicated thereon.

Executed at San Francisco, California, this 15th day of December, 1998.



Mark Fogelman

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