

EX PARTE OR LATE FILED

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February 8, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: **EX PARTE**
WT Docket No. 98-229

Dear Ms. Salas:

This letter will inform you that on February 6, 1999 I met with the Federal Communications Commission Commissioners and staff members and discussed the potential implications of the above cited docket on the exhaust of numbers within the North American Numbering Plan (NANP) area.

Commissioner Gloria Tristani and Legal Advisor Karen Gulick;

Commissioner Harold Furchtgott-Roth, and Legal Advisors Kevin Martin and Paul Misener;

James Casserty and Linda Kinney, Legal Advisors to Commissioner Ness;

Peter Tenhula, Legal Advisor to Commissioner Powell; and,

James Schlicting, Deputy Bureau Chief, Wireless Bureau.

Enclosed is a copy of the outline I used during my discussion.

Sincerely,



Alan C. Hasselwander
Chairman, North American Numbering Council

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cc: Commissioner Gloria Tristani, Commissioner Harold Furchtgott-Roth, Karen Gulick, Kevin Martin, Paul Misener, James Casserty, Linda Kinney, Peter Tenhula, James Schlicting, Kris Monteith Jeannie Grimes

Enclosure: 1

Talking Paper for Meeting with FCC Commissioners and Staff on Friday, February 5, 1999

- Thank you for the time
- I apologize for the short notice
- Some information has come to my attention very recently concerning telephone number exhaust which might bear on the wireless forbearance request currently pending.
- I want to stress that I'm not here as an advocate against wireless interests. As chairman of the North American Numbering Council (NANC), I am and must be neutral.
- But I must be an advocate of efficient number utilization, and it is in that role that I am here.
- In March of 1998 the Chief of the Common Carrier Bureau asked the NANC to advise the Bureau, among other things, on a method of telephone number pooling that could be implementable by the end of 1999. We delivered a report to the Bureau in October that was responsive to that request and which indicated among other things that Thousands Block Number Pooling was feasible within that time frame. The report was released on November 6 with a Public Notice seeking public comment by December 21. It is my understanding that the Commission will be following with an NPRM on number pooling and other optimization measures in the not too distant future.
- My request is that the Commission not do anything that might foreclose the ability to do number pooling on a timely basis across all industry segments.
- The North American Numbering Plan Administrator (NANPA) is charged by rule to administer the North American Numbering Plan (NANP) and to advise the industry, the FCC and NANP countries on matters involving the NANP. S 52.13 (b) (2) of the rules state that the NANPA must plan "for the long-term need for NANP resources to ensure the continued viability of the NANP by implementing a plan for number resource administration that uses effective forecasting and management skills in order to make the industry aware of the availability of numbering resources and to meet the current and future needs of the industry."
- The new NANPA has not been in a position to do effective forecasting, since it is still in the process of taking over CO Code administration. (The new NANP took over the NPA (Numbering Plan Area) administration functions in January of last year. A phase in of CO Code administration functions on an area by area basis from the prior CO Code Administrators, i.e. incumbent Local Exchange Carriers, has been ongoing. At the end of 1998, 9 out of 16 regions had been transitioned. It is expected that the process will complete about mid-year). It is generally accepted that the Central Office Code utilization (COCUS) data that the new NANPA inherited are very poor. Previous forecasts based on that data projected exhaust sometime between 2025 and 2036.
- Recently the NANPA did a study based on the best information it had available. (This information became available after the last NANC meeting and will therefore not be shared with NANC until February 18).

- The study attempted to do three things: project NPA Assignment Growth, project CO Code Assignment Growth, and estimate the impact of LNP based Thousands Block Pooling.
- Background: There are 618 NPA codes available for assignment in the US and Canada. 207 Geographic codes are assigned in the US and 41 to other countries. There are 258 total NPAs in use. At least 22 more will go into service this year; another 50 are in jeopardy, that is in a rationing mode. Since 1994, 108 NPAs have been added. The number of NPAs in jeopardy at the beginning of 1994 was 7. At the beginning of 1998 it was 28. At a compound growth rate of 12%, we run out of NPAs in 2007 or perhaps somewhat later if we utilize some reserved codes. A 12 % growth rate is not inconsistent with the growth rate over the last few years and the increasing number of jeopardy NPAs. (The rationing phenomenon may dampen perceived demand).
- NANP estimates that 59% of CO Codes are used by ILECs, 17% by CMRS carriers, 15 % by CLECs and 10% by Paging Carriers. It calculated that the 1998 CO Code Growth growth is 20% for CMRS, 9% for paging, 61 % for CLECs and 10% for ILECs.
- In order to understand the effect of LNP based Thousand Block Number Pooling on number exhaust, the NANPA "created" a theoretical average NPA based on nationwide average industry by industry fill rates and growth rates. Assuming no pooling, the NPA would exhaust by 2001. With wireline only pooling beginning in the 2d Quarter of 2000, exhaust would occur by 2004; with all participants other than paging carriers pooling, exhaust would occur in 2009. Adding paging providers would move the exhaust out to 2011. Delaying pooling by a year would bring 2011 back to 2008. Reclaiming all non-contaminated Thousand blocks (<10% utilized) would improve the date to 2018.
- I am not arguing today that the analysis that has been done should not be subject to scrutiny, as it surely should and will be. But I believe that its conclusion must be taken seriously, i.e. that not including all players in number pooling can have a very profoundly negative impact on the efficacy of pooling and thus hasten the need for NANP expansion and the costs associated with it. We don't know for sure what the costs of expansion are, but they can easily reach \$50 billion and estimates range as high as \$150 billion.
- I am arguing that nothing should be done that could ultimately preclude all carriers, including wireless carriers, from participating in LNP based pooling whenever it might be ordered. The pieces for adopting Thousand Block pooling are largely in place; requirements are written, a trial is ongoing, a nationwide Number Pooling Administration Center (NPAC) release is well along in development (3.0 is under development; 1.4 is working now and would support a limited rollout) and can be implemented in the 2d Quarter of 2000. I hope that all industry segments will be prepared to implement Thousand block pooling if ordered.

Alan Hasselwander
February 5, 1999