

May 3, 1999

Ms. Magalie R. Salas
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Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

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MAY 8 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Maine Public Utility Commission's Petition for Additional Delegated Authority to Implement Number Conservation Measures, NSD File No. L-99-27; Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717, NSD File No. L-97-42; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98

Dear Ms. Salas:

Enclosed herewith for filing are the original and four (4) copies of MCI WorldCom's Comments regarding the above-captioned matters.

Please acknowledge receipt by affixing an appropriate notation on the copy of the MCI WorldCom Comments furnished for such purpose and remit same to the bearer.

Sincerely yours,



Henry G. Hultquist

Enclosure
HGH

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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Conservation Measures)	
)	
Petition for Declaratory Ruling and Request)	
for Expedited Action On the July 15, 1997)	
Order of the Pennsylvania Public Utility)	NSD File No. L-97-42
Commission Regarding Area Codes)	
412, 610, 215 and 717)	
)	
Implementation of the Local Competition)	
Provisions of the Telecommunications)	CC Docket No. 96-98
Act of 1996)	

COMMENTS OF MCI WORLDCOM, INC.

MCI WorldCom, Inc.
Henry G. Hultquist
Mary DeLuca
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May 3, 1999

EXECUTIVE SUMMARY

MCI WorldCom shares the frustration of the Maine Public Utilities Commission with the antiquated assignment practices that are causing area code exhaust throughout the country. MCI WorldCom supports allowing Maine to implement a trial of unassigned number porting in two circumstances: (1) to address specific customer requests; and (2) to allow carriers that will require fewer than twenty-five numbers in a given rate area to establish their service “footprint” with unassigned numbers that are ported from another carrier. The limited extent of these measures should provide benefits to competition and, to some extent, code conservation without delaying the implementation of a national framework for number resource optimization. The Commission should not, however, allow Maine to displace the numbering plan administrator by establishing number assignment and utilization standards that are unique to Maine. Such a fragmentation of the numbering plan would do nothing to prevent the exhaust of the 207 area code. Nor should the Commission allow Maine to implement thousand block pooling before the Commission establishes an adequate foundation for pooling to take place throughout the country. Until the Commission does so, the systems and processes required to implement pooling on an automated, scaleable basis simply will not exist.

The Commission can best assist Maine and other states by completing its actions with respect to number resource optimization at the earliest possible date.

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COMMENTS OF MCI WORLDCOM, INC.

MCI WorldCom, Inc. (MCI WorldCom) hereby submits comments, pursuant to Public Notice DA 99-638, regarding the Maine Public Utility Commission's Petition for Additional Delegated Authority to Implement Number Conservation Measures (filed March 17, 1999) (MPUC Petition). Therein, the MPUC seeks authority to: (1) establish number assignment and utilization standards; (2) order interim unassigned number porting; and (3) order thousand-block pooling. MCI WorldCom shares the frustration of the MPUC with the inefficient number assignment practices that cause premature area code exhaust, and recognizes the MPUC's commitment to promote competition. MCI WorldCom also supports certain state initiatives on

unassigned number porting. However, this Commission should not authorize individual states to depart from national number administration standards and guidelines. Nor should the Commission allow additional states to order redundant pooling trials before the Commission establishes the national framework for pooling. The Commission can best help the states and the industry avoid premature area code exhaust with the prompt issuance of an NPRM in the NRO proceeding, followed by national rules for thousand-block pooling by the end of 1999.

I. Background

The MPUC is rightly concerned that the 207 area code is projected to exhaust in June of 2000, despite the more than 5.7 million unused numbers contained in that code.¹ On the surface, this would appear as improbable as dying of thirst in the middle of Moosehead Lake. As it happens, the premature demise of 207 is far from unusual. Throughout the country, area codes in which many numbers remain unused are facing exhaust. Indeed, this Commission has received a series of petitions from state commissions that describe circumstances remarkably similar to those in Maine.²

In every case, the culprit is the antiquated number assignment practice whereby local exchange carriers must obtain at least one NXX code (10,000 numbers) for each rate area in which they intend to offer service. While this wasteful practice was acceptable in an era of monopoly, it is plainly inadequate when numerous service providers, including incumbent local

¹ MPUC Petition at 2.

² *See, e.g.*, New York Department of Public Service Petition for Additional Authority to Implement Number Conservation Measures, NSD File No. L-99-21 (filed February 19, 1999).

exchange carriers (ILECs), competitive local exchange carriers (CLECs), and wireless carriers, require numbering resources. In fact, Maine provides an object lesson in the inadequacy of this number assignment practice. There are over 200 rate areas in Maine, some of which contain as few as 20 working lines.³ As long as numbers are assigned in blocks of 10,000 for over 200 rate areas, it is inconceivable that a single NPA, which contains, at most, 792 assignable NXXs, would long suffice to meet the needs of ILECs, CLECs, and wireless carriers in Maine.⁴

Local exchange competition and competition among numerous wireless carriers require the adoption of more rational number assignment practices. The inadequacy of the current practice causes needless area code relief in all parts of the country. The projected exhaust of 207 is just one example of the wastefulness of assigning numbers in blocks of 10,000.

II. The MPUC Petition

In its petition, the MPUC seeks authority to: (1) establish number assignment and utilization standards; (2) order interim unassigned number porting; and (3) order thousand-block pooling.

A. Number Assignment and Utilization Standards

According to the MPUC, current numbering administration policies and guidelines are: (a) not enforceable by the North American Numbering Plan Administrator (NANPA); and (b)

³ See MPUC Petition at 2.

⁴ After subtracting codes that are reserved for testing and other uses, the 207 area code contains only 752 assignable NXXs.

insufficient because they do not limit the ability of carriers to acquire and use numbers.⁵ To remedy these perceived inadequacies, the MPUC seeks delegation of broad authority over number administration in Maine, including authority to: (1) establish fill rates that must be met before a carrier may acquire an additional code in a rate center where it already has a code; (2) establish needs-based criteria for the acquisition of codes; (3) reclaim codes which have been acquired in violation of the Guidelines and any other applicable rules or regulations; (4) reclaim codes which are being used to provide service in violation of state law; (5) reclaim test codes which have not been put in service within the time provided by the Guidelines and other protocols or policies established by the MPUC; (6) reclaim codes acquired by carriers certifying that they would be facilities-based carriers but who have failed to establish facilities within the appropriate time frame; (7) establish mandatory number utilization reporting requirements; and (8) establish procedures to audit carrier utilization reports.

This authority, if delegated and exercised, would, to a great extent, cause the displacement of the NANPA with the MPUC established as the Maine Numbering Plan Administrator. This Commission has consistently recognized the importance of maintaining uniformity in administration of the North American Numbering Plan (NANP).⁶ Before granting such broad powers, the Commission should require a showing that: (1) existing policies and guidelines are inadequate and unenforceable; (2) the inadequacy and unenforceability of those

⁵ MPUC Petition at 3-4.

⁶ See, e.g., Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech - Illinois, *Declaratory Ruling and Order*, 10 FCC Rcd 4596, 4602 (1995). In Connecticut, where each code request requires approval by the state commission, the industry has experienced needless delay in code assignments, without any corresponding code conservation benefits.

policies and guidelines is the proximate cause of the projected exhaust of the 207 area code; and (3) the delegation would prevent the exhaust of the 207 area code without imposing burdensome and unjustifiable costs on carriers and their customers. The MPUC has not demonstrated that any of these are true. The requested delegation would erode the uniformity of NANP administration which this Commission has established. The Commission should not authorize the fragmentation of the administration of the NANP to fix a perceived problem that may not exist, and, in any case, is not the cause of the projected exhaust of the 207 area code.

MCI WorldCom disagrees with the assertion that the existing guidelines are unenforceable. The Central Office Code Guidelines clearly authorize the NANPA to seek the return of codes that are either issued in violation of the Guidelines or state law, or, although issued properly, are not placed into use within a reasonable period of time.⁷ Any state commission that believes that the Guidelines are being violated, can and should work with the NANPA to ensure that carriers adhere to those Guidelines.

MCI WorldCom also disagrees with the assertion that the Guidelines are insufficient because they do not limit carriers' abilities to acquire and utilize numbers. In fact, under the Guidelines, a carrier may request an additional code for a rate area in which it is already a code holder, only when its number inventory is insufficient to meet its projected needs over the following twelve months (six months during jeopardy). Unlike fill rates, the months-to-exhaust standard is a flexible measure that takes into account variations among the business plans and market experiences of service providers, and the time frame required to implement a central

⁷ See Central Office Code (NXX) Assignment Guidelines, INC 95-047-008, Reissued January 27, 1999 at Section 8.0 and following.

office code in the network. Fill rates are a “one- size-fits-all” approach to number administration. Their “objectivity,” which is thought by some to be a virtue, is actually a vice that makes them inappropriate for an industry in which service providers adopt diverse business plans. For example, for one carrier, a forty percent fill rate (i.e., 6,000 numbers left to be assigned), might represent a dangerously low inventory level, while for another carrier, that same level might be sufficient for the next two years. In most cases, a minimum of sixty-six days is required to activate a code. Adoption of a uniform fill rate standard might leave a carrier without numbers if the standard resulted in an inventory level within that carrier’s sixty-six day requirements.

The industry and the NANPA are in the process of developing tools, including carrier inventory audits, that will assist in ensuring compliance with the Guidelines. The parallel development of state-specific measures would potentially require carriers to conform to 50 different systems of number administration, despite the fact that the state-specific measures would be unlikely to provide incremental benefits. In this case, the MPUC has made no showing that the development and implementation of a state-specific number administration system would materially extend the expected life of the 207 area code.

The 207 area code is facing exhaust, not because industry guidelines are inadequate or unenforceable, but rather because of the antiquated assignment practice that is causing needless area code exhaust throughout the country. None of the number assignment and utilization standards that the MPUC proposes to adopt would prevent exhaust of 207. They would, however, undermine a system of nationwide numbering administration and, in the process, impose additional costs on service providers and consumers. State-specific number inventory

audits are just one example of a practice that, if adopted, would require the dedication of substantial resources on the part of service providers. Such costs might be justifiable if the practice could yield commensurate benefits. In fact, it cannot. These audits would be redundant to the work under way by the industry and the NANPA. Moreover, they would do nothing to extend the life of the 207 area code.

B. Interim Unassigned Number Porting

MCI WorldCom agrees with the MPUC that Unassigned Number Porting (UNP) is a pro-competitive policy which could positively affect number utilization, depending on how it is implemented. Indeed, MCI WorldCom has consistently supported a three-tiered approach to the implementation of UNP.⁸ States should play a significant role in the implementation of the first phase of UNP as advocated by MCI WorldCom, in which a carrier would be able to port specific numbers from the inventory of another carrier in response to specific customer requests. The MPUC's petition describes a slightly different, limited use of UNP that, with some modifications, could be used to avoid unnecessary NXX assignments.

The MPUC anticipates that during the early stages of competition, the majority of a CLEC's customers will be ILEC customers ported to the CLEC via local number portability (LNP). Thus, the MPUC believes that rather than assign 10,000 numbers to a CLEC, it would make more sense to port a smaller amount of numbers that are already assigned to a given rate center, in order to enable the CLEC to launch service. MCI WorldCom does not believe that this

⁸ See, e.g., *In the Matter of Number Pooling and Other Optimization Methods*, Public Notice DA-2256, NSD File No. L-98-134 (rel. November 6, 1998) (NRO Proceeding), Comments of MCI WorldCom.

description accurately describes the entry plans and market experiences of most CLECs. However, recent experience with the NANP Exhaust Ad-Hoc group has shown that there are some service providers with business plans that require only a very small quantity of numbers. It may be possible to adapt UNP to enable such carriers to establish a service footprint without assigning that carrier more than one NXX to serve multiple rate areas.⁹

MCI WorldCom would support authorizing the MPUC to establish a UNP trial for footprint establishment in cases where a carrier anticipates that it will require fewer than twenty-five numbers in a given rate area, if the MPUC also requires carriers to participate in Phase 1 of UNP. For carriers that require more than a very small quantity of numbers, providing those numbers with UNP would require the selection of a third-party administrator and development of automated processes. These later phases of UNP will only become feasible when this Commission adopts rules for a national framework for UNP. The Commission should not authorize individual states to attempt to implement the later phases of UNP until those national rules are in place.

C. Thousand Block Pooling

The MPUC also seeks authority to order implementation of thousand block pooling in case this Commission does not issue national pooling rules by December 31, 1999. Thousand block assignment is a means of number conservation that, when developed, will address the root cause of premature area code exhaust -- the existing, inefficient assignment practice. MCI WorldCom urges the Commission to complete its rulemaking on pooling at the earliest possible

⁹ For LRN functionality, at least one NXX per switch must be assigned.

date. However, the Commission should not authorize individual states to order redundant pooling trials until its rulemaking is complete. The MPUC is incorrect in its belief that pooling technology and systems already exist. In their absence, the MPUC could not possibly implement pooling in Maine soon enough to avert the exhaust of 207.

The pooling trial that is taking place in Illinois and the voluntary pooling occurring in New York, do not demonstrate that pooling is available today. Relatively few service providers are participating in New York. In Illinois, the trial is being conducted using manual processes and a soon-to-be superseded version of the database software. This effort is not scaleable. Its extension to additional states would strain the available resources of many carriers, including MCI WorldCom, and would risk service problems, as manual processes inevitably do. The industry is in the process of developing the technology and systems that will enable thousand block pooling to occur in an automated, scaleable manner. Completion of that development requires this Commission to establish the national framework in which pooling will take place. Until that development is completed, redundant state trials will needlessly divert resources. The Commission can best assist Maine and other states by establishing that national framework, not by authorizing them to undertake actions that may delay development of the technology and systems that are required to provide pooling reliably on a nationwide scale.

Even if authorized to order thousand block pooling, the MPUC would be unable to implement it quickly enough to have an appreciable impact on the projected exhaust of the 207 area code. The following is a partial list of the actions that would have to be completed before the first thousand block could be assigned: (1) analyses of impacts of pooling forecast on the record capacity requirements of participating service providers; (2) MPUC Order defining area of

pooling, cost recovery method, and definition of participation from all wireline carriers; (3) preparation of RFP for Pool Administrator; (4) selection of and negotiations with Pool Administrator from bidders; (5) approval by Limited Liability Company (LLC) of the requisite NPAC software load; (6) approval by LLC of interim cost recovery method; (7) installation and testing of software load with all carriers; (8) pool establishment activities with selected administrator, including -- establish/confirm assignment and operational procedures with industry participants (confirm LNP capability and LNP triggers opened on all codes), identification of rate area pools, utilization study to identify blocks eligible for donation, carrier development of block forecasts to determine quantity of blocks necessary for each pool, comparison of blocks necessary with blocks eligible to determine level of donation and/or NXXs required, coordination of donation activities with each carrier, population of pools, coordinating any new NXX code assignments as necessary; and, (9) removal of donated blocks from Carrier number assignment systems. MCI WorldCom estimates that these activities would take at least six months to complete. Thus, even manual thousand block pooling, would not begin in Maine until the middle of 2000. In the meantime, the MPUC would still have to order relief for the 207 area code.

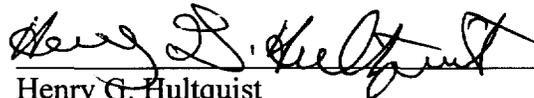
Additional pooling trials using NPAC 1.4 will necessarily entail migration costs when NPAC 3.0 is implemented. These include costs related to: identification of block ranges that were pooled which must be migrated; data conversion of individual pooled records into a single NPAC 3.0 pooled record coordinated between the NPAC and LSMS systems; data conversion of internal operational support systems from individual pooled/porting records to pooled blocks, e.g., number assignment systems. The delegation requested by the MPUC will not prevent the

exhaust of 207, but it will needlessly divert resources and create additional costs for service providers and, ultimately, consumers. The Commission should not grant the requested authority, but should make every effort to ensure that the national framework for pooling is in place at the earliest possible date.

III. Conclusion

For the reasons stated above, the Commission should decline to grant the MPUC additional authority to implement number assignment and utilization standards and thousand block pooling. The Commission should, however, allow the MPUC to implement limited UNP as described above.

Respectfully submitted,
MCI WorldCom, Inc.



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May 3, 1999

CERTIFICATE OF SERVICE

I, Barbara Nowlin, do hereby certify that copies of the foregoing Comments of MCI WorldCom, Inc. were sent via first class mail, postage paid, to the following on this 3rd day of May, 1999.

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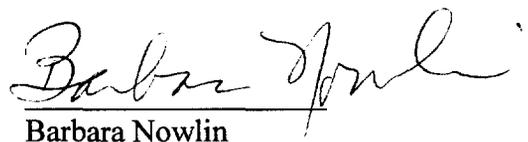
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