



STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL

April 30, 1999

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

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MAY 3 1999

Common Carrier Bureau
Network Service Div.
Office of the Chief

Re: File No. NSD-L-99-33, Florida Public Service Commission Petition for Expedited Decision for Grant of Authority to Implement Number Conservation Measures

CC DOCKET 96-98

Dear Ms. Salas:

Enclosed please find one original and five copies of the Connecticut Department of Public Utility Control comments filed in the above noted proceeding.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard

Louise Rickard
Acting Executive Secretary

Enc.

cc: Al McCloud

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Florida Public Service Commission's Petition for)
Expedited Decision for Grant of Authority to)
Implement Number Conservation Measures)

File No.
NSD-L-99-33

COMMENTS OF THE CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL

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COMMENTS OF THE CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL

I. Introduction

The Connecticut Department of Public Utility Control (CTDPUC) hereby files comments with the Federal Communications Commission (FCC or Commission) in the above noted proceeding in support of the Florida Public Service Commission's (FPSC) Petition for Expedited Decision for Grant of Authority to Implement Number Conservation Measures (Petition). FPSC requests authority to: 1) institute thousand block number pooling; 2) implement sharing of NXX codes in rate centers; 3) revise rationing measures and institute NXX lotteries to prolong the life of existing area codes; 4) reclaim unused and reserved central office codes; 5) maintain the current central office code rationing measures for at least six months after the implementation of all area code relief plans; 6) expand deployment of permanent number portability; 7) implement unassigned number porting; 8) implement rate center consolidation; 9) update the Central Office Code Utilization Survey (COCUS) report quarterly, instead of annually; 10) establish allocation standards to more efficiently manage numbering resources; and 11) expressly grant the FPSC authority to require

wireless carriers to provide the necessary COCUS and other information need to carry out its responsibilities. Petition, pp. 3-6.

II. Discussion

On April 2, 1999, FPSC petitioned the Commission requesting that it be provided the authority to implement various area code conservation measures in the State of Florida. FPSC requested this waiver to fashion a Florida-specific solution to its existing number crisis.

CTDPUC supports the Petition and recommends that it be adopted by the Commission. FPSC has requested Commission authority to implement several area code conservation measures that it believes will address the state's existing number crisis. FPSC in support of its Petition has provided overwhelming evidence demonstrating the inefficient use of NXX codes as indicated by the North American Numbering Plan Administrator declaring extraordinary jeopardy in the 305, 561, 941 and the 954 area codes. FPSC notes that in the 305 area code, 39% of the available telephone numbers are utilized; in the 561 area code, 35% are utilized; in the 941 area code, 37% are utilized; and in the 954 area code, 50% are utilized. Petition, p. 2. Approval of the Petition will provide FPSC with the ability to implement conservation measures and perhaps delay the introduction of new area codes.

FPSC has requested that it be delegated the authority to implement several conservation measures that attempts to address the telephone number crisis in Florida. The Petition should be approved because FPSC is in a better

position to determine what is in the best interest of the State of Florida. CTDPUUC believes that these proposals, when collectively implemented, provide an orderly approach to alleviating the current telephone number crisis in Florida. CTDPUUC notes that a number of FPSC's proposed conservation measures have been adopted and are in use in other jurisdictions. In particular, FPSC has requested that the Commission delegate authority to implement mandatory thousand block number pooling similar to that delegated to Illinois. The inefficient manner in which telephone numbers are assigned (i.e., in 10,000 blocks), is clearly the underlying factor creating the NPA shortage today. Mandatory thousand block number pooling would provide for a more efficient use of telephone numbers and minimize a wasteful allocation of these limited resources. FPSC should be afforded the same opportunity as was provided in Illinois.

FPSC has also requested Commission approval to maintain the current central office code rationing measures for the six months following the implementation of area code in relief in the Florida area codes. The Commission has already granted a similar waiver in California; and therefore, FPSC should be provided with the same opportunity to ration central office codes in Florida.

Additionally, providing FPSC with the ability to reclaim unused and reserved central office codes should also add to the existing code inventory, thus delaying the introduction of new NPAs. FPSC should be permitted to reclaim these codes. Lastly, FPSC has requested Commission approval to implement Unassigned Numbering Porting (UNP) in Florida which, based on its

understanding, has already been used by certain carriers during a rationing plan. Equity requires that FPSC be permitted the opportunity to implement UNP as was the case in other jurisdictions.

III. Conclusion

FPSC has offered the Commission several area code conservation measures, that if adopted as proposed, would provide FPSC with the ability to slow the deployment of additional area codes and minimize the inconvenience, disruption and cost that is often associated with their implementation. Approval of the Petition will also provide FPSC with the flexibility to implement a number of

conservation measures and provide it with the ability to impose stricter requirements on those seeking codes requiring a more efficient use of the codes in their possession before additional ones are awarded. The Petition is in the public interest and should be adopted.

Respectfully submitted,

CONNECTICUT DEPARTMENT OF PUBLIC
UTILITY CONTROL

Donald W. Downes
Chairman

Glenn Arthur
Vice-Chairman

Jack R. Goldberg
Commissioner

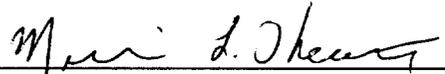
John W. Betkoski, III
Commissioner

Linda Kelly Arnold
Commissioner

April 30, 1999

Connecticut Department of
Public Utility Control
Ten Franklin Square
New Britain, CT 06051

CERTIFICATION

A handwritten signature in cursive script, reading "Miriam L. Theroux", positioned above a horizontal line.

Miriam L. Theroux
Commissioner of the Superior Court