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

CC Docket 96-98

In the Matter of	)	
	)	
FLORIDA PUBLIC SERVICE COMMISSION	)	File No. NSD-L-99-33
PETITION FOR ADDITIONAL	)	
AUTHORITY TO IMPLEMENT	)	
NUMBER CONSERVATION MEASURES	)	

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Comments of Omnipoint Communications

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Summary

Omnipoint Communications MB Operations, LLC ("Omnipoint Communications" or "Omnipoint") hereby opposes the petition of the Florida Public Service Commission ("Florida PSC") for additional authority to implement various number conservation methods including mandatory thousand-block pooling, NXX code sharing, and/or measures such as code rationing and lotteries. As shown in Omnipoint's comments, permitting the Florida PSC to institute mandatory thousand-block and NXX code sharing would be premature and would seriously hamper the NANPA's ability perform its national functions effectively. Permitting the Florida PSC to implement number pooling, NXX code sharing and other LRN-based methodologies would also force PCS providers such as Omnipoint to prematurely confront the serious technical difficulties and costs of implementing wireless number portability, and would do so prior to the development of national standards for other conservation methodologies (i.e., thousand-block pooling). Such a result would contravene the Commission's recent Forbearance Order concerning the implementation of number portability by wireless carriers. Moreover, as applied to wireless carriers, such conservation measures would neither result in the increased efficiency or increased supply of numbers sought by the Florida PSC.

As an alternative to the remedies proposed by the Florida PSC, Omnipoint proposes that the Commission reconsider permitting technology-specific or wireless-only overlay codes as a means of optimizing number resources without disadvantaging wireless carriers. In the absence of final, national number conservation guidelines, such wireless-only overlays promise an immediate and efficient means of alleviating PCS

providers' difficulties in obtaining enough number resources to compete in new markets. In light of these competitive realities, and in light of the basic inefficiency of requiring wireless carriers to obtain NXX codes on the basis of wireline-based rate centers, Omnipoint believes the Commission should reconsider its 1995 ruling barring such wireless-only overlays. This rule no longer serves its stated rationale of protecting wireless providers from discrimination or leveling their competitive playing field.

Lastly, Omnipoint opposes the Florida PSC's request for additional authority for states to consider number rationing or lotteries as methods of number conservation before the adoption of permanent area code plans or the setting of an implementation date for such relief. Instead of helping, such programs would serve to delay the adoption of efficient, effective and long-term solutions to regional numbering shortages. Moreover, past experience demonstrates that rationing and lotteries do not furnish wireless carriers with sufficient numbers to enter and compete in new markets, and have a discriminatory impact in favor of established, incumbent carriers. This discriminatory impact hampers the development of competitive markets and thereby conflicts with the goals of this Commission under the Telecommunications Act of 1996.

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Comments of Omnipoint Communications MB Operations, LLC

Omnipoint Communications, by its attorneys, hereby opposes the Petition of the Florida Public Service Commission ("Florida PSC") for additional authority from the Commission to implement number conservation measures.

I. Background

A. Omnipoint Communications

Omnipoint Communications MB Operations, LLC ("Omnipoint Communications" or "Omnipoint") is a leading Personal Communications Service ("PCS") licensee and service provider. It began offering PCS service in West Palm Beach, Miami and Fort Lauderdale March, 1998, and currently provides advanced wireless communications services in much of New York, New Jersey, Connecticut, eastern Pennsylvania, Delaware, Massachusetts, New Hampshire, Rhode Island, Michigan, Indiana and some service in Maine, Maryland and Ohio. Omnipoint intends to offer similar services in the future in additional areas.

B. The Florida PSC Petition

On April 2, 1999, the Florida PSC filed a petition with the Federal Communications Commission seeking additional authority to implement a multitude of

number conservation measures. Specifically, the Florida PSC is seeking additional authority to: (1) institute thousand-block pooling; (2) implement sharing of NXX codes in rate centers; (3) revise rationing measures and institute NXX lotteries; (4) reclaim unused and reserved central office codes; (5) maintain the current central office code rationing measures beyond implementation of area code relief; (6) expand deployment of permanent number portability; (7) implement interim unassigned number porting; and (8) implement rate center consolidation. See Public Notice, NSD File No. L-99-33, DA 99-725 (April 15, 1999). As noted in the Florida PSC's Petition, the purpose of implementing or exploring these diverse methodologies in an expedited manner, is directly linked to the State's increasing "crisis" management of central office code assignments and the developing exhaust of its current numbering resources in the 305, 561, 941 and 954 Number Planing Areas (NPAs).

C. Available Conservation Methods

The NPA conservation methods of thousand-block pooling, unassigned number porting and permanent number portability are similar in that each requires a portability architecture based upon Location Routing Numbers. As the Commission is aware, this past February it revised the implementation schedule under which CMRS carriers are to implement local number portability ("LNP"). See In the Matter of Cellular Telecommunications Industry Association's Petition for Forbearance From Commercial Mobile Radio Services Number Portability Obligations and Telephone Number Portability, Memorandum Opinion and Order, WT Docket No. 98-229, FCC 99-19 (February 9, 1999)("LNP Forbearance Order"). As a result of this ruling, the deadline by which CMRS carriers were to implement number portability has been extended until November 24, 2002

-- a date concurrent with the conclusion of the five-year PCS build-out period. In granting this extension, the Commission ruled that it will "provide the industry with the flexibility to allocate its immediate resources toward network construction -- a goal proven to promote a competitive marketplace." See id. at ¶ 49. The Commission also noted that ". . . [t]he public interest in efficient use of numbering resources is not harmed by this limited extension of the LNP deadline . . ." See id. at ¶ 48.

The wireless industry has demonstrated to the Commission that wireless carriers can ensure efficient utilization of numbering resources prior to November 24, 2002, during the period that they are not LNP-capable. Specifically, the Commission has observed in this regard that, "[t]he proposals submitted by wireless carriers are helpful, and they demonstrate that there are certain number conservation techniques that are not LNP-based that can be implemented during the period in which CMRS carriers have been relieved from their current obligation to implement LNP." See LNP Forbearance Order at ¶ 47. The Commission has signaled its intention to further investigate non-LNP-based conservation methods, with the goal of creating new, uniform, federal rules that will "establish more control" over number administration. Id.

II. Allowing the Florida PSC to Institute Mandatory Thousand-Block Number Pooling and Expand Deployment of Permanent Number Portability Would Create Serious Administrative Problems

The Commission clearly outlined the scope of authority delegated to the state commissions on area code matters in its Second Report and Order regarding local competition. See Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Second Report and Order and Memorandum Opinion

and Order, CC Docket No. 96-98, 11 FCC Rcd 19392 (1996)("Second Local Competition Order") As the Commission is aware, the Second Local Competition Order granted state commissions the "authority to implement new area codes . . . [and choose] among available area code relief mechanisms," but declined to delegate authority to state commissions to administer or allocate NXX codes. See, e.g., In the Matter of 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, Memorandum Opinion and Order and Order on Reconsideration, NSD File No. L-97-42 and CC Docket No. 96-98, at ¶¶ 32-33 (1998). As stated by the Commission, "[I]f each state commission were to implement its own NXX code administration [e.g. conservation] measures without any national uniformity or standards, it would hamper the efforts of the North American Numbering Plan Administrator ["NANPA"] to carry out its duties as the centralized NXX code administrator . . . and could interfere with forecasting and projections for exhaust of the North American Numbering Plan and could force implementation of a new plan earlier than would otherwise be necessary to ensure that numbers are always available for telecommunications providers." See id. at ¶ 32.

The Commission is diligently working with the Industry Numbering Committee to adopt uniform thousand-block pooling guidelines. In fact, the North American Numbering Council is also in the process of concluding an investigation of a sole source bid provided by Lockheed Martin/CIS on thousand-block pooling administration. In the interim of such important work on national standards, granting the Florida PSC additional authority to implement mandatory thousand-block pooling and the expansion of number portability deployment would be premature. Furthermore, granting this additional authority to the

Florida PSC – which has provided little to no detail as to how these costly measures would be implemented – could negatively impact the NANPA's administrative functions, including its ability to determine number utilization and forecasting information. This would in turn significantly hinder carriers' access to numbering resources.

III. Thousand-block Pooling and Sharing of NXX Codes In Rate Centers Would Prematurely and Unnecessarily Impose Local Number Portability on PCS Carriers

Omnipoint supports the Florida PSC's efforts to adopt reasonable code conservation measures within the jurisdiction granted by the Commission. Furthermore, Omnipoint recognizes the Commission's delegation of limited authority to state commissions to implement voluntary pooling trials. However, the Commission, and the telecommunications industry itself have each acknowledged that thousand-block pooling and other methodologies based upon Location Routing Numbers ("LRNs") are not technically feasible for all segments of the telecommunications industry at the present time. Since allowing the Florida PSC to implement thousand-block number pooling and other methodologies based upon LRN architecture would force PCS providers to prematurely confront the technical problems acknowledged in the LNP Forbearance Order, the Commission should not grant the Florida PSC the authority to implement these diverse conservation mechanisms.

A. The Commission Has Recognized Technological Constraints in the LNP Forbearance Order

As discussed above, the Commission recently extended the deadline by which wireless carriers must deploy local number portability until November 24, 2002. In so doing the Commission stated that, despite the fact that some PCS providers may be able to

deploy number portability under accelerated schedules, "[w]e believe that to facilitate the goals of deploying portability in all major markets and to support nationwide roaming, the deadline we establish should be one that is realistic for the wireless industry as a whole." See LNP Forbearance Order at ¶ 30.

Omnipoint recognizes, however, that the LNP Forbearance Order also addressed the possibility of implementing national standards for various number conservation methodologies prior to the new deployment date for wireless LNP, including the possibility of implementing number pooling or other non-LNP methodologies. Specifically, the Commission stated:

> Although the Commission has not yet adopted pooling requirements, several state public utility commissions have already implemented number pooling trials, which have necessarily excluded CMRS ... we also intend to move rapidly forward to develop national standards for a variety of other number conservation methods possibly including one or more pooling methods. Should the Commission adopt number pooling requirements in a rule-making proceeding, our decision to grant forbearance in this instance in no way is intended to limit our ability to require wireless participation in pooling at an earlier date, if doing so were necessary to address specific number exhaust problems. Our decision to grant forbearance similarly does not limit our ability to invoke number exhaust remedies that may provide relief only for carriers that are LNP-capable.

See id. at ¶ 48.

Omnipoint and the wireless industry continue to work with the state utility commissions in an effort to investigate methodologies that conserve numbering resources while providing all carriers equal access to numbering resources in spite of technical constraints. In fact, Omnipoint supports the consideration of using rate center consolidation on a statewide basis, where technology permits. Omnipoint believes that

such conservation methodologies are viable means of conserving NXX codes while considering current carrier technical constraints.

B. The Commission Has Further Recognized the Capital Restraints On New Entrants Which Are Developing Networks and Establishing Service Quality

In addition to noting the current technical constraints on both wireless carriers and some wireline carriers, the Commission also balanced the significant capital constraints currently restricting their ability to become LNP capable. Primarily, the Commission noted the current financial constraints of wireless carriers like Omnipoint, which are currently focusing their limited capital resources on their network build-out in compliance with the Commission five year requirement as well as other requirements governed by the Commission. The Commission detailed its investigation of these costs in the LNP Forbearance Order, stating

> ... [w]e believe that extending the LNP deadline until November 24, 2002 more appropriately balances the competitive costs and benefits of wireless LNP. The record demonstrates that the costs to the industry of implementing wireless number portability, though not prohibitive, are substantial. Commenters in this proceeding have estimated that it would cost individual carriers, depending on their size, millions of dollars in network upgrade, switch replacement, and changes in back office operations in order to implement wireless number portability. The Yankee Group, an international strategic planning and market research firm, has estimated that the wireless industry as a whole will need to spend up to $1 billion to implement wireless number portability, including software and network modifications.

Id at ¶ 37.

The Commission further added:

> We agree with CTIA that requiring wireless carriers to implement number portability under the current schedule has the potential to divert available financial and technical resources from other initiatives that could have a more immediate impact on competition, such as network buildout. Indeed,

> our findings in the Third CMRS Competition Report suggest that in the next few years, investment in buildout will be critical to broadband CMRS carriers as they seek to improve coverage and service quality in response to growing consumer demand. In addition, CMRS carriers are currently devoting substantial resources to Y2K issues and to other regulatory requirements, such as E911 and CALEA, which are designed to meet important public interest needs but likely will result in some additional technical burden. Thus, if carriers are required to implement number portability within the same time frame as these other initiatives, this could slow network buildout and system development efforts necessary to meet these other demands.

See id at ¶ 38.

The Florida PSC's Petition asks the authority to mandate all carriers operating in the State of Florida -- including PCS carriers -- to incur the costs associated with employing pooling and porting methodologies prior to the Commission's LNP deployment date. This request is clearly is in contradiction with the LNP Forbearance Order. Further, requiring wireless carriers to incur additional, significant capital costs now would hinder their ability to improve coverage and service quality -- goals which the Commission has clearly recognized as in the public interest. Specifically, in this respect the Commission has found that the "[e]xtension of the deadline will provide the industry with the flexibility to allocate its immediate resources toward network construction -- a goal proven to promote a competitive marketplace." See LNP Forbearance Order at ¶ 49.

C. Wireless Carriers Are Not Guilty of the Waste and Inefficiencies Which Pooling and Porting Methodologies Are Designed To Prevent

The Commission recognized in the recent LNP Forbearance Order that wireless carriers are efficient users of numbering resources. Specifically, the Commission stated that the wireless number utilization records provided during the CTIA Forbearance proceeding "are helpful, and they demonstrate that there are certain number conservation

techniques that are not LNP-based that can be implemented during the period in which CMRS carriers have been relieved from their current obligation to implement LNP." See LNP Forbearance Order at ¶ 47. The Commission also noted that the wireless utilization records "underscore[] the need for further development of the record with respect to number utilization by all carriers, including other carriers such as LECs outside the top 100 MSAs who are not yet LNP capable, and the need to develop comprehensive rules that prevent inefficient use of this critical resource." Id.

By its nature, number pooling does not result in increased efficiency or an increased supply of available numbers for wireless carriers. Omnipoint already achieves high fill rates in each of its service areas. The rapid rate at which Omnipoint assigns new numbers, specifically in the West Palm Beach, Miami and Fort Lauderdale area, requires that it maintain numbers in reserve. In its Florida markets, for instance, Omnipoint is licensed by the Commission to cover over 4.5 million POPs. At the current consumer demand, Omnipoint has run through a complete NXX code in a matter of weeks.

It should also be noted that wireless carriers such as Omnipoint are efficient users of numbering resources and do not "warehouse" numbers in a manner that would be addressed by thousand-block pooling or other LNP-based methodologies. Instead, Omnipoint and similarly situated carriers are providing the rapid and broad deployment of PCS, as envisioned both by this Commission and by Congress, and as evidenced by high fill rates and rapid growth within the industry.

In sum, the number pooling and porting remedies proposed by the Florida PSC would constitute a cure worse than the problem. The Commission should therefore deny the relief requested in the Petition, at least with respect to wireless carriers.

IV. Rationing and Lottery Methodologies Are Not Effective or Efficient Conservation Methods for Wireless Carriers

Omnipoint opposes the Florida PSC's request that the Commission allow state regulators additional authority to consider and implement NXX code rationing after jeopardy has been declared, but before an area code relief plan has been adopted or an implementation date set. As demonstrated below, rationing and lottery mechanisms of distributing number resources are not effective or efficient conservation measures as applied to wireless carriers. By disadvantaging wireless carriers relative to incumbent wireline providers, such measures may also produce anticompetitive results.

Omnipoint recognizes its obligations to use scarce numbering resources in an efficient manner. Omnipoint employs responsible numbering practices that ensure the high and efficient utilization of the numbers associated with its assigned central office codes. Omnipoint's experience has taught it that the assignment of entire NXX codes (10,000 number blocks) is the only feasible allocation alternative for wireless carriers. But Omnipoint and other wireless carriers have experienced significant allocation delays even with rationing scenarios that distribute entire NXX codes. This form of rationing has not proven to be an effective number conservation method with respect to wireless carriers. Here, a basic understanding of the fundamental differences between wireline and wireless number utilization is required in order to comprehend how winning – or losing – in a lottery affects a service provider's ability to serve its customers.

With roughly 19,000 rate centers in the United States, spread among approximately 200 active NPAs, a typical NPA consists of about 100 rate centers. To serve fifty percent of that NPA (the economically attractive portion), a new wireline

entrant to this market would require fifty full NXX codes prior to pooling, one in each rate center to be served, for a total of 500,000 numbers. In contrast, a wireless carrier would obtain NXXs in only one out of ten rate centers, thereby requiring only five full NXXs, for a total of 50,000 numbers to cover the same geographic area. Obviously, if the two carriers in this example are growing at equal rates, the wireless carrier's exhaust of the numbering resources allocated to it are precipitous if new NXXs are not readily made available to it.

Moreover, a shortage of numbers in any single wireless rate center encompasses a service area ten times the size of a similar shortage suffered by a wireline carrier. This difference is critical. When a wireless carrier runs out of numbers in one of its rate centers, it is essentially out of business in a large portion of its NPA. In contrast, a wireline carrier will only be out of business in a single rate center. Yet in a lottery scheme for allocating NXXs, both wireline and wireless carriers are treated equally, without concern to whether this blind assignment results in de facto favoritism to wireline carriers.

The lottery methodology highlights other problems and defects of interim number rationing measures. First, it discriminates in favor of existing wireline carriers and against new entrants by granting first priority for NXX codes to carriers of last resort (i.e. incumbent local exchange carriers) that have no numbers in a particular wire center. The essence of lotteries and rationing methodologies is that some prospective competitors will be denied telephone numbers, or will not receive then until weeks or months after they were needed. These denials and delays result directly in losses of critical customers and revenues by these competitors, and will severely disrupt and impair their marketing and financial plans and prospects. Second, Omnipoint's experience with lotteries in New York

and Pennsylvania demonstrates that they simply do no ensure adequate supply of numbers to keep pace with the demand for new wireless service. In fact, wireless carriers have had to seek relief in the New York and Pennsylvania commissions because numbers obtained via their state lotteries have not been sufficient to satisfy the rapid growth in new wireless customers.

In the past, the Commission has adopted numbering regulations which expressly advance the following three goals: (1) to facilitate entry into the telecommunications marketplace by making numbering resources available on an efficient, timely basis; (2) to not unduly favor or disfavor any particular industry segment or group of customers; and (3) to not unduly favor one telecommunications technology over another. See 47 C.F.R. § 52.9(a). If the Commission delegates any numbering administration functions to a state commission, it must therefore require that the state commission perform these functions in a manner wholly consistent with these general goals and requirements. See 47 C.F.R. § 52.9(b).

In its Pennsylvania Numbering Order, FCC 98-224, NSD File No. L-97-42, released September 28, 1998, the Commission delegated a limited amount of additional authority to state commissions. This additional authority allows the states to impose an NXX rationing plan, but only under the following circumstances: (a) if the state commission previously has decided upon a specific form of area code relief; (b) if the state commission previously has established an implementation date; and (c) if the industry is unable to agree upon a rationing plan. See id. at ¶¶ 24-25. In other words, the Commission allowed the states to engage in limited NXX code rationing, but only if such rationing would not interfere with or delay the adoption and implementation of an area

code relief plan. The Commission expressly prohibited state commissions from using conservation measures as "substitute for area code relief" or to "avoid making difficult and potentially unpopular decisions on area code relief." Id. at ¶ 16.

Omnipoint therefore opposes the Florida PSC's instant request that states be allowed additional authority to consider and implement NXX code rationing measures. If granted, such measures would delay adoption of efficient and effective long-term area code relief plans and would allow states such as Florida to implement conservation measures devoid of any national guidelines. Moreover, the past experience of states such as Pennsylvania and New York demonstrates that lotteries and other interim measures do not furnish wireless carriers with sufficient number resources in a timely manner, thereby hampering their ability to enter new markets and effectively compete for customers. Since lotteries and number rationing hobble new entrants, it should be clear that they do not operate in a competitively neutral manner

It is therefore apparent that an adequate supply of telephone numbers is an essential requirement for attaining the telecommunications competition sought by the Telecommunications Act of 1996 and this Commission's policies. Put simply, the only way to ensure a level playing field for wireless carriers and other attempting to compete in telecommunications markets is to require the adoption and implementation of uniform national standards for number conservation

V. The Commission and the Florida PSC Should Reconsider Wireless-Only Overlays as a Means of Addressing Number Conservation

Because wireless carriers have a proven record of employing efficient allocation methods and high utilization rates of telephone numbers, Omnipoint respectfully requests

that the Florida PSC and the Commission reconsider technology-specific or wireless-only overlays as a means of optimizing number resources.

In the past, Omnipoint has advocated both to the Commission and individual state utility commissions the employment of technology-specific overlays as a means of area code relief. Most recently several states, including California, Massachusetts and Connecticut, have themselves requested waivers from the Commission to further investigate and employ this area code relief methodology. Based on these facts, Omnipoint hereby requests that the Commission and the Florida PSC reconsider this area code relief methodology in the context of telephone number resource optimization and conservation. Wireless-only overlays are worth reconsidering because they promise an immediate and efficient solution for the numbering scarcity suffered by wireless carriers, which form a significant and rapidly growing portion of the industry and which are largely blameless for the problems facing the Florida PSC.

Omnipoint therefore renews its support of wireless-only overlays in the absence of any finalized number conservation methodology guidelines and requests that the Commission modify its 1995 ruling against permitting such overlays, which has since been codified in Section § 52.19(c)(3)(i) of the Commission's Rules. See Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech-Illinois, Declaratory Ruling and Order, 10 FCC Rcd 4596 (1995)("Ameritech Order"); see also 47 C.F.R. § 52.19(c)(3)(i). As a wireless carrier, Omnipoint asserts that service-specific or technology-specific overlays are no more discriminatory, inherently anti-competitive, or harmful to consumers than the current rate center methodology utilized by local exchange carriers. The Ameritech Order sought to protect wireless carriers at a time when the full record on

efficient wireless industry number utilization was not known. Now that the Commission has recognized the full record on wireless number utilization efficiencies in its most recent Forbearance Order, it is appropriate that the Commission revisit this methodology because it clearly removes the industry's most efficient carriers from the on-going number resource optimization "crisis" in Florida.

Omnipoint recommends that the Commission and the Florida PSC specifically consider the following parameters for a wireless-only overlay in an effort to address area code exhaust and number resource conservation: (a) mandatory assignment of a new overlay code to all new wireless customers, paging customers and wireline carriers; (b) mandatory requirement that all new wireless handsets be upgraded with new overlay code; (c) establish a threshold utilization rate for all wireless carriers, requiring them to begin using the new overlay area code once the threshold has been reached (such as a 92% fill rate); and (d) agree that mandatory ten-digit dialing will not be required other than for dialing between NPAs.

These proposed guidelines would ensure that a high utilization is maintained, would ease the demands placed on existing area codes by the rapid expansion of wireless services, and would ensure that, eventually, all NXXs within an old area code would be returned in a manageable fashion, thereby renewing the life of existing NPAs. Such guidelines would alleviate the discrimination concerns voiced by other wireless carriers against wireless-only overlays.

Most importantly, a wireless-only overlay would benefit competition by allowing rapidly growing wireless carriers superior access to telephone numbers than either the current NPA jeopardy procedures or the Florida PSC's proposed procedures. In a

practice carried over from serving traditional wireline carriers, the current assignment guidelines assign NXX blocks to wireless carriers on the basis of landline rate centers. Wireless technology is not tied to traditional rate centers and their numbering parameters, however. It is Omnipoint's belief that this applying rate centers to wireless services is therefore inefficient. Moreover, the competition between wireless and wireline carriers for scarce NXX resources on a rate-center-by-rate-centers basis unnecessarily starves wireless carriers of the numbers they need to provide service in a competitive market. Because wireless carriers are able to spread a single NXX block of 10,000 telephone numbers over a larger service area, and because they are thereby capable of using their allocated NXX blocks more efficiently, a wireless-only overlay promises to free wireless carriers from the current congestion.

VI. Conclusion

For the foregoing reasons, Omnipoint recommends that the Commission exercise its Section 251(e)(1) jurisdiction over numbering administration and adopt uniform national rules and procedures for implementing interim numbering conservation. Exactly like other rules regarding local competition, establishing uniform and national standards regarding number conservation will ensure that prospective competitors have an opportunity to enter telecommunications markets in a timely and efficient manner. Such uniform and national standards will also limit the ability of inconsistent and unpredictable state allocation methods to discourage and delay such entry.

Respectfully Submitted,

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