

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

In the Matter of)	
)	
Petition of the California Public Utilities Commission and the People of the State of California for Delegation of Additional Authority Pertaining to Area Code Relief and to NXX Code Conservation Measures)	File No. NSD L-98-136
)	
Implementation of the Local Competition Provisions of the Telecommunications Act of 1996)	CC Docket No. 96-98

COMMENTS OF SBC COMMUNICATIONS INC.

Since the Commission issued its *Pennsylvania Numbering Order* in September 1998,¹ the California Public Utilities Commission (“CPUC”) has made strides in developing regulatory policies to alleviate the numbering crisis in the State of California. In these past few months, it has adopted six overlay area codes (providing the most efficient and longest-lasting form of area code relief), and it has accelerated the implementation of relief in the 415 area code in California and the 714 area code in Anaheim. During this period, the State of California has begun to see an improvement in its numbering crisis – for the first time since the CPUC began rationing of central office (“CO” or “NXX”) codes in the fall of 1996, the “pent-up” demand for such codes has been significantly reduced: the number of outstanding NXX code requests fell 28

¹ *Request 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 (FCC 98-224), NSD File No. L-97-42, CC Docket No. 96-98 (released Sept. 28, 1998) [Pennsylvania Numbering Order].*

percent between November, 1998 and April, 1999.² If the CPUC remains focused on providing timely and efficient area code relief, and continues on its current path of providing sufficient resources for all carriers, it can permanently end numbering shortages in the State of California.

The current petition for additional numbering authority, however, stands in stark contrast to the CPUC's recent actions.³ Although the petition claims that the CPUC needs additional authority to address numbering shortages in that State, the authority CPUC requests would not have any appreciable impact on eliminating the current NXX code shortages in California. Some of the actions proposed by the CPUC would be inconsistent with the Commission's mandate to make numbering resources available for all carriers on a competitively-neutral basis.⁴ Others would interfere with the Commission's on-going efforts to put in place national numbering optimization policies. Still others are entirely unnecessary, as the CPUC can accomplish the same result without additional authority. And such authority, if granted, could result in resources being displaced and attention being diverted from providing the area code relief

² See "D.96-09-087 Status Report 32" (CPUC filed May 19, 1999). That monthly report of the CPUC NXX code lottery shows that at the time the *Pennsylvania Numbering Order* was issued in September 1998, 822 requests for NXX codes were outstanding and unfilled in the State of California, and this "pent-up" demand grew steadily throughout 1998. Two months later, in November, 1998, the "pent-up" demand for NXX codes reached an all-time high at 942 outstanding code requests. By April, 1999, that number had dropped to 677 requests, a reduction of more than 250 codes, and the lowest amount of "pent-up" demand since July of 1998. The number increased to 843 outstanding requests in May, but it still remains significantly lower than the high point established in November, 1998.

³ See Petition of the California Public Utilities Commission and of the People of the State of California for Delegation of Additional Authority (filed April 23, 1999) [*CPUC Petition*]. The Common Carrier Bureau requested comments regarding the comments through a May 14, 1999 Public Notice (DA 99-928); these comments are filed in accordance with that Public Notice.

⁴ The CPUC petition states that the CPUC may want to give preferential access to numbering resources to competitive local exchange carriers seeking to enter the residential market. See *CPUC Petition*, at 13 n.11.

that is so desperately needed in California today.⁵ It is precisely the reluctance to implement timely area code relief and the belief that numbering policies should be used to promote other objectives that contributed to the depth and severity of the numbering shortages in California.⁶ The CPUC's petition, if granted, threatens a return to the very practices that caused the constantly-increasing shortages of numbering resources in that state.

After the CPUC filed its motion, the Commission issued its Notice of Proposed Rulemaking concerning numbering resource optimization, in which it announced it would adopt comprehensive national regulations to govern numbering resource optimization ("NRO NPRM").⁷ The NRO NPRM addresses all of the issues raised in the CPUC's motion, plus many others, and it does so in a comprehensive review of numbering resource optimization policies. The issues raised in the CPUC petition would be better addressed by the Commission in a single and comprehensive fashion, rather than have California and other states issue piecemeal interim decisions. Independent, interim state action could cause industry participants to comply with varied and potentially conflicting and costly state requirements while simultaneously trying to work on developing and implementing federal regulatory policies. Accordingly, the Commission needs to maintain the focus on these issues on the national level as it moves forward on adopting national numbering resource optimization policies. The Commission also needs to ensure that the CPUC continues its progress toward eliminating California numbering shortages while the

⁵ In its petition, the CPUC implies that area code relief should not be a priority, claiming it is "not in the public interest for the CPUC to continue to implement new area codes without regard to the inefficiencies inherent in the number allocation systems as it presently exists." *CPUC Petition*, at 6.

⁶ *See, e.g.*, Comments of SBC Communications Inc. (filed Feb. 5, 1999) and Reply Comments of SBC Communications Inc. (filed Feb. 22, 1999), NSD File No. 98-136 (regarding the CPUC's petition for authority to ration NXX codes).

⁷ *In re: Numbering Resource Optimization*, Notice of Proposed Rulemaking (FCC 99-122), CC Docket No. 99-200 (released June 2, 1999) [*NRO NPRM*].

Commission puts in place national optimization policies, which, as the Commission made clear in the *Pennsylvania Numbering Order*, requires that the CPUC continue to focus its efforts primarily on providing sufficient and timely area code relief.⁸

Thus, SBC Communications Inc. (“SBC”) urges the Commission to deny the CPUC’s petition. The specific items that the CPUC requests authority to implement are addressed below.

Mandatory Number Pooling Trial. The CPUC requests broad authority to mandate a number pooling trial of its choosing (either thousands-block or individual telephone number pooling), contending that it needs to order incumbent LECs (“ILECs”) to participate in a number pooling trial.⁹ The CPUC claims that it would hold a voluntary number pooling trial, but many competitive local exchange carriers (“CLECs”) refuse to participate in a number pooling trial unless the ILECs are compelled to participate as well.

A mandatory number pooling trial in California would provide little benefit at this time. It is unlikely that a thousands-block number pooling trial could be implemented earlier than the Commission’s adoption of national number conservation policies.¹⁰ Moreover, as the California Task Force on Number Pooling recommended, such a trial should be conducted in a single area code, and it therefore would not provide any benefit whatsoever for the rest of the

⁸ *Pennsylvania Numbering Order*, at ¶ 21.

⁹ *CPUC Petition*, at 8-9.

¹⁰ In fact, it is questionable whether the CPUC has sufficient resources to conduct a number pooling trial. The CPUC admits that it would need to have utilization surveys as a first step toward performing a number pooling trial, but claims that it does not have sufficient resources to collect such data. *See CPUC Petition*, at 14. If the CPUC does not have sufficient resources to take the first necessary step toward implementing number pooling, it is difficult to see how it can conduct a number pooling trial.

area codes in the State of California.¹¹ Such a trial should be held in a new area code, and it is less likely that such a new area code (particularly with the number of new area codes adopted in the State of California in the past few years) would exhaust before the Commission adopts national number conservation policies.¹² An attempt to do number pooling throughout a larger geographic area could cause serious network capacity problems and threaten the efficacy of the local number portability infrastructure.¹³ Thus, there would be little, if any, benefit to consumers from a number pooling trial in California.

Moreover, such a trial would very likely not provide any benefit to the consideration of national standards, either. Parties right now are preparing comments on the numbering resource optimization NPRM; there is no way that results from a California trial could be included in those comments. Even if a trial were put in place, the CPUC presents no reason

¹¹ Indeed, most of the participants in the CPUC's number pooling task force in favor of a number pooling trial recommended that such a trial be held in a single, new area code. *See* Interim Report of the Number Pooling Task Force, at 2-3, Docket Nos. R.95-04-043, I.95-04-044 (CPUC filed March 22, 1999).

¹² If the trial were held in an area code approaching exhaust, it likely would not appreciably delay exhaust, as Illinois discovered with its number pooling trial in the 847 area code. *See* Direct Testimony of Brian Baldwin, Ameritech Illinois, at 6, *Petition for Approval of NPA Relief for the 312, 630, 708, and 773 NPAs* (Ill. PSC filed April 1, 1999) ("it should be understood, as well, that pooling in and of itself will not provide sufficient relief to those [Numbering Plan Areas] facing a jeopardy situation") (discussing the extension of the Illinois number pooling trial from the 847 NPA to other Illinois NPAs).

¹³ Efficient data representation ("EDR") is not available in Number Portability Administration Center/Service Management System ("NPAC"), which is the only means currently available to implement thousands-block pooling. Thus, porting of each telephone number in a thousands-number block would be required for any trial in California at this time. Moreover, EDR is optional under the current technical standards, and EDR needs to be required for all carriers before pooling is authorized on a widespread basis. Otherwise, the volume of porting transactions could easily overwhelm carriers' networks and contribute to "slow horse" problems with the delivery of NPAC information.

why a California thousands-block number pooling trial would provide any information beyond that available from the Illinois and New York pooling trials.¹⁴

Fill Rates And/Or Sequential Number Allocation. SBC fully supports efforts to tighten current number administration requirements in a workable, competitively-neutral manner.¹⁵ However, to be effective, such standards should be imposed on a national basis and need to be monitored (through a comprehensive audit program, for example) to ensure compliance by all carriers. Such a comprehensive program should be adopted by the Commission as part of its national numbering resource optimization policies, but different standards should not be imposed by 50 state commissions. It would be difficult and potentially costly for the national numbering administrator and all national and regional carriers to comply with disparate sequential number assignment or fill rate standards set by state commissions, and it is unlikely that such standards could be enforced in any meaningful and competitively-neutral fashion.¹⁶ Accordingly, SBC recommends that the Commission not delegate such authority to the CPUC at this time, but, instead, that it establish effective national standards as part of its decision adopting regulations governing numbering resource optimization.

¹⁴ The CPUC's request to conduct a trial of individual telephone number pooling ("ITN") should not even be considered, as the Commission has tentatively concluded that ITN should not be required at this time as part of number optimization. *NRO NPRM*, at ¶ 141. Moreover, a trial of ITN would very likely require years to design and develop and would require sufficient porting capacity to port every telephone number. *See id.*

¹⁵ "Fill rates" are not an effective means to control assignment of NXX codes, because they are too inflexible to allow carriers to respond to a competitive market and require numerous exceptions (such as customer-specific arrangements, seasonal and industry-specific demand fluctuations). Moreover, exceptions can lead to policies that discriminate between different carriers or classes of carriers.

¹⁶ Indeed, utilization surveys are almost certainly necessary to monitor compliance with any sequential number assignment. The CPUC has not conducted utilization surveys for more than a year, even though carriers such as Pacific Bell have repeatedly urged the CPUC to conduct such surveys, and the CPUC admits that it would have to do such surveys as part of a number pooling trial. *See CPUC Petition*, at 14.

Lottery Exceptions. The CPUC should not be delegated any authority to grant exceptions to its monthly NXX code lottery. The North American Numbering Council (“NANC”) has recommended to the Commission that the North American Numbering Plan Administrator (“NANPA”) be given the authority to grant such exceptions, rather than state commissions, and that detailed procedures and guidelines should govern any such exceptions.¹⁷ While the issue has been pending, the Common Carrier Bureau has granted exceptions in two instances.¹⁸ There is no reason to deviate from this procedure in California.¹⁹

While the CPUC may have a role in recommending exceptions under the guidelines that are ultimately developed, or in making recommendations to the Commission for specific exceptions, it should not be permitted to grant exceptions in favor of certain classes of carriers to the detriment of others. The CPUC’s lottery already discriminates in favor of new entrants and against established carriers, such as existing Commercial Mobile Radio Service providers and ILECs.²⁰ The CPUC petition suggests that the CPUC would use additional authority to grant a preference to carriers seeking to provide residential service.²¹ To ensure that any exceptions are granted on a competitively-neutral basis, the Commission should retain the authority to grant

¹⁷ See North American Numbering Council, November 18-19 Meeting Minutes, at 13.

¹⁸ See *Emergency Petition of American Cellular Corporation for Numbering Relief*, Letter from Yog Varma, FCC/CCB, to Ronald Conners, NANPA (DA 99-663), NSD File No. 99-31 (dated April 7, 1999); *Sprint PCS Request for Emergency Numbering Relief in the 516 NPA*, Letter from Yog Varma, FCC/CCB, to Ronald Conners, NANPA (DA 99-505), NSD File No. 99-25 (dated March 12, 1999).

¹⁹ Of course, granting exceptions to the lottery will not slow the pace of area code relief, or eliminate the numbering shortages in the State of California, which is the basis for the CPUC’s petition. On this ground alone, the petition should be denied.

²⁰ See, e.g., Comments of SBC Communications Inc. (filed Feb. 5, 1999) and Reply Comments of SBC Communications Inc. (filed Feb. 22, 1999), NSD File No. 98-136 (regarding the CPUC’s petition for authority to ration NXX codes).

²¹ *CPUC Petition*, at 13 n.11.

exceptions, or delegate such authority to NANPA in accordance with the NANC recommendations.

Code Reclamation. SBC fully supports the CPUC playing an active role in reclaiming unused NXX codes in accordance with industry guidelines. To effectively engage in reclamation, the CPUC would need to conduct utilization surveys, which it has not yet done and which it believes it does not currently have the resources to do. However, if the CPUC is willing to undertake utilization surveys, it might find (as the State of Colorado did) that carriers voluntarily return NXX codes. The CPUC could work in conjunction with NANPA to ensure reclamation of any unused codes that are not voluntarily returned.²² The CPUC does not need any additional authority delegated to it to take effective action to reclaim unused NXX codes.

Actions The CPUC Should Take Under Existing Authority. As a major provider of local exchange service throughout much of the State of California through its subsidiary Pacific Bell, SBC has experienced first-hand the problems associated with rapid exhaust of area codes in California. Pacific Bell and its business and residential customers incur the lion's share of the cost of most of the area code changes in California. SBC thus fully appreciates the concerns regarding the pace of area code relief in the State of California, and the harm caused to carriers, including Pacific Bell, and its customers due to numbering resource shortages. Much more needs to be done to end shortages of telephone numbers in the State of California and minimize impacts on customers caused by repeated area code relief.

To that end, SBC has advocated several actions to bring the current numbering shortages in California to an end in a manner that causes the least amount of disruption to consumers. The CPUC currently has a rulemaking proceeding pending regarding area code relief

policy; SBC believes that the CPUC would take an important step toward ending California numbering shortages once and for all by adopting a policy in favor of overlay area codes in the high-growth, densely-populated urban areas of California, and adopting a statewide 1+10-digit dialing plan (with waivers permitted for rural areas). The CPUC also should explore options to expedite area code relief to ensure a sufficient supply of numbering resources in the future, since its current statutory requirements mandate three years of planning before implementing area code relief. The CPUC also should survey telephone number utilization, and it should work with NANPA and NANC to ensure that carriers return any unused NXX codes. Most importantly, however, the CPUC needs to continue to focus on implementing the most efficient and effective area code relief plans, and putting new area codes in place in a timely fashion. The CPUC can take all of these actions without any additional authority delegated from the Commission, and it should do so as soon as possible.

Respectfully submitted,

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Date: June 14, 1999.

²² In the extremely unlikely chance that a carrier refused to return codes at the direction of NANPA, the CPUC could work with the NANC and the Commission to ensure that the carrier returned the unused codes.

CERTIFICATE OF SERVICE

I, Mary Ann Morris, do hereby certify that copies of the "Comments of SBC Communications Inc." in File No. NSD-L-99-33 were served by first class United States Mail, postage prepaid, upon the parties appearing on the attached service list this 14th day of June, 1999.

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June 14, 1999

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