



PUBLIC UTILITIES COMMISSION

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June 16, 1999

William E. Kennard  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street SW, Room 8B201  
Washington, DC 20554

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Dear Chairman Kennard:

I would like to express my appreciation for the FCC's recent issuance of the Notice of Proposed Rulemaking (NPRM) pertaining to code conservation measures. As you and I discussed in April, the area code situation in California, and nationwide, is reaching crisis proportions. Many citizens have already labeled the situation as out-of-control. The NPRM plainly is a necessary first step in the direction of regaining control over number allocation and area code relief. I believe that the NPRM will produce several critical changes that will protect the long-term viability of the current area numbering system. Further, if the FCC acts promptly and aggressively enough, we will be able to ensure that the supply of numbers will last for some years, and thus can forestall the need to overhaul the North American Numbering Plan. My colleagues and I are acutely aware that there are no quick fixes to the numbering dilemma both the FCC and the states face. Further, given the very scope of the NPRM, I believe the FCC will need to devote considerable time and effort to crafting a comprehensive and effective public policy.

Notwithstanding issuance of the NPRM we urge the FCC to act on California's pending petitions. California is on the verge of a true crisis if we cannot find a way to slow the pace at which we are implementing area code relief. California's first overlay is scheduled to open on July 17<sup>th</sup>. The current version of a bill in the California Legislature proposes to prevent the overlay from occurring. Additionally, Assemblymember Wally Knox has filed a Petition to Modify with this Commission in order to halt the overlay. Additionally, many Californians have become aware that telephone numbers are allocated inefficiently, and that the inefficient allocation has produced an "artificial" shortage of numbers, which in turn drives the intense demand here for new area codes. The media has been very attentive in pointing out that of the now more than 200 million numbers available, only approximately 45 million are being used.

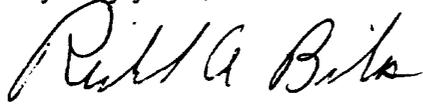
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Therefore, I urge timely consideration by the FCC of California's pending petitions. These requests for waiver from FCC rules will provide us a small window of opportunity to more efficiently use numbers on an interim basis until the FCC has completed its NPRM. Should the FCC grant our petitions, the CPUC would be able to act earlier to curtail the drain on numbering resources and the concomitant need for new area codes. Without timely action by the FCC, California will be burdened with an additional 15 area codes within by the end of 2002.

The problems California encounters now are likely to affect all states in the union. Indeed, a number of other states, notably Florida, New York, and Pennsylvania, are confronting comparably escalating demand for numbers. The area code shortage is simply more evident in California because of the sheer number of CLECs and our large population. Yet given time, most states will likely suffer from a similar situation. California is willing to test several possible area code conservation strategies from which the entire nation can benefit.

In closing, I thank you again for the NPRM. That proceeding will accomplish a difficult, but necessary task. I also ask for timely approval of California's petitions to impose specific code conservation strategies.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Richard A. Bilas".

Richard A. Bilas, Ph.D.  
President