

We do not support mandatory national 10-digit dialing, and further support a prohibition on 10-digit dialing for those NXX exchanges which generally have national line number assignments to single entities (950 and 555 NXXs), since they are not assigned to carriers in the first instance (assigned nationally by NANPA to the line level to end-user entities), and thus 7-digit dialing cannot have anti-competitive effects. These exchanges can be utilized to mitigate the impact on the elderly, children, and memory impaired individuals, as well as ubiquitous public service clients (i.e. 555-xxxx).

We support promulgation of specific enforceable anti-warehouseing and anti-hoarding regulations (Part 52), expanding and modifying existing PART 52 restrictions on toll free numbers to extend to all NANP administered numbering resources.

We support number pooling (1,000 block). We support retention of geographic NPA's and do not support technology specific overlays.

We reserve the filing of an amendment to this filing within 10 days.

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