

to all code holders, and it appends as Attachment B the guidelines industry adopted in Florida, which Sprint submits as a strawman proposal.

**5. The Commission Should Require States to Begin Rate Center Consolidation as a Condition to Implementing 1000s-Block Pooling**

Landline rate centers were developed decades ago, at a time when it cost substantially more to transport a call 1,000 miles as opposed to 10 miles. However, between competition and advances in technology (*e.g.*, optical fiber), the incremental cost of transport has become flatter and less distance sensitive. Thus, for example, Sprint PCS offers rate plans where for a low as 10 cents per minute (*including* airtime), one can place a long distance call anywhere in the country. Indeed, it is not uncommon for consumers to pay less for calls across the continent than a nearby (intraLATA) toll call.

Rate center consolidation, the Commission has aptly observed, can be “a vitally important long-term measure to optimize the utilization of numbering resources.”<sup>44</sup> Consider the situation in San Antonio, Texas, which once consisted of 31 different rate centers. The Texas Commission recently consolidated these 31 rate centers into one rate center. As a result of this consolidation, a new entrant wanting to serve San Antonio requires only one NXX code (10,000 numbers) as opposed to the 31 codes (310,000 numbers) that were required in the past — a reduction of over 96%. With number pooling, the new entrant would require only 1,000 numbers (vs. the 310,000 required in the past) — a reduction of *over 99%*.

Some states have already engaged in meaningful rate center consolidation, including Colorado and Texas.<sup>45</sup> None of the petitioning states (other than Texas) has seriously examined rate center consolidation, although Massachusetts is beginning to consider the matter.<sup>46</sup> This inaction is inexplicable given their claimed interest in number conservation.

The Commission has appropriately asked what incentives it could adopt to “encourage states to implement rate center consolidation.”<sup>47</sup> Sprint submits that the most effective incentive the Commission could impose would be to condition exercise of 1,000-blocks number pooling on implementation of meaningful rate center consolidation. A state commission claiming interest in number conservation should not be permitted to adopt one conservation measure when it is unwilling to adopt other, equally effective conservation measures (especially when implementation of the two measures combined could reduce number requirements by 95% or more). As illustrated by the San Antonio example, the benefits of number pooling will be maximized if pooling is implemented in conjunction with rate center consolidation.

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<sup>44</sup> *Numbering Optimization Notice* at ¶ 116. Of course, carriers that consolidate their rate centers must be allowed to recover their costs and rebalance their rates to account for the new environment.

<sup>45</sup> See *Numbering Optimization Notice* at n.185. Arizona also engaged in meaningful rate center consolidation, but then undermined the effectiveness of its action by splitting the local calling area into three different area codes. Minnesota appears to have done the same thing.

<sup>46</sup> See *Investigation on its Own Motion to Determine Whether Measures Could Be Implemented to Conserve Exchange Codes within Eastern Massachusetts*, DTE 93-38 (Mass., June 28, 1999).

<sup>47</sup> *Numbering Optimization Notice* at ¶ 118.

**6. The Commission Should Prohibit the Assignment of Numbering Resources to Any Carrier That Has Not Filed Current COCUS Data**

It is necessary for NANPA to collect information on the utilization of numbering resources and projected future demand in order to allocate resources efficiently and to forecast area code exhaust dates reliably. Historically, NANPA has used COCUS, although the Commission is now considering new survey alternatives to replace COCUS.<sup>48</sup> Obviously, forecasts based on incomplete COCUS data are far less reliable than forecasts based on complete data. NANPA recently discovered that based on a sample survey of 10 NPAs, one-third of all carriers receiving NXX codes did not respond to the 1999 COCUS and that these non-responding carriers received nearly one-half (46%) of all codes assigned in the sample NPAs during March 1999.<sup>49</sup> NANC has noted that incomplete COCUS data “contribute[s] to the problem of inaccurate prediction of exhaust of NPAs.”<sup>50</sup>

If a carrier wants the benefits of receiving scarce public numbering resources, it must share in the burden of administering those resources efficiently. Indeed, not to apply the same set of rules to all carriers contravenes the core principle of competitive neutrality. Sprint therefore recommends that the Commission require *all* users of

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<sup>48</sup> See *Public Notice*, “Common Carrier Bureau Seeks Comment on North American Numbering Council Recommendation Concerning Replacement of Central Office Code Utilization Survey,” NSD File No. L-99-51, DA 99-1315 (July 1, 1999).

<sup>49</sup> See Attachment to E-mail from Johan Manning, NANPA, to Alan Hasselwander, NANC (June 18, 1999).

<sup>50</sup> NANC, COCUS Replacement Study Report, at 6 (June 30, 1999).

NANP resources to respond fully to COCUS requests (or any replacement to COCUS). Moreover, to ensure that carriers comply with this requirement, Sprint further recommends that NANPA be empowered to reject applications for additional numbering resources if the applicant does not have complete and current COCUS data on file.<sup>51</sup> A list of non-participating carriers should also be submitted to this Commission and appropriate state commissions.

**B. It Has Become Necessary for the Commission to Impose Timelines Regarding the Adoption and Implementation of Area Code Relief Plans**

**1. The Area Code Relief Process Has Worsened, Not Improved**

The ability of carriers to obtain timely access to additional numbering resources is worsening, not improving — despite the Commission’s reminder to states that number conservation is not a substitute for timely area code relief. Twenty-six area codes have been declared to be in jeopardy in the past two months alone.<sup>52</sup> NANPA announced recently that 33 area codes will exhaust next year, another 37 codes will likely exhaust in year 2001, and yet another 34 codes are expected to exhaust in 2002.<sup>53</sup> And worst of all, there are numerous area codes that were in “extraordinary jeopardy” at the time the Commission released its *Pennsylvania Area Code* order where, 10 months later, the state commission still has not announced a relief decision.

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<sup>51</sup> As discussed above, Sprint does not object to NANPA sharing this COCUS data with states, so long as confidentiality provisions are in place.

<sup>52</sup> See [www.nanpa.com/news/bulletin\\_board.html](http://www.nanpa.com/news/bulletin_board.html).

<sup>53</sup> See [www.nanpa.com/pdf/cocussorted/pdf](http://www.nanpa.com/pdf/cocussorted/pdf).

Some states have delayed making long overdue relief decisions because they have decided to first investigate number conservation measures, in the hope that such measures will obviate the need for having to make difficult area code relief decisions. Take, for instance, the situation in Massachusetts. The Massachusetts Department of Telecommunications and Energy (“DTE”) learned in March and May 1998 that the four area codes serving the greater Boston metropolitan area were in “extraordinary jeopardy” — yet it waited 10 months (January 1999) before commencing an area code relief proceeding.<sup>54</sup> The DTE decided instead to focus its attention on conservation issues, commencing a new proceeding in April 1998.<sup>55</sup> And, shortly after commencing its relief proceeding, the DTE filed a petition seeking authority to implement the same wireless-only overlays that this Commission has twice ruled would violate the Communications Act.<sup>56</sup>

Thus, over a year after four populous area codes had been placed in “extraordinary jeopardy,” industry continues to wait for the Massachusetts DTE to release its relief decisions. The DTE has not even announced when it might render its decision, or whether it is deferring its deliberations pending the outcome of its wireless-overlay petition. (Of course, once the DTE makes a decision, yet additional time will be needed to implement the order.)

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<sup>54</sup> *Petition of Lockheed Martin, the North American Numbering Plan Administrator, for area code relief for the 508, 617, 781, and 978 area codes*, D.T.E. 99-11 (MA, Jan. 11, 1999).

<sup>55</sup> *See The Need for New Area Codes in Eastern Massachusetts and Whether Measures Could Be Implemented to Conserve Exchange Codes within Eastern Massachusetts*, D.T.E. 98-38 (MA, April 24, 1998).

The problem with this “conservation first” approach is that it will not work — at least for area codes currently in jeopardy. All available data demonstrate that even the immediate implementation of one of the most effective conservation measures, thousands-block pooling, will delay the need for relief by at most one year or so.<sup>57</sup>

Other states have delayed making or implementing relief decisions on the ground that they can rely on code rationing to defer relief indefinitely. Take, for example, the situation of the 310 area code serving Los Angeles. Industry has been forced to ration codes *for the past 33 months*, since October 1996. The California Public Utilities Commission (“PUC”) finally decided to implement relief *via* an overlay code in May 1998.<sup>58</sup> Permissive dialing began in July 1998, and the new code was scheduled to take effect on July 17, 1999.<sup>59</sup> However, on June 24, 1999, only three weeks before the new area code was to take effect, the PUC suspended implementation of the 424-relief code.<sup>60</sup> The PUC decided that it could defer implementation of the 310/424-relief plan because through continued reliance on rationing, it apparently believed that the 310 area code would not exhaust until April 2000:

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<sup>56</sup> See *Public Notice*, “Common Carrier Bureau Seeks Comment on Massachusetts Department of Telecommunications and Energy Petition for Waiver to Implement a Technology-Specific Overlay in the 508, 617, 781, and 978 Area Codes,” DA 99-460 (March 4, 1999).

<sup>57</sup> See, e.g., *Numbering Optimization NPRM* at n.270.

<sup>58</sup> See *Competition for Local Exchange Service*, Rulemaking 95-04-043, Decision No. 98-05-021 (CPUC, May 7, 1998).

<sup>59</sup> *Ibid.*

<sup>60</sup> CPUC News Release, “CPUC Temporarily Suspends 424 Area Code Overlay,” I95-04-043 (June 24, 1999).

By continuing to utilize the lottery for rationing the remaining NXX codes, exhaust [of the 210 NPA] can be forestalled . . .<sup>61</sup>

There are two problems with this decision. First, for all practical purposes, the 310 area code has exhausted. There were only 55 NXX codes remaining following the July lottery assignments. However, 62 NXX codes in the new 424 NPA had already been allocated as of that time — numbering resources carriers had expected to begin using on July 17, 1999. Thus, while the demand for codes in Los Angeles already exceeds the available supply, the California PUC suspended final implementation of the relief plan so it can reconsider the “*very same issues* [that] were before the Commission when we initially considered relief for the 310 area code.”<sup>62</sup>

More fundamentally, the California PUC has misused entirely the rationing process. Rationing, this Commission has noted, should be the exception, not the norm.<sup>63</sup> In fact, the Commission declined to give states the authority to impose rationing prior to making a relief decision precisely because it feared that states would then begin using rationing “to avoid making a decision on area code relief.”<sup>64</sup> Yet, the events in the 310 area code demonstrate that states have still have used rationing to avoid making a decision on area code relief.

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<sup>61</sup> *Competition for Local Exchange Service*, Rulemaking 95-04-043, *Interim Opinion*, at 6 (CPUC, June 24, 1999)(“*424 NPA Suspension Order*”). Inasmuch as it was aware that codes had already been allocated in the new 424 NPA, even the California PUC knew that relief could not be deferred to April 2000.

<sup>62</sup> *Id.* at 5 (emphasis added).

<sup>63</sup> See *Pennsylvania Area Code Order*, 13 FCC Rcd at 19025 ¶ 24 (“[R]ationing of NXX codes should only occur when it is clear that an NPA will run out of NXX codes before implementation of a relief plan.”). See also *id.* at 19039 ¶ 48.

<sup>64</sup> *Id.* at 19027 ¶ 25.

The problem in California is not unique. The 516 area code in Long Island was declared to be in “extraordinary jeopardy” in November 1997, and the next month industry agreed to ration NXX codes at a rate of three per month.<sup>65</sup> The relief coordinator asked the New York Commission to adopt a relief decision “by April 1998.”<sup>66</sup> However, the New York Commission did nothing for over a year, waiting until December 1998 before it even asked its staff to prepare an “options paper” addressing the relief alternatives.<sup>67</sup> The New York Commission finally adopted a relief decision on April 29, 1999.<sup>68</sup> Industry adopted new demonstrated needs-based assignment criteria (*see* Attachment A), and the available supply of remaining codes is now exhausted.<sup>69</sup> The situation industry has been facing in Long Island (516 NPA) is now repeating itself in the lower Hudson valley (914 NPA).<sup>70</sup>

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<sup>65</sup> The code administrator at the time predicted that without rationing, the 516 NPA would exhaust during “the first quarter of 1998.” Memorandum from D. Wayne Milby, Bell Atlantic Manager – NPA/Code Administration, to 212 and 516 Code Holders and Other Industry Members (Nov. 25, 1997).

<sup>66</sup> Letter from Myra L. Walls, Bell Atlantic Manager – NPA/Code Administration, to Hon. John C. Crary, NYDPS Secretary, at 1 (Jan. 29, 1998).

<sup>67</sup> *Ruling Concerning Future Course of Proceeding*, NYDPS Case 98-C-0689 (ALJ, Dec. 2, 1998).

<sup>68</sup> *See Proceeding to Institute an Omnibus Proceeding to Investigate the Efficiency of Usage of Telephone Numbering Resources and to Evaluate the Options for Making Additional Central Office Codes and/or Area Codes Available in Areas of New York State, When and Where Needed*, Case 98-C-0689, Opinion No. 99-6 (NYDPS, April 29, 1999).

<sup>69</sup> Less than two years ago, the N.Y. Commission stated that it would be “unthinkable” to allow an area code to exhaust and that as a result, relief “is better provided slightly too soon (should that in fact be the case) than slightly too late.” *Proceeding to Evaluate the Options for Making Additional Central Office and/or Area Codes Available in the 212 and 917 Area Codes*, Case 96-C-1158, Opinion No. 97-18 (NYDPS, Dec. 10, 1997). Yet, it has now allowed the “unthinkable” to occur in the 516 NPA, and it is about to let the “unthinkable” to occur again in the 914 NPA.

<sup>70</sup> The N.Y. Commission has yet to announce a relief decision for the 914 NPA even though the area code was declared to be in jeopardy over 17 months ago and even though industry had been rationing only five codes per month for over a year. Because the number of remaining codes in

The same phenomenon is occurring in Massachusetts. As noted above, NANPA declared “extraordinary jeopardy” for the four area codes encompassing the Boston metropolitan area in March and May 1998, yet the Massachusetts DTE waited 10 months, until January 1999, before even commencing a relief proceeding. When two carriers recently returned over 200 codes in this area, the DTE announced that it would rely on continued rationing so it could postpone having to make a long overdue relief decision:

The voluntary return of exchange codes by LBC and Level 3 has the clear potential to forestall the immediate need for new area codes in Massachusetts and to bridge the gap until the FCC implements a new and less wasteful exchange code distribution system based on emerging technologies. However, the potential to avoid the need for new area codes depends on the industry agreeing to maintain the current rationing procedures.<sup>71</sup>

The California, Massachusetts, and New York examples confirm the validity of the Commission’s decision to limit state participation in the rationing process. But these examples further demonstrate that even with the limitations on rationing that the Commission did impose, states have nonetheless begun to use rationing as a means “to avoid making a decision on area code relief.”

The inability of carriers to obtain numbers when needed is contrary to the public’s interest in obtaining the services they want from their preferred service provider.

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the 914 NPA are so few, industry decided in May to end the rationing process and begin implementing a needs-based formula similar to that used in the 516 NPA. Excluding the 20 NXX codes that have been set aside in the event that the N.Y. Commission adopts an overlay, all remaining NXX codes in the 914 NPA have been assigned under the new needs-based procedure. As a practical matter, the 914 NPA has exhausted — yet industry still waits for a relief decision.

<sup>71</sup> Letter from the Massachusetts DTE to Eastern Massachusetts Code Holders, at 1 (May 4, 1999).

The inability to obtain numbers also distorts the competitive process because new entrants cannot draw upon the number reserves that incumbent carriers have accumulated over the years and thus cannot survive a draught as can incumbent carriers.

**2. The Commission Must Adopt Timelines to Ensure That States Implement Relief in a Timely Manner**

The current crisis concerning the availability of additional numbering resources will be solved only by prompt implementation of area code relief. As noted above, however, an increasing number of states are postponing their area code relief decisions, and the crisis is worsening. Given these circumstances, there are only two ways this crisis will be solved: (1) this Commission can assume direct responsibility for implementing area code relief — at least with regard to states that have demonstrated an inability (or unwillingness) to do the job themselves;<sup>72</sup> or (b) it can establish strict timelines under which all states must operate. Because it is questionable whether the Commission has the resources to become involved directly and because states best understand local conditions, Sprint recommends that the Commission establish timelines governing their exercise of delegated area code relief authority.

**(a) The Commission Should Require States to Adopt Relief Decisions Within Six Months for Area Codes in Jeopardy**

There are three steps in developing a relief decision: (1) the relief planner/coordinator notifies the public and industry that an area code is in need of relief;<sup>73</sup> (2)

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<sup>72</sup> So the Commission is not misled, there are states that responsibly and timely implement area code relief.

<sup>73</sup> This had been a weak link in the process because too often industry first learned of the need for relief in conjunction with a jeopardy notice. The situation has improved dramatically since

industry then meets to discuss the relief option that should be adopted;<sup>74</sup> and (3) the state commission adopts a relief order. It is the third step — state commission decision-making — which has been the weak link in this process, and is the area most in need of reform. The Commission has noted that there is a lack of discipline in the way industry today assigns numbering resources.<sup>75</sup> Yet, there is also a lack of discipline governing timely state commission area code relief decision-making. Unless this Commission is willing to assume this task directly, it is essential that this Commission impose limits on the time state commissions may take to complete the relief planning process. Remembering that state commissions often become involved once the need for relief is announced (step 1 above), six months from the date of the submission of a relief process is ample time for state commissions to complete this work.<sup>76</sup> Sprint therefore recommends that the Commission require state commissions to exercise their delegated authority

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Lockheed Martin has assumed the relief planning administration process. Indeed, it recently published a list of all NPAs it believes will likely exhaust and need relief within the next decade. See NANPA, *Anticipated Start of Relief Planning for U.S. NPAs Projected to Exhaust in the Next 10 Years*, [www.nanpa.com/pdf/relief\\_schedule1.pdf](http://www.nanpa.com/pdf/relief_schedule1.pdf) (July 1999).

<sup>74</sup> Sometimes industry is successful in reaching consensus over a particular plan; other times, it cannot reach consensus. But even when consensus is not reached, industry generally is successful in narrowing the viable options for submission to a state commission. As a general rule, industry has ample incentive to complete its work.

<sup>75</sup> See, e.g., *Numbering Optimization Notice* at ¶ 36.

<sup>76</sup> For example, the Maryland Commission, though conducting eight hearings, announced its relief decision within five months of the submission of a relief petition. See *New Telephone Area Codes*, Case No. 8705, Order No. 72274, 165 P.U.R.4<sup>th</sup> 344 (1995), *reh. Denied*, 87 Md P.S.C. 18 (1996). Of course, states can always seek an extension of the timelines if they can demonstrate “good cause.” See 47 C.F.R. § 1.3.

within six months of the submission of a relief petition — at least for area codes in a jeopardy condition.<sup>77</sup>

**(b) The Commission Should Also Require States to Adopt a Decision-Making Schedule Within One Month**

The Commission has indicated that it will intervene if a state commission fails to enact area code relief in a timely manner.<sup>78</sup> However, meaningful (and timely) Commission intervention is not possible if industry must wait an unspecified amount of time for a state commission to act before it can even invoke this Commission's processes. Sprint therefore recommends that the Commission require states, within 30 days of a relief petition having been submitted, to announce a schedule designed to complete their deliberations within the allowed time. Without this schedule, there would be no assurance that a state commission will render a decision promptly.

**(c) The Commission Should Require that Relief Plans for Area Codes in Jeopardy Be Implemented Within Six Months**

Time is generally needed to implement a relief decision.<sup>79</sup> Industry uses this time to modify its networks, to educate the public about the new arrangements, and to work with public safety agencies to modify and test new 911 calling arrangements. Although area codes can be implemented in four months or less, in ideal conditions industry

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<sup>77</sup> At this time, Sprint does not believe that timelines are necessary for area codes not in jeopardy, so long as relief is implemented before a jeopardy condition occurs.

<sup>78</sup> See *Pennsylvania Area Code Order*, 13 FCC Rcd at 19027 ¶ 26 (“If state commissions do not make decisions on area code relief when forecasts indicate that NXX depletion is imminent, carriers may petition this Commission for relief.”).

<sup>79</sup> However, once an all-services overlay is implemented, little or no time is needed to implement another overlay code.

may take one year or longer to complete these tasks. Obviously, when an area code is in jeopardy, relief should be implemented as quickly as possible.

It is often difficult for industry to implement quickly jeopardy relief plans because of resistance interposed by some incumbent LECs. Sprint does not deny that incumbent LECs, given the size of their networks, often face considerable work in implementing a new area code. But incumbent carriers also have vast reserves of numbers that new entrants do not possess, and as a result, they often have less incentive to implement relief promptly compared to most new entrants.

Sprint therefore urges the Commission to require that relief plans for area codes in jeopardy be implemented within six months of the relief decision. If a state commission believes that a six-month schedule is too aggressive in a particular situation, it can petition the Commission for an extension.

### III. Conclusion

For the foregoing reasons, Sprint urges the Commission to adopt expeditiously a two-part plan dealing with both the conservation and competition facets of the numbering crisis. The Commission should take such action in response to the pending waiver requests by various state commissions or as an interim measure prior to the conclusion of this rulemaking. By acting now, and by taking into account all aspects of number utilization, the Commission may be able to turn a burgeoning crisis into a manageable problem.

Respectfully submitted,

**Sprint Corporation**



Jonathan Chambers  
Sprint PCS  
1801 K Street, N.W., Suite M112  
Washington, D.C. 20006  
(202) 835-3617

Jay Keithley  
Sprint Corporation  
1850 M Street, N.W., Suite 1100  
Washington, D.C. 20036-5807  
(202) 857-1030

Joseph Assenzo  
Sprint PCS  
4900 Main, 12<sup>th</sup> Floor  
Kansas City, MO 64112  
(816) 559-2514

Its Attorneys

July 30, 1999

# **ATTACHMENT A**

JUN. 9. 1999 6:02AM

LOCKHEED MARTIN IMS

NO. 0229 P. 8/29 516

**Lockheed Martin IMS**  
Communications Industry Services  
1133 15th Street, N.W. Washington, D.C. 20005  
Telephone 202-756-5600 Facsimile 202-887-0331



June 8, 1999

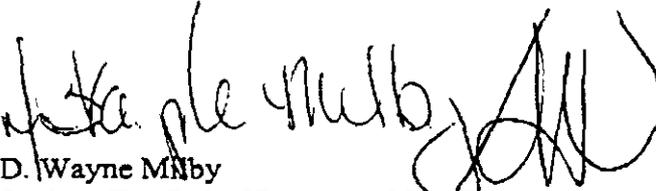
To: 516 (New York) Code Holders and Other Industry Members

Re: Final Meeting Notes Distribution

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Attached, for your records, are the final approved notes resulting from an industry meeting held May 10, 1999 to address a Reconsideration of the 516 NPA Rationing Plan.

Please feel free to call me on (804) 795-5919 or Frank Colaco on (973) 740-9100 if you have any questions regarding this distribution.

  
D. Wayne Maby  
Senior NPA Relief Planner - NAWPA

Enclosures

**NEW YORK  
RECONSIDERATION OF THE 516 NPA RATIONING PLAN  
INDUSTRY MEETING**

**MONDAY, MAY 10, 1999**

**WELCOME & INTRODUCTIONS**

Wayne Milby, Senior NPA Relief Planner – NANPA, welcomed everyone and asked the meeting participants to introduce themselves and identify the companies they represented. See Attachment 1 for the names of those who attended the meeting.

Wayne reviewed the agenda for the meeting and provided a brief status of the issues to be discussed.

**ACTION ITEM FROM APRIL 12, 1999 MEETING**

In response to an action item from a previous meeting held April 12, 1999, Bell Atlantic indicated that it is not opposed to releasing the 212 NXX for assignment in the 516 NPA. Bell Atlantic, however, indicated that it must first address network-timing issues before it can consider releasing the Adjacent NPAs (347, 718, 917) and the Home NPA (516). Bell Atlantic stated it does not object to releasing 800 and 900, but requests that these NXX codes be reserved for assignment as a last resort to avoid customer dialing confusion. Additionally, the 936 NXX will be reclassified in the Local Exchange Routing Guide (LERG) as a Bell Atlantic code, and will be excluded from assignment.

*Action Item:* Bell Atlantic will review the network-timing issues regarding Adjacent NPAs (347, 718, 917) and the Home NPA (516) to determine if the corresponding 516 NXXs can be released for assignment. Bell Atlantic will also check the status of 999 to determine if it too can be made available for assignment.

Consensus was reached that 212, 800 and 900 will be returned to the NXX pool for assignment. However, 800 and 900 will be reserved for assignment as a last resort.

*On the subsequent conference call held May 24, 1999 to approve these notes, consensus was reached that the Home NPA (516) would not be returned to the pool of available NXXs.*

**RECONSIDERATION OF THE 516 NPA RATIONING PLAN**

In response to an action item from a previous meeting held April 12, 1999, NANPA CO Code Administration reported that eleven (11) NXX codes in the 516 NPA have been assigned to a single carrier under multiple OCN's.

**CONSENSUS ON METHOD TO PROVIDE NXX CODES FOR EMERGENCY REQUEST**

Bell Atlantic presented and reviewed a contribution that proposes a plan to distribute the remaining NXX Codes in the 516 NPA. (See Attachment 2)

The participants reviewed the proposal making edits as follows:

#### **Return of Codes**

Consensus was reached to modify item 1 as follows: *Any codes assigned prior to 5/1/99 and not activated within six months of the assignment date must be returned to the pool. Any codes assigned after 5/1/99 must be activated within three months of the assignment date, unless technical difficulties exist beyond the carrier's control. In the event of difficulties, this carrier will notify NANPA in writing on or before 90 days documenting an anticipated activation date.*

Consensus was reached to adopt items 2, 3 and 4 as written.

#### **Emergency Pool**

Consensus was reached to adopt the introductory paragraph as written.

Consensus was reached to adopt the section titled Imminent Exhaust Criteria with minor modifications.

#### **Assignment of Remaining Codes**

Consensus was reached that NANPA CO Administration will stagger NXX effective dates in the 516 NPA beginning with the assignment of no more than twenty-two (22) NXX codes in a given week to the first twenty-two (22) entities appearing on the priority list who have submitted the requisite documentation. The remaining NXX codes will be assigned with effective dates that are at least one week later.

#### **Extreme Exhaust Assignment Criteria**

Consensus was reached to adopt Sections A & B, as revised at this meeting.

Consensus was reached to adopt section titled Suspension/Denial of a Code Application (Imminent or Extreme Exhaust, Growth or Initial), as revised at this meeting.

*Statement for the Record (New York State Department of Public Service):* The New York State Department of Public Service supports priority allocation treatment for two or more carriers willing to share an NXX Code through pooling or other technically-workable methodology. We believe that this treatment rewards carriers seeking to conserve finite numbering resources while at the same time meeting their needs for numbers.

*Statement for the Record (Nextel):* Nextel opposes giving priority status to carriers who volunteer to share an NXX code as proposed by the NY PSC. To do so would violate the general requirements for number administration as mandated by the FCC that numbering resources be made available to all carriers on an equitable and non-discriminatory basis. Wireless carriers cannot currently share NXX codes. Thus granting

priority to carriers that can code share discriminates against the wireless industry based upon its technology.

*Statement for the Record (MCI Worldcom):* MCI Worldcom notes its objection to those parts of the Bell Atlantic's revised "Contribution for the Distribution of the Codes Remaining in NPA 516" that limit the ability of carriers with more than one OCN per industry segment to request codes. The INC Guidelines allow for code requests by OCN.

Consensus was reached to adopt the Bell Atlantic Proposal for the Distribution of the Codes Remaining in the 516 NPA, as revised at this meeting.

#### **EFFECTIVE DATE FOR THE IMPLEMENTATION OF THE EMERGENCY POOL**

Consensus was reached that the first date on which carriers can submit requests to NANPA CO Code Administration for numbers from the 516 Emergency Pool will be June 1, 1999 at 8:00 AM (PDT)/11:00 AM (EDT).

In response to an industry request, NANPA CO Code Administration agreed to fax monthly status reports of the 516 NPA Emergency Pool to the New York telecommunications industry.

#### **NEXT MEETING TO REVIEW AND APPROVE NOTES AND REPORT RESULTS OF THIS MEETING TO FCC**

Consensus was reached that NANPA will distribute the draft notes resulting from this meeting to the industry on May 20, 1999 via facsimile. Additionally, consensus was reached to conduct a conference call on May 24, 1999 at 10:00 AM (EST) to review and approve these draft notes. The call-in number for the call is 651-291-5101 + Access Code 3366\*.

Consensus was reached that NANPA will report the results of this meeting to the FCC in a letter with a copy of the approved meeting notes attached.

ATTACHMENT 1

RECONSIDERATION OF THE 516 RATIONING PLAN  
MEETING INVITEES

Abbruzzese	Jared	CAI Wireless Systems, Inc.	518-462-2632	518-462-3045
Ackerman	David	Winstar Wireless of NY	703-917-9117	703-761-0309
Ackley	Lorinda	Taconic Telephone Corporation	518-392-1276	518-392-1290
Adams	Thomas	Time Warner-Binghamton Division	607-786-0025	607-786-1299
Adams	Bernie	El-Mar Communications Co.	716-928-2812	716-928-1988
Aiberico	David	All Florida Paging	800-815-0218	407-260-5823
Alfonso	Norman	Future Electronics Corp.	508-779-3000	508-779-2756
Allan	William R.	New York Telephone Company	518-396-1001	
Allard	Rosemary	Princeton Cable Co., Inc.	518-346-1107	518-346-1107
Allen	William R	Bell Atlantic	518-396-1001	518-465-0385
Aronow	David	Metropolitan Telecomm.	212-759-0577	212-759-0706
Assenzo	Joseph	Sprint Spectrum	816-559-2514	816-559-2591
Atkinson	Robert C.	Teleport Communications	732-392-2160	732-392-3743
Azzhara	Joseph	Cablevision of Long Island	516-393-1377	516-364-4553
Backman	Art	Cablevision Lightpath	516-393-3456	516-393-0455
Bacon	Anita	AT&T Wireless	972-776-4522	972-776-4572
Baldassari	Julius	Hemisphere Comm. Inc.	716-646-1773	716-646-1973
Bail	Gary K.	MFS Intelenet of Maine, Inc.	212-843-3056	212-843-3060
Balog III	John M	Time Warner - Champlain	518-297-8689	518-297-3598
Barbuto	Tony	Time Warner - Manhattan	212-364-5544	212-364-7245
Barker	Curtis	Delhi Telephone Company	607-746-2111	607-746-7991
Barker	Curtis W.	Delhi Telephone Company	607-746-2111	607-746-7991
Beach	Raymond	Dunkirk & Fredonia Telephone Co.	716-673-3031	716-879-4005
Beacker	James R.	FiberNet, Inc.	708-218-7288	
Beacker	Ronald F.	Middleburgh Telephone Company	518-827-5211	
Beary	James	Porta-Phone Paging	850-841-7100	850-561-8996
Beaumont	Ronald R.	FiberNet, Inc.	708-218-7288	
Behringer	Bill	Time Warner-Manhattan	212-364-7244	212-364-7245
Beiga	Bill	Sprint (United Tel of Pa)	717-245-6227	717-245-7952
Belcher	Camille	Chautauqua & Erie Tel. Corp.		716-326-3166
Belenets	Dan	BAM	212-364-7244	212-598-7327
Benay	Matthew	ZAP Telecom (USA) Ltd.	212-839-9898	
Benjamin	Irene	Frontier Communication of New York	914-782-1062	914-782-9894
Bennett	Bruce	Lockheed Martin-NANPA	925-363-8701	925-363-8714
Bennett	Mary	Radiofone, Inc.	504-837-8330	504-831-7859
Benton	Marianne	Albany Telephone Company	518-464-7777	518-464-7908
Birmingham	Mike	Nextel Communications	914-448-4322	914-421-2700
Berthelsen	Sarah	Focal Comm. Corp. of NY	312-578-8400	312-895-8403
Biegen	Craig	NYPSC	518-474-3139	518-474-5616
Billand	Michelle	MCI	202-736-6204	202-736-6876
Blade	Cindy	Adelphia Cable-Resort(Mountain)	518-891-2810	518-891-4583
Blanchette	John	Cellular One	617-462-4000	617-462-5985
Blumenthal	George	OCOM New York, Inc.	212-906-8440	
Bogie	Russ	Time Warner - Sullivan Co.	914-292-7582	914-292-1658
Boister	William	Teleport Communications	617-476-4799	617-476-4767
Bonisiow	Daniel	Tel-Save, Inc.	215-862-1500	215-862-1085
Boyar	Richard	U.S. West Interprise	303-293-6326	303-293-9860
Brannon	Debby	Telgent	703-762-5332	703-762-5450
Brennan	Brian	Time Warner-Carthage	315-493-0651	315-782-9182
Broikou	Peter A.	Township Telephone Company Inc.	315-649-2411	315-649-3654
Bronston	David	Wolf, Block, Schorr, & Solis-Cohen LLP	212-883-4942	212-986-0604
Brooks	Suzanne	MCI World Com	972-656-1430	972-656-1499
Buffmire	Andrew	Wireless Co. L.P.	816-559-2516	816-559-3243
Bumgarner	Jack	Central Wireless Partnership	209-440-0164	209-440-0297
Burdette	Roy E.	Nextlink California	805-389-3090	800-392-4081
Burke	Thomas	NYPSC	518-488-2827	518-474-5616
Burr	Ann	Time Warner-GRC	716-325-1111	716-756-1872

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	Cannon	Ron	Bell Atlantic	410-738-8829	410-738-6068
	Carr	Jerry	Rochester Telephone Corp.	716-777-8005	716-325-7639
	Casey	Thomas	Time Warner Cable	607-756-2871	607-753-9754
	Castle	Gregory	Pacific Bell	415-542-7083	415-543-2935
	Ceresoll, Jr.	Joseph	Citizens Cablevision, Inc.	315-324-5911	315-324-5917
	Chomers	Glen	Time Warner-National Division	716-372-5220	716-372-1198
X	Chomyak	John	Bell Atlantic	212-285-7354	212-513-1098
X	Ciavarella	Michael	Omnipoint Communications	973-290-2513	973-290-2445
	Cliff	Karen	Automated Alarm Center		404-288-3189
	Cocotta	Sue	Frontier Local Services	716-777-1692	716-325-4481
X	Colaco	Frank	Lockheed Martin IMS	973-740-9100	973-740-9119
	Cole	William	Castle Cable TV Inc.	315-482-9975	315-482-2589
	Compon	Tim	Long Island Telephone		
	Conley	William	Bath Television & Service Co	607-776-4861	607-776-1152
	Conley	Kathleen	Time Warner-Genesee Co.	716-344-2544	716-344-0913
	Cook	Jeff	Pioneer Cable Corp	607-748-5214	607-748-5598
	Cooney	John	Cooney Cable Association	716-786-5638	716-786-8696
	Cooper	Dee	Omnipoint Communications		
	Cortissoz	Anne	Bell Atlantic	410-736-8547	410-736-6066
	Cotter	Mary	Time Warner-Syracuse	315-463-2288	315-463-2088
	Csigi	Michael J.	Greene Cablevision Co. Inc.	607-656-7110	
	Currie	Eugene	Teligent	817-854-7478	617-371-2950
	Davis	Dean	Vista United Telecommunications	407-827-2115	407-827-2128
	Day	Steven	Metrocall	703-660-6677	703-785-4385
	Debeaubien	Terid	Metrocall	703-660-6677	703-765-4385
	Deweese	Robert	Peabody & Brown	617-345-1316	617-345-1300
	DiGennaro	Mary	Albany Telephone Company	716-435-2246	716-435-2667
	Dilcom	Mark	American Cellular	914-483-8115	914-483-8405
	Dingwall	Craig D.	Sprint Communications	202-828-7447	202-828-7403
	Direnzo	Barbara	Armstrong Telephone	724-283-0925	724-283-9655
	Dobrowsky	Eric	Paging Partners Corporation	732-409-7088	732-409-7366
	Doherty	Thomas	Fisher Island Telephone Corp.	516-788-7001	516-788-7798
	Doolittle	Jimmy	Time Warner	203-328-0600	203-328-0677
	Dorman	Michael	Lockheed Martin IMS	202-414-3667	202-408-5822
	Downs	Jena	Bell Atlantic	410-736-6711	410-736-6066
	Drehmann	Donna	Nextlink, New York	212-684-5111	212-684-5818
	Drmota	Fred	Cellular One - Buffalo	716-435-634	716-868-9008
	Dubow	Larry	ACC Long Distance	800-456-6006	716-987-3290
	Duncan	Barry	Bell Atlantic	410-736-6642	410-736-6066
	Dunn	John	AT&T	312-230-2637	312-230-8211
	Duros	Theodor J.	General Telephone Co	617-227-0325	617-227-0671
	Easley	Stephen	American Cellular	202-508-6619	202-508-6699
	Edgerty	Bob	Nextel		
	Eldredge	Paul	Comay Telco Inc.	508-390-9000	516-794-1742
	Elfner	Doug	NYCPB	518-486-6532	518-473-7482
	Ellis	Thomas I.	Northland Networks, Ltd.	315-797-8101	315-865-5211
	Evanitsky	Margaret	Han-Cel Video, Inc.	607-637-2568	607-637-9899
	Farley	John	Network Plus	212-894-2400	212-432-7111
X	Faul	Kelly	MCI WorldCom	703-918-0457	703-918-6814
	Feehan	Stephen	Deposit Telephone Co. Inc.	607-467-8040	607-467-3232
	Ferzoco	Alexander	Safety Signal	508-376-2013	508-376-9543
	Fields	Helen	CONXUS Network, Inc.	864-241-5412	864-241-8197
	Fitzgerald	Brian T.	LeBoeuf, Lamb, Greene&MacRae	518-456-1500	518-458-1585
	Fitzpatrick	James	Fitzpatrick TV Cable	607-356-3117	607-356-3117
	Fleming	Andrew	Time Warner - Binghamton	607-798-0422	607-770-8639
X	Foose	Nathan T.	Nextel Communications, Inc	908-301-1211	908-301-1212
	Forcier	James	Chazy & Westport Telephone Corp.	518-962-8211	518-962-4911
	Forcier	Gerald	Chazy & Westport Telephone	518-962-8211	518-962-4911
	Foss	L.Theodore	Newport Telephone Co. Inc	315-845-8112	315-845-8662
	Francis	Sharon	TKR Cable of Rockland & Ramapo	914-624-3500	914-623-5619
	French	Patricia	LLGM	617-439-9500	617-439-0341

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	Frezza	Dave	Citizens Communications	518-773-6594	518-773-8801
	Frisoli	Paul	Special Agent Systems, Inc.	817-824-2100	617-923-1886
	Furbish	Karen	AT&T Communications		
	Fury	John	US ONE Communications of NY, Inc.	972-376-8520	
	Gallagher	Josephine	Bell Atlantic	703-974-8160	703-974-0816
	Gallagher	Frank	Twin Tier Cablecom LP	607-324-0638	607-324-7270
	Gan	Howard	Falcon Cable TV	310-824-9990	310-208-3655
	Ganley	William	NuView TV, Inc.	315-821-7225	315-655-4400
	Gardella	Charles	WorldCom Network Services, Inc.	601-360-8965	601-360-8971
	George	David	Cellular One-Syracuse	315-439-5633	315-439-5622
	Gifford	Jennifer	Nextel	617-839-5622	617-839-5812
	Gilchrist	Amy M.	Citizens Telecommunications Co. of NY	304-325-1624	
	Godwin	Ronald	Frontier Comm. Of Miss.	601-462-5197	601-462-8020
	Goodson	Pete	Citizens Communications	914-344-9105	914-343-3768
	Graham	Timothy	Winstar Locate, Inc.	703-917-9117	212-922-1637
	Grswold	William	Trömansburg Home Tele. Company	607-387-5050	607-387-5860
X	Groves	Curtis	MCI	914-312-6007	914-312-2287
	Gruneisen	Donald	Nichoville Telephone Comp.Inc.	315-328-4411	315-328-4802
	Guariglia	Annette	MCI	914-312-2287	914-312-2287
	Gurdineer	Teresa	Cable TV of Tri-States, Inc.	717-491-4837	717-491-2742
	Haddad	Bill	Telergy	315-431-2670	315-433-5399
	Hall	Alan	Time Warner-Jamestown	716-664-7315	716-664-3123
	Hall	Dennis	Southwestern Bell Comm. Svcs. Inc.	925-468-5217	925-468-4842
	Harrington	Michael	Chautauqua & Erie Tel. Corp.	716-328-2121	716-328-3168
	Harvey	Karen	Teligent (Bell Atlantic)	703-762-5428	703-288-5843
	Harwood	Stacey	NYDPS		
	Hayes	Shella	Sprint	913-534-2623	913-534-5366
	Heeren	Andrew	Cablevision of Hauppauge	516-348-8800	516-348-6872
	Heibling	Nancy	Frontier Tele. Of Rochester Inc.	716-777-6161	716-777-6115
X	Helms	Kimberly	Network Plus	212-894-2420	212-432-7111
	Hicks	Linda	Time Warner-Orange County	914-692-5339	914-692-0778
	Higgins	Jeannine	Bell Atlantic		716-842-7090
	Hill	Judy	Adelphia Cable-Hoosick	802-447-1533	802-442-2063
	Hiltz	Cara	Hyperion Telecommunications	412-220-5063	412-220-5164
	Hinkley	Douglas	Margaretville Telephone Com., Inc.	914-586-3311	914-586-4050
	Hirsh	David	Teleport Communications		202-739-0044
	Hogue	John	Sprint	913-624-6016	913-624-5504
X	Hoskins	Anne	Bell Atlantic NYNEX Mobile	908-306-7862	908-306-7731
	Hovarian	Shant S.	Cellular Vision of NY, L.P.	212-751-900	
	Hughes	Banner	Voice Telecommunications		
	Huntley	David	Cellular One	617-462-5094	617-462-5024
	Hutchison	Kim	AT&T	732-234-4787	732-719-7246
	Ilen	Levent	Florida Public Service Commission	850-413-8562	850-413-6563
X	Ingraham	Bruce	Pagenet	908-541-6050	908-541-6099
X	Ingram	Barbara	Bell Atlantic	410-736-6272	410-736-6647
	Ipsaro	Earl	Time Warner Telecom	716-756-1133	716-756-1117
	Jacobs	Bob	Time Warner-Manhattan	212-596-7200	212-420-4803
	James	Michelle	MCI World Com	616-224-4603	616-224-5110
	Jarrett	Lawrence	Time Warner-QUICS	718-739-7474	718-739-8124
	Jones	Dennis	Century Communications	607-334-3839	607-334-9674
	Jones	Lea	Southwestern Bell Comm. Services, Inc.	972-733-2176	
	Jones	Rochelle	Time Warner Communications	203-328-4002	203-328-4008
	Jordan	Barbra	E.Spire Communication Inc.	703-386-2222	703-386-2035
	Jordan	Paula	AirTouch Corp.	925-279-6033	925-279-6621
	Kalsh	Harvey	McCartor & English	973-622-4444	973-624-7070
	Kalifa	Yirmi	Superior Communication Tech Corp.		
	Kaplan	Andrew	Dept. of Telecomm & Energy	617-305-3500	617-723-8812
	Kaplan	Ralph	Deposit TV	607-487-2105	
	Kaufman	James G.	Champlain Telephone Company	518-298-2411	518-298-8882
	Kavanaugh	Linda	Time Warner- Mt. Vernon	914-699-8080	914-699-8131
	Keith	Patrick	Alfred Cable Systems	607-587-9313	607-587-9883

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	Kelly	Brian	Berkshire Telephone Corp.	518-758-8951	518-758-9978
	Kelly	Lonnle	Foothills Rural Telephone Corp. Inc.	606-297-3501	606-297-2000
	Kennicott	Deborah	AT&T - Wireless	773-695-2171	773-695-2190
	Kent	Tony	Cellular South		601-974-7189
	Kenworthy	Pamela	Lockheed Martin-NANPA	973-267-7812	973-267-7921
	Kimberlin	Tony	Bell Atlantic	410-736-7823	410-736-6066
	King	Jeffrey	Time Warner - Albany Division	518-242-8890	212-869-1007
X	King	Patricia	Residential Comm. Network of NY, Inc	609-720-5705	609-720-5870
	Khwior	Jon	Sprint Spectrum		
	Kizzee	Cheryl	MCI WorldCom	972-656-1613	972-656-1499
	Knapp	Patricia	Crown Point Telephone Corp.	518-597-3300	518-597-3000
	Koch	Richard N.	R.N.K. Inc.	781-297-9831	781-297-9836
	Koppoe	Wanda	MCI WorldCom	703-394-7363	703-918-6085
	Krug	John F.	Teleport Comm.	718-355-2792	718-355-4804
	Kwon	Rhea	Allegiance Telecom	312-228-6192	312-228-6180
X	LaCava	Julie	Bell Atlantic	518-396-1046	516-465-8488
X	LaGattuta	Paul	AT & T	212-387-4009	212-780-7837
	Lake	Darlene	Adelphia Cable-Aurora & Int'l	716-558-8200	716-558-8044
	Lane	Rob	Time Warner-Newburgh	914-585-8882	914-565-8818
	Laty	Mike	Automted Alarm Center	404-288-7512	404-288-3189
	Laurendi	Vincent	Adelphia Cable-Niagara & Riverside	716-297-6900	716-297-0616
	Lawrence	Dave	Metromedia Paging		
	Leclair	Bill	AlrTouch Paging	781-707-3732	781-453-8720
	Lencke	Robert	Cellular One	802-654-5000	802-655-3619
	Liebschutz	Elizabeth	N.Y.S. Dept. of Public Services	518-486-1895	518-486-5710
	Light	Floyd	TCI of NY-Kingston/Poughkeepsie	914-331-1804	914-331-0393
	Lipschitz	Benjamin	Dept. of Info. Technology & Telecom	718-403-8403	718-403-8504
X	Louie	Cecilia	Lockheed Martin	925-363-8710	925-363-8714
X	Ludwikowski	Scott	Sprint PCS	913-315-2611	913-315-2532
X	Lukowski	Raymond	Winstar Telecommunications, Inc.	703-645-5463	703-645-5704
	Madison	Jim	Cellular One-Syracuse	315-446-0400	315-445-8138
	Maese	Leo	Cablevision Lightpath Inc.	516-393-3402	516-393-0455
	Magliocco	Guy	Time Warner Telecom	716-758-1125	716-756-1117
	Mahoney	Michael	C-Tec Corp.	609-734-3700	609-951-8632
	Maini	Francis	Cellco Partnership	908-306-7211	908-306-6838
	Mandel	Slid	American Alpha Dispatch Svcs., Inc.	516-247-7241	516-247-7337
	Mansel	Will	Geotak		
	Marotta	Julie	Telecom Consulting	617-696-6841	617-696-6478
	Marr	Joseph	Citizens Telecommunications Corp.		
	Martens	Frances	MFS WorldCom, Inc.	781-663-5000	781-663-5155
	Masseau	Michael	Odgen Telephone Company	716-352-7201	716-352-7301
	Maytum	Robert	Cassadaga Telephone Corp.	716-673-3031	716-872-7646
	Mc Laughlin	Tom	Cellular One	802-654-5020	802-655-3214
	McAdoo	Andrew P.	Edwards Telephone Company, Inc.		
	McArdle	Cindy	TCI of NY-Amsterdam	518-843-8773	518-842-5261
	McCarthy	Angela	MapMobile Communications	757-424-1191	757-578-4963
	McCarthy	James	Onedia County Rural Tel Co.	315-865-5201	315-865-5211
	McClean	Garry	West KY Rural Telephone Co.	502-674-1000	502-656-3651
	McCue	Martin T.	Frontier Comm. Internatuon Inc.	716-777-8497	716-546-7823
	McGee	Thomas	AT&T	770-785-5872	770-929-4348
	McGuigan	Louis	Time Warner-Fingertakes & Canandaig	315-781-1551	315-781-0231
	McJimsey	Elizabeth	Sprint PCS, Legal Department	816-559-6009	816-559-2591
	McKee	David	C-Tec Cable-New York	914-225-2343	914-225-1802
	McTague	Joseph	Hometown TV, Inc.	518-658-9047	
	Meegan	Paul	TCI of NY-Buffalo	716-853-8700	716-853-7785
	Meins	Charlene	AT&T Wireless	425-580-8132	425-580-8609
	Meldazis	Daniel	Focal Communications Corp.	312-895-8272	312-895-8403
	Melendez	Marcos	Marathon Metro, Incl	206-812-1800	206-812-7283
	Melluso	Maggie	Cablevision Lightpath, Inc.	516-733-3200	516-393-0455
	Mercer	Peter	Hudson Valley RSA6	518-392-1265	518-392-3414
	Merrilees	Bob	Time Warner - Brooklyn	718-463-4100	718-991-5120

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X	Millby	Wayne	Lockheed Martin-NANPA	804-795-5919	804-795-5514
	Mitchell	William	Tele-Communications, Inc.	732-356-1010	732-356-9067
	Mitchell	Joe	AAT Radio Telephone	718-987-4000	718-987-5595
	Mitchell	Daniel	Mass. Attorney General's Office	617-727-2200	617-727-1047
	Monagle	Dan	Bell Atlantic	215-963-8004	215-563-2658
	Morin	Kenneth	Teleport Communications	817-476-2888	817-478-4767
	Morrissey	Michael	AT&T Communications of NY, Inc.	212-387-4700	212-387-4390
	Mosca	Paul	Cellular One of Boston	617-462-7048	617-462-5975
	Mucha	John	Harron Cable-Adirondack	518-793-4356	518-793-0192
	Muench	William	Time Warner-Capital	518-869-5500	518-869-1007
	Mulcahy	Michael	Paging Network	617-743-3296	781-229-1504
	Mullen	Daniel	Bell Atlantic Mobile	908-306-7342	908-306-6836
	Munnely	Robert	New England Cable TV Association	781-843-3418	781-849-6267
	Murray	Steve	Winstar Communication	703-288-6605	703-288-6645
	Murray	Melissa	KMC Telecom	770-638-2485	770-806-4988
	Murray	Kathryn	TSR.Wireless, LLC	201-947-5300	201-461-2907
	Muse	Dennis	FiberNet, Inc.	630-203-7200	630-203-0564
X	Nanos	Janet	Omnipoint Communications	973-290-2513	973-290-2445
	Neill	Dave		303-566-5952	303-566-1596
	Nephew	Arthur	TCI of NY - Buffalo	716-843-8030	716-853-7785
	Niles	David	Hancock Telephone Company	607-637-0944	607-637-9999
	Nixon	Stephen	ST Long Distance	716-326-3125	716-326-3124
	Nixon	Peter	ST Long Distance	716-326-2121	716-326-3166
	Noreca	Karen	Time Warner-Fredonia	716-673-1059	716-673-1039
	Nosewicz	Raymond	Cellular One of Rochester	716-768-6620	716-732-5715
	Okello	Sharon	Cablevision of Rockland/Ramapo	914-624-3500	914-623-5619
	Oliverio	Bill	Sullivan & Oliverio	716-854-5300	716-854-5299
	Pagano	Stephen	Time Warner-Staton Island	718-447-7000	718-818-8433
	Parks	Brenda	Time Warner - Liberty Div.	914-295-2664	914-295-2451
	Parr	Mark	Seiko Communications of America Inc	503-531-1509	503-531-1550
	Paszwalers	Shirley	Level 3 Communications	303-635-9602	303-635-9525
X	Pattenaude	Greg	New York Department of Publice	518-474-8717	518-474-5616
	Pearl	Henry	Time Warner-Oneida	315-363-4832	315-337-0587
	Pendelton	Charles	GAP Management	608-432-0720	608-433-0500
	Pender	Claire	Congress Alarm Company	617-269-4250	617-269-4619
	Peters	Diane	Upstate Cellular		
	Peterson	Sue	Brooks Fiber Communications	616-244-4665	616-224-5110
	Phillips	Bubba	AT&T Long Distance	770-785-5773	770-929-4348
	Piechocki	Gregory	Time Warner - Brooklyn Queens	718-463-4100	718-961-3768
	Pierce	Kevin	Century Communications	607-334-3639	607-334-9674
	Pilittere	Helen	Upstate Cellular Network	716-321-7093	716-321-7050
	Potter	Nancy	Time Warner-Malone	518-483-7210	518-483-0677
	Powell	Dale	Citizens Communications	914-344-9105	914-343-3768
	Prack	Jeff	Taconic Technology Corp.	518-392-1227	518-392-3699
	Price	Robert	Chill Cellular	212-757-5600	212-397-3755
	Purcell	Meabh	Teligent	617-439-9500	617-439-0341
	Putnam	Gary	Time Warner Coming	607-9363741	607-936-0607
	Pyle	Tina	Media One	303-793-6772	303-804-6777
	Quinn	William	Cablevision Systems	516-364-8450	516-496-1780
	Quintana	Bill	Time Warner Telecom	303-566-5971	303-566-1596
	Quintant	Bill	Time Warner		
	Rafferty	Don	Time Warner-Liberty Division	914-295-2650	914-295-2451
	Randall	Jacqueline	Level 3 Communications	303-635-9603	303-635-8525
X	Raposo	Nicole	Omnipoint Communication	973-872-5766	973-875-5014
X	Rappoport	Bruce	Bell Atlantic Mobile	908-306-7862	908-306-7240
	Raymond	Gregg	Harron Communications Corp	610-644-7500	610-644-2790
	Reed	Michael	Oriskany Falls Telephone Corporation	802-485-2924	
	Reld	Sean	Metrocall	850-438-1653	850-432-9208
	Renna	Diane	AT&T Local	908-234-7347	908-719-7246
	Reynolds	James	Mid-Hudson Communications	518-943-6600	578-943-6603
	Rickert	Robert	Time Warner-Sayre	717-888-9331	717-888-8091

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	Riley	T. M.	Highland Telephone		
	Rios	Jose	AT&T	212-387-4707	212-387-5048
X	Rizzi	Jeannette	Omniport Communications	973-872-5046	973-872-5048
	Robertson	Pat	Alltel	330-650-7232	330-650-7264
	Roberts	Steve	AirTouch Paging	972-880-3312	972-860-3248
	Rohrscheib	Walter	Pagenet of Mass.	781-272-7243	781-229-1504
	Rooney, Jr.	William	Global NAPS	617-350-0100	617-426-5251
	Ross	Kathy	Citizens Communications	214-365-3340	214-365-4059
	Rowland	Tom	North Central Tel. Coop.	615-666-2151	615-666-6772
	Ruppert	Harley	Newport Telephone Co.	315-845-8112	315-845-8662
	Rutledge	Tene	Teligent Inc.	703-762-5532	703-288-5643
	Ryan	William	Cable Vision of New York City	718-991-6000	718-378-2625
	Sabin	Mary Frances	Adelphi Cable-Syracuse	315-471-1911	315-471-1502
	Sagendorf	Alan	TCI of NY-Schenectady	518-370-3900	518-370-4808
	Sagerer	Lori	Vanguard Binghamton, Inc.	910-282-3890	336-545-2219
	Sanders	Gregg	Media One dba American Cable System	914-762-8684	914-762-0799
	Sanders	John	Preferred Networks, Inc.	770-582-3723	770-734-0938
	Saur	Paul	Cellular One	617-462-4000	617-462-5976
	Sayers	Richard E.	Local Fiber L.L.C.	718-937-1200	
	Scardino	Kim	MCI Metro Access Services	914-312-6124	914-312-2287
	Schiltz	Jeanne	TPS Telecom	808-664-4236	808-664-4225
	Schmidt	Eileen	Media One	978-883-5500	978-883-7057
	Schneider	Gary	General Communications & Electric		
	Schonewolf	Paul	Hamilton County Cable TV	518-361-4832	518-361-4833
	Sdalabba	Samuel	Falcon Cable TV	518-563-5777	518-563-2696
	Scott	Barton	AllTek Ltd, Inc.	401-943-0010	401-943-4277
	Sevey	Mari	Media One dba US Cablevision	914-297-3333	914-297-9364
	Shampooe	Randall	Chautaugua Cable, Inc.	716-355-4509	716-355-4509
	Shannon	Jackie	Alltel	716-661-5381	716-484-1566
	Shapiro	Phil	AT& Comm. Of NY Inc.	518-483-2555	518-483-5943
	Sheehan	Dan	Time Warner-Staten Island	718-390-7031	718-816-8433
	Sheets	Scott	Airtouch Paging	972-860-3353	972-860-8248
	Shortly	Mike	Frontier		
	Silva	Paul	Wayne Alarm Systems	781-595-0000	781-592-2500
	Simms	Anna	Time Warner-Fulton	315-593-8843	315-592-4034
	Simon	Arthur	Onsite Access LLC	212-324-1555	212-324-1550
	Singh	Rajendra	Digital Services Corp.	703-706-3800	703-706-3837
	Slattery	Larry	State Telephone Company	518-731-8129	518-731-9600
	Smede	George	A-R Cable Services	518-283-6100	518-283-7340
	Smith	Jim	Frontier Communication of NY	914-783-5239	914-782-9994
	Smith	Mike	Time Warner-Battenkill	518-869-6330	518-892-2047
	Smith	Doug	DWS Cablevision	518-359-9139	
	Smith	Reid	Alltel	716-661-5232	716-487-2329
	Smith	Craig M	SBMS New York Services, Inc.		
	Smith	Mike	Time Warner-Troy	518-237-0284	518-237-1217
	Smith	Michael	Cablevision of Westchester	914-378-8960	914-963-7712
	Snoop	Donald	TKR Cable of Warwick	914-986-0221	914-986-0031
	Snyder	Bob	Pagemart, Inc.	214-765-4209	214-765-4881
	Solomon	Jeanne R.	Dutchess County Cellular Telephone		914-422-3939
X	Spagnoia	Sal	Cablevision Lightpath	516-390-5832	516-393-0455
	Spigle	Kenneth	Sprint PCS	617-964-7000	617-964-4025
	St.Ledger-Roty	Judith	Reed Smith, Shaw & McClay	202-414-9237	202-955-9792
	Starrs	John	NYDPS		
	Steinhart	Lance	Total-Tel USA, Inc.	770-232-9200	770-232-9208
	Stinson	Virginia	NXS PCS	716-847-3259	716-947-3426
	Storm	John A.	Hometown Cablevision Corp.	716-988-3188	
	Streck	William F.	The Mary Imogene Bassett Hospital	607-547-8700	607-547-3921
	Swanson	Nicole	Cellular One	617-462-7073	617-462-5024
	Takas	Michael	Mercury Paging & Communications		
	Taylor Jr.	Robert C.	Focal Communications Corp of NY	312-578-8400	312-895-8403
	Terry	Ron	Adelphia Cable-Harbor Vue	716-368-8484	716-368-6399