to apply different rating formulas to both customer and inter-carrier billing. Without such a designation, carriers would bill incorrectly based on the unadjusted IRC V&H.

As in the case of rate center consolidation, IRCs may impose limitations on future area code relief options. Area code boundaries must not split a rate area since doing so results in either the assignment of unnecessary exchange codes or potential 10-digit number changes to customers. (See discussion on page 9.) IRCs make it more difficult to implement a geographic split that does not partition some carriers' rate areas.

Moreover, the same 911 emergency service bureau routing issues that apply to rate center consolidation also apply to IRCs.

4.3 IRC Implications on Local Number Portability

Also, Local Number Portability (LNP) complications arise in conjunction with IRCs. Service Provider Portability allows limited location portability (i.e., movement within the rate area) based upon regional definition. A CLEC having an IRC can port in customers anywhere within the bounds of the IRC. In the case above, any customer within RC1, RC2 or RC3 can port to the CLEC. To further complicate matters, the CLEC customer may also move anywhere within the IRC without requiring a number change. This type of movement can affect inbound call rating insofar as the customer crosses the consistent rate area boundaries.

Carriers with consistent rate area definitions are limited as to which customers can port their numbers from IRC carriers. The call rating complexities cause those limitations. In the example above, assume that the customer belonging to the IRC carrier within the region of RC1 ports to a consistent rate area carrier. Since that customer still has NXX_4, calls to that customer will continue to be rated as if that customer obtained service from the IRC carrier. In effect, the consistent rate area carrier would be providing a different service with different call rating from their own NPA-NXXs, to ported customers with the IRC NPA-NXX. In addition, if a consistent rate area carrier were to port in customers with an IRC NXX, the consistent rate area carrier may need to negotiate an "IRC-like"

interconnection agreement. Carriers without such agreements will face different costs to serve these customers than are faced by carriers with such agreements. Instead, consistent rate area carriers are choosing to avoid these complexities by requiring customers that wish to port out of an IRC, to take a number change to an NXX associated with consistent rate areas.

4.4 IRC Implications on LNP Based Conservation Measures

Thousands Block Pooling distributes number resources in groups of 1,000 numbers rather than in groups of 10,000 numbers as occurs currently with central office code assignment. With consistent rate areas, a single pool is required for each rate area. Moreover, all consistent rate area carriers are able to draw numbers from each pool. The benefits of pooling are maximized when the maximum number of carriers can participate in any given pool.

The introduction of IRCs would require the establishment of one group of pools for consistent rate area carriers and separate pools for IRC carriers. IRC NPA-NXXs cannot be placed into a pool with consistent rate area NPA-NXXs for the same reason that IRCs make it difficult to port numbers among all carriers. The IRC NPA-NXX is associated with a different service having different local and toll characteristics than the service offered by consistent rate area carriers. If a consistent rate area carrier were to be assigned a thousands block that was donated by an IRC carrier, the end user who received that number would take on the incoming calling scope of the IRC carrier. For a carrier that adheres to consistent rate areas, this would create problems since the service they would be offering with the IRC-pooled NPA-NXX would differ from that offered with an NPA-NXX from a consistent rate area. Identical problems arise for unassigned number porting (UNP) where spare numbers are ported from an NXX in an IRC.

The conclusion drawn is that for a single pair of V&H coordinates, separate pools would be required for each and every rate area variation that shares those coordinates. Taking the example in Figure 2, four separate pools would be needed to cover the three-rate-center area. If IRC arrangements are to provide any code conservation benefits, there

must be common IRC boundaries that can be shared among carriers within a region. It is likely that regulators would need to establish IRC boundaries for carriers to follow.

Separate pools also reduce the efficacy of number conservation. A unique NPA-NXX is required for each pool. More pools require more NPA-NXXs to establish those pools. The use of IRCs therefore requires the establishment of more block pools than otherwise would be needed, in order to provide unique NPA-NXX designations for each rate area. Consequently, more NPA-NXXs are used than otherwise would be needed if consistent rate areas were used by all. Thus, the use of inconsistent rate areas tends to offset the number conservation effects that thousand block pooling would provide.

There are several implications of having separate pools for each defined rate area. First, separate pools will affect the extent and nature of competition. CLECs, including MCI WorldCom, have sought competitive access to numbering resources in the ILEC embedded base. Since separate pools are required for consistent rate area carriers and IRC carriers, the ILEC will necessarily participate in a different pool than some CLECs. IRC will effectively limit the ability of customers to obtain the number of their choice from the carrier of their choice, since carriers will not be able to use numbers from every pool.

5.0 Long Term Rate Area Paradigm – Removing Rating Intelligence from the Telephone Number Address

The purpose of rate center consolidation and inconsistent rate areas is to minimize the quantity of NPA-NXXs necessary for a carrier to operate in a given area. In turn, NPA-NXX efficiency will extend the life of NPAs and, hence, extend the life of the North American Numbering Plan (NANP). However, significant rate center consolidations and IRCs cannot be implemented without the ramifications discussed above. One long term technical method that should be explored, which effectively negates the need for rate center consolidations and IRCs and can provide the most efficient way of assigning numbers to rate centers, is to remove the rating intelligence from the telephone number address. This would allow spare stranded telephone number assignments in low demand

rate areas to be reallocated to higher demand rate areas, and would therefore permit higher utilization levels of an NPA-NXX.[12]

In order to remove the rating intelligence from the telephone number address, rate area information must be *associated* with the address rather than *embedded* in it. That is, the NPA-NXX of the address must no longer be relied on to determine the end user's rate area V&H coordinates. This is analogous to how Local Number Portability allows the removal of the routing intelligence from the telephone number address. Each telephone number address for a ported number has an association of a switch identity, called the LRN. The association between the telephone number address and the LRN is made by a query between a switch and an external database. The returned query provides the LRN, which is used to route the call.

A means of rate area identification could also be developed and included in the query information and the external database, so that whenever a query response is returned to the switch, the rate area identification also be returned. Upon return to the switch, the rate area information would be inserted into the call records (i.e., AMA records) for later processing by billing and/or operational support systems. The absence of an associated rate area identity to a telephone number within the external database would result in the default rate area identification implied by the NPA-NXX of the address, as happens today. The above call rating methodology changes would require significant time and expense to develop. It would also require the development of processes to ensure the integrity of the rate area identifier data derived from the external databases.

In order to allow number assignments from any NPA-NXX to a given rate area, any set of spare telephone numbers within the NPA-NXX could simply be assigned to the rate area identifier in the external database. In such an environment, rate center consolidations and inconsistent rate centers no longer would be necessary to gain NPA-NXX efficiencies. It should be noted that the technology to implement this capability is

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[12] A framework would need to be developed in order to determine which NPA-NXX numbers are eligible for use within specific rate areas.

also needed for number portability outside of a rate area, which is referred to by the FCC as geographic portability.[13]

6.0 Conclusion

Rate center consolidations entail many complexities. IRCs raise additional and more significant regulatory, contractual, and technical issues. In particular, the detrimental effects of IRCs on the potential conservation efficiencies of number pooling cannot be ignored.

LNP/LRN broke the paradigm of embedding routing intelligence in the customer address. Similarly, over the long term, a technical method will be developed to remove the rating intelligence from the address, thereby allowing spare numbers to be used across rate area boundaries to improve NPA-NXX assignment efficiency.

[13] This development will also facilitate wireless to wireline porting.

Attachment II
Arizona Petition
April 1999

MCI WORLDCOM

Henry G. Hultquist
Associate Counsel
Federal Law and Public Policy

April 1, 1999

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
The Porals
445 12th Street, SW
Washington, D.C. 20554

Re: In the Matter of Emergency Joint Petition of ALTS, ELI, GST, MCI WorldCom, and Winstar for Suspension of Phoenix Area Code Relief Plan or, in the Alternative, Other Relief, CC Docket No. 96-98.

Dear Ms. Salas:

Enclosed herewith for filing are the original and four (4) copies of this Emergency Joint Petition.

Please acknowledge receipt by affixing an appropriate notation on the copy of the Petition furnished for such purpose and remit same to the bearer.

Sincerely yours,

Henry G. Hultquist

Enclosure
HGH

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:	)	
	)	
Emergency Joint Petition of ALTS, ELI, GST, MCI WorldCom, and Winstar for Suspension of Phoenix Area Code Relief Plan or, in the Alternative, Other Relief	)	**NSD File No. 99-___**
	)	
Implementation of the Local Competitions Provision of the Telecommunications Act Act of 1996	)	**CC Docket No. 96-98**
	)	
Administration of the North American Numbering Plan	)	**CC Docket No. 92-237**

Emergency Joint Petition for Suspension of Phoenix Area Code Relief Plan or, in the Alternative, Other Relief

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EXECUTIVE SUMMARY

This petition, filed jointly by a group of facilities-based CLECs that operate in the Phoenix area, asks that Commission act swiftly to suspend a discriminatory area code relief plan that was ordered by the Arizona Corporation Commission. The Arizona Commission has ordered a 3-way geographic split that partitions a single rate area into three NPAs. If implemented, the plan would burden CLECs and some of their customers with 10-digit number changes. ILEC customers would, at most, require a new area code. Under the Arizona Commission's order, wireless customers are "grandfathered," and thus none will require any number changes at all. This discriminatory area code relief order exceeds Arizona's delegated authority in that it violates federal rules and guidelines on number administration. Moreover, by requiring the introduction of two new area codes it uses number resources in an extremely inefficient fashion. This Commission should immediately suspend implementation of the plan as ordered, which begins on April 1, 1999, and allow the Arizona Commission an opportunity to substitute a lawful relief plan.

In the event that the Commission does not suspend implementation of the plan, it should order the Central Office Code Administrator to release all NXX codes that are required to prevent 10-digit customer number changes. These changes would extremely burdensome for customers and carriers. However, while the release of these codes would eliminate the need for 10-digit number changes, it would not make this 3-way geographic split a more efficient use of the scarce numbering resource. The Commission should make clear that geographic splits that partition a rate area, are harmful to local competition and violate federal number administration rules and guidelines.

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Appendix C -- Affidavit of Mitch Kaufman

Appendix D -- 602 NPA Jeopardy Procedures

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:	)	
	)	
Emergency Joint Petition of ALTS, ELI, GST, MCI WorldCom, and Winstar for Suspension of Phoenix Area Code Relief Plan or, in the Alternative, Other Relief	)	**NSD File No. 99-___**
	)	
Implementation of the Local Competitions Provision of the Telecommuncations Act Act of 1996	)	**CC Docket No. 96-98**
	)	
Administration of the North American Numbering Plan	)	**CC Docket No. 92-237**

Emergency Joint Petition for Suspension of Phoenix Area Code Relief Plan or, in the Alternative, Other Relief

The Association for Local Telecommuncations Services ("ALTS"), Electric Lightwave, Inc. ("ELI"), GST Telecom Inc ("GST"), MCI WorldCom, Inc. ("MCI WorldCom"), and Winstar, Inc. ("Winstar"), ("Joint Petitioners"), hereby submit this emergency petition for suspension of the area code relief plan that has been ordered by the Arizona Corporation Commission ("ACC") for the Phoenix area. The ACC has ordered implementation of a 3-way geographic split. The ACC's December 1998 order exceeds the extent of its authority to oversee area code relief, in that it would uniquely burden some customers of facilities-based competitive local exchange carriers ("CLECs") with changes in their 10-digit numbers to accommodate the ACC's decision. No customers of U S West, the incumbent local exchange carrier ("ILEC"), would require more than a change in their area code. Not a single wireless customer would

suffer any number change at all. The relief plan, as ordered, facially violates federal number administration rules and guidelines that require competitively neutral number administration. It also may damage the viability of number portability, directory assistance, and other services. The Commission should immediately suspend implementation of the plan as ordered, and allow the ACC an opportunity to substitute a lawful plan.

Petitioning parties have expended considerable resources explaining these issues to the ACC, and attempting to get relief so that customers would not be required to change their numbers. To date, these efforts have been unsuccessful, and it is as a last resort that we seek the Commission's intervention to ensure that its polices and requirements are enforced.

It is imperative that the Commission suspend implementation of the Phoenix plan, no later than June 1, 1999. In June, CLECs will begin to assign replacement telephone numbers to customers whose numbers must change. If the Commission does not suspend implementation by June 1, CLECs will be forced to take significant and irreversible actions to implement a discriminatory area code relief plan. The Commission has a duty to protect fair competition and must prevent this discrimination from occurring. Also, if the Commission suspends implementation of the plan before June 1, the ACC will have sufficient time to substitute a lawful plan. Commission staff, and most carriers have supported an overlay relief plan that could be expeditiously substituted for the 3-way geographic split.

In the alternative, the Commission should order the Central Office Code Administrator immediately to release to all facilities-based CLECs, NXX codes in the new NPAs that are identical to codes they hold in the existing 602 NPA. Duplicate codes for U S West will also

need to be assigned in certain cases to support local number portability. These actions will be necessary to avoid the unique burden of 10-digit number changes for CLEC customers, if the Commission does not suspend implementation of the plan. While this second-best alternative would eliminate the need for 10-digit number changes, it would not represent the most efficient use of telephone numbers. Except to avoid this discriminatory effect, CLECs do not need these numbers, and their premature assignment will only accelerate the eventual exhaust of the new NPAs.

I. Background

On April 28, 1997, U S West, in its capacity as the CO Code Administrator for Arizona, notified the ACC that the 602 NPA would exhaust in late 1999. In August of that year, the ACC held a Relief Forum, at the conclusion of which the ACC asked the NPA relief coordinator for Arizona to submit a recommendation on a relief plan for the 602 NPA. On September 16, 1997, the relief coordinator recommended the adoption of an overlay. In December of 1997, the ACC opened an investigation and solicited comments from interested parties. In February of 1998, the ACC scheduled a series of public hearings.

On November 5, 1998, the ACC staff issued a memorandum in support of the overlay. However, on December 22, 1998, contrary to the staff's recommendation, the ACC ordered a three-way geographic split.[1] The order further allowed an extension of permissive dialing for

[1] *In the Matter of the Generic Investigation into the Recommendation of the Numbering Plan Administrator for an Area Code Relief Plan in the 602 Area Code*, Order of the Arizona Corporation Commission, Docket No. T-00000F-97-0693, Decision No. 61301 (adopted 12/22/98). Attached as Appendix A. (*Arizona Order*)

alarm companies, and "grandfathered" wireless codes in the 602 NPA.

MCI WorldCom, U S West, and others sought reconsideration of this order.[2] MCI WorldCom pointed out to the ACC the hardship that the split would impose on CLEC customers. U S West sought, among other things, extension of the beginning of implementation from March 1, 1999 to April 1, 1999. On February 26, 1999, the ACC's Chief Hearing Officer granted a delay in implementation until April 1, 1999. However, the Commission has failed to act on requests to reconsider the geographic split. Permissive dialing and network implementation are scheduled to begin on April 1, 1999. Mandatory 10-digit dialing for "split" NPAs will begin on September 1, 1999.

II. The Phoenix Plan Imposes a Discriminatory Burden on CLECs

The 3-way geographic split ordered by the ACC imposes unique burdens on CLECs and their customers. Specifically, it would require CLECs and some of their customers to suffer 10-digit number changes, while ILEC customers, at most, would see a change in their NPA. Since the plan "grandfathers" wireless codes in the 602 NPA, wireless customers would be unaffected.

The reasons for this discriminatory effect are caused by changes that have occurred with respect to the Phoenix rate areas, and differences between the ILEC and CLEC networks. When a CLEC enters a new market, it must obtain at least one NXX for each rate area in which it intends to offer service. Prior to 1997, the 602 NPA consisted of 18 rate areas. In December of 1996, the ACC ordered rate area consolidation in the 602 NPA. The consolidation order merged

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[2] *See, e.g., MCI WorldCom's Comments in Support of Various Motions to Reconsider*, Before the Arizonz Corporation Commission, Docket #T-0050F-97-693, January 29, 1999. Attached as Appendix B. (*MCI Recon Comments*)

those 18 into a single rate area. Going forward, this consolidation would promote the efficient use of numbering resources by allowing new entrants to serve end users throughout the area with a single NXX. However, any CLEC that requested and obtained numbers prior to that time, may have obtained at least one NXX for each of the 18 rate areas that existed at that time.[3]

A critical difference between CLEC and ILEC networks is the size of the geographic area served by their switches.[4] ILECs typically serve a metropolitan area out of a number of switches and wire centers. A CLEC, however, is likely to serve the entire area with a single switch. After the rate area consolidation order in the 602 NPA, CLECs were able to assign numbers from any of their NXX codes throughout the consolidated rate area. U S West, however, associates NXX codes with particular wire centers, and thus would not disperse numbers from a single NXX code throughout the consolidated rate area.

The result is that, since rate area consolidation occurred, the Joint Petitioners have not associated their assigned NXXs with specific geographic areas within the 602 NPA. Instead, they have dispersed numbers from their assigned NXXs throughout the consolidated rate center. If a 3-way geographic split is imposed on top of this consolidated rate center, CLECs will be forced to associate each of their assigned NXXs with one of the three NPAs. A customer using that NXX in one of the other NPAs will have to be assigned a completely new number -- not just the new NPA, but also a new NXX-XXXX, unless that customer's CLEC is also assigned the

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[3] For example, MCI WorldCom has sixteen NXXs in the 602 NPA.

[4] For a discussion providing additional detail on the technical aspects of the Phoenix area code relief plan, *see, Affidavit of Mitch Kaufman* at paras. 4-6. Attached as Appendix C.

customer's current NXX in the new NPA.[5] Some CLECs may need additional NXX's code in the other two NPAs just for customer number assignment. Customers of U S West will not face this situation, since U S West associates NXXs with individual wire centers, and the split that has been ordered does not divide any of U S West's wire centers. This is not only an unfair burden on CLECs and their customers, but it also wastes precious number resources, not just in Arizona, but throughout all of the U.S. and North America.

III. The Phoenix Plan Exceeds the ACC's Delegated Authority

The Telecommunications Act of 1996, recognized the exclusive jurisdiction of this Commission over the portions of the North American Numbering Plan that pertain to the United States.[6] The Commission, in turn, has delegated limited authority to the states to oversee "the introduction of new area codes subject to the Commission's numbering administration guidelines."[7] Specifically, state commissions:

> may resolve matters involving the introduction of new area codes within their states. Such matters may include, but are not limited to: Directing whether area code relief will take the form of a geographic split, an overlay area code, or a boundary realignment; establishing new area code boundaries; establishing necessary dates for the implementation of area code relief plans; and directing public education and notification efforts regarding area code changes. (47 C.F.R. §52.19(a)).

Although the Commission delegated to the states the authority to direct that area code relief take

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[5] This situation would arise in any case where a geographic split divides a rate center.

[6] 47 U.S.C. §251(e)(1).

[7] *In the Matter of Implementation of the Local Competition Provisions of the Telecommuncations Act of 1996,* CC Docket No. 96-98, *Administration of the North American Numbering Plan*, CC Docket No. 92-237,et al, Second Report and Order and Memorandum Opinion and Order, FCC 96-333 (released August 8, 1996), at para. 281. ("Second Interconnection Order")

the form of a geographic split, it also required them to comply with the Commission's numbering administration guidelines.[8] Arizona has violated those guidelines, and thereby overreached its limited authority.

The Commission's guidelines, first enumerated in the *Ameritech Order*,[9] require that numbering administration should, *inter alia*, "not unduly favor or disfavor any particular industry segment or group of consumers."[10] Arizona's plan clearly violates these guidelines. The plan unduly disfavors CLEC customers by causing those customers alone to suffer 10-digit number changes. The plan unduly disfavors the CLEC segment of the industry by causing CLECs and only CLECs to process 10-digit number changes for some of their customers. Finally, the plan unduly favors the wireless and ILEC carriers and their customers by sheltering them from similar number changes. State commissions should not order a geographic split that has these discriminatory effects.

IV. The Commission Should Suspend Implementation of Area Code Relief in Phoenix and Allow the ACC an Opportunity to Substitute a Lawful Plan

The Phoenix plan plainly violates the Commission's number administration guidelines. The plan unduly disfavors CLECs and their customers by uniquely burdening them with 10-digit number changes. By ordering implementation of this plan, the ACC has exceeded the limits of its delegated authority to oversee area code relief. In order to prevent irreparable harm to CLECs

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[8] *See* 47 C.F.R. §52.19(b).

[9] *See In the Matter of Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech-Illinois,* IAD File No. 94-102, Declaratory Ruling and Order, FCC 95-19 (1995) (*Ameritech Order*)

[10] 47 C.F.R. §52.9(a)(2).

and their customers, the Commission should exercise its plenary jurisdiction over the numbering plan, by suspending immediately implementation of the Phoenix plan, and allowing the ACC an opportunity to substitute a lawful plan. While the Joint Petitioners recognize that the Commission is chary of overruling state commission relief plans, the situation in Arizona is so prejudicial to CLECs that the Joint Petitioners have no choice but to ask for this extraordinary remedy. A geographic split which divides a rate area in the manner proposed by the ACC, has the effect of causing the premature exhaust of number resources, which in turn will lead to a need for further NPA relief earlier than would be desirable or necessary. In addition to the inconvenience caused to CLECs and their customers by the plan, its implementation as proposed would require CLECs and other new entrants to order up to *three times as many* NXX codes in order to comply with the plan as would be necessary under the original overlay proposal. Even absent arguments about the discriminatory nature of the plan, the inefficiency created by an immediate need for substantial increases in CLEC codes violates both the letter and the spirit of current number conservation efforts. Therefore, the plan, even from a technical standpoint, runs directly counter to the very mission it purports to accomplish.

There can be no question that the Commission has the authority to suspend the implementation of an unlawful area code relief plan. Congress gave the Commission exclusive jurisdiction over the portions of the numbering plan that pertain to the United States. The Commission delegated to the states only limited authority to oversee area code relief. Arizona has exceeded that delegation by ordering relief that would violate the Commission's guidelines. Those guidelines are critical to the establishment of fair competition, and the preservation of

neutral administration and the limited supply of numbering resources. The Commission must suspend implementation of this unlawful plan in order to protect CLECs and their customers from severe and unequal hardship.

Unless the Commission suspends the Phoenix plan, CLECs alone will engage in costly customer education and notification campaigns. Only the customers of CLECs will suffer 10-digit number changes.[11] This discriminatory burden will also entail severe additional harms. These include: damage to the integrity of number portability in Phoenix; white and yellow pages listings for CLEC customers may be rendered worthless; and CLEC directory assistance services will be made unreliable. For example, GST obtains directory assistance from parties other than U S West. Since those providers of directory assistance use databases that might not be updated by June 1, 1999, they will not be able to provide callers with correct telephone numbers. Nor will potential customers of CLEC subscribers be able to rely on the directories published by U S West Dex. Those already have been printed and primed for distribution in April with pre-split numbers. For the reasons already cited in this petition, the published numbers of U S West customers will be correct.

Forcing customers to undergo number changes always imposes certain costs upon the customers. However, the costs to customers of 10-digit number changes would be in addition to and greater than the costs of the more conventional NPA change. A significant difference between the two is that when there is a 10-digit number change, parties attempting to call the

[11] For example, MCI WorldCom estimates that approximately 12% of its customer telephone numbers in Phoenix would require a number change. *See* Kaufman Affidavit at paras. 7-16, n.5.

customer have no easy method to determine the customer's new telephone number. If they attempt to merely dial the old number with the new NPA (as the state education process will instruct them), they may reach a recording indicating that the customer is no longer in service or is out of order. In addition, this number change will appear to the customer's long distance carrier as a disconnected customer. The new number will appear as new service. Not only does this potentially leave the customer without long distance service, but the customer may also lose all customer-specific profile information, such as that customer's calling plan, and whether that customer has specific discounts.

In the event that the Commission does not suspend the Phoenix plan, the Commission must order the CO Code administrator to assign to CLECs duplicate NXXs in the 480 and 623 NPAs to the extent that CLECs require them.[12] Duplicate codes for some U S West-assigned NXXs will also have to be assigned, insofar as CLECs have ported-in U S West numbers for customers that have moved outside of the U S West wire center boundaries.[13] Unless these NXX codes are assigned, calls originated by subscribers to non-LNP capable providers, such as CMRS, will fail. These actions are necessary because under the current jeopardy procedures for 602, the CO Code administrator cannot release these codes until two months after the beginning of mandatory 10-digit dialing.[14] Moreover, the Commission has an obligation to see that numbers

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[12] For example, MCI WorldCom would require 9 duplicate NXX codes for one of the new NPAs, and one duplicate code for both of them. *See* Kaufman Affidavit at para.10, n.3 and para 13, n.4.

[13] *See* Kaufman Affidavit paras 17-20.

[14] *See 602 NPA (Arizona) Jeopardy Procedures Extraordinary Code Conservation Measures, December 14, 1998*, North American Numbering Plan Administrator Central Office Code Administration. Attached as Appendix D.

are available on an equitable basis.[15] This minimal relief, while it will not eliminate all inefficiencies of the 3-way geographic split, will at least prevent CLECs and their customers from suffering the discriminatory burden of 10-digit number changes.

Customers have agreed to place their local service with CLECs in the belief that CLECs will provide service that is, technically, as good as or better than the ILECs'. If CLEC customers now need to change their entire 10-digit telephone number, while U S West and wireless customers do not, there is no doubt that, in the future, CLEC offerings will be viewed with greater uncertainty and skepticism by the general public. In the petitioners' view, this amounts to a substantial setback for local competition and not only in Phoenix.

V. Conclusion

For the reasons stated above, the Commission should suspend implementation of the Phoenix area code relief plan, or, in the alternative, order the CO Code Administrator to release all NXX codes that are needed to prevent 10-digit customer number changes.

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[15] 47 U.S.C. §251(e)(1).

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