

**LEWIS
AND
ROCA
LLP**
LAWYERS

1 require the phone user in Phoenix to always be aware as to when to dial the area code and
2 when not. As a result of this split, the Phoenix area consumer will already have a high
3 incidence of ten-digit dialing.

4 The split of the rate center also inadvertently reverses the original intent of the rate
5 center consolidation by requiring CLECs to have at least three NXX codes in order to
6 operate in the Phoenix rate center rather than a single NXX code prior to the proposed
7 split. A CLEC who wants to operate in the Phoenix area, under the overlay approach,
8 would only require a single NXX code to begin serving customers within the rate center.
9 Thus, the proposed split at least partially will undo what this Commission sought to do
10 with the 1997 rate center consolidation.

11 The least objectionable relief method for expanding the numbering resources of the
12 602 area code for all consumers is the overlay due to the large consolidated rate center in
13 the area. The FCC Second Report and Order 96-333, ¶ 281, on number administration
14 states that "numbering administration should . . . not unduly favor or disadvantage any
15 particular industry segment or group of consumers." The three-way split proposed does
16 not meet this criteria.

17 If the Commission fails to reconsider the split and adopt an overlay, MCI
18 WorldCom asks the Commission to support allocation of MCI WorldCom matching NXX
19 assignments in each of the new NPA's so that our customers will not be subject to a ten-
20 digit number change as a result of the split and will at least be able to retain the seven-digit
21 portion of their number assignments. MCI WorldCom is aware that this action utilizes
22 many NXX assignments, but without the overlay, this is the only way to mitigate impacts
23 to our customers to the same extent the current plan insulates U.S. West's customers.

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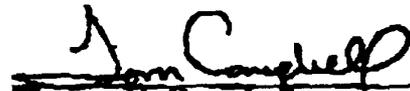
**LEWIS
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If one of the two above alternatives (overlay or additional codes) are not made available, MCI WorldCom believes the FCC should review this matter.² It is important that customers do not perceive that they may obtain more favorable treatment from one provider than another in the area of number resource availability.

RESPECTFULLY SUBMITTED this 29th day of January, 1999.

LEWIS AND ROCA


Thomas H. Campbell
40 N. Central Avenue
Phoenix, Arizona 85004

- AND -

Thomas F. Dixon
MCI Telecommunications Corporation
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Denver, Colorado 80202

Attorneys for MCI WorldCom

ORIGINAL and ten (10) copies
Of the foregoing hand-delivered this
29th day of January, 1999, to:

Arizona Corporation Commission
Docket Control - Utilities Division
1200 W. Washington Street
Phoenix, Arizona 85007

² The FCC Second Report & Order 96-333, Para 291, states "if a state acts inconsistently with Federal Number Guidelines designed to ensure the fair and timely availability of numbering resources to all telecommunications carriers, parties wishing to dispute a proposed area code plan may file a petition for declaratory ruling, rulemaking, or other appropriate action with the commission."

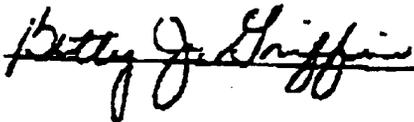
**LEWIS
AND
ROCA
LLP**
LAWYERS

1 COPY of the foregoing mailed
2 this 29th day of January, 1999, to:

3 Timothy Berg
4 Fennemore Craig P.C.
5 3003 N. Central Avenue
6 Suite 2600
7 Phoenix, Arizona 85012-2913

8 Pat vanMidde
9 AT&T Communications
10 2800 N. Central Avenue
11 Phoenix, Arizona 85004

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14 2901 N. Central
15 P.O. Box 400
16 Phoenix, Arizona 85001-0400

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.. EXHIBIT 1

NPA 602

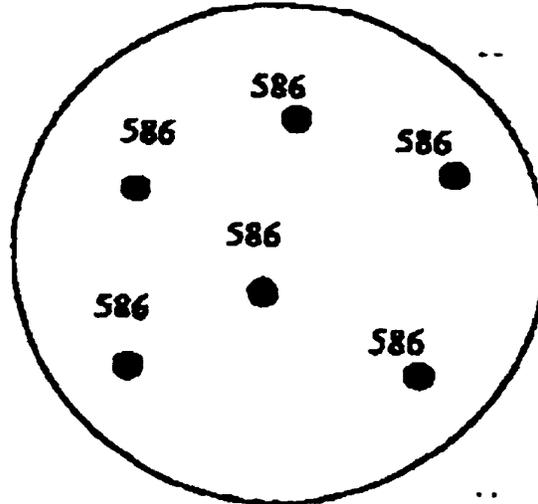


FIGURE 1

NPA 602

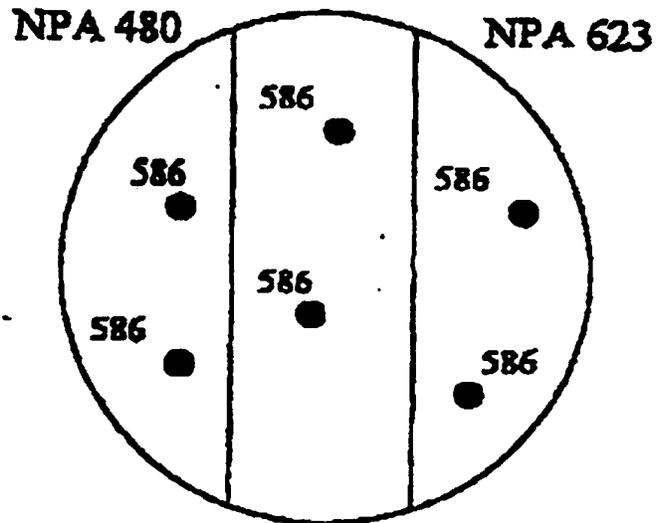


FIGURE 2

Appendix C

Affidavit of
Mitch Kaufman, Senior Manager,
MCI Worldcom Numbering Planning and Administration

Affidavit of Mitch Kaufman

I, Mitch Kaufman, declare as follows:

1. I am employed by MCI WorldCom as Senior Manager of Numbering Planning and Administration. I have held this position since December 1997.
2. The purpose of this affidavit is to describe the technical impacts to competitive local exchange carriers ("CLECs") and other carriers of the Arizona 602 area code split. The affidavit will show that splitting a rate area with two or more area codes will cause substantial harm to CLECs. By way of background, the Phoenix metropolitan area had a significant rate area consolidation in 1997, creating a large rate area in the region and encompassing much of the 602 area code. The area code split, which was ordered by the Arizona Corporation Commission (ACC) on December 22, 1998, calls for the 602 area code and the Phoenix rate area to be split into 3 different regions. Figure 1 shows the proposed area code split boundaries.

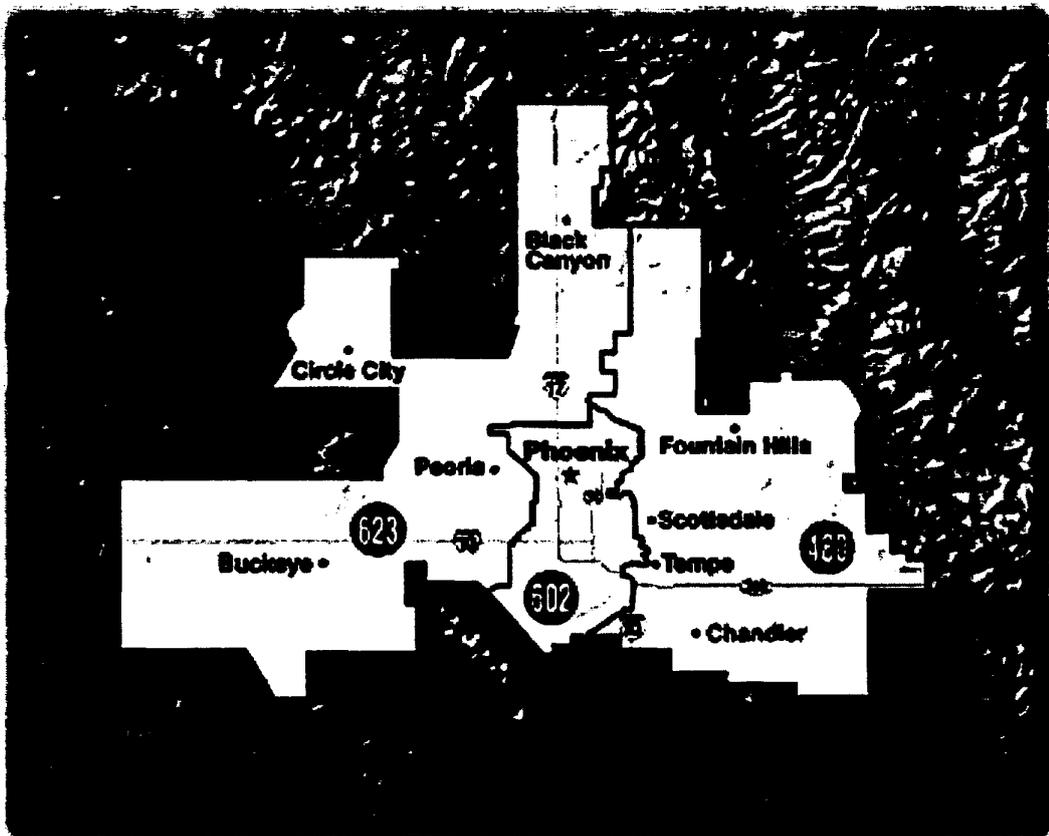


Figure 1 – Arizona 602 NPA Split Boundaries

3. To minimize impacts to wireless carriers, the ACC ordered that any NXX codes assigned to wireless carriers before October 31, 1999 will be "grandfathered." Thus, any wireless customer assigned a telephone number prior to that time will retain their 10-digit number including the 602 area code, regardless of where that customer

actually resides. Wireless customers assigned after November 1, 1999 will be given a telephone number in the appropriate area code based upon the customer's service address.¹

4. ILEC switches cover relatively small, discrete geographic areas. NXX codes are assigned per switch to cover an area consisting of the ILEC wire center. For an illustration specific to the Phoenix area, refer to Figure 2.

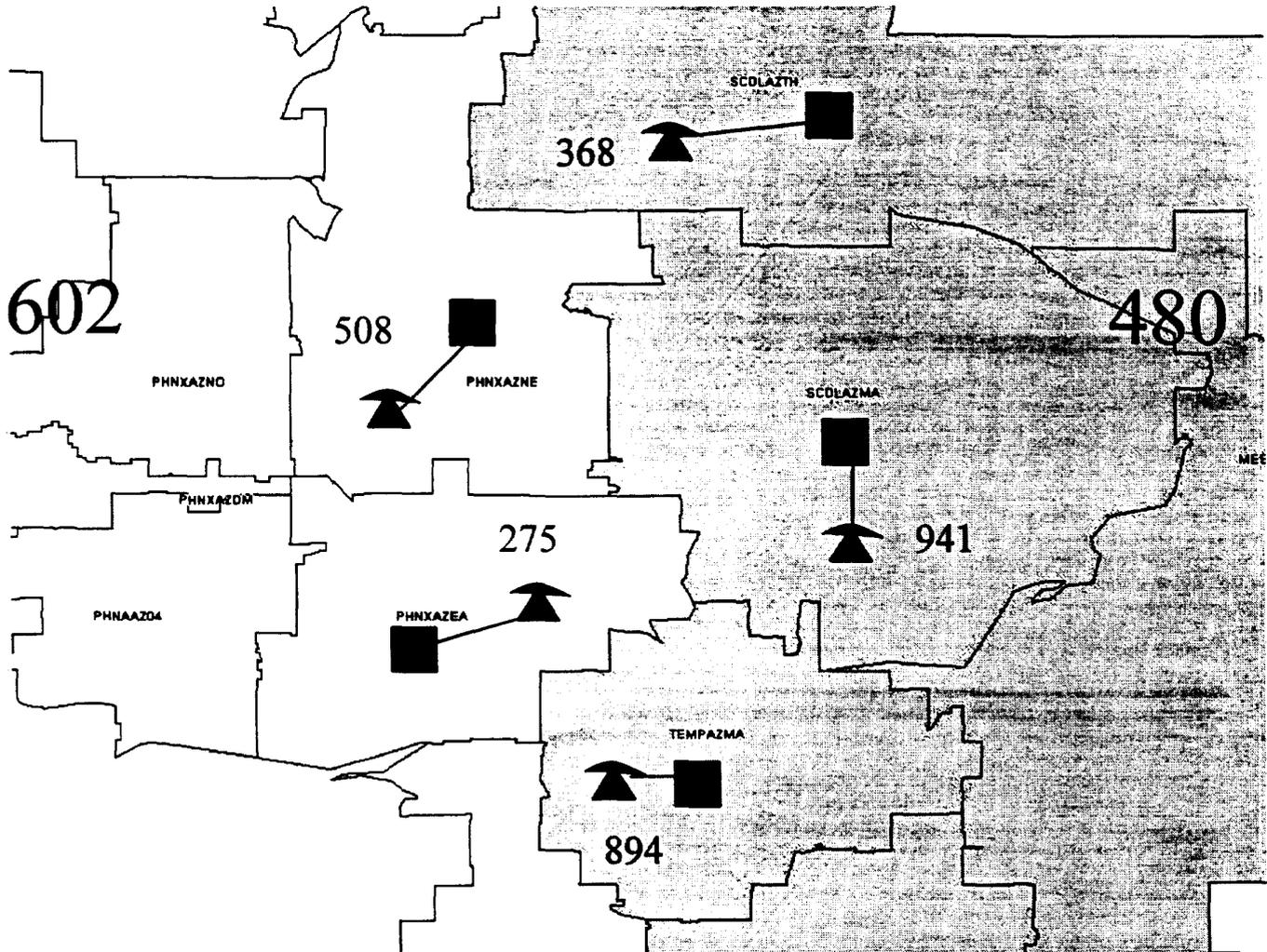


Figure 2 – U S West Wire Centers

5. Referring to Figure 2, the split boundaries defined by the ACC conform to the ILEC wire center boundaries. The shaded area contains wire centers that are located in the new area code 480. The unshaded area contains wire centers located in the post-split 602 serving area. To implement the split, U S West must determine the area code

¹ Arizona Order.

into which each wire center falls, identify the NXX codes within the wire centers, and then convert all customer numbers assigned to the NXXs to one of the two new area codes, or do nothing if the wire center remains within the 602 area code. As an example above, U S West customers in the PHNXAZNE wire center having the 508 NXX will remain in the 602 NPA and all customers in the SCDLAZMA wire center having the 941 NXX will be converted to the 480 NPA. This appears to be the same process that U S West would use for a normal split that does not partition a rate area.

6. Impacts to CLECs for a split which partitions rate area boundaries are quite different. CLEC switches cover much larger geographic areas than ILEC switches and typically cover multiple rate areas. NXX codes for CLEC switches are acquired by rate area, so typically, telephone numbers within an NXX code are assigned throughout the entire rate area, as opposed to the ILEC wire center assignment approach.² Refer to Figure 3 for an illustration.

² CLEC NXX coverage of an entire rate area may differ depending on how many CLEC switches cover the area.

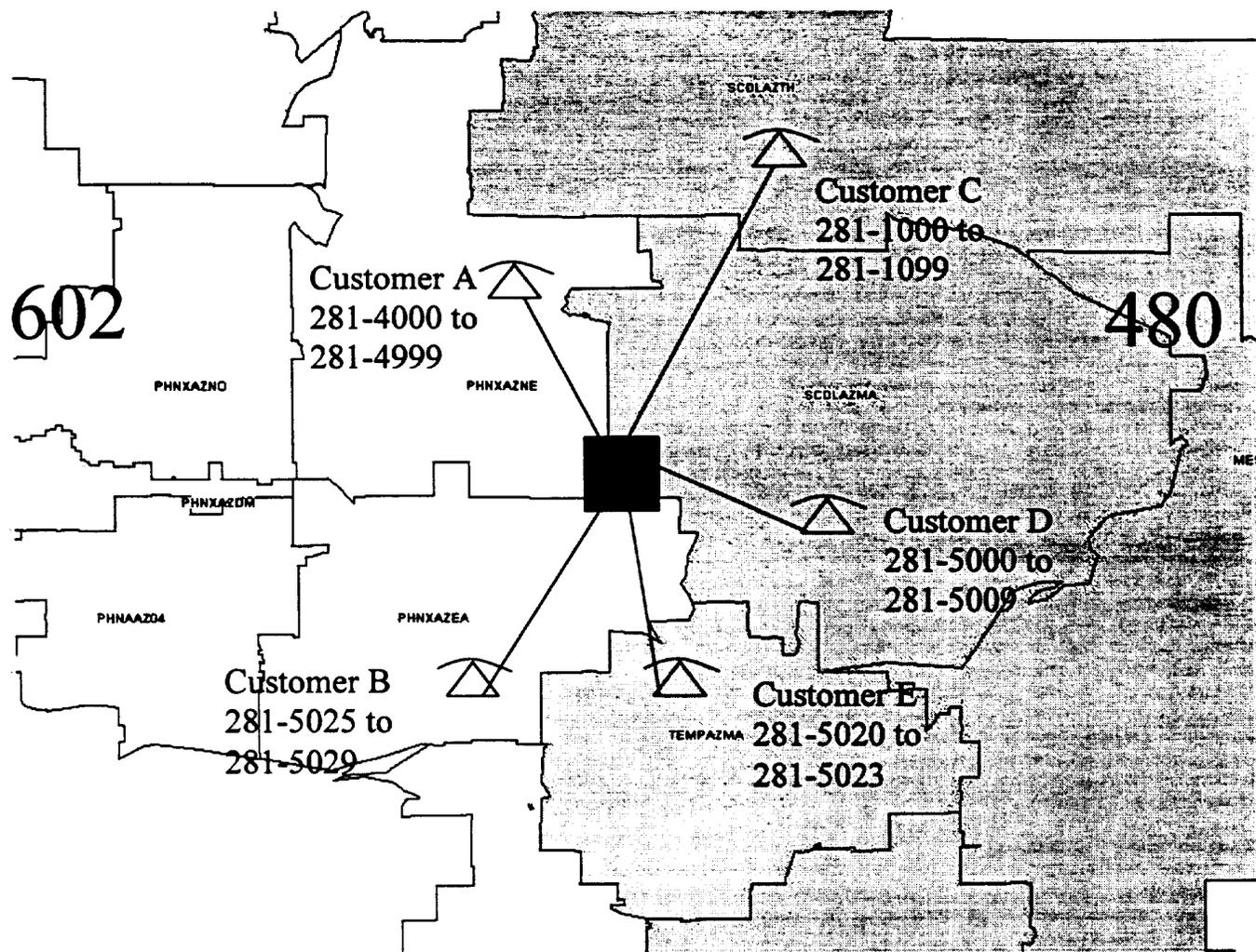


Figure 3 – CLEC Split Impacts

7. Referring to Figure 3, a single CLEC switch covers the entire Phoenix rate area. A single NXX code, 281, has been assigned to the switch and customers have been assigned telephone numbers with the 281 NXX code throughout the rate area; in this particular case there are five different customers.
8. In order for a CLEC to determine how it is affected, it must first be able to identify the boundaries of the proposed split based upon ILEC wire center boundaries. The ILEC wire center boundaries must be encoded in geographic mapping software applications, and these applications must be used in order to determine in which ILEC wire center the CLEC customer is located. Using the geographic mapping application, the CLEC must run a query on all of its customers' service addresses in

order to determine the ILEC wire center in which the customer is located. Take for instance, the example in Figure 3. Customer A's service address is located in the PHNXAZNE ILEC wire center, and Customer B's service address is located in the PHNXAZEA ILEC wire center. All customers are located within the Phoenix rate area.

9. The process for performing the geographic mapping of service addresses is fraught with potential errors, all of which require manual intervention. This is an extremely time consuming process that costs CLECs additional resources.
10. Once the geographic mapping of service addresses to ILEC wire centers is completed, the next step is to associate the customer's service address to an area code. Once the association of service address to area code is made, it is now possible to identify the specific customer telephone numbers which are affected by the split. Using the example in Figure 3, the telephone numbers associated with the Customer A and Customer B service addresses will be in the 602 area code and the telephone numbers associated with the Customer C, Customer D, and Customer E service addresses will be in the 480 area code.³
11. The CLEC must then determine the area code with which each NXX should be associated. There are different ways that a service provider can do this. One is to select the area code that has the most telephone numbers assigned within it. For instance, in the example in Figure 3, the 281 NXX code has 114 customer telephone numbers assigned on the 480 side of the split and 1,005 telephone numbers assigned on the 602 side of the split. The service provider would associate the 281 NXX code with the 602 area code.
12. In order for the CLEC to comply with the split, it must either obtain duplicate NXX codes for the new NPAs, or change the numbers for customers currently served by an NXX that will not be associated with their NPA.
13. Duplicate NXX code assignments could be made in those areas where customers have been assigned telephone numbers in NXX codes that overlap multiple area code boundaries. Using Figure 3 as an example, a duplicate NXX code assignment of the 480-281 NXX to the CLEC is necessary in order to ensure that the 114 customer telephone numbers that will be served by 480 are not impacted by the split rate area. Even though the CLEC may not require the NXX code in order to satisfy actual customer forecast needs, it is required to ensure that CLEC customers are not subject to a 10-digit number change.⁴

³ In MCI WorldCom's specific case, out of a total of 16 NXX's in the Phoenix area, 6 NXXs have customers with service addresses in a single area code, 9 NXXs have customers with service addresses in two area codes, and one NXX has customers with service addresses in all three area codes.

⁴ In MCI WorldCom's case, a total of 11 duplicate NXX codes must be assigned to ensure that MCI WorldCom customers are not subject to a 10-digit number change as a result of the Arizona area code split. These NXX codes have no other purpose than to prevent a 10-digit number change for customers. Preliminary indications from NANPA indicate that the duplicate NXX codes in Arizona will not be provided to MCI WorldCom.

14. The only other way for the CLEC to comply with the split is for the CLEC to impose 10-digit customer telephone number changes on those customers who are served by NXXs that will not be associated with their new area code. In figure 3, the 281 NXX code will be associated with the 602 area code because a majority of the customer telephone number assignments are on that side of the boundary. Therefore Customers A and B would retain their 281 NXX code assignment. Customers C, D and E together will require 114 telephone numbers to have a 10-digit number change to other NXX codes that may exist on the 480 side of the boundary.⁵ If the CLEC has no codes in 480, at least one will need to be assigned.
15. Both of the area code split scenarios identified above (duplicate NXX codes and 10-digit customer number changes) have major impacts to inter-exchange carriers (IXC) as well as local providers. Since there is no simple way of identifying the split impacts to CLECs based solely on their NXX codes, IXCs cannot have a simple conversion of their own long distance customers' service order records. Other more specific identification of CLEC customers impacted by the split must be exchanged with IXCs, such as with Customer Account Record Exchange ("CARE") transactions.
16. So far, this affidavit has described effects on customers served out of a CLEC's own inventory of numbers. However, a geographic split that divides a rate area, such as the 3-way split ordered by the ACC, can also affect customers who have ported numbers that were originally assigned by other carriers. Such a plan introduces limits to local number portability that were not experienced before the split. For example, ILEC customers that port-in to CLECs may be affected by this type of split. Customers that port from a CLEC to the ILEC might also be affected. Refer to Figure 4 for an example.

⁵ In MCI WorldCom's case, approximately 12% of the total telephone numbers assigned would require a 10-digit number change in order to comply with the Arizona area code split.

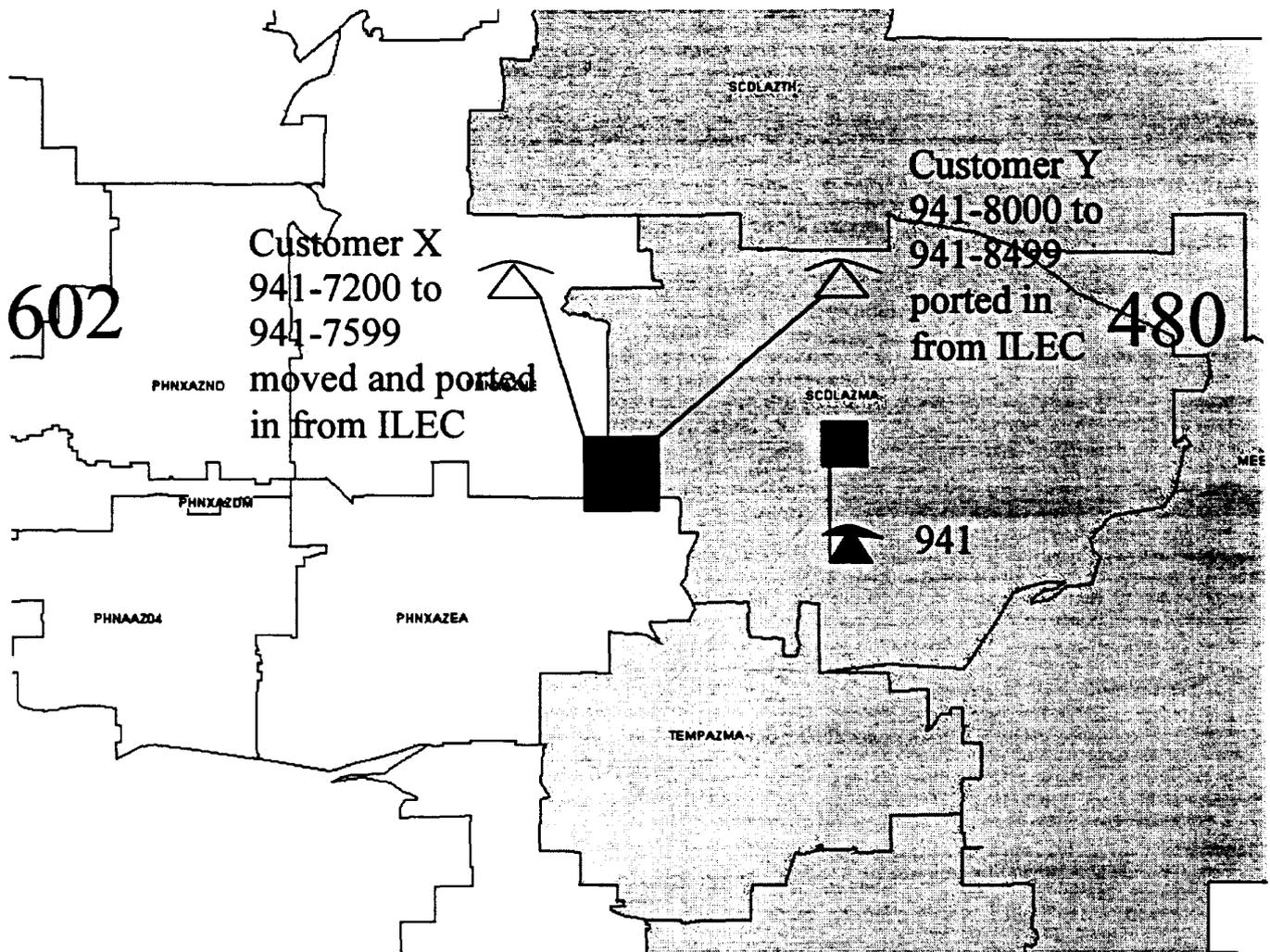


Figure 4 – LNP Implications of Split

17. There are different LNP scenarios that must be considered when assessing the impacts caused by an area code split that segments rate area boundaries. A complicating factor is that porting of telephone numbers can involve some movement within the rate area. As an example, refer to Figure 4. A CLEC has ported-in two different customers from the ILEC 941 NXX code. This NXX code, in the ILEC environment, is used for customers within the bounds of the SCDLAZMA wire center. One customer does not have any movement associated with their port and they remain within the SCDLAZMA wire center boundaries. The other had some movement to the PHNXAZNE wire center associated with their port to the CLEC. This is not unusual since a business or residential customer may reassess its local

service provider upon relocation. In addition, there is a general industry consensus in favor of allowing porting within the rate area.

18. The telephone numbers associated with CLEC Customer Y's service will not result in any issues to the CLEC service provider, since the ILEC wire center remains the same. When the ILEC implements the split for its own customers that have the 941 NXX code, they will convert to the 480 area code based upon the area code split boundary definitions of the wire centers. The CLEC service provider having a ported-in customer with the same 941 NXX code will also have to convert Customer Y's area code to 480 as long as their service address remains in the SCDLAZMA wire center.
19. However, because Customer X moved their service address location to the PHNXAZNE wire center, which is in the 602 area code, there will be impacts to this CLEC customer. Again, there are two options for the CLEC service provider. The first is to ensure assignment of the duplicate NXX code in the other area code to ensure that the ported customer's telephone number will not require a 10-digit number change; but this time the duplicate NXX code is associated with the ILEC assigned NXX code.⁶ The reason why this duplicate NXX code is required is to ensure that LNP default routing can operate as intended by the LNP specifications. In the example in Figure 4, if no duplicated code were available for the 602-941 NXX code, all local calls originating from non-LNP capable switches (i.e., wireless providers and others who are exempted from implementing LNP) would have no routing associated with the NXX code and therefore the calls would fail.
20. The second option is to perform a 10-digit number change to the customer's number. In the example in Figure 4, a total of 400 customer telephone numbers are required to be changed (these are Customer X's telephone numbers).⁷ The 10-digit number change has significant competitive issues that require customers to change their numbers which make this option unacceptable for implementation (particularly since these customers ported to keep their numbers in the first place).
21. In summary, both of the options that exist to implement an area code split that segments rate area boundaries are suboptimal. Assignment of duplicate codes unnecessarily assigns NXX codes to carriers that would not normally need them. The other option is to require a 10-digit number change for customers, which is competitively unacceptable and may also involve NXX code assignments that would not otherwise be needed. The only area code relief option for the Arizona specific situation that is both competitively neutral to all carriers and uses NXX codes efficiently, is an overlay.

⁶ In MCI WorldCom's case, there are three NXX codes that will need to be duplicated in order to ensure that ported-in customers do not require a number change.

⁷ In MCI WorldCom's case, approximately 1.5% of all ported in numbers will require a 10-digit number change if duplicate codes are not allocated.

ls

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703-918-6083

Appendix D

**602 NPA (Arizona) Jeopardy Procedures Extraordinary Code Conservation Measures,
December 14, 1998, North American Numbering Plan Administrator Central Office Code
Administration.**

**602 NPA
(Arizona)
Jeopardy Procedures
Extraordinary Code Conservation
Measures**

12/14/98

**Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures**

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Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

Introduction

These jeopardy procedures for Extraordinary Code Conservation Measures are submitted for the consideration of industry participants in the jeopardy procedures process – code holders, potential code holders and other stakeholders such as the state regulatory commission.

The purpose of these extraordinary code conservation measures is to generate thoughts and ideas for discussion by industry members. The objective is to formulate the most fair and equitable means of managing the limited number of central office (CO) codes/NXXs for the benefit of all service providers in the NPA(s).

Questions regarding the content of this plan may be directed to either:

Joanne Edelman, Senior Code Administrator
NANPA CO Code Administration
925-363-8710 (voice)
925-363-8729 (fax)
joanne.edelman@nanpa.com

Or

Craig Wiseman
NPA Relief Planner
303-841-1329 (voice)
303-646-2197 (fax)
craig.wiseman@nanpa.com

1)

**Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures**

Summary of Key Dates

Table A	
Action/Activity	Key Dates
<i>Code Rationing Period</i>	
• Interim Jeopardy Procedures Begins (with jeopardy declaration)	November 18, 1998
• Code Rationing Begins (in accordance with these procedures)	January 18, 1999
• Monthly Submission Deadline (for Part 1 code requests)	5 th business day
• Monthly Code Allocation Day (if lottery required)	12 th business day
• Last Lottery Date	July 1999 (12 th Business day)
<i>Non-Jeopardy Code Requests</i>	
• Earliest Date to Submit Requests for Reservation of Codes	6 months prior to start of new NPA
• Earliest Effective Date NOT SUBJECT to Jeopardy Procedures	First codes effective 1 month after start of mandatory*
• Earliest Date to Submit Non-Jeopardy Procedure Requests	6 months prior to start of new NPA
• Last Day of Permissive Dialing	September 1, 1999

* For assignment of non-duplicated codes. The effective date of duplicated codes will be November 1, 1999 or after.

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

2) Code Rationing Period

- a) Beginning January 1, 1999, CO Code (NXX) assignments for the 602 NPA will be rationed.*
- b) Rationing of codes will continue through the 12th business day of July 1999.*
- c) Codes rationed during this period will be those that have a requested effective date earlier than September 16, 1999, for non-duplicated codes. Duplicated codes will have an effective date of November 1, 1999, or after.*

3) Number of Codes That May Be Assigned

- a) A base quantity of 6 NXXs may be assigned each month from January 1, 1999, through July 1999 (the 12th business day).*
 - i) This is the monthly “code allotment.”
 - ii) This code allotment is derived by dividing the number of codes available for assignment at the start of the code-rationing period by the number of months remaining until the end of the code-rationing period as defined above.
- b) In the event that NXXs are recovered during the code-rationing period, then the monthly allotment will be recalculated to reflect this larger number of available codes.*
 - i) The CO Code Administrator may adjust the monthly allocation as a result of code recovery without seeking industry consensus.
 - ii) Notice of any recalculated monthly allotment will be posted on the NANPA Web site (under “Bulletin Board”/“Jeopardy Information”).
 - iii) Recalculated allotments will be available for assignment the month after the Web notice is posted.
 - iv) The Code Administrator will send an E-mail/Fax notice to stakeholders on file advising that the number of monthly codes has been revised/check the NANPA Web site for details.
- c) If the code allotment for any given month is not fully assigned, the unassigned quantity will “carryover” and will be added to the following month’s code allotment. (The monthly code allotment calculation is not affected by carryover quantities.)*
- d) There will be only one “pool” from which all code assignments will be made.*
- e) There will be no distinction as to whether an applicant is an existing service provider or a new market entrant.*

**Jeopardy Procedures
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- f) There will be no distinction as to whether a request is for an initial code, growth code or “new application” of a code.

Jeopardy Procedures
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4) Inclusion in Monthly Rationing Process

- a) *Requests received by the submission deadline in any given month will be included in that month's rationing process provided that all "Eligibility Requirements" have been met by that date.*
- b) Requests received after the submission deadline in any given month will be included in the following month's rationing process provided that all "Eligibility Requirements" have been met by that next month's submission deadline.
- c) If a request is suspended, but required data/supporting documentation is received by the submission deadline of any given month, the request will be included in that month's code rationing process.
- d) If a request is suspended and required data/supporting documentation is not received by the submission deadline, the request will be ineligible for participation in any monthly rationing process/lottery until all eligibility requirements have been met.

5) Number of Requests That May Be Submitted

An applicant may submit no more than three Code Assignment Requests per month.

- a) Requests for more than one code are to be identified by the applicant as 1st choice, 2nd choice and, if applicable, "3rd" choice.
- b) For these jeopardy procedures, "applicant" is defined as an entity with a valid, NECA assigned "OCN" (Operating Company Number/Company Code).
- c) If an OCN submits more than "3" requests by the submission deadline for any given month, only the first "3" requests received will be accepted; the others will be denied.
- d) This number of requests includes any held priority requests.

**Jeopardy Procedures
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6) Deadline for Submission of Requests

- a) Requests must be received no later than 5:00 p.m., Pacific Time, on the 5th business day of the month starting January 1, 1999, through the last lottery month (July 1999).
- b) Requests may be submitted anytime from the 6th business day of the previous calendar month to the submission deadline of the current month. (Requests for the January 1999 Allocation/Lottery can be submitted upon receipt of these guidelines.)
- c) Requests are to be delivered to the NANPA CO Code Administrator by facsimile, E-mail or messenger (e.g., FedEx, Airborne, etc.) as specified below:

Table B 602 NPA Code Requests	
For Fax or E-mail Delivery:	Paula Hustead CO Code Administrator 925-363-8733 (fax) E-mail: paula.hustead@nanpa.com "cc" e-mail requests to: cecilia.louie@nanpa.com
Address for Messenger Delivery:	NANPA CO Code Administration 1800 Sutter Street, Suite 570 Concord, CA 94520 Attn: Paula Hustead 925-363-8706 (voice)

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

7) Requested Effective Date

- a) The requested effective date must be at least 66 calendar days after the lottery date.*
 - i) Requests with an earlier requested effective date will be denied.
 - ii) This is the industry-standard code activation timeline.¹

- b) The requested effective date may not be more than 6 months after the lottery date.*
 - i) Requests with a later requested effective date will be denied.
 - ii) This is the industry-standard code maximum ordering interval.²

- c) If a requested effective date is on or after September 16, 1999, (for non-duplicated codes or November 1, 1999, for duplicated codes) the request will not be subject to these jeopardy procedures.*

8) Reservation of Codes

- a) NANPA will not accept requests for code reservation in the new NPAs prior to May 1, 1999.*
 - i) Requests to reserve a code that are received prior to this date will be denied.

 - ii) If it becomes necessary to extend/continue jeopardy for the 602 NPA for any reason, code reservation requests will be denied for that extended period of time.

¹ Central Office Code (NXX) Assignment Guidelines, (INC 95-0407-008).

² Central Office Code (NXX) Assignment Guidelines, (INC 95-0407-008).

Jeopardy Procedures
602 NPA
(Arizona)
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9) Eligibility Requirements

- a) The requested effective date on the Part 1 must fall within the allowable timeframe. (See "Requested Effective Date.")*
- b) There is only one rate center for the 602 NPA – Phoenix. Requests should indicate which locality (wire center) the OCN wishes to serve or which switch CLLI the code will reside on.*
- c) A valid entity name/OCN association must be specified on the Part 1 Code Request.*
- i) This association must match National Exchange Carrier Association (NECA) assignments as reflected in the Bellcore Routing Data Base System (RDBS).*
 - ii) If the applicant is "doing business as" (d.b.a.) another company, the NANPA CO Code Administrator must be given a memo specifying all affected entity names and OCNs.*
 - iii) OCN/entity name must be valid/explained by the code request submission deadline.*
- d) The applicant OCN must be authorized to provide service in the jeopardy NPA.*
- i) The type of authorization (CPCN #, tariff # or FCC license #) must be specified.*
 - ii) The type of entity requesting the service (franchised local carrier, competitive local exchange service carrier, CMRS, etc.) must be specified.*
 - iii) The type of service to be provided by the requested code (end office, paging, cellular, PCS, etc.) must be specified.*
- e) In accordance with Industry guidelines, each Industry member company must submit a jeopardy COCUS to the Code Administrator within thirty (30) days of the jeopardy being declared. Industry members are encouraged to show their cooperation during the jeopardy by submitting their jeopardy COCUS as early as possible to give the Code Administrator the best possible information for managing the remaining number resources for the exhausting NPA. As member companies forecasts and plans change during the jeopardy, updated jeopardy COCUS information will assist the Code Administrator in anticipating the aggregated requirements of the area. All individual company jeopardy COCUS information is confidential. A jeopardy COCUS must be submitted in order to be eligible to receive an NXX in these NPAs.*
- f) A Months-to-Exhaust form must be filled out and submitted to the Code Administrator*