

First, a single NPA should be designated as the test market to ensure that the NPAC version 3.0-based systems and processes work properly. This test roll-out should be scheduled over a two month period.

Second, pooling should be implemented in one NPA per month in each of the current LLC territories. Because pooling should be implemented first in NPAs with the highest rate of NXX assignment, NPAs would have to be ranked within each region. In addition, when the roll-out occurs in all area codes in a newly split or overlaid NPA area, the affected area codes should count as one for purposes of the per-month roll-out figure.

To speed the roll-out of pooling, carriers should initially be required to donate only their uncontaminated blocks to the number pools. The exclusion of contaminated blocks will relieve donating carriers of the burden of internally porting the contaminated numbers, and the pool administrator and receiving carrier of the need to track the numbers. During this initial roll-out period, carriers should be encouraged to follow thousands block administration principles to maximize the number of lightly contaminated blocks that can be collected at a later date.

Third, after the first six months of pooling, the roll-out pace should be doubled to 14 NPAs per month nationwide, without regard to the LLC territories. However, to prevent one region from being overwhelmed in a particular month due to uneven scheduling, NPAs could be moved up or down on the list.

Under AT&T's proposed schedule, one year after the test roll-out, between 99 and 113 NPAs would have pooling in place. At that point, the Commission, based on a recommendation from the NANPA, should assess whether to continue to implement pooling in additional NPAs or to revisit NPAs that already have pooling to incorporate contaminated blocks into the pool.

**4. Non-LNP Capable Carriers Should Remain Exempt from Thousands Block Pooling**

The Commission has correctly recognized that thousands-block pooling requires the use of LNP, and that only LNP-capable providers can participate.<sup>97/</sup> There is no basis to revise that conclusion at this juncture.

**a. Requiring Wireless Carriers To Implement Pooling Before They are LNP-Capable Would Fruitlessly Divert Resources from the LNP Implementation Effort**

The Commission has correctly decided to extend the deadline for wireless carriers to implement LNP until November 2002.<sup>98/</sup> In rendering this decision, the Commission thoroughly considered how extending the LNP deadline might affect numbering resources.<sup>99/</sup> As the Commission found, wireless carriers can serve customers over a broad geographic area from a single NXX, rather than being limited to the geographic boundaries of a particular rate center.<sup>100/</sup> Thus, unlike their wireline counterparts, wireless carriers need not obtain numbers in every rate center in which they wish to do business. Moreover, the evidence shows that wireless carriers

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<sup>97/</sup> See, e.g., NRO NPRM at ¶ 159; Pennsylvania Order, 13 FCC Rcd at 19028-29 ¶ 29.

<sup>98/</sup> Cellular Telecommunications Industry Association's Petition for Forbearance from Commercial Mobile Radio Services Number Portability Obligations and Telephone Number Portability, Memorandum Opinion and Order, 64 Fed. Reg. 22,562 (1999) ("Forbearance Order").

<sup>99/</sup> Id. at ¶ 48.

<sup>100/</sup> Id. at ¶ 47.

administer the numbers they are assigned very efficiently.<sup>101/</sup> In addition, the Commission found that during the period in which they are not LNP-capable, wireless carriers can participate in non-LNP-based conservation methods to further the efficient management of numbering resources.<sup>102/</sup> Carriers could, for example, comply with thousands-block number management procedures in anticipation of pooling. For all of these reasons, wireless carriers' participation, or lack of participation, in LNP-based conservation measures, such as pooling, is likely to be of little consequence.

There is simply no reason either to delay the implementation of nationwide pooling until all carriers obtain LNP capability or to try to force non-LNP capable carriers into a regime for which they lack the technical means.<sup>103/</sup> The NANC's Wireless Number Portability Subcommittee recently submitted a report finding that, while non-LNP query based pooling is technically possible, key technical and practical limitations call into question the efficacy of such a proposal.<sup>104/</sup> In particular, to participate in this type of pooling, all wireless carriers in a pooled rate center must be equipped to do their own queries – *i.e.*, the wireless switch must be able to recognize that an NXX is portable and then launch a query to determine proper call routing.

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<sup>101/</sup> The Commission has found that number utilization data show that wireless carriers use a high percentage of their allocated numbers. *Id.* at ¶ 45. AWS's policy is to open a new NXX only when those it already has opened have high utilization rates; to return codes when possible in jeopardy situations; and to employ sound thousands block number management practices (in anticipation of eventual pooling). In addition, wireless carriers, including AWS, typically use shorter aging intervals than most telecommunications carriers, thus ensuring that numbers are "recycled" as quickly as possible.

<sup>102/</sup> *Id.* at ¶ 47.

<sup>103/</sup> See NRO NRPM at ¶ 165.

<sup>104/</sup> Wireless Number Portability Subcommittee Report to the NANC, June 22, 1999 ("WNP Subcommittee Report").

Carriers not presently equipped with LRN LNP software would be forced to make system upgrades that, depending on vendor capability, may not be immediately available.<sup>105/</sup>

Accordingly, even if the requisite resources were devoted to implementing pooling in the absence of full wireless LNP, it could not be implemented by all wireless carriers before late in the second quarter of 2002 – just slightly ahead of the November 2002 LNP implementation deadline.<sup>106/</sup>

In addition, pooling before wireless LNP is in place would needlessly divert resources from wireless carriers' LNP implementation effort.<sup>107/</sup> Meeting the November 24, 2002 deadline for LNP implementation already has required, and will continue to demand, a tremendous amount of capital and human resources.<sup>108/</sup> To shift resources from the LNP effort to implement pooling would jeopardize the industry's ability to satisfy this deadline.<sup>109/</sup> In light of the greater

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<sup>105/</sup> For instance, Motorola wireless switches are not currently capable of recognizing that an NPA NXX is portable and may not have that capability for more than two years. Although some wireless carriers have installed the required LRN software, it would not be competitively neutral to require only those carriers to bear the costs of modifying their administration systems to accommodate management, tracking, and forecasting of thousands blocks prior to the LNP deadline, while exempting their direct competitors in the same market from such obligations.

<sup>106/</sup> The systems development and testing necessary for LRN software and query testing will not be complete until the second quarter of 2002.

<sup>107/</sup> See Opposition of AT&T Wireless Services, Inc. to the Petitions for Reconsideration of the Commission's grant of the Cellular Telecommunications Industry Association's Petition for Forbearance from Commercial Mobile Radio Services Number Portability Obligations, CC Docket No. 95-116, filed June 25, 1999.

<sup>108/</sup> Wireless LNP is being developed and deployed pursuant to a rigorous schedule. Integration testing of network elements subsequent to the MIN/MDN split will last from early 2001 well into the third quarter. Inter-carrier testing of full wireless LNP will begin in August of 2001 and last until June 2002. Only upon completion of this testing can full wireless LNP be deployed.

<sup>109/</sup> See WNP Subcommittee Report (finding that wireless participation in pooling prior to Phase 2 LNP may jeopardize compliance with the November 24, 2002 wireless LNP implementation deadline).

benefits of LNP and the close proximity of the implementation dates for the two solutions, it would be more efficient for carriers to continue on the course they have already commenced. Even if the Commission were to conclude that LNP implementation should be accelerated in order to promote pooling, it should not permit state commissions to mandate LNP on a state-by-state basis. Wireless number portability must be implemented on a national basis because roaming is impossible unless all wireless carriers are LNP-capable.

**b. Once They are LNP-Capable, Wireless and Wireline Carriers Should be Held to the Same Pooling Requirements**

AT&T agrees that, once they are fully LNP-capable, wireless providers should be held to the same pooling requirements as their wireline counterparts. Specifically, at that time, covered CMRS providers should be required to participate in pooling on the same terms and in the same NPAs as wireline carriers, provided that they are only required to participate in pools in rate centers where they wish to obtain numbers.<sup>110/</sup>

AT&T believes that the incremental cost and the time for wireless carriers to implement pooling after they are LNP-capable will be minimal. The bulk of pooling costs are associated with the network upgrades and back office modifications required to implement portability. As AT&T has explained on numerous occasions, attaining wireless LNP is extremely difficult because of the need to split the mobile identification number ("MIN") and mobile directory number ("MDN"), and for every CMRS provider to commence this element of wireless portability simultaneously. Once this occurs, however, pooling should be a relatively easy step.

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<sup>110/</sup> See NRO NPRM at ¶ 161.

**D. The Commission Should Adopt any Necessary Pooling Implementation Policies as Expediently as Possible**

**1. Existing Standards Resolve All Significant Technical Issues Associated with Pooling**

The Commission asks whether it should adopt the technical requirements developed by the Alliance for Telecommunications Industry Solutions (“ATIS”) T1S1.6 Working Group on Number Portability, which define the switch and number portability database requirements for thousands block pooling.<sup>111/</sup> AT&T believes that the consensus T1S1.6 proposals, together with NPAC SMS requirements established by the NANC LNPA Working Group and the pooling administration guidelines developed by the INC, should be adopted as the basis for national thousands block pooling. These requirements resolve all significant technical issues associated with pooling. Awaiting additional NANC action or formal acceptance by the American National Standards Institute (“ANSI”) of such standards, as suggested by the NPRM, would cause unnecessary delay in the development of a national pooling architecture, with no corresponding benefit.<sup>112/</sup>

There is also no cause for concern about potential adverse effects of number pooling on the provision of E911 services. Pooled numbers are treated as ported numbers for purposes of 911, and requirements for 911 routing of ported numbers have already been developed and tested. The standards established by the National Emergency Number Association and the T1S1.6 recommended restriction on porting routing numbers to which E911 calls are translated are more than sufficient to ensure reliable 911 service after implementation of pooling.

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<sup>111/</sup> See Id. at ¶ 177.

<sup>112/</sup> See Id. at ¶ 178.

**2. Administrative Guidelines can be Adopted Promptly**

AT&T supports the INC pooling guidelines, which propose that a Pooling Administrator functions essentially as another carrier.<sup>113/</sup> In particular, the Pooling Administrator would request numbering resources from the NANP in order to maintain an inventory of thousands blocks for allocation to carriers within a rate center. These guidelines reflect an industry consensus and are the most fully developed pooling proposals available. They also meet the needs of carriers who will be taking thousands blocks as well as those who still require the allocation of whole NXXs.

Because thousands block pool administration is part and parcel of numbering administration, AT&T supports the NANC's recommendation that the NANPA be named the national pooling administrator. Many of the same functions will have to be performed in connection with thousands block pooling that today are handled by the NANPA. For example, a pooling administrator will be called upon to analyze forecasting and utilization data and assign codes to requesting carriers. Further, there appear to be significant synergies to be gained by placing these responsibilities in the hands of a single contractor. Concerns that it may be unwise to place these functions in a single entity are alleviated by the fact that each of the administrative functions is provided under an individual fixed-length contract, which would be subject to a competitive bidding process for future terms.

**3. So Long as Carriers Can Retain Sufficient Numbers in a Rate Center To Provide Service to Customers, Requiring Some Carriers To Donate More Numbers to a Pool Than Others is not Discriminatory**

In light of the fact that new entrants have been required to obtain a minimum of 10,000 numbers per rate center to develop their initial serving area footprint, they presumably will have

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<sup>113/</sup> See Id. at ¶ 183.

a disproportionate number of thousands blocks to return to a pooling administrator. This fact is not necessarily discriminatory. So long as CLECs can retain a sufficient store of numbers to serve their customers who do not arrive with ported numbers, they would not be harmed by giving back unassigned thousands blocks.<sup>114/</sup>

The major problem with thousands block reclamation is that most ILEC blocks are likely to have a utilization (or “contamination”) rate of greater than 10 percent, which would make them ineligible under current proposed guidelines for return to the industry pool. Although some carriers have suggested the use of a higher contamination level for ILEC reclamation, they fail to take into account that the use of more highly contaminated blocks would require significantly more administrative effort – and therefore greater expense. Rather than increase the costs of pooling at this time, AT&T proposes that the Commission and the industry work toward processes such as UNP, which would allow “stranded” ILEC numbers to be made available for use by other carriers.

**4. The Commission Should Mandate Thousands Block Management Measures Rather than Sequential Number Assignment**

The Commission asks whether it should order some form of sequential number assignment prior to the actual implementation of pooling and tentatively concludes that sequential number assignment both within thousands blocks and from block to block would

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<sup>114/</sup> AT&T believes that ultimately, in the context of thousands block pooling, the code allocation process could be accelerated considerably. It currently takes at least 66 days to obtain a code after a request is made to the NANPA. If only a thousand numbers are allocated at a time, however, requests to the administrator are likely to be more frequent and the immediate need for numbers more dire. Therefore, AT&T urges the Commission to direct the pooling administrator to adopt more streamlined guidelines for thousands block allotment.

facilitate pooling.<sup>115/</sup> For a variety of reasons, AT&T believes that a requirement that code holders consecutively assign numbers is both unwise and unnecessary. Instead, the Commission should simply require that numbers within each thousands block be assigned to customers or be otherwise unavailable before a carrier begins to assign numbers out of a new thousands block, unless a new thousands block is needed to meet a specific customer request.

For pooling purposes, it does not matter which thousands blocks within an NPA the carrier first uses to assign telephone numbers or in what order the carrier uses numbers from within an open thousands block. The only thing needed to facilitate code reclamation for eventual pooling is a requirement that carriers attempt to assign all numbers out of a given thousands block before opening a new block.

Not only is mandatory sequential number assignment unnecessary, it can cause several significant problems for carriers and consumers. First, there are some equipment limitations that make the utilization of certain telephone number series unworkable for some customers. For example, some PBX customers cannot use telephone numbers from the 0, 1, 8, or 9 thousand blocks because those number series are used to access the PBX attendant, toll services, or outside lines. Second, there are often customers who require large blocks of telephone numbers, generally from a particular 1000 or 100 number series. Finally, some carriers may have internal assignment management issues that make true consecutive assignments very difficult. For instance, resellers of a code holder's services may have to assign numbers from specific number groups that are not otherwise available to the code holder's own customers. Similarly, a carrier's

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<sup>115/</sup> See NRO NPRM at ¶ 190.

own number assignment procedures may be limited by such things as whether it maintains multiple service centers and how it ages numbers before they are made available for reuse.

In order to facilitate the eventual implementation of pooling, thousands number block management is an appropriate way to prevent many blocks from becoming unnecessarily contaminated. AT&T supports the adoption of thousands number block management techniques by both LNP capable and non-LNP capable carriers. Mandatory sequential number assignment, however, would burden carriers and consumers with little or no corresponding benefit.

Finally, with regard to inventory levels, AT&T supports the Thousands Block Pooling Guideline's proposal to establish a nine-month inventory of numbers in both the industry inventory and the service provider inventory. These inventory levels potentially could be reduced after carriers and the administrator have more experience with the pooling process and it is clear that applications for thousands blocks can be processed in a timely fashion to make resources available for assignment quickly. AT&T notes, however, that carriers require, as a minimum, a six month inventory of numbers to operate efficiently.

**E. All Carriers Currently Contributing to the NANPA Should Bear the Costs of Pooling**

Because pooling is a number administration function, Section 251(e)(2) authorizes the Commission to adopt a distribution and recovery mechanism for both the intrastate and interstate costs of number pooling, and AT&T encourages it to do so. This mechanism should require all classes of carriers that currently contribute to the NANPA to cover the costs of pooling in a competitively neutral manner.

In AT&T's view, there is no justification for exempting any carrier from pooling cost recovery on the basis of its size, code utilization rates, or other criteria. The exemptions

proposed by some parties are not competitively neutral and would complicate billing and collection activities. In any event, all carriers will benefit from pooling because it will lower the rate of jeopardy declarations and attendant rationing, decrease the need for costly area code relief, and, most importantly, help provide carriers with access to the numbers they need to serve customers. Even though wireless carriers are not yet capable of pooling, they should be required to bear their share of the start-up costs in anticipation of their eventual participation.

**1. Pooling Implementation Should Not Await Cost Recovery**

As a preliminary matter, the Commission should make clear that the industry's development and implementation of pooling should not be held hostage to the resolution of cost recovery issues. Some ILECs have suggested that they do not wish to move forward with pooling implementation until cost recovery is fully resolved. The Commission should state at the earliest opportunity – for example, through an interim order in this docket – that it will at a later date adopt cost recovery rules that will compensate carriers for costs they incur in the interim (e.g., to develop NPAC upgrades).<sup>116/</sup> LNP costs were successfully handled in this fashion, and in that manner the Commission was able to avoid delaying the roll out of number portability while it resolved questions of cost recovery.

There is, however, no reason to expect pooling cost recovery to present the same thorny issues raised by LNP. Indeed, the Commission has already established a cost recovery regime that it can, and should, utilize for pooling costs. Because pooling is a number administration

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<sup>116/</sup> The Commission should also keep in mind that ILECs that hope to gain an exclusion from pooling on the grounds that they have relatively high number utilization rates or by virtue of other factors are also likely to drag their feet on pooling implementation. For this reason, the Commission also should make clear in any interim pooling order that it does not intend to permit any class of technically capable carriers to opt out of pooling.

function, pooling costs should be recovered via the NANPA mechanism, which is well-defined and well-understood by the industry. AT&T does not believe that modifications to existing number portability databases required to support pooling should be treated as number portability costs. Following the recommendations of the NANC Cost Recovery Working Group, all eligible pooling costs, including costs incurred for NPAC development, should be recovered using the existing NANPA formula.

**2. Carriers Should Bear Their Own Carrier-Specific Pooling Costs**

AT&T supports the Commission's tentative conclusion that thousands-block pooling administration involves three categories of costs. These were the same categories identified by the Commission in its LNP docket, and they appropriately reflect the costs that should be recovered through a cost sharing mechanism.<sup>117/</sup> Pooling cost recovery should be limited to industry-wide ("Type 1") costs – for example, expenses incurred to fund a pooling administrator and upgrade the NPAC. Carriers should bear their own carrier-specific ("Type 2") costs, such as the expenses they incur to upgrade their internal systems.

The Commission found in the LNP docket that requiring carriers to bear their own costs in the manner AT&T proposes would be competitively neutral.<sup>118/</sup> There is no reason to believe that the cost per telephone-number for pooling will be higher for any one class of carriers than

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<sup>117/</sup> See Id. at ¶ 197.

<sup>118/</sup> See LNP Order at 8422 ¶ 136 (ruling that "a mechanism that requires each carrier to pay for its own costs of currently available number portability measures" would satisfy the competitively neutral requirement of § 251(e)(2)).

another. ILECs may have higher total costs, because they have more numbers but, as the Commission has held, the proper measure of competitive neutrality is cost per number.<sup>119/</sup>

AT&T's cost recovery solution is simple, fair, and reasonable. Moreover, the overall costs of pooling should be far lower than those the industry incurred to implement number portability. Indeed, the cost estimates offered by some ILECs to date are completely unsupported and appear to be significantly overstated, as were ILECs' claimed costs for LNP.<sup>120/</sup> The Commission can avoid the quagmire of investigating cost claims by simply recognizing that the costs each carrier will incur to modify its own systems and network to operate in a pooled world are simply costs of doing business that each carrier can and should bear itself.<sup>121/</sup> Such a policy will also incent each carrier to minimize its implementation costs, whereas a mechanism

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<sup>119/</sup> See Telephone Number Portability, Third Report and Order, 13 FCC Rcd 11701, 11774 ¶ 137 (1998) ("LNP Cost Recovery Order") ("Requiring incumbent LECs to bear their own carrier-specific costs directly related to providing number portability will not disadvantage any telecommunications carrier because under an LRN implementation of long-term number portability a carrier's costs should vary directly with the number of customers that carrier serves. . . . Incumbent LECs will likely have large absolute costs because of their large networks, but they also will have a large customer base over which to spread those costs; competitive LECs and CMRS providers will likely incur fewer absolute costs because of their smaller networks, but they will also likely have smaller customer bases over which to spread those costs. We are not persuaded by arguments by SBC and GTE that incumbent LECs will incur disproportionately higher costs than competitive LECs.").

<sup>120/</sup> The Commission recently disallowed roughly \$900 million in costs claimed in ILEC LNP tariffs (and the costs initially claimed by the ILECs were even higher than those in the tariff filings in question). See Public Notice, FCC Investigation Produces Lower Number Portability Charges For Customers Of U S West Communications, Inc., released July 9, 1999 (noting that as a result of the Commission's LNP tariff investigations, "the amount consumers will pay for local number portability has been reduced by almost \$900 million").

<sup>121/</sup> In all events, it is clear that the costs of pooling are minimal when compared with the costs of NANP expansion or certain other optimization measures under consideration (e.g., ITN pooling or geographic portability as set forth in the Colorado Proposal).

that permits a carrier to force its competitors to bear a portion of its costs would encourage efforts to claim unrelated costs as “pooling” expenses.

In the event the Commission does elect to permit carriers to specially recover their carrier-specific costs of pooling, it should adhere to the principles established in the LNP Cost Recovery Order and LNP Cost Classification Order: “[A] carrier must show that these costs: (1) would not have been incurred by the carrier ‘but for’ the implementation of number portability; *and* (2) were incurred ‘for the provision of’ number portability service.”<sup>122/</sup>

AT&T strongly opposes the NPRM’s proposal to permit ILECs to recover their pooling costs through rate-of-return or price cap adjustments (exogenous or otherwise). Under price cap regulation, ILECs have considerable room to raise prices for less competitive services, harming consumers and competitors. If, in contrast, ILECs were required to recover their carrier-specific costs in the same manner as CLECs, CMRS providers, and non-dominant IXCs, then ILECs would have a much stronger incentive to be efficient and keep prices low. It would also permit the Commission to avoid a potentially lengthy and administratively burdensome proceeding to evaluate ILEC cost claims.

While IXCs benefit from pooling and thus should be required to pay a share of the implementation costs through the NANPA formula, they should not be forced to “pay twice” for pooling through increased access charges. As the Commission determined with regard to LNP: “Because number portability is not an access-related service and IXCs will incur their own costs for the querying of long-distance calls, we will not allow LECs to recover long-term number portability costs in interstate access charges. Nor would it likely be competitively neutral to do

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<sup>122/</sup> Telephone Number Portability Cost Classification, CC Docket No. 95-163, Memorandum Opinion and Order, DA 98-2534, at ¶ 10 (rel. Dec. 14, 1998).

so.”<sup>123/</sup> Allowing cost recovery for pooling through access charges suffers from the same problems the Commission found in the context of LNP. Moreover, a system that permits ILECs to earn supracompetitive profits on bottleneck facilities would run directly counter to the Commission’s often stated goal of reducing access charges to cost.

Finally, AT&T opposes the use of a cost recovery mechanism that is based on the quantity of numbers held by a carrier. While this could alleviate the “double counting” problem discussed above, it would needlessly complicate the NANP administration by adding a third allocation formula that requires separate billing and collection activities. A better solution would be to require ILECs to recover carrier-specific costs in the same manner as their nondominant competitors.

**F. Carriers Should not be Permitted To Opt Out of Number Optimization Measures Based on Utilization Thresholds**

The Commission asks for comment on whether it should permit carriers that attain an as yet undefined number utilization rate (or various rates) to opt out of the number optimization measures under consideration in this proceeding.<sup>124/</sup> AT&T strongly opposes such a policy. It would not be competitively neutral to permit carriers to avoid participating in number conservation measures unless they lack the technical capability to participate in a particular mechanism.

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<sup>123/</sup> LNP Cost Recovery Order at 11773 ¶ 135. See also id. at ¶ 39 (“If the Commission ensured the competitive neutrality of only the distribution of costs, carriers could effectively undo this competitively neutral distribution by recovering from other carriers. For example, an incumbent LEC could redistribute its number portability costs to other carriers by seeking to recover them in increased access charges to IXCs.”).

<sup>124/</sup> NRO NPRM at ¶¶ 215-224.

The NPRM suggests that neutrality might potentially be ensured if the Commission established the appropriate utilization rate for each type of carrier.<sup>125/</sup> This proposal is groundless. Pooling and other measures require significant expenditures by carriers to alter their internal technical and record-keeping systems and to port pooled blocks. It also significantly complicates and increases the burden of ongoing number administration. Requiring certain carriers to pool while excusing others would, in effect, require the former to pay more for the use of numbering resources than the latter. No reasonable construction of Section 251(e) could find such a scheme competitively neutral.

Nor does AT&T agree that the use of utilization thresholds in lieu of participation in number optimization measures would encourage carriers to arrive at their own solutions to the problem of number exhaust.<sup>126/</sup> New entrants already have a significant incentive to attract more subscribers, which would increase their number usage rates at the same time. Establishing a utilization threshold that discriminates in favor of incumbent LECs would provide no further impetus to increase efficiency. Indeed, because they are new entrants to the local exchange market, the vast majority of CLECs would have no choice but to participate in thousands block pooling before they would have a chance of meeting any but the lowest of utilization rates.

Similarly, a utilization threshold would not spur ILECs on to greater number efficiency. As is explained in detail above, there is not necessarily a correlation between high utilization rates and efficient use of numbers. Moreover, by virtue of their historic monopoly status, ILECs generally have high number utilization rates today without having expended any effort. To

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<sup>125/</sup> Id. at ¶ 220.

<sup>126/</sup> See id. at ¶ 217.

reward ILECs for this historical anomaly would be profoundly unfair. As the Commission has stated:

Concomitant with the need for one uniform numbering plan is the imperative that any numbering plan be capable not only of serving incumbents, but also of accommodating new market entrants. For this reason, we have attempted, wherever possible, to ensure that new telecommunications carriers have access to numbering resources on the same basis as incumbents.<sup>127/</sup>

ILEC exemption from pooling – which is what the Commission’s “carrier choice” plan ultimately means – not only is discriminatory, it likely would undermine the ability to get pooling off the ground in many areas. ILECs are essential participants in industry workshops and provide much of the technical and logistical support needed to establish standards and perform tests. Moreover, by virtue of the sheer quantity of codes held by ILECs, they likely would have a significant number of blocks to donate to a pool despite their relatively high utilization rates.<sup>128/</sup>

Finally, it is not clear how the Commission would determine a carrier’s right to opt out of pooling based on its utilization rates, because such rates change from day to day. Would pooling be required in April but not in May depending on the number of new subscribers won in a particular rate center? What would happen if a carrier lost subscribers or opened a new code in

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<sup>127/</sup> The Use of N11 Codes and Other Abbreviated Dialing Arrangements, First Report and Order and Further Notice of Proposed Rulemaking, 12 FCC Rcd 5572, 5610 ¶ 66 (1997) (“N11 Order”).

<sup>128/</sup> For example, SBC recently contended that ILECs have more than 237 NXX blocks, or 2.3 million numbers, in the 310 NPA. See Reply Comments of SBC Communications, Inc., CC Docket No. 96-98, NSD File No. L-98-136, at 7, filed June 28, 1999. Even with an 80 percent utilization rate, the ILECs would have 600,000 numbers available for assignment.

June? Such a standard would be an administrative nightmare and subject to manipulation. The Commission should not adopt the NPRM's "carrier choice" proposal.

#### **IV. THE COMMISSION'S PROPOSAL TO SELL NUMBERS IS UNAUTHORIZED AND WOULD NOT BE COMPETITIVELY NEUTRAL**

From both a legal and practical perspective, the Commission's proposal to sell numbering resources through competitive bidding is unsound and should not be further pursued.<sup>129/</sup> As a threshold matter, the Commission has no authority to require carriers to pay for numbers. While the Commission auctions licenses to use the portions of the electromagnetic spectrum, this authority does not extend to numbers. Spectrum and telephone numbers are similar in that both are scarce resources essential to modern telecommunications technologies that the Commission is charged with administering consistent with the public interest. The Commission's authority to conduct spectrum auctions, however, derives from a specific statutory provision permitting that practice, rather than from its general powers to manage spectrum. There is no comparable statutory authorization for the sale of numbering resources.<sup>130/</sup>

Specifically, Congress first authorized the Commission to award licenses to use the electromagnetic spectrum via auctions as part of the Omnibus Budget Reconciliation Act of 1993. The plain language of that provision indicates that Congress sought to grant a power that it did not believe the Commission possessed at that time, rather than merely confirming the Commission's existing authority:

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<sup>129/</sup> See NRO NPRM at ¶¶ 225-240.

<sup>130/</sup> Although spectrum auctions are a precedent in some respects, spectrum and numbers are crucially different in that end users have a direct interest in and relationship to their assigned numbers. Any proposal that would strip carriers of numbers for failure to pay would directly impact customers.

[T]he Commission shall have the authority . . . to grant such license or permit to a qualified applicant through the use of a system of competitive bidding that meets the requirements of this subsection.<sup>131/</sup>

The Commission correctly points out that Section 251(e)(1) of the Communications Act grants the Commission express authority to administer numbering resources. However, unlike Section 309(j)'s unequivocal grant of authority to conduct spectrum auctions, nothing in the Act authorizes the sale of those resources.<sup>132/</sup> Congress clearly expressed its intent to authorize the sale of public telecommunications resources – i.e., electromagnetic spectrum – when that was its aim. It has not done so with respect to the sale of numbering resources.

Apart from its questionable legality, it is not clear how the Commission would design a number sale that is competitively neutral. Charging only new entrants, or even charging for “new” numbers, would be fundamentally unreasonable. ILECs still have the vast majority of numbers in the NANP and the Commission would have to ensure that they pay for their existing numbering resources. The Commission has repeatedly made clear that numbers are a public

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<sup>131/</sup> 47 U.S.C. § 309(j)(1) (emphasis added). Similarly, Section 309(j)(10) required certain conditions to be met before the Commission could conduct spectrum auctions, further indicating that it did not have that power except pursuant to the specific terms of Section 309(j).

<sup>132/</sup> Moreover, the fact that the Commission's enabling statutes do not expressly withhold the power to auction numbering resources provides no support for the claim that Congress intended to grant that authority by implication. "To suggest ... that Chevron step two is implicated any time a statute does not expressly negate the existence of a claimed administrative power (i.e., when the statute is not written in 'thou shalt not' terms), is both flatly unfaithful to the principles of administrative law ... and refuted by precedent." Railway Labor Executives' Assoc. v. NMB, 29 F.3d 655, 671 (D.C. Cir. 1994) (*en banc*), cert. denied, 115 S. Ct. 1392 (1995); accord, e.g., Ethyl Corp. v. EPA, 51 F.3d 1053, 1060 (D.C. Cir. 1995).

resource, and that no carrier or user has a proprietary interest in them.<sup>133/</sup> While this does not necessarily present an argument against charging a “rental” or “lease” fee for numbers, such a license arrangement could not impose a disproportionate burden on new entrants.

Moreover, it would be unreasonable and potentially anti-competitive to penalize carriers for using “extra” numbers if the competitive bidding system obligated them to buy in larger blocks than necessary to serve their needs. Under such a system, for example, smaller carriers, who might need only a portion of a thousands block, would pay more on a per-number basis than larger carriers who can make use of full thousands blocks. A block-based competitive bidding system, therefore, might impose an artificial unit cost disadvantage on smaller carriers, to the detriment of competition.

Even if the Commission had the legal authority (as it does not) to establish a scheme to sell numbering resources, ensuring that such a regime were competitively neutral would likely require the devotion of considerable administrative resources, both on the part of the Commission and carriers. While such a system theoretically might increase carriers’ efficiency in using numbering resources, designing such an arrangement would be time consuming and burdensome. Given its potential to inhibit competitive entry, the Commission should concentrate its efforts on other solutions, such as pooling, which have a better likelihood of addressing the problems raised in this docket.

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<sup>133/</sup> [C]arriers do not ‘own’ codes or numbers but rather administer their distribution for the efficient operation of the public switched telephone network. The Commission, also on several occasions, has further characterized telephone numbers as a national public resource.” N11 Order at ¶ 71 (footnotes omitted).

## V. THE COMMISSION SHOULD ENSURE THAT AREA CODE RELIEF IS IMPLEMENTED PURSUANT TO ITS REGULATIONS

For the most part, the Commission's delegation of authority to the states to implement area code relief has worked well. States have generally fulfilled their obligations in a responsible and timely manner and, only on a few occasions, has relief been delayed so long that carriers' access to numbers was jeopardized. AT&T is very concerned, however, that as the Commission begins to focus on number optimization strategies, several states, in the apparent hope that conservation measures could replace the need for a new NPA, have either refused to institute relief when it was clearly called for or have aborted implementation of an overlay mere weeks before it was due to go into effect.<sup>134/</sup>

Although the Commission delegated to the states the right to implement area code relief, it explicitly conditioned that right on the fulfillment of certain obligations. In particular, the Commission's rules provide that a state must "[f]acilitate entry into the telecommunications marketplace by making telecommunications numbering resources available on an efficient, timely basis to telecommunications carriers."<sup>135/</sup> To ensure compliance with this rule as number pooling and other optimization strategies are rolled out, bringing with them the promise of extended life for NPAs, the Commission should:

- Confirm its finding in the Pennsylvania Order that conservation measures are not a substitute for area code relief and that states must implement a new area code when necessary to ensure adequate access to numbering resources.<sup>136/</sup>
- Clarify that providing carriers with the chance to win a code in a lottery does not ensure that numbers are being made available on an efficient, timely basis. More and

<sup>134/</sup> See, e.g., CPUC Suspension Order at 6-7.

<sup>135/</sup> 47 C.F.R. § 52.9. See also 47 C.F.R. § 52.19(b).

<sup>136/</sup> Pennsylvania Order at 19025 ¶ 23.

more states are relying on rationing as a means to defer area code relief but, in many cases, rationing leaves carriers without enough codes to serve customers.<sup>137/</sup> Rationing, then, may not satisfy a state's obligations to provide timely access to numbers.

- Clarify that states should strive to adopt and implement area code relief plans before an NPA goes into jeopardy. This should be their goal always.
- Commit to act on any challenge to a state area code relief plan (or lack thereof) within 90 days of submission of the request to the Common Carrier Bureau to do so. Such a policy will be particularly important in the event the Commission elects to permit states greater authority to "experiment" with number optimization measures, as carriers will benefit from the assurance that there is sufficient federal oversight to ensure the continued uniformity and integrity of the NANP. Both end users and carriers will also benefit from the assurance that adequate numbering resources will remain available.

**A. Decisions Regarding Geographic Splits Should Be Made at the State Level**

As the Commission notes, there are a number of advantages to the implementation of geographic splits as a form of area code relief, including the ability to retain one NPA per customer premises, intra-NPA seven-digit dialing, and the continued association of one area code with a particular geographic area. Area code splits are also more competitively neutral than overlays because they allow "equal availability of unassigned NXXs in both the new and the old NPA to all industry segments."<sup>138/</sup>

Although geographic splits can be disruptive to users, especially when they occur seriatim in a short time frame, AT&T does not believe that the Commission should limit the

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<sup>137/</sup> In California, for example, the CPUC has specified that six codes can be allocated per month in the 310 area code. Because there are 60 NXXs remaining to be allocated, the CPUC believes that the 310 area code will not reach total exhaust for ten months. See CPUC Suspension Order at 6. What the CPUC fails to mention, however, is that there are more than 120 outstanding requests for the codes. Under these circumstances, some carriers' numbering needs obviously are not being met.

<sup>138/</sup> NRO NPRM at ¶ 248.

number of times a state can utilize splits in one location. States are already extremely sensitive to the need to avoid consumer telephone number changes and the INC has incorporated a suggested limit into its guidelines. Because such decisions require a unique knowledge of local conditions and the ability to respond to local needs, the Commission would have great difficulty crafting a hard and fast rule that would be appropriate for all occasions and all locations.

Nor does AT&T believe that the Commission should adopt a rule limiting or conditioning geographic splits after a rate center consolidation. The Commission should, however, clarify that states should take into account recent consolidations and rate center boundaries generally in deciding where to split an NPA. In Arizona, for example, the state commission recently ordered a three-way split in the 602 area code just after completion of a consolidation of 18 rate centers in that NPA. This disparately affected CLECs, because those carriers had been assigning numbers across former rate center boundaries, because ILECs had maintained their old rate center lines for assignment purposes. Under this scenario, many CLEC customers would have to undergo 10-digit number changes while the ILEC customers would only have to change their area codes – a result that plainly is not competitively neutral.

Provided that LNP and pooling are done on rate center-by-rate center basis, there does not appear to be any reason for the adoption of new federal rules to govern the adoption of geographic splits in a pooling environment. In addition, AT&T does not think the implementation of splits would reduce the opportunities for porting or pooling.<sup>139/</sup>

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<sup>139/</sup> See *id.* at ¶ 252.

**B. While Less Competitively Neutral than Splits, All-Services Overlays Have Significant Advantages**

Area code overlays sometimes require customers to use different area codes for lines on the same premises and they require subscribers to use 10-digit dialing for calls within their own areas. In addition, because new entrants often are unable to obtain codes in the old NPA, the impact of an overlay often is not competitively neutral. For this reason, AT&T strongly supports retention of the Commission's mandate that calls placed both within and outside of the subscriber's NPA use 10 digits when an overlay is implemented.

Despite the disadvantages of overlays, AT&T believes that states should have the authority to determine when and where to implement all services overlays and when geographic splits make the most sense. Both forms of NPA relief have merits and demerits, and the overall effects of each vary greatly depending on the characteristics of particular locales. However, overlays generally are less expensive to implement than splits because customers do not have to change telephone numbers. In addition, once an overlay is adopted, subsequent NPA relief is easier to implement.

The Commission also asks about the potential merits of "expanded" overlays, including "reverse" overlays.<sup>140/</sup> AT&T is unconvinced that expanded overlays would have significant number optimization benefits. Presumably, an expanded overlay would require more frequent area code relief and an overlay over an existing expanded overlay would have an even shorter life. This does not appear to be consistent with the main objective of this proceeding – extending the life of the NANP by avoiding the constant need for the introduction of new NPAs.

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<sup>140/</sup> Id. at ¶¶ 253-255.

As the Commission points out, there are also several practical problems with expanded overlays, including its potential effect on the rating and billing of calls between the overlay NPA and underlying NPAs. In particular, expanded overlays would make it more difficult for customers to determine whether they will be billed for calls as toll or local. Moreover, expanded overlays could compound the competitive inequities inherent in overlays. Until these problems can be resolved, the Commission should decline to authorize expanded overlays.

**C. Service-Specific Overlays Raise Serious Competitive Concerns and Are Unlikely to Yield Significant Optimization Benefits**

In 1995, the FCC concluded that Ameritech's proposed wireless-only overlay would unreasonably discriminate against wireless carriers and would thwart the FCC's goals of encouraging new services and additional competition.<sup>141/</sup> The following year the Commission reaffirmed this reasoning, concluding in its Second Local Competition Order<sup>142/</sup> that a technology specific overlay proposed by the Texas Public Utilities Commission (the "Texas PUC") violated the Ameritech Order.<sup>143/</sup> The FCC specifically found unpersuasive the Texas PUC's arguments that a wireless-only overlay would extend the life of existing NPAs and reduce customer confusion.<sup>144/</sup> No party has yet presented any actual evidence challenging the Commission's prior reasoning and there are no grounds to revisit this issue.

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<sup>141/</sup> Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech-Illinois, 10 FCC Rcd 4596, 4604-05, ¶ 20 (1995).

<sup>142/</sup> Second Local Competition Order at 19508 ¶ 281 ("We find that the guidelines and the reasoning enumerated in [the Ameritech] decision should continue to guide the states and other entities participating in the administration of numbers because these guidelines are consistent with Congress' intent to encourage vigorous competition in the telecommunications marketplace.").

<sup>143/</sup> Id. at 19527 ¶ 304.

<sup>144/</sup> Id. at 19528 ¶ 306.

While AT&T agrees that the discriminatory effects of a service-specific overlay would be less severe if there were no “existing or likely competition” between wireless and wireline carriers, as some state commissions have alleged,<sup>145/</sup> it would be profoundly unwise in an era of “convergence” to rest Commission policy on such assumptions. The telecommunications marketplace is changing at much too rapid a pace to conclude that wireless technologies have no potential to compete directly with wireline in the near future. Moreover, even if services are not considered substitutes for one another, wireless companies, through flat-rated pricing plans and other incentives, compete for wireline minutes today.

The most troubling aspect of service-specific overlays is the disparate costs they will impose on the wireless industry if a “take-back” of numbers is imposed. Unlike wireline telephones, wireless handsets must be reprogrammed if a state commission does not permit wireless users to retain their same 7-digit telephone number when they are assigned to a new NPA. While some handsets are capable of remote reprogramming, for many wireless phones, the new mobile identification number must be programmed directly into the phone’s microchip. This often requires a special programming device and onsite service. In other words, customers would have to take time out of their busy schedules to bring their handsets into a customer service center that has the necessary equipment. Even if a phone is customer programmable, a customer must call in and be able to follow instructions for programming via his or her phone’s keypad. If a customer fails to reprogram his or her handset, service would be cut off completely.

The inconveniences caused by reprogramming and associated changes translate into enormous costs for the wireless industry. The costs of reprogramming handsets and making

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<sup>145/</sup> See e.g., Public Notice, Connecticut Department of Public Utility Control Files Petition for Rulemaking, DA 98-743, RM No. 9258 (rel. April 17, 1998).

necessary network and switch changes alone would be millions of dollars, and this figure does not take into account the loss of goodwill and customers that wireless providers would suffer. Many subscribers may simply choose to give up wireless service altogether rather than take the steps necessary to keep their accounts active. In addition, wireline PBX operators may not be as quick to reprogram their equipment to acknowledge new wireless numbers as they would if a new area code were applied to all services. The enormous costs and adverse impacts on competition far outweigh any benefits that might be garnered by this decision.

Most significantly, all available evidence demonstrates that service-specific overlays would actually decrease the efficiency with which numbers are allocated. In fact, the only wireless-only overlay implemented to date (the 917 NPA in New York City) was recently terminated, and the New York Public Service Commission reinstated wireless carriers' access to codes in the 718 NPA.<sup>146/</sup> Absent any demonstrable benefit offered by implementation of technology-specific overlays, the Commission should reaffirm its consistent conclusion that it is unreasonable to impose costs and burdens on one segment of the industry through this mechanism.

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<sup>146/</sup> See Case No. 98-C-1331, Joint Petition of Nextel Communications of Mid-Atlantic, Inc., Celco Partnership d/b/a Bell Atlantic Mobile, Omnipoint Communications, Inc., Cellular Systems Inc. d/b/a AT&T Wireless Services and AT&T Communications of New York, Inc. to Amend the Commission's Orders Issued July 1, 1991 in Case 90-C-0347 and December 10, 1997 in Case 96-C-1158, Order Granting Petition (Feb 3, 1999).

**CONCLUSION**

AT&T fully supports the Commission's efforts to optimize the use of telephone numbers in the United States, and encourages the Commission to assume the role Congress set out for it in Section 251(e) of the Communications Act.

Respectfully submitted,

AT&T CORP.

Howard J. Symons  
Sara F. Seidman  
Amy Bushyeager  
MINTZ, LEVIN, COHN, FERRIS,  
GLOVSKY, & POPEO, P.C.  
701 Pennsylvania Avenue, N.W.  
Suite 900  
Washington, D.C. 20004  
(202) 434-7300

Of Counsel

  
Mark C. Rosenblum  
Roy E. Hoffinger  
James H. Bolin, Jr.  
Room 3245H1  
295 North Maple Avenue  
Basking Ridge, NJ 07920  
(908) 221-4617

Douglas I. Brandon  
Vice President - External Affairs  
1150 Connecticut Avenue, N.W.  
Suite 400  
Washington, D.C. 20036  
(202) 223-9222

July 30, 1999

## CERTIFICATE OF SERVICE

I, Teresa S. Kadlub, hereby certify that on this 30<sup>th</sup> day of July, 1999, I caused copies of the foregoing "COMMENTS OF AT&T CORP., to be served by U.S. mail, first class, postage prepaid, or by hand delivery (\*) on the following:

Lawrence Strickling, Chief\*  
Common Carrier Bureau  
Federal Communications Commission  
The Portals - 5-C450  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Tom Power, Senior Legal Advisor\*  
Office of Chairman Kennard  
Federal Communications Commission  
The Portals - 8-B201L  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Kevin Martin, Legal Advisor\*  
Office of Commissioner Furchtgott-Roth  
Federal Communications Commission  
The Portals - 8-A302E  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Peter Tenhula, Senior Legal Advisor\*  
Office of Commissioner Powell  
Federal Communications Commission  
The Portals - 8-A204C  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Bill Bailey, Legal Advisor\*  
Office of Commissioner Furchtgott-Roth  
Federal Communications Commission  
The Portals - 8-A302E  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Kyle Dixon, Legal Advisor\*  
Office of Commissioner Powell  
Federal Communications Commission  
The Portals - 8-A204C  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Linda Kinney, Legal Advisor\*  
Office of Commissioner Ness  
Federal Communications Commission  
The Portals - 8-B114D  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Dorothy Atwood, Legal Advisor\*  
Office of Chairman Kennard  
Federal Communications Commission  
The Portals - 8-B201  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Dan Connors, Legal Advisor\*  
Office of Commissioner Ness  
Federal Communications Commission  
The Portals - 8-B114D  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Ari Fitzgerald, Legal Advisor\*  
Office of Chairman Kennard  
Federal Communications Commission  
The Portals - 8-B201  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Sarah Whitesell, Legal Advisor\*  
Office of Commissioner Tristani  
Federal Communications Commission  
The Portals - 8-C302B  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Al McCloud\*  
Network Services Division  
Common Carrier Bureau  
The Portals - 6-A423  
445 12<sup>th</sup> Street, S.W.,  
Washington, D.C. 20554

David Furth, Chief\*  
Commercial Wireless Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
The Portals - 4-B522  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Joel Taubenblatt\*  
Wireless Telecommunications Bureau  
Federal Communications Commission  
The Portals - 4-A260  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Anna Gomez\*  
Common Carrier Bureau  
Federal Communications Commission  
The Portals - 6-A324  
4455 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Blaise Scinto\*  
Common Carrier Bureau  
Federal Communications Commission  
The Portals - 6-A420  
44512<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Yog Varma, Deputy Bureau Chief\*  
Common Carrier Bureau  
Federal Communications Commission  
The Portals - 5-C352  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Robert C. Atkinson, Deputy Bureau Chief\*  
Common Carrier Bureau  
Federal Communications Commission  
The Portals - 5-C356  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

John Spencer\*  
Wireless Telecommunications Bureau  
Federal Communications Commission  
The Portals - 3-A103  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Patrick Forster\*  
Network Services Division  
Common Carrier Bureau  
The Portals - 6-A461  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Jeannie Grimes\*  
Network Services Division  
Common Carrier Bureau  
Federal Communications Commission  
The Portals - 6-A401  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Tejal Mehta, Legal Advisor\*  
Common Carrier Bureau  
Federal Communications Commission  
The Portals - 6-A431  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Mary A. Keeney  
Assistant Attorney General  
Office of the Attorney General  
Natural Resources division  
P.O. Box 12548, Capitol Station  
Austin, TX 78711-2548

Trina M. Bragdon  
Staff Attorney  
State of Maine Public Utilities Commission  
242 State Street  
18 State House Station  
Augusta, Maine 04333-0018

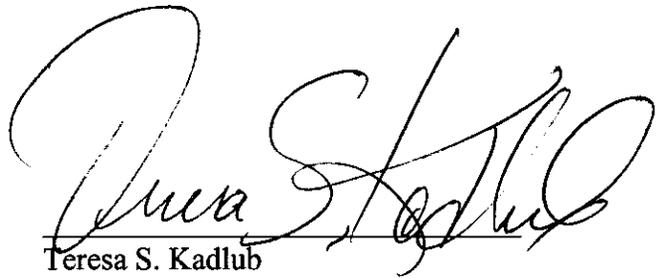
Lawrence G. Malone  
General Counsel  
Public Service Commission of the State of  
New York  
Three Empire State Plaza  
Albany, New York 12223-1350

Karen J. Reed  
Department of Telecommunications & Energy  
100 Cambridge Street, 12<sup>th</sup> Floor  
Boston, MA 02202

Joe Garcia, Chairman  
Florida Public Service Commission  
Capital Circle Office Center  
2540 Shunard Oak Boulevard  
Tallahassee, Florida 32399-0850

Helen M. Mickiewicz  
Peter Arth, Jr.  
Lionel B. Wilson  
Public Utilities Commission  
State of California  
505 Van Ness Avenue  
San Francisco, California 94102

International Transcription Service (ITS)\*  
1231 20<sup>th</sup> Street, N.W.  
Washington, D.C. 20037



Teresa S. Kadlub