



STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

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August 16, 1999

Hon. Magalie Roman Salas
Secretary
Federal Communications
Commission
Portals II
445 12th Street, S.W., TWA-325
Washington, D.C. 20554

Re: Petition of Texas Public Utility Commission For
Delegation of Additional Authority to Implement Number
Conservation Measures; NSD File No. L-99-55; DA-99-1380

Dear Secretary Salas:

The New York State Department of Public Service files this letter in support of the Texas Public Utility Commission's (Texas PUC's) request to implement various number conservation measures. The Texas PUC, like many state commissions, is facing increased pressures to adopt area code relief plans in unprecedented numbers.

We recognize that the increased demand for central office codes (NXXs), and the concomitant exhaust of area codes, is in part the result of increased local competition, which we applaud. However, the rapidly declining number of available NXXs is also directly attributable to inefficient and ineffective industry number assignment and utilization practices.

Given the important role that states play in addressing area code relief, the Commission should allow willing states, such as Texas, to assume the responsibility of adopting efficient number utilization methods.

NYDPS Comments
NSD File No. L-99-55
DA-99-1380

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Various carriers suggest that the Commission should not allow states to implement efficient number utilization measures until the Commission adopts national rules. This suggestion, if adopted, would forestall efficient number use in the name of national uniformity and industry convenience. We recognize that the Commission is examining various number conservation measures to improve the efficient allocation and utilization of numbering resources.¹ However, efficient number utilization should not be delayed any longer. The Commission should allow states to act now to prevent premature area code exhaust. Granting states additional delegated authority to adopt number conservation measures will minimize customer and carrier costs as well as the disruption that occurs with frequent area code changes.

Sincerely,

Lawrence G. Malone
General Counsel

cc: FCC Electronic Filing System
Al McCloud, Common Carrier Bureau
Network Service Division (two copies)
All Parties

¹ In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, Notice of Proposed Making (Released June 2, 1999).