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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

August 17, 1999

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
TW-A325  
Washington, D.C. 20554

RE: Ex Parte Presentation. Numbering Resource Optimization, CC Docket No. 99-200; State Numbering Petitions, DA 99-1198; NSD File Nos. L-98-136, L-99-19-21, 27, 31, 33; CC Docket No. 96-98

Dear Ms. Salas:

On Tuesday, August 17, 1999, I met with Sarah Whitesell, Legal Advisor to Commissioner Tristani, to discuss the Numbering Resource Optimization Rulemaking and various state petition filings related to numbering. Attached is a copy of a written ex parte presentaiotn distributed at the meeting.

Pursuant to Section 1.1206(a) an original and nine copies of this letter and attachments are being filed with your office. Please associate this letter and attachments with the files in the above-captioned proceedings.

Please contact me should you have any questions concerning the foregoing.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Riley".

Pamela Riley

Attachment

cc: Sarah Whitesell



# Numbering Resource Optimization

(CC Docket No. 99-200)

## State Numbering Petitions

(DA 99-1198; NSD File Nos. L-98-136, L-99-19, -21, -27, -31, -33)

(CC Docket No. 96-98)

*Ex Parte* Presentation

AirTouch Communications, Inc.

July 30, 1999



## AirTouch Is . . .

- An efficient user of number resources and active in INC/NANC number conservation efforts
- Committed to strong Federal oversight of public numbering resources and to making the centralized NANPA process work
- Concerned about ability of states to develop and implement efficient numbering practices/protocols -- the numbering crisis is *real*.
- Concerned about recent statements that FCC may delegate inappropriate numbering responsibility to States



# Critical Priorities in Numbering

- Uphold plenary role of FCC on numbering
  - Congress has properly asserted Federal primacy in the area; States have role to play but no independent jurisdiction; there is no “preemption” issue
  - Reaffirm the *Pennsylvania Order*
  - Allow NANPA to work
- Eliminate wasteful numbering practices
  - Too many rate centers
  - 7-Digit dialing
  - Use of entire NXX codes by LNP-capable carriers
- Ensure that States proceed with area code relief
- Make existing policies work through enforcement and audits (NANPA and FCC roles)



# FCC, States, NANPA Have Important Roles to Play

Item	State role	NANPA role	Needed FCC action
Rate center consolidation	Full authority to act	None	Require States to act
10 digit dialing	Full authority to require	None	Mandate 10-DD
1000-block pooling for LNP-capable carriers	Support FCC and industry activities	Administer 1000-block pooling	Set standards
Data collection, code usage/ reclamation	Interim data collection efforts in coordination with NANPA	Code assignment, enforce reclamation; audit carriers	Adopt audit and enforcement rules; empower NANPA to enforce INC guidelines
Area code relief	Establish on timely basis -- at least 6 months prior to exhaust	Facilitate area code relief planning; initiate first implementation meeting	Ensure States undertake timely A/C relief consistent with FCC policies; enforce guidelines



## Central Policy Objectives

- Confirm Federal primacy over numbering, assure that States have appropriate roles
- Give the INC/NANC/NANPA process a chance to work
- Require rate center consolidation first
- Mandate 10-digit dialing
- 1000-block pooling by LNP-capable carriers
- Enforce audit procedures
- Establish enforcement procedures
  - NANPA enforcement of INC assignment guidelines
  - FCC enforcement