
**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Connecticut Department of Public)	
Utility Control Petition for Rulemaking)	
To Amend the Commission's Rule)	RM No. 9528
Prohibiting Technology-Specific or)	
Service-Specific Area Code Overlays)	
)	
Massachusetts Department of)	
Telecommunications and Energy)	
Petition for Waiver to Implement a)	NSD File No. L-99-17
Technology-Specific Overlay in the)	
508, 617, 781 and 978 Area Codes)	
)	
California Public Utilities Commission)	
And the People of the State of California)	
Petition for Waiver to Implement a)	NSD File No. L-99-36
Technology-Specific or Service-Specific)	
Area Code)	

REPLY COMMENTS OF SBC COMMUNICATIONS INC.

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SUMMARY

SBC Communications Inc. strongly endorses the adoption of a comprehensive national standard for purposes of number resource optimization. Although certain state commissions continue to argue that numbering practices and policies should be set on a state-by-state or even an NPA-by-NPA basis, this piecemeal implementation would jeopardize telecommunications services throughout the country. In setting this national policy, SBC and other commenters agree the Commission must focus on the cause of rapid area code exhaust – the increase in competition in the local exchange market and the currently inefficient assignment of numbering resources.

As Sprint proposed in its Comments, SBC urges the Commission to immediately adopt measures which will address the needs of the public and preserve the integrity of the North American Numbering Plan. These measures are as follows: (1) Direct the North American Numbering Plan Administration (NANPA) to begin the reclamation of unused NXXs and provide a report to state commissions; (2) Order all code holders providing service in the top 100 metropolitan statistical areas (MSAs) to implement a national standard for a thousand block number assignment process developed by the North American Numbering Committee (NANC); (3) Grant waivers permitting states relief from the mandatory 10-digit dialing requirement in association with overlays; (4) Order all service providers to demonstrate need to NANPA as a condition to obtaining initial and growth codes; (5) Adopt a cost-efficient random and for-cause audit program; (6) Adopt mandatory reporting of the current Central Office Code Utilization Survey and require the reporting of supportive data on a semi-annual basis and; (7) Deny all requests for number pooling “trials,” focusing instead on deploying a national thousand block pooling standard within 12-15 months. In relation to long-term measures, SBC continues to urge the Commission to adopt a focused implementation of thousand block number pooling for the top 100 MSAs in relation to all LNP-capable carriers which fail to meet a reasonable

utilization threshold. The Commission should also encourage the adoption of overlays in all NPAs within the top 100 MSAs, concurrent with the temporary waiver of mandatory 10-digit dialing.

On the issue of cost recovery, SBC urges the Commission to adopt a cost recovery mechanism in advance of any required implementation of number resource optimization measures. There is no question that these measure will require significant expenditures. Therefore, it is only fair for carriers to receive guidance in advance of these costs as to which costs will be recoverable and to what extent.

As demonstrated in these Reply Comments, the Commission should maintain its position with regard to Technology Specific Overlays. Although endorsed by certain state commissions, there is no evidence that this drastic and costly approach will have any impact on area code exhaust. To the contrary, it would be likely to accelerate area code depletion. Moreover, it would adversely impact the wireless industry, and its customers, in an unlawful, discriminatory manner.

Nor should the Commission adopt Unassigned Number Pooling (UNP). MCI's recommendation of a phased-in UNP will result in multiple carriers being required to serve as number administrators, in contravention of the Commission's dictates. Moreover, it is not supportable that in all instances, these carriers will perform these functions in an "impartial" fashion as such relates to their competitors. Other problems associated with UNP include the adverse impact on the local number portability architecture, the resulting inability of carriers to predict their NXX and thousand block needs, the increase in the number of contaminated thousand blocks and the likelihood of disputes among carriers relating to the numbers available for assignment.

Similarly, individual number pooling (ITN) should not be implemented at this time. The administrative architecture needed to support ITN has not been defined and cannot be implemented within three years as proposed by certain state commissions.

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REPLY COMMENTS OF SBC COMMUNICATIONS INC.

SBC Communications Inc., on its behalf and on behalf of its subsidiaries (collectively referred to as “SBC”) herein endorses and, in some cases, refutes certain of the Comments filed in this proceeding.¹ A national standard, as currently envisioned by the Commission, is imperative if number conservation efforts are to be successful. In

¹ Approximately, 64 parties filed Comments in response to the Commission’s *Numbering Resource Optimization*, Notice of Proposed Rulemaking, CC Docket No. 99-102 (released June 2, 1999) (“Notice”). When referencing these Comments, SBC shall identify the commenting party by utilizing a short form of the party’s name and or the initials of the party. The Comments of the Public Utility Commission of Texas shall be referenced as “PUCT Comments, p. ___.” and the Comments of the California Public Utilities Commission and People of the State of California shall be referenced as the “California PUC Comments, p. ___.”

order for such a standard to be effective, it must address the core cause of area code depletion. The situation accelerating area code exhaust is the increased demand for numbering resources resulting from competition in the local service market and the assignment of these scarce resources where need has not been demonstrated.

While a national standard is necessary for an efficient number conservation policy, certain commenters, primarily state commissions, continue to insist that numbering policy, practices and procedures should be set on a state-by-state or even NPA-by-NPA basis.² SBC and other commenters oppose this approach.³ As the Commission itself has recognized, piecemeal implementation cannot take place without “jeopardizing telecommunications services throughout the country.”⁴

A national approach to numbering administration that addresses the needs of customers and the state commissions with an overarching comprehensive optimization plan will protect the integrity of the North American Numbering Plan (NANP). In this regard, Sprint proposes that the Commission take six steps in the immediate future, in order to enable numbering reform to begin while additional and more permanent measures are being considered.⁵ SBC supports Sprint’s recommendation that the Commission should promptly adopt some number conservation measures to speed meaningful reform. Therefore, SBC supports the Commission’s adoption of the following immediate measures:

1. Direct the North American Numbering Plan Administration (NANPA) to immediately begin the process of reclaiming unused NXXs consistent with its Guidelines. It should then report to the states and the NANC the results of the reclamation process.

² California PUC Comments, p. 33; PUCT Comments, p. 25.

³ *See, e.g.* AT&T Comments, pp. 4-9; Voicestream Wireless Comments, pp. 5-7; Ameritech Comments, p. 4.

⁴ Memorandum Opinion And Order and Order on Reconsideration, *In the Matter Of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, 13 FCC Rcd 19009 (1998).

⁵ Sprint Comments, p. 7.

2. Order all code holders providing services in the Top 100 metropolitan statistical areas (MSAs) to implement a national standard for Thousand Block Management (TBM) to avoid the unnecessarily contamination of thousand blocks. The TBM procedures should be developed by the North American Numbering Council (NANC) within three months of the final Order in this proceeding and implemented within two months of development.
3. Liberally grant waivers to states requesting relief from the mandatory 10-digit dialing requirement associated with the implementation of overlays. This action would facilitate the introduction of timely, efficient area code relief in many jurisdictions with minimal customer disruption.
4. Immediately order all service providers to comply with code request requirements, in relation to both initial and growth codes, to ensure all codes assigned by the NANPA are based on demonstrated need.
5. Adopt a cost-effective random and for-cause audit program consistent the recommendation of NANC at its August 1999 meeting.
6. Adopt mandatory reporting of the current Central Office Code Utilization Survey (COCUS) and require the industry to report support data on a semi-annual basis beginning in the year 2000. Compliance with this reporting requirement should be a pre-condition to the granting of numbering resources within an NPA.
7. Deny all requests to implement number pooling "trials" and focus on the measures needed to promptly deploy a national thousand block pooling standard, as described below, within 12-15 months of the final Order released in this proceeding.

In relation to long-term measures, SBC continues to urge the Commission to adopt a limited, focused implementation of thousand-block number pooling for the top 100 MSAs in relation to all LNP-capable carriers which fail to meet a reasonably established utilization threshold. Further, the Commission should commit to the adoption of a national 10-digit dialing plan in the top 100 MSAs by a specified date. Finally, the Commission should actively encourage the states to adopt NPA overlays in cases where area codes are exhausting and the conditions described below as for number pooling are not met.

I. Uniform Administrative Procedures Should be Adopted.

The commenters universally agree that there is a need for the adoption of new uniform administrative procedures applicable to all service providers.⁶ In addition, several companies and state commissions propose the adoption of a national standard of number definitions for purposes of reporting and auditing.⁷ While SBC agrees there should be a uniform national standard for defining numbering categories, the lack of this standard is not the fundamental problem causing rapid area code exhaust. Rather the problem is the existing system of allocating large blocks of telephone numbers to multiple service providers on a geographic basis.

Several parties urge the Commission to adopt a policy of limiting reserved numbers to only 45 days or not allowing reserved numbers at all.⁸ If there was a shortage of telephone numbers, there might be legitimate reason to adopt one of these proposals. However, such is not the case. To adopt a proposal that fails to address the core reasons for NPA exhaust would serve no purpose and would disadvantage many businesses and governmental agencies. SBC believes there should not be any limitation on the length of time numbers can be reserved, if the reservation is in accordance with a legally enforceable written agreement and the result of a valid customer request. In the alternative, SBC supports the adoption of the time limitations included in the Number Resource Optimization Working Group of NANC (NRO) report on number reservations.⁹

The Commission should allow the industry, through the leadership of the Industry Numbering Committee (INC) and the NANC, to continue to develop appropriate

⁶ *See, e.g.*, Winstar Comments, p. 47; State Outline Comments, p. 1; BellSouth Comments, p.12; ALTS Comments, p. 4.

⁷ *See, e.g.*, California PUC Comments, p. 11 and State Outline Attachment, p. 1; VoiceStream Wireless Corp. Comments, p. 10; Airtouch Comments, p. 14; Bell Atlantic Comments, p. 4.

⁸ *See, e.g.*, PUCT Comments, p. 6; California PUC Comments, Attached State Outline, p. 2.

⁹ The Number Resource Optimization Working Group Report on Telephone Number Reservations, Report to the North American Numbering Council, As Modified by the North American Numbering Council, dated August 24, 1999.

numbering definitions.¹⁰ Additionally, the industry must be permitted to phase-in any revised policy on number definitions to provide sufficient time for customer notification and education as well as to implement the required changes to operational support systems.

II. More Efficient Number Assignment Procedures Should Be Adopted.

A. In Developing Numbering Assignment Procedures, the Commission Should Not Focus On Ensuring the Growth of Number Assignments Parallels the Growth in Telephone Lines.

A major focus of the industry's efforts regarding number optimization has been on improving the process for the assignment of NXXs within NPAs in order to lengthen the life of the NPAs. Toward this end, the goal of the Commission in this proceeding is to address the underlying drivers of area code exhaust, not to ensure that the growth in number assignments more closely parallels the growth in telephone lines, as Cox suggests.¹¹

Number assignments within NPAs have never mirrored the growth in telephone lines. Given this fact, neither the state commissions nor this Commission has felt it necessary in the past to develop number assignment methodologies directed toward this objective.

While certain inefficiencies related to the number assignment system have played a limited role in area code exhaust, the major catalyst causing this problem is the proliferation of new entrants and the associated demand for numbering resources.

SBC agrees that in a competitive marketplace, more efficient number assignment procedures are needed. The Commission must focus on improving the assignment of the

¹⁰ The Industry Numbering Committee (INC) has completed its revisions to the number category definitions. In addition, the NRO presented its report on telephone number reservations at the August 1999 NANC meeting.

¹¹ Cox Communications Comments, p. 3.

NPA numbering resource and must adopt cost-effective measures to ensure that the use of existing and future NPAs are maximized.

B. Mandatory Procedures Must Be Adopted for the Assignment of Initial and Growth Codes.

Commenters generally agree that service providers should include as part of their initial code requests a “months-to-exhaust” (MTE) forecast and the proper state or federal certification.¹² Several commenters, including state commissions, urge the Commission to adopt a more stringent process to ensure that initial codes are properly justified.¹³ Although some commenters¹⁴ oppose these measures for allegedly having a disproportionate impact on new entrants, the Commission must adopt a process that requires service providers to support their numbering requests.

In opposing increased certification requirements for initial codes, ALTS claims that this requirement is exclusively targeted toward competitive local exchange carriers (CLECs).¹⁵ ALTS would have the Commission believe that simply because a service provider requests an initial code, it must have a justified need. Yet, as Sprint’s experience in Massachusetts demonstrates, some CLECs have been hoarding a sizable supply of numbers, without any demonstrable need.¹⁶ In its Comments, SBC contends that codes should be actually placed “in service” not just “activated” in the LERG.¹⁷ Thus, carriers should be required to provide NANPA with interconnection information data, as well as the MTE and certification information, before numbering resources are allocated. Several

¹² See, e.g., PUCT Comments, p. 7; North Carolina Utilities Commission Comments, p. 5; New York PUC Comments, p. 5; New Jersey Board of Public Utilities Comments, p. 2; California PUC Comments, State Outline Attachment, p. 3.

¹³ *Id.*

¹⁴ RCN Telecom Comments, p. 3; ALTS Comments, p. 7.

¹⁵ ALTS Comments, p. 7.

¹⁶ Sprint Comments, p. 2, footnote 5.

¹⁷ SBC Comments, p. 44.

state commissions endorse this approach to ensure that numbering resources are actually being used and not being stockpiled.¹⁸

In insisting that a “readiness test” is necessary to promote the appropriate and timely use of limited numbering resources, SBC is not advocating that carriers should be denied resources legitimately needed in order for them to compete. However, there must be more than just a “promise” that these assigned telephone numbers will actually be put into service in a timely fashion. Six months following the assignment of the NXX codes offers sufficient time for these codes to be activated into service.

C. A Need Must be Demonstrated Before the Assignment of Growth Codes.

SBC and certain commenters advocate that growth codes should be allocated to carriers only after the submittal of MTE data. In order to receive subsequent assignments, carriers must meet a reasonably established utilization threshold with limited exceptions permitted in specific circumstances.¹⁹ Several companies oppose adoption of a utilization threshold showing for growth codes because they allege it will restrict their ability to obtain numbering resources.²⁰

SBC agrees that the strict enforcement of utilization thresholds to obtain growth codes might unduly impact service providers under certain circumstances. For these reasons, SBC recommends limited exceptions for certain situations, including cases involving specific customer requests or state regulatory requirements which necessitate the allocation of additional number resources.

¹⁸ See, e.g., California PUC Comments, State Outline Attachment, p. 3; PUCT Comments, p. 7.

¹⁹ SBC Comments, pp. 45-49; Liberty Telecom LLC Comments, p. 4; California PUC Comments, State Outline Attachment, pp. 4-5.

²⁰ RCN Comments, p. 6; AT&T Comments, p. 15; GTE Comments, p. 18; Bell Atlantic Comments, p. 9; Choice One and GST Comments, p. 5.

SBC proposed a utilization threshold of 70%, phased in over a three-year period to allow carriers ample time to increase their utilization.²¹ Some state commissions suggest that the threshold should be 80% or higher before number resources can be allocated.²² SBC strongly opposes this proposal. An 80% threshold is unreasonably high, particularly in a thousand-block number pooling environment. Moreover, an 80% threshold will not allow carriers to adequately meet customer demand while waiting for numbering resources to be allocated and will result in carriers submitting exceptions more frequently than envisioned.²³ A utilization threshold that gradually increases to 70% strikes the proper balance between meeting the needs of the carriers and improving number optimization.

Additionally there should be no differences in the percent fill rates among carrier segments as suggested by some commenters.²⁴ As certain commenters correctly note, disparate treatment between industry segments would be anti-competitive and discriminatory. Moreover, this approach would serve no optimization purpose.

In calculating the utilization percentage, certain state commissions have supported the exclusion of reserved numbers, numbers allocated to resellers and numbers in dealer numbering pools from utilization calculations.²⁵ SBC strongly disagrees with these commenters. Numbers in these categories are not available for assignment and, therefore, should be included in the utilization calculation. For example, reserved numbers are numbers set aside at a customer's request and with the customer's knowledge. These numbers are also subject to porting requirements and are not available for assignment to other customers. In a pooling environment, these numbers must be considered in

²¹ SBC Comments, pp. 46-47.

²² Ohio PSC Comments, p. 17; California PUC Comments, State Outline Attachment, p. 4.

²³ The January 27, 1999 INC Thousand-block Pooling Administrative Guidelines permits carriers to have an inventory of 9 months of numbering resources. Using unreasonably high fill rates for demonstrating need while allowing a 9-month inventory of numbering resources is unreasonable.

²⁴ Winstar Comments, p. 58; ALTS Comments, p. 12.

²⁵ California PUC Comments, State Outline Attachment, p. 5.

determining contamination of thousand blocks because the customers which have reserved the numbers can, and likely will, request their activation. For these reasons, reserved numbers should be properly included in utilization.

Numbers assigned to resellers are also unavailable for assignment and should be categorized as such. Resellers initiate requests for numbers to provide service to their customers. If a reseller requests an entire thousand-block from a service provider, the service provider has no alternative but to fulfill the request. These numbers are no longer available for assignment by the code holder and should be treated as such. It is unreasonable on this basis for a service provider to report that the thousand-block is not being utilized and fail a utilization threshold test. The numbers are assigned and unavailable for future assignment.

In relation to numbers assigned to dealer pools, in the wireless environment, oftentimes a service provider allocates to its dealers assigned numbers to be utilized on behalf of the service provider in activating customer service. In some cases, these numbers are pre-programmed into customer handsets. To avoid duplicate number assignments, the numbers provided to dealers are considered assigned numbers and are unavailable for assignment elsewhere. As such, numbers in dealer pools must be included in the utilization calculation.

In the cases of reserved numbers and numbers assigned to resellers, these numbers must be ported back to the service provider that donated the block to the thousand-block pool in order to avoid duplicate number assignment.²⁶ Numbers in dealer pools are not available for assignment to any other customer and should be reported as such. Therefore SBC urges the Commission to continue to permit the inclusion of reserve number, as well as numbers allocated to resellers and dealer numbering pools as part of the numerator in calculating utilization.

²⁶ Wireless dealer pools are not impacted by thousand block pooling until the wireless industry converts to LNP on November 24, 2002.

D. The Sale of Telephone Numbers is Not a Viable Means for Number Assignment.

The Commission's suggestion that pricing might be any effective method for efficiently allocating telephone numbers met with opposition from numerous commenters.²⁷ Only two commenters, the Public Utility Commissions of Ohio and California, present any rationale for pricing telephone numbers with the objective of decreasing carrier demand for these resources.²⁸ However, current demand is likely to be unaffected unless prices are so high as to influence market entry and distort increased competition.

It should also be noted that not even the CPUC and the Ohio Commission support market based pricing for numbers.²⁹ Although both present innovative, if ill-conceived, methods for the ostensible recovery of administrative costs, requiring carriers to pay for telephone numbers is simply not a viable long term solution for slowing the pace of area code exhaust. Competitive entry is most likely to occur in densely populated, metropolitan areas exhibiting high revenue potential and the opportunity to minimize distance sensitive costs of entry. The rewards of entering these markets are greater than those achievable in relatively sparsely inhabited areas.

Since numbers are a fundamental component in the provision of competitive telecommunications service, entrants may be willing to pay a premium in these situations to avoid refusing service to potential subscribers because of insufficient numbering resources. If entrants are required to pay prices for numbers that lower the overall expected rate of return on investment, entry in the market will be deterred, the demand for

²⁷ Some commenters cite uncertainty regarding the scope of the Commission's authority to implement market based pricing for numbering resources while others raise concerns regarding the likely effectiveness of using prices to effectively ration numbers. In addition, some argue that pricing numbers may constitute a barrier to competitive entry. Regardless of the reason given, most comments oppose the application of prices to telephone number allocation.

²⁸ Ohio PUC Comments, pp. 36-40; CPUC Comments, pp. 36-43.

²⁹ CPUC Comments, p. 37; Ohio PUC Comments, p. 37-38.

numbers may decline, and the pace of area code relief might be effected. But such an approach is clearly not competitively neutral.

Requiring carriers to pay for telephone numbers alone will not significantly alter demand patterns. The “top markets” will continue to receive the greater share of numbers in comparison to slower growth markets, despite the imposition of pricing. Moreover, if the price of numbers is to be recovered as a production cost in service prices, retail prices to end users will rise. For these reasons, the Commission should heed the overwhelming majority of comments and reject the sale of telephone numbers to carriers.

III. Unused Numbering Resources Should Be Reclaimed.

Although there is some disagreement *when* unused codes should be reclaimed from a service provider, most parties agree that unused numbering resources should be reclaimed and NANPA should be the sole party authorized to reclaim them.³⁰ SBC believes that NANPA currently has the authority to reclaim unused NXX codes, but supports other parties’ suggestions that modifications to the guidelines are necessary to strengthen the code reclamation process.³¹ SBC and other parties also support the Commission’s proposal that codes be returned to the NANPA within 60 days after the activation deadline.³²

Certain state commissions³³ recommend that the Commission delegate authority to the states to reclaim unused resources. However, to ensure a uniform, national number administration structure, the NANPA must be the only entity delegated the authority to administer the numbering guidelines. SBC encourages the states to consult and assist the

³⁰ Missouri PSC Comments, p. 3; North Carolina Comments, p. 9; New York Comments, p. 8; Liberty Telecom LLC Comments, p. 3; Ameritech Comments, p. 27.

³¹ California PUC Comments, State Outline Attachment, p. 9; GTE Comments, p. 31; MediaOne Comments, p. 15.

³² SBC Comments, p. 65; New Jersey Board of Public Utilities Comments, p. 5; Connecticut DPUC Comments, p. 6; North Carolina Utilities Commission Comments, p. 10; California PUC Comments, State Outline Attachment, p. 7.

³³ Minnesota PSC Comments, p. 9; Missouri PSC Comments, p. 3; Connecticut DPUC Comments, p. 7.

NANPA to the extent possible regarding the reclamation of unused resources in accordance with Section 6.3.3 of the Central Office Code Guidelines.³⁴

IV. Random and For-Cause Audits are Warranted.

Most parties agree that a cost-effective audit and enforcement program should be instituted to ensure that carriers report accurate information to the NANPA.³⁵ Audits are effective to ensure that all carriers comply with the Commission's guidelines and industry standards. However, adopting all of the audit types suggested by some of the commenting parties³⁶ would create unnecessary costs with little additional benefit. SBC believes that random audits alone will encourage carriers to comply with the industry standards because of the ever-present risk of being audited. SBC and several other commenters agree that random and "for-cause" audits will ensure compliance at a reasonable cost.³⁷ The NANC at its August 1999 meeting also endorsed this position and found no need for regularly scheduled audits. Adopting regularly scheduled audits for the entire industry would be unnecessary and prohibitively expensive. Random and for-cause audits, coupled with the requirement that all carriers report their utilization and forecast data semi-annually to the NANPA would undercut the ability to build and carry a large inventory of unneeded NXX codes or thousand blocks. SBC urges the Commission to adopt procedures limiting audits on a random and for-cause basis.

³⁴ INC Central Office Code Guidelines, INC 95-0407-008.

³⁵ See, e.g., Voicestream Wireless Comments, p. 17; Cox Communications Comments, p. 27; MediaOne Comments, p. 19; Nextel Comments, p. 22.

³⁶ PUCT Comments, p. 13; Ohio PSC Comments, p. 22; MediaOne Comments, p. 19; North Carolina Utilities Commission Comments, p. 7; California PUC Comments, State Outline Attachment, p. 7.

³⁷ SBC Comments, p. 57-58; Bell Atlantic Comments, p. 12; NextLink Comments, p. 20; USTA Comments, p. 6; GTE Comments, p. 26.

V. There is a Lack of Support for the Submission of Utilization and Forecast Data on a Quarterly Basis.

SBC and a majority of the commenters³⁸ agree that the semi-annual collection and submission of utilization and forecast data sufficiently monitors number usage and provides for expedient action with regard to area code relief. Additionally, for forecasting and utilization data to be of any value, NANPA, the industry and other affected parties must have adequate time to review and analyze the data. If the data is reported quarterly as proposed by the Commission, the analysis of previously submitted data will not be completed before additional data is produced.

Those commenters who support the collection of utilization and forecast data on a quarterly basis provide no evidence to suggest that quarterly data is necessary or appropriate, rather, they suggest that the current process of collecting data on an annual basis is insufficient.³⁹ One commentator believes that new entrants enter the market “quarterly,”⁴⁰ apparently suggesting this fact supports the need for quarterly data. The Commission should remember that there is near unanimity among all commenters, that before any provider is assigned numbering resources, the service provider must have submitted a forecast to the NANPA. Quarterly data submissions would dramatically add to industry costs with no discernible benefit. Forecast and utilization data are critical but the Commission’s focus should be on enforcing the submittal of quality data, rather than the frequency of reporting. Therefore, the FCC should adopt the recommendation of the NANC regarding reporting requirements and structure.⁴¹ The NANC’s recommendation represents a sound and cost-effective solution to the current shortcomings of the current reporting process.

³⁸ See, e.g. AT&T Comments, p. 18; MCI Comments, p. 40; Bell Atlantic Comments, p. 10; BellSouth Comments, p. 14.

³⁹ New Jersey Commission Comments, p. 3; California PUC Comments, p. 14.

⁴⁰ California PUC Comments, p. 14.

⁴¹ Correspondence from Ronald J. Binz, Co-Chairman of NANC to Yog R. Varma, Deputy Chief of the Common Carrier Bureau, dated June 30, 1999.

VI. A Restricted Definition of Sequential Number Assignment (SNA) Should Be Adopted.

In its Comments, SBC supported a concept of SNA with defined characteristics.⁴² While Sprint and AT&T oppose the mandatory consecutive assignment of telephone numbers,⁴³ they support a thousand block number management process which includes many of the characteristics recommended by SBC. For example, AT&T⁴⁴ agrees with SBC that a *requirement* that code holders must consecutively assign numbers is inappropriate. The thousand block management/number assignment process (TBM) proposed by AT&T and Sprint in many ways reflects SBC's recommendation to set aside uncontaminated thousand blocks.

SBC supports a requirement that all service providers implement a nationally defined TBM program in local number portability (LNP) capable switches serving the Top 100 MSAs. TBM, as defined in this context, will be terminated once pooling is deployed within a MSA. As Sprint recognizes in its Comments once pooling is implemented, carriers must manage and assign numbers in thousand blocks.⁴⁵

VII. The Limited Focused Deployment of Thousand Block Number Pooling (TBNP) is Justified.

Commenters generally agree that the Commission should adopt some form of thousand block number pooling (TBNP). SBC and other parties advocate a limited deployment of TBNP,⁴⁶ while some of the state commissions⁴⁷ recommend that TBNP

⁴² SBC Comments, p. 86.

⁴³ Sprint Comments, pp. 19-20; AT&T Comments, p. 52.

⁴⁴ AT&T Comments, p. 52.

⁴⁵ Sprint Comments, p. 19.

⁴⁶ SBC Comments, pp. 68-75; GTE Comments, p. 40; AT&T Comments, p. 43; Ameritech Comments, p. 38; US West Comments, p. 21.

⁴⁷ California PUC Comments, State Outline Attachment, p. 11.

should be permitted in any LNP capable rate area at the discretion of the state.⁴⁸ Still other commenters advocate giving the state commissions interim authority to implement TBNP trials.⁴⁹

SBC appreciates the state commissions' frustration relating to area code relief and recognizes their impatience in waiting for national number conservation measures. However, SBC and other parties urge the Commission to resist granting the states' interim TBNP authority, allowing the industry to focus its attention on the timely deployment of cost-effective national number conservation measures.⁵⁰

Some states appear to be delaying NPA relief decisions in hopes that number pooling will eliminate any need for additional measures.⁵¹ For example, the CPUC noted in its Comments that recent events bring into question whether states need to implement relief plans at all.⁵² This position concerns SBC and the other industry members. As Sprint points out in its Comments,⁵³ despite the Commission's reminder to the states that number conservation is not a substitute for timely area code relief, state commissions

⁴⁸ The California PUC argues the Commission should order nationwide deployment of LNP LRN technology in order to provide the infrastructure to support number conservation. To revisit the schedule for the implementation of LNP at this late date would not only strain LEC resources, it would also require the reopening of issues relating to LNP cost recovery, previously resolved by the Commission. Moreover, even if the California PUC's proposal were adopted, not every LNP capable switch can support thousand block number pooling. As SBC stated in its Comments, 1AESS switches cannot be included in TBNP because Lucent does not plan to develop any software for these switches which would enable this capability. SBC Comments, pp. 79-80.

⁴⁹ New Hampshire Office of Consumer Advocates Comments, p. 1.

⁵⁰ USTA Comments, p. 15; NextLink Comments, p. 10; Sprint Comments, p. 18-19; US West Comments, p. 16-17.

⁵¹ SBC is compelled to respond to the unfounded allegation levied by the PUCT that the industry intentionally thwarted its efforts to implement a number pooling trial in the 817 NPA. After careful review, NANPA found that CLECs had submitted most of the code requests. NANPA concluded that these code requests were merely a footprint expansion endeavor by the CLECs. The PUCT fails to provide *any* evidence in support of its allegations and indeed, there is no evidence of such a "conspiracy."

⁵² California PUC Comments, p. 43.

⁵³ Sprint Comments, p. 24.

continue to look for ways to avoid providing this relief. TBNP is a number conservation measure and is not an acceptable means to avoid dealing with the unpleasant task of ordering NPA relief measures when they are needed.

VIII. TBNP “Trials” Are of No Discernable Benefit.

The Commission should deny requests for additional TBNP “trials.” To grant such requests would jeopardize the national pooling standard, requiring the industry to unnecessarily expend financial and personnel resources on state pooling trials. Additionally, SBC submits that the industry and many of its vendors have already begun negotiating systems requirements and costs for deploying the national number pooling solution. Current estimates are that the national pooling solution can be implemented within 12-15 months.⁵⁴ Deployment of each pooling trial could require 9-12 months, with limits on the number of trials that can be supported by the industry.⁵⁵ There is no reason to believe that such trials are cost effective or of any defensible benefit. Furthermore, until Efficient Data Representation (EDR) is available, any ordered trials would reduce capacity within the LNP infrastructure, with possible adverse results. SBC estimates that it can pool, on a trial basis, only two or three NPAs per region for no longer than a year before its Signal Transfer Points (STPs) reach their capacity limitations. Additionally, it is not known whether Lockheed Martin has the resources or capacity to manage several state trials.⁵⁶ SBC agrees with the commenters that recognize TBNP trials would only frustrate the industry’s ability to deploy a national TBNP standard. SBC estimates that any attempt

⁵⁴ SBC Comments, p. 83.

⁵⁵ AT&T estimates it only has the capacity of supporting 8 NPAs associated with pooling trials nationally. Five of these are already allocated to Illinois, leaving only three more trials it can support. See, Comments of AT&T Corp., *In the Matter of the California Public Utilities Commission’s Petition for Additional Authority to Implement Number Conservation Measures*, File No. NSD-L-98-136, p. 5.

⁵⁶ SBC expects that any cost incurred to implement ordered number pooling trials will be included in industry’s allowable cost recovery.

to implement state pooling trials, concurrent with deploying the national standard, will delay the national pooling architecture by as much as an additional 9 months.

IX. TBNP Should Be Employed on a Limited, Focused and Cost-Effective Basis.

A. TBNP Should Be Considered Only in the Top 100 MSAs Using a Utilization Threshold

With regard to the national TBNP standard, SBC and other commenters advocate that TBNP should be deployed only in the largest 100 MSAs, where the demand for numbering resources is highest and where LNP already exists.⁵⁷ As the Commission correctly points out in its Notice, local competition and the current method of allocating numbering resources are major contributors to the numbering crisis today. This situation is most prevalent in the top 100 MSAs. Clearly the benefits of TBNP will be more significant in areas where a substantial number of carriers provide service. Additionally, allowing state commissions to implement TBNP in NPAs nearing exhaust will not prevent this exhaust and only will delay the implementation of pooling in NPAs where benefits can be fully realized. Therefore, SBC urges the Commission to limit TBNP to the top 100 MSAs where NPAs are projected to exhaust no sooner than twenty-four months after the Commission's final Order in this proceeding. Moreover, TBNP must be shown to extend the life of the NPA for at least an additional three to five years.⁵⁸ If the NPA fails to meet this criteria, the NANPA must initiate the necessary NPA relief planning process.

Additionally, the Commission should establish a utilization threshold to determine which carriers should participate in TBNP.⁵⁹ Carriers with low utilization are more likely to require fewer numbers at one time, and therefore might efficiently use numbers in blocks of one thousand, instead of complete NXX codes. In addition, service providers with low utilization will have the majority of uncontaminated blocks to be contributed to

⁵⁷ SBC Comments, p. 75; ALTS Comments, p. 23; US West Comments, p. 20; USTA Comments, p. 8-9.

⁵⁸ GTE suggests that five years should be the threshold. GTE Comments, p. 40.

⁵⁹ SBC Comments, pp. 70-74.

rate center number pools. Conversely, carriers with comparatively high utilization are more likely to demand a greater number of thousand number blocks to meet their requirements. Moreover, they will have fewer uncontaminated blocks to contribute to the rate center number pool establishment. In summary, carriers with high utilization would supply less, and demand more, from number pooling participation.

B. TBNP Should Be Implemented on a Reasonable Rollout Basis.

SBC and other commenters⁶⁰ also advocate a controlled rollout of TBNP to allow the industry and Lockheed Martin sufficient time to test the number pooling administration systems, the operational support systems and the enhancements to the Number Portability Administration Center (NPAC) system. SBC recommends that the deployment of TBNP for the first quarter be at a rate of one NPA for each NPAC region and for subsequent quarters, require no more than two NPAs for each NPAC region. This conversion schedule would provide for the conversion of 49 NPAs within the first year of adoption and could potentially extend the lives of NPAs meeting the above pooling requirements.

With regard to the wireless industry's deployment of TBNP, SBC agrees with observations made at the July 1999 NANC meeting⁶¹ that the wireless industry should not be required to participate in TBNP prior to its implementation of LNP. Moreover, the deployment of TBNP by the wireless industry prior to this date would provide no discernable benefits. The complications posed by a deployment of number pooling before the availability of wireless number portability are so complex as to render the participation in pooling virtually meaningless at this point. The earliest the wireless industry can feasibly deploy this measure is early 2003.

⁶⁰ AT&T recommends a single NPA should be tested over a two month period to ensure for proper testing of the NPAC and other systems. AT&T Comments, p. 44. MCI also recommends that testing be conducted in an NPA followed by a limited rollout of two NPAs each month. MCI Comments, p. 13.

⁶¹ See NANC Meeting Minutes, dated July 20-21, 1999.

C. A Contamination Threshold of No More Than 10% Should Be Adopted.

SBC supports commenters recommending that a 10% threshold contamination level be adopted by the Commission as a reasonable target, which would neither harm or unduly benefit any particular industry segment.⁶² The 10% contamination level is consistent with the INC recommendation and therefore, represents the industry consensus as to an appropriate and reasonable threshold level. The Commission should not adopt a block contamination threshold above 10%. To do so would cause an increase in the number of ported transactions required to port assigned numbers back to the service providers donating the blocks. This action would unnecessarily strain the capacity requirements of Signal Transfer Point and Signal Control Points, as well as increase associated costs. It could also cause potential customer service disruptions.

X. Cost Recovery Principles Must Be Defined in an Expedient Manner.

TBNP deployment should not occur until the Commission adopts a cost recovery mechanism which permits carriers to fully recover their costs associated with the deployment. TBNP and other proposed administrative procedures will be extremely expensive to implement. AT&T has suggested that the industry begin deployment of these measures in advance of the adoption of a cost recovery mechanism, claiming that local number portability was effectively handled in this measure.⁶³ SBC strongly disagrees. The adoption of clear and unequivocal cost recovery precepts in advance of cost expenditures is essential, otherwise carriers will again be operating blind, with no guidance as to which of their costs will be recoverable and to what extent.

XI. Overlays and 10-Digit Dialing are Appropriate Measures to Address Area Code Exhaust.

⁶² New York PSC Comments, p. 11; Ameritech Comments, p. 45.

⁶³ AT&T Comments, p. 54.

A. Overlays Are Justified in the Top 100 MSAs and in Areas Where Geographic Splits have Been Ineffective or Predictably Will Be Ineffective.

Certain commenters⁶⁴ have suggested that overlays do not facilitate number optimization. For example, Cox Communications argues that area code relief can have little or no effect on the efficiency with which numbers are used.⁶⁵ This conclusion is incorrect. Overlays provide the most optimal use of the key numbering component of the NANP-the NPA resource.

SBC recommends in its Comments that overlays be presumed by the Commission as appropriate in the Top 100 MSAs and in areas where geographic splits have failed, or predictably will fail, to provide sufficient relief. From a number administration perspective, overlays are the most efficient and effective NPA relief remedy. In contrast, by their very nature, NPA splits inefficiently use the NPA resource. A split provides relief for a lesser period of time than that provided to the same area by an overlay. This is an irrefutable fact.⁶⁶

B. Mandatory 10-Digit Dialing is Advisable.

SBC supports those commenters favoring the migration to mandatory 10-digit dialing on a nationwide basis.⁶⁷ Millions of customers currently dial 10 digits for local calls. Moreover, it has been SBC's experience in the overlays implemented within its region that customers adapt very quickly to the change from 7-digit to 10-digit dialing. Both the Colorado Commission and the PUCT in their Comments note that in situations where mandatory 10-digit dialing and overlays have been implemented, customer problems were minimal. However, SBC does recognize that state commissions are faced with protests alleging that 10-digit dialing will pose a major inconvenience for customers.

⁶⁴ See, e.g., ALTS Comments, p. 28; Cox Communications Comments, p. 24.

⁶⁵ Cox Communications Comments, p. 24.

⁶⁶ SBC Comments, p. 98.

⁶⁷ See, e.g., Colorado PSC Comments, p. 12; Liberty Telecom Comments, p. 3; US West Comments, p. 13; BellSouth Comment, p. 17.

Because of these protests, timely area code relief in some areas has been delayed. For this reason, SBC encourages the Commission to liberally grant temporary waivers of the mandatory 10-digit dialing requirement.

C. Technology Specific Overlays Will Not Impact NPA Exhaustion.

Several state commissions recommend that the Commission permit technology specific overlays (TSO).⁶⁸ The Commission should continue to reject these requests, which are unsupported by any factual evidence. Actual (publicly available) data shows the wireless industry uses its numbers very efficiently, allowing the industry's high growth to be accommodated with relatively few NXX assignments. Therefore, contrary to the opinions of the TSO proponents, the wireless industry's numbering demands are not a primary cause of NPA exhaust and therefore, technology specific overlays are unwarranted.

That the wireless industry is not a primary contributor to NPA exhaust is demonstrated by data comparing the monthly number of NXX assignments made to the wireless industry on an NPA basis in the two most populous states in the country. The tables below contain data relating to the NXX assignments made to the entire wireless industry (cellular, PCS, and paging) over the past 19 months in the states of Texas and California – two states which arguably are experiencing some of the highest wireless demand. During this period, the average number of NXXs per month assigned to the

entire wireless industry has been less than 2 NXXs per NPA. On average, none of the

⁶⁸ See, e.g. Colorado PUC Comments, p. 13; North Carolina Utilities Comments, p. 19; New York Commission Comments, p. 20; Connecticut PUC Comments, pp. 9-10; California PUC, pp. 46-50.

NPAs in either of the two states assigned more than 4 NXXs per month to the wireless industry.

California Wireless NXX Assignments

Year	Cellular/PCS	Paging	Total NPAs	NXXs per NPA–Monthly Average
1998	373	220	593 23	2.15
1999 (thru July)	231	92	323 27	1.71

Texas Wireless NXX Assignments

Year	Cellular/PCS	Paging	Total NPAs	NXXs per NPA–Monthly Average
1998	177	43	220 15	1.22
1999 (thru July)	204	45	249 18	1.98

Clearly, the adoption of TSOs will have no discernible impact on delaying area code exhausts. If, on average, the entire wireless industry is being assigned NXXs at the rate of less than two per month per NPA, no delay in NPA exhaust will occur since the two NXXs being “saved” each month will certainly be assigned to wireline carriers in that same month. In fact, a prospective TSO, while doing nothing in the way of delaying NPA exhaust, will actually worsen the North American Numbering Plan (NANP) exhaust situation. This is because two NPAs must be assigned at roughly the same time (the TSO and a relief NPA for the exhausting NPA) instead of just one (relief for the exhausting NPA). If TSOs are widely deployed, this could cause the NANP to exhaust much sooner than anticipated.

The other type of TSO, the TSO with the mandatory take-back of all wireless telephone numbers in the particular NPA, is unreasonably discriminatory to the wireless industry and its customers, has little impact on delaying NPA exhaust, and also worsens the NANP exhaust situation. For example, in California and Texas, the average number of

existing wireless NXXs in each NPA is about 100 NXXs. Assuming a 75% utilization rate, approximately 750,000 wireless subscribers (in each area code) would be required to change their telephone numbers. At an absolute minimum, 12 months would be required to educate the existing customer base and perform the manual reprogramming. Costs as high as \$50.00 per customer for this re-programming effort have been cited in other proceedings, resulting in expenditures of \$30-\$40 million per NPA for the wireless industry. The end result would be, on average, the recovery of only 100 NXXs – which would typically delay NPA exhaust only a matter of several months. In California, where the monthly state-wide pent-up NXX demand equals a full NPA, the implementation of a TSO with mandatory take-back would delay NPA exhaust only 2-3 months in most cases. Additionally, if widely implemented, this type of TSO would also have the effect of significantly worsening the NANP exhaust situation, since two NPA assignments would be required (within months of each other) as opposed to only one.

Finally, the Commission must keep in mind that the implementation of either type of TSO will have the effect of prohibiting the benefits of wireless LNP, currently scheduled for November 24, 2002. For example, if a TSO were implemented in 2000 or 2001, and the cellular/PCS industry deploys LNP in November 2002, no wireline customer could move their service to a wireless provider and be able to keep their telephone number (or vice-versa) because a mandated segregation of wireless numbers and wireline numbers had been established via the TSO. This means that no wireline numbers are allowed in the wireless-only NPA and no wireless numbers are allowed in the de-facto wireline-only NPA. This would negate the entire premise of why LNP would ultimately be required – to allow all customers to change their service provider and be able to retain their telephone number.

In conclusion, the Commission need not reconsider their earlier prohibitions on the implementations of TSOs. They continue to be unreasonably discriminatory, do little or

nothing to delay NPA exhausts, worsen the NANP exhaust situation, and prohibit the full benefits of LNP.

XII. Certain Identified Administrative Guidelines Should Be Codified.

Several commenters agree that the Commission should in some fashion ensure that industry guidelines are followed not only by members of the industry, but also by state commissions.⁶⁹ At a minimum, the Commission must strongly endorse existing industry guidelines and instruct state commissions and industry members to comply with these guidelines. While the Commission itself need not become involved in the day-to-day operation of numbering administration, it must recognize that industry group guidelines must be uniformly and consistently applied if the nondiscriminatory and equitable intent of its national numbering policy is to be achieved. Because the fluid nature of these guidelines is an essential quality of their effectiveness, not all of these guidelines should be codified. However, SBC has endorsed above the inclusion of certain of these guidelines as part of the Commission's regulations. Among these precepts, SBC encourages the Commission to adopt mandatory, semi-annual reporting of forecast and utilization data, uniform number definitions as defined by INC, and a required showing of need prior to the allocation of initial and growth codes.

XIII. Unassigned Number Porting (UNP) Should Not Be Permitted, Even on a Voluntary Basis.

UNP in any form is clearly number administration. It is for this reason that SBC and other commenters⁷⁰ oppose its adoption. UNP if implemented in accordance with MCI's proposal⁷¹ would result in multiple carriers being required to serve as number

⁶⁹ See, e.g., AT&T Comments, p. 10; Primeco Comments, p. 12; ALTS Comments, p. 4; MCI Comments, p. 45.

⁷⁰ Ameritech Comments, p. 47; GTE Comments, p. 39; Bell Atlantic Comments, p. 22; Ohio PUC Comments, p. 31.

⁷¹ MCI Comments, p. 19.

administrators, a consequence contrary to the Commission's express purpose.⁷² Nor is it likely that even MCI would consider these carriers to be "impartial" number administrators as required by the Commission and the Telecommunications Act, simply by virtue of the fact that these carriers compete with other service providers in the same market. Adoption of UNP as MCI envisions would effectively eliminate the consolidation of number administration activities.

In addition, MCI's recommendation that UNP be implemented on a "phased in" approach⁷³ is patently infeasible. MCI acknowledges that Phase I of its implementation schedule would require manual processes. However, it never explains how a provider can assign these numbers manually or how administrative issues could be handled. MCI's objective in proposing this approach is not to conserve numbering resources as claimed but rather to apparently develop a means by which it can obtain the numbering resources of its competitors.

There are numerous issues associated with UNP that state commissions and MCI have not considered in their advocacy. Predictably, UNP will adversely impact the underlying LNP architecture. Moreover, since UNP allows for individual telephone numbers to be transferred from one provider to another, the benefits derived from Efficient Data Representation (EDR) will be drastically reduced.⁷⁴ The coordination of UNP with number portability guidelines already in place would also need to be resolved. UNP will certainly create disputes between carriers relating to which UNP numbers are

⁷² Report and Order, *In the Matter of Administration of the North American Numbering Plan*, CC Docket No. 92-237, 11 FCC Rcd 2588 (1995).

⁷³ MCI Comments, p. 19.

⁷⁴ The industry developed EDR to alleviate problems caused by porting high volumes of consecutive ranges of telephone numbers. Under EDR, pooling of thousand blocks would allow 1,000 consecutive numbers to be compressed into a single record and stored in the STPs/SCPs. This record storage architecture is designed to increase the storage capacity of the STPs/SCPs. UNP would require an additional exception record to be established for each unassigned number ported and undermine the storage efficiencies inherent in EDR.

available for assignment. In addition, UNP will dramatically impact a carrier's ability to properly forecast its future NXX and thousand block needs. It will also increase the number of contaminated thousand blocks which will be unavailable to donate to a rate center thousand block pool.

While voluntary UNP seems feasible on the surface and is supported by several commenters,⁷⁵ the issues identified above still pertain. For these reasons, the Commission should not adopt a UNP policy, even on a voluntary basis, without a complete analysis of its impact on the industry and its merits as a number conservation measure.

XIV. Individual Number Pooling Should Not Be Adopted.

The industry overwhelmingly supports the Commission's tentative conclusion that individual telephone number pooling (ITN) should not be implemented at this time.⁷⁶ SBC submits that the architecture to support ITN has not been adequately defined and, therefore, cannot be implemented within three years as suggested by certain state commissions.⁷⁷ At least one state commission acknowledges the complexity of attempting to deploy a ITN architecture and suggests that it will take at least four to five years to implement.⁷⁸ The commenters which suggest that ITN should be implemented within a few years⁷⁹ do not understand the infrastructure that will be required to allocate individual unassigned numbers for the entire industry. The STP/SCPs and other network and software components are not capable of handling the millions of individual records that will be stored with ITN. Proposing implementation of ITN architecture without fully knowing its impact on the LRN infrastructure is premature and dangerous.

⁷⁵ MCI Comments, p. 17; Cox Comments, p. 7.

⁷⁶ Bell Atlantic Comments, p. 32; MCI Comments, p. 16; Airtouch Comments, p. 11; AT&T Comments, p. 40; US West Comments, p. 17-18.

⁷⁷ *See, e.g.*, Ohio PUC Comments, p. 31.

⁷⁸ Colorado PUC Comments, p. 4.

⁷⁹ *See, e.g.*, Cox Comments, p. 13; CPUC Comments, p. 29.

XV. “D” Digit Expansion is Unwarranted at this Time.

On the issue of “D” digit expansion, there is no support by commenters to open the “D” digit at this time. Commenters agree that now is not the time to deal with this issue and the matter merits further study.⁸⁰ Based on the record, the Commission should not pursue “D” digit expansion at this time.

XVI. SWBT as “Industry” NPA Relief Implementation Coordinator.

The PUCT independently raises the issue in its Comments as to the role Southwestern Bell Telephone Company (SWBT) should play in the future with relation to code administration.⁸¹ SWBT on a transition basis is performing code administration responsibilities within the state of Texas. Serving in this capacity, SWBT in the past coordinated industry implementation of all ordered relief projects within the state. These responsibilities included conducting monthly implementation meetings/calls, coordinating industry customer education plans related to relief projects, filing monthly reports with the PUCT and industry members concerning details associated with the relief implementation, and answering media requests. Consistent with the NPA Relief Plan procedure agreed to with LM-NANPA, SWBT will coordinate the industry implementation project through completion. SWBT is still operating in this capacity within the 512 NPA in Texas.

However, upon completion of this relief implementation, in October 1999, SWBT will no longer have any industry code administration responsibilities in Texas.⁸² This responsibility is then transferred to Lockheed Martin. It appears to be the position of the Texas PUC that if it fails to receive a satisfactory response from Lockheed Martin it should be permitted to enlist the services of SWBT. SWBT has no desire to again assume

⁸⁰ North Carolina Utilities Commission Comments, p. 11; MCI Comments, p. 29-30; SBC Comments, p. 106; GTE Comments, p. 37; California PUC Comments, p. 25.

⁸¹ PUCT Comments, p. 36.

⁸² Similar implementation coordination work is being performed by SWBT in conjunction with the 314/636 area codes in Missouri and the elimination of the 816 code in Missouri and the 913 code in Kansas. These projects will be completed in early 2000.

the industry coordination role relating to number administration responsibilities. Therefore it requests the Commission reaffirm that once the number administration responsibility is transferred to Lockheed Martin, Lockheed Martin is solely responsible for these activities and the state commission cannot reassign this responsibility to a carrier.

XVII. Conclusion

On one point most of the commenters overwhelmingly agree – the Commission must adopt new national procedures to improve number resource optimization and adopt a cost-effective means to address the high demand for numbering resources. SBC and other commenters agree that these policies must focus on the root cause of premature code exhaustion which is the inefficient assignment of numbering resources to multiple carriers in the same geographic area without any demonstration of need. In addressing this problem, the Commission should adopt the following principles: (1) requests for initial and growth codes must be properly supported; (2) service providers must submit forecast and utilization data to the NANPA on a semi-annual basis; (3) unused numbers should be reclaimed within 60 days after six-month code activation period has expired; (4) a cost-effective audit program should be adopted; (5) a limited, focused implementation of thousand block pooling should be considered for carriers which fail to meet a reasonable utilization standard; (6) a policy favoring overlays in the top 100 MSAs, with the possible elimination of the 10-digit dialing requirement, should be adopted and; (7) cost recovery rules should be established in advance of the implementation of number optimization measures. In addition, the Commission should maintain its current position on technology specific overlays and reject the concept of telephone number pricing.

Respectfully submitted,

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August 30, 1999

CERTIFICATE OF SERVICE

On this 30th day of August 1999, I, Katie Turner, hereby certify that the Reply Comments of SBC Communications Inc. in CC Docket 99-200 have been served upon the parties listed in the Service List attached to the Reply Comments of SBC Communications Inc.

/s/ Katie Turner

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