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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
 Numbering Resource Optimization)
)
 Connecticut Department of Public Utility Control)
 Petition for Rulemaking to Amend the Commission's)
 Rule Prohibiting Technology-Specific or)
 Service-Specific Area Code Overlays)
)
 Massachusetts Department of Telecommunications)
 and Energy Petition for Waiver to Implement a)
 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 Technology-Specific or Service-Specific)
 Area Code)

CC Docket No. 99-200

RM No. 9258

NSD File No. L-99-17

NSD File No. L-99-36

REPLY COMMENTS OF CENTURYTEL, INC.

CenturyTel, Inc. ("CenturyTel")¹ hereby submits its reply to opening comments filed in response to the *Notice of Proposed Rulemaking* ("*Notice*") in the above-captioned proceeding.²

The *Notice* seeks comment on a variety of measures to increase the efficiency with which

¹ CenturyTel provides integrated communications services including local exchange, wireless, long distance, Internet access and security monitoring services to more than two million customers in 21 states. The company, headquartered in Monroe, Louisiana, is publicly traded on the New York Stock Exchange under the symbol CTL. CenturyTel is the 9th largest local exchange telephone company, based on access lines, and the 10th largest cellular company, based on population equivalents owned, in the United States.

² Numbering Resource Optimization, *Notice of Proposed Rulemaking*, FCC 99-122 (June 2, 1999).

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telecommunications carriers use telephone numbering resources. As detailed below, CenturyTel joins the majority of industry participants in supporting prompt implementation of ten-digit dialing nationwide as an effective number optimization measure. However, at this time, the Commission should not mandate blanket rate center consolidation or number pooling as the potential benefits of these options may not outweigh their costs in all areas. CenturyTel submits that Wireless Extended Local Calling Areas would be far simpler, more immediate and less costly than these two alternatives.

I. THE COMMISSION SHOULD ADOPT TEN-DIGIT DIALING NATIONWIDE

The wireline and wireless carriers who commented on the *Notice* were virtually unanimous in their support for nationwide implementation of ten-digit dialing for all calls.³ CenturyTel joins those commenters in urging the Commission to act promptly to mandate ten-digit dialing as the standard throughout the United States.

As detailed in the record, ten-digit dialing advances number optimization goals by reclaiming protected codes and permitting potential expanded use of the "D digit."⁴ It also

³ See, e.g., Comments of AirTouch Communications, Inc. ("AirTouch") at 8-10; Comments of Bell Atlantic at 20-21; Comments of BellSouth Corporation at 15-17; Comments of Cincinnati Bell Telephone Company ("CBT") at 14-15; Comments of Liberty Telecom LLC at 3; Comments of Nextel Communications, Inc. at 23-24; Comments of Organization for the Protection and Advancement of Small Telecommunications Companies ("OPASTCO") at 6; Comments of The Personal Communications Industry Association ("PCIA") at 21; Comments of PrimeCo Personal Communications, L.P. at 6-7; Comments of U S WEST Communications, Inc. at 12-16; Comments of Winstar Communications, Inc. ("Winstar") at 15-20.

⁴ CenturyTel submits that D-digit expansion requires more analysis and should not be implemented at this time.

eliminates competitive inequities inherent in area code overlays, thus reducing disincentives to use that number optimization technique. Moreover, in contrast to other number conservation measures, ten-digit dialing can be implemented quickly without costly technical upgrades. As noted by GTE:

once a carrier has implemented an overlay in one region in which it operates, it will have already completed the modifications to its operating systems necessary for ten-digit dialing. While changes to a carrier's databases and announcement systems are required, the impact is not any greater than would be required for an area code split.⁵

CenturyTel believes that concerns of customer disruption resulting from implementation of ten-digit dialing have been vastly overstated.⁶ Consumers are already accustomed to dialing ten digits for long distance and toll calls. Those who use carrier access codes and/or billing codes are used to dialing far more digits. Customers in overlay areas already dial ten digits for all of their calls. With an appropriate consumer education program, few consumer complaints should be anticipated.⁷

⁵ Comments of GTE at 36.

⁶ On July 11, 1999, CenturyTel began implementing an overlay in Oregon, where 503 is being overlaid with 971. The company is also about to begin implementing overlays in Michigan and in Texas. CenturyTel is not aware of any customer complaints as a result of this process.

⁷ CenturyTel agrees with BellSouth that the disruption to individuals and businesses for changing advertising, stationery, *etc.* to reflect the ten-digit telephone number would be minimal. Comments of BellSouth at 17, n.38. Given the increasingly global nature of the economy due to enhanced forms of communications and e-commerce in particular, most business advertisements and stationery already contain area codes. Further, it would clearly be less costly for companies to make this change once, rather than repeatedly as splits and overlays are implemented.

Finally, as recognized by several commenters, mandatory ten-digit dialing is inevitable. This measure has already been implemented in approximately 25 NPAs in thirteen states and is becoming increasingly common.⁸ Prompt nationwide implementation of ten-digit dialing would extend the benefits of this number optimization technique as well as eliminate customer confusion due to inconsistencies in dialing patterns from one area to another.

II. THE COMMISSION SHOULD NOT MANDATE BLANKET RATE CENTER CONSOLIDATION

CenturyTel agrees with a number of commenters who assert that the Commission should not take any steps at this time to mandate blanket implementation of rate center consolidation, beyond ordering ten-digit dialing. As recognized in the *Notice*, rate center consolidation “brings varying levels of number conservation benefits and disruptive impact, depending on the effect on calling scopes and the complexity of the rate center geography.”⁹ As such, this number optimization measure may not be the best solution for every locale.

Indeed, particularly in rural areas, implementation of rate center consolidation could substantially disadvantage certain carriers.¹⁰ Many rural LECs are not yet SS7 capable.¹¹ They rely on rate centers in order to route and rate calls. If rate centers were consolidated, such non-

⁸ See Comments of AirTouch at 9.

⁹ *Notice* at ¶115.

¹⁰ See Comments of Winstar at 13-14.

¹¹ Currently, not all of CenturyTel’s central offices are equipped with SS7 capabilities.

SS7 carriers would have no ability to distinguish and charge for calls previously classified as toll within the consolidated area. Thus, they could experience a loss in critical revenue.

As recognized by many commenters, rate center consolidation could also adversely impact the functioning of 911 systems in some areas.¹² When automatic number identification (“ANI”) for a call fails,¹³ a 911 call is routed to a public safety answering point (“PSAP”) based upon the originating rate center of the call. However, when rate centers are consolidated, default-routed calls may not be routed to the right PSAP, resulting in critical delays in the arrival of emergency assistance. While technical fixes may be available, these expensive system upgrades have not been implemented in all areas.

Finally, implementation of rate center consolidation could create substantial customer confusion and increased rates. Consumers rely on the link between rate center and NXX code to judge the type and cost of the call they are making. In many cases, rate center consolidation would remove that link, leaving customers clueless as to the nature and cost of their calls until the bill arrives weeks later.

For these reasons, CenturyTel agrees with those commenters who assert that the final decision on rate center consolidation should be left to the states.¹⁴ Only decisionmakers familiar

¹² See, e.g., Comments of Illinois Chapter of National Emergency Number Association at 9-10; Comments of National Emergency Number Association at 5; Comments of Winstar at 14-15.

¹³ According to Winstar, ANI failure occurs in approximately 3 percent of 911 calls. Comments of Winstar at 14.

¹⁴ See, e.g., Comments of CBT at 10; Comments of Cox Communications, Inc. at 12-13; Comments of GTE at 34; Comments of New Jersey Board of Public Utilities at 5; Comments of Small Business Alliance for Fair Utility Regulation at 8.

with the unique characteristics of the area and the capabilities of the local carriers and PSAPs can best judge whether implementation of this numbering optimization method will have a beneficial impact overall.

III. THE COMMISSION SHOULD NOT MANDATE BLANKET IMPLEMENTATION OF NUMBER POOLING

The record reflects the potential benefits of number pooling as a number optimization technique. Yet, as recognized by many commenters, number pooling is simply not appropriate for all areas and all carriers.¹⁵ The Commission, accordingly, must not mandate blanket implementation of number pooling, even within the top 100 MSAs.¹⁶

In rural areas in particular, there may be no immediate threat of numbering depletion and thus no need to implement pooling at this time. Even within the top 100 MSAs, there may be markets in which pooling is not yet necessary or cost justified. If the Commission were to mandate pooling – and the Local Number Portability (“LNP”) upgrades necessary to accomplish it – carriers in these markets could face significant monetary and human resource costs. These are expenses that cost-laden rural carriers can ill afford, particularly when they are ultimately unnecessary to ensure adequate numbering resources. Indeed, as noted by OPASTCO, the

¹⁵ See, e.g., Comments of GTE at 43; Comments of United States Telephone Association at 8-9.

¹⁶ CenturyTel agrees with the many commenters opposing implementation of individual telephone number pooling and unassigned number porting. These measures are as yet unproven and carry with them significant costs and other disadvantages.

implementation of expensive LNP upgrades could very well stall the implementation of advanced services for rural subscribers.¹⁷

In addition, non-LNP-capable carriers, such as wireless carriers, should not be subject to number pooling requirements. Wireless carriers currently are not required to have LNP capabilities.¹⁸ The Commission should not mandate costly LNP upgrades by these carriers merely to accomplish pooling.¹⁹ As recognized by several commenters, wireless carriers use numbers differently from wireline carriers.²⁰ Subscriber growth and churn for wireless carriers is significantly greater than for wireline companies. Further, wireless services take numbers from fewer rate centers than wireline carriers. As such, imposing pooling requirements on wireless carriers is unlikely to result in the return of a substantial number of unused or poolable numbers.²¹ Such minimal benefits clearly do not justify accelerating costly LNP implementation

¹⁷ Comments of OPASTCO at 5.

¹⁸ The Commission has determined that broadband CMRS providers need not implement LNP capabilities until November 24, 2004. CTIA's Petition for Forbearance From Commercial Mobile Radio Service Number Portability Obligations, *Memorandum Opinion and Order*, 14 FCC Rcd 3092, 3093 (1999). Certain other wireless carriers, such as paging providers, are fully exempted from LNP requirements. Telephone Number Portability, *First Report and Order and Further Notice of Proposed Rulemaking*, 13 FCC Rcd 8352, 8433-34 (1996).

¹⁹ Not only are LNP upgrades costly in their own right, but adding pooling capabilities would require the carrier to incur substantial additional expenses. *See, e.g.*, Comments of GTE at 50.

²⁰ *See, e.g.*, Comments of GTE at 48-49; Comments of PCIA at 24-25.

²¹ CenturyTel agrees with GTE that the NANPA exhaust projections for CMRS providers significantly underestimates the numbers utilized by these carriers. Comments of GTE at 49.

or diverting wireless carriers from other system upgrades, such as those necessary to satisfy CALEA, accommodate Enhanced 911, or deploy improved services to customers.

Finally, while number pooling can provide benefits in certain areas in addressing number shortages, Omnipoint Communications, Inc. correctly notes that this technique simply “reshuffles” resources to where they are needed and does not address underlying structures that have led to the number crisis.²² Ultimate resolution of numbering scarcity will require pursuit of more longterm solutions.²³

IV. THE COMMISSION SHOULD ADVOCATE WIRELESS EXTENDED LOCAL CALLING AREAS AS A PRIMARY NUMBER OPTIMIZATION MEASURE

As CenturyTel’s subsidiary, CenturyTel Wireless, Inc., detailed in its joint comments with other cellular carriers, Wireless Extended Local Calling Areas (“WELCAs”) offer many of the benefits of rate center consolidation and number pooling without the many disadvantages cited in the *Notice* and recognized above.²⁴ For this reason, WELCAs should be promoted by the Commission as a primary number optimization technique.

WELCAs, also referred to as reverse billing arrangements, are contractual arrangements between CMRS carriers and ILECs that extend a local calling area to a fixed geographic area, often encompassing multiple landline exchange areas and rate centers. The Commission has

²² Comments of Omnipoint Communications, Inc. at 22.

²³ See discussion of ten-digit dialing at Section I, *supra*.

²⁴ See Joint Comments of Centennial Cellular Corporation, CenturyTel Wireless, Inc., Thumb Cellular Limited Partnership and Trillium Cellular Corp. (“Joint Comments”).

recognized that wireless carriers typically have larger local calling areas than wireline carriers.²⁵

WELCA arrangements take this larger service area into account, enabling “wireless carriers to use their allocation of numbers more efficiently by permitting CMRS providers to fully utilize each NXX code over a wider geographic area before seeking assignment of additional numbering resources.”²⁶ Indeed, where WELCAs are in place, wireless carriers have been able to conserve numbering resources more effectively. Significantly, WELCAs can also be implemented quickly without the substantial costs, delays and dislocations inherent in other optimization techniques.

Despite these benefits, several states have recently just stood by while LECs have eliminated WELCA arrangements in their jurisdictions.²⁷ The result is that affected wireless carriers are forced to seek additional NXX codes, thereby aggravating number scarcity. The Commission should act now not only to foreclose further elimination of existing WELCA arrangements, but also to advocate more widespread use of WELCAs as an efficient and effective number optimization measure for wireless carriers.²⁸

²⁵ *Notice* at ¶112.

²⁶ *Comments of The Cellular Telecommunications Industry Association (“CTIA”)* at 23.

²⁷ *See Joint Comments* at 6-7; *Comments of CTIA* at 24-25.

²⁸ As emphasized in the *Joint Comments*, the Commission has authority under Section 251(e) of the Communications Act to mandate the offering by ILECs of WELCA arrangements. The Commission also has jurisdiction over wireless/wireline interconnection under Section 332 to mandate the offering of WELCAs to requesting wireless carriers. *Joint Comments* at 7.

V. CONCLUSION

For the foregoing reasons, CenturyTel submits that the record supports prompt implementation of ten-digit dialing nationwide as a fast, low-cost and effective number optimization measure. In contrast, the Commission should not mandate blanket rate center consolidation and number pooling because the costs of these measures outweigh their benefits in many areas. Finally, the Commission should advocate increased use of Wireless Extended Local Calling Areas as a more easily implemented and less costly alternative.

Respectfully submitted,

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