

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

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September 3, 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 Connecticut Department of Public Utilities
Control For Delegation of Additional Authority to
Implement Area Code Conservation Measures; NSD File No.
L-99-62; DA-99-1555

Dear Secretary Salas:

The New York State Department of Public Service files this letter in support of the Connecticut Department of Public Utilities Control's (Connecticut DPUC's) request to implement various number conservation measures. The Connecticut DPUC, 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 Connecticut, to assume the responsibility of adopting efficient number utilization methods.

September 3, 1999

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 Rulemaking (Released June 2, 1999).

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

In the Matter of the Petition of Connecticut Department of
Public Utilities Control for Delegation of Additional
Authority to Implement Area Code Conservation Measures: NSD
File No. L-99-62; DA-99-1555

CERTIFICATE OF SERVICE

I, Jacquelynn R. Nash, hereby certify that an original and
four (4) copies of comments in the above-captioned proceeding
were sent via Airborne Express to Magalie Roman Salas, Secretary
of the Federal Communications Commission. In addition, a copy
was filed using the Commission's Electronic Filing System and
copies were sent by First Class Mail, postage prepaid, to all
parties on the attached service list.

Jacquelynn R. Nash

Dated: September 2, 1999
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