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WASHINGTON, D.C. 20036

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DIRECT LINE (202) 955-9788
E-MAIL: tdaubert@kelleydrye.com

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VIA HAND DELIVERY

Magalie R. Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ***Numbering Resource Optimization*** **– CC Docket No. 99-200, RM No. 9258, NSD File Nos. L-99-17 & L-99-36**

Dear Ms. Salas:

On August 30, 1999, the Personal Communications Industry Association ("PCIA") filed reply comments in the above-captioned proceeding using the Electronic Comment Filing System ("ECFS"). Confirmation of the filing is attached hereto. However, ECFS would not accept the attachments. Therefore, PCIA, by its attorneys, hereby submits a paper version of the filing, which includes the relevant attachments.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

Todd D. Daubert

cc: International Transcription Services

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Federal Communications Commission

The FCC Acknowledges Receipt of Comments From ...
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...and Thank You for Your Comments

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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 Prohibiting Technology-Specific or Service-Specific Area Code Overlays	)	RM No. 9258
	)	
Massachusetts Department of Telecommunications and Energy Petition for Waiver to Implement a Technology-Specific Overlay in the 508, 617, 781, and 987 Area Codes	)	NSD File No. L-99-17
	)	
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	)	NSD File No. L-99-36

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REPLY COMMENTS OF THE PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION

Mary McDermott
Chief of Staff and Senior Vice President
Government Relations
Robert L. Hoggarth
Senior Vice President, Paging and Messaging
Harold Salters, Director
Government Relations

PERSONAL COMMUNICATIONS
INDUSTRY ASSOCIATION
500 Montgomery Street, Suite 700
Alexandria, Virginia 22314-1561
703-739-0300

August 30, 1999

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	)	
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	)	NSD File No. L-99-36

To: The Commission

REPLY COMMENTS OF THE
PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION

The Personal Communications Industry Association ("PCIA"), by its attorneys, hereby respectfully submits its reply comments on the Commission's *Notice of Proposed Rulemaking* ("NPRM") in the above-captioned proceeding.[1]

I. INTRODUCTION AND SUMMARY

The comments in this proceeding reflect widespread industry agreement about many of the issues raised in the NPRM. PCIA urges the Commission not to underestimate the

[1] *Numbering Resource Optimization et al.*, Notice of Proposed Rulemaking, CC Docket No. 99-200, RM No. 9258, NSD File No. L-99-17 & NSD File No. L-99-36 (rel. June 2, 1999) ("NPRM").

significance of the consensus among all types of carriers, and even some states, about many of the proposed numbering optimization measures. First and foremost, carriers from every industry segment agree that the Commission must maintain federal leadership and control over numbering issues. The Commission should assert its role immediately, and take all actions necessary to articulate clear rules, methods and processes for numbering administration and optimization. Because time is of the essence, the Commission must expedite this proceeding to the greatest extent possible, giving it the highest priority and concluding it within the next 120 days.

PCIA also urges the Commission to issue an initial order mandating certain number optimization means as soon as possible, even before the Commission is able to conclude this proceeding on an expedited basis. The initial order should mandate number optimization means that enjoy widespread industry support, can be implemented easily, and will assist the Commission and the states to address immediate numbering crises while this proceeding is pending. For example, the Commission should immediately adopt the Hybrid reporting approach recommended in the NANC report. However, the Commission should not take any action at this time that will limit or restrict federal control over numbering administration or that will interfere with the development of a uniform national approach to numbering administration and optimization.

Second, there is widespread industry consensus that further rate center consolidation should be explored, particularly in areas where number pooling is being considered. The Commission has already taken the important step of delegating the authority to the states to consolidate rate centers. Now the Commission should guide the states' use of this authority by requiring state commissions to give rate center consolidation priority over less effective and more onerous forms of number optimization.

Third, the industry is almost unanimous in its opposition to technology-specific overlays. The Commission should embrace this consensus and continue to maintain its current prohibition of technology-specific overlays. As the Commission has repeatedly recognized, technology-specific overlays do not lead to the more efficient utilization of numbering resources, and they discriminate against various types of carriers and consumers. The Commission should use this proceeding to reemphasize its prohibition on technology-specific overlays, reaffirm that it will not consider requests for authority to implement technology-specific overlays under any circumstances, and clarify that states should not waste precious resources considering the potential merits of technology-specific overlays.

Fourth, the comments reflect growing industry consensus for implementation of mandatory ten-digit dialing on a nationwide basis within the next three years. Implementation of mandatory ten-digit dialing would remove the pressure to maintain seven-digit dialing, which is the largest hurdle to implementing area code relief in the form of all-service overlays and adopting the most efficient means of number optimization. Moreover, PCIA, like most carriers, believes that ten-digit dialing is inevitable in the near term, and thus the entire nation will have to learn to dial ten-digits for every call. PCIA submits that the inconveniences, the costs, and the political resistance to ten-digit dialing could all be lessened if the Commission mandates ten-digit dialing throughout the nation, at the same time.

Fifth, PCIA agrees with the idea expressed in many comments that all carriers share an equal responsibility to ensure that numbering resources are utilized efficiently. Not all carriers must, or even can, meet this burden in the same way. As such, PCIA takes no position with respect to whether number pooling should be implemented for wireline carriers. However, PCIA urges the Commission to reiterate that wireless carriers should not, and cannot, be required

to participate in number pooling, as carriers from all industry segments recognize. Nonetheless, wireless carriers should be required to continue to utilize numbers as effectively as carriers that participate in number pooling. Therefore, PCIA supports CTIA's proposal to set the minimum utilization threshold at 60% initially and to increase to 70% over time. In addition, PCIA supports allowing carriers to receive codes when they have less than this utilization rate if: (1) they can show that they will need the code within the ordering interval; and (2) certain recently acquired codes are discarded for purposes of calculating the utilization rate.

Sixth, many carriers agree that the Commission should authorize NANPA to be the sole collector of numbering data. There is a growing trend among the states to request additional information directly from carriers about their utilization of numbering resources. The burden imposed by these individual state data requests is enormous. There is also no guarantee that information provided to states will receive confidential treatment. PCIA urges the Commission to authorize NANPA to be the sole collector of numbering data, and clarify that states have no authority to request numbering utilization data from individual carriers.

Finally, PCIA concurs with the broad consensus that carriers should not be required to pay for numbering resources. Payment for numbering resources is not a valid means of number optimization or allocation. Moreover, requiring carriers to pay for numbering resources would create new entry barriers, inhibit competition, and discriminate against various classes of carriers and consumers.

II. THE COMMISSION MUST ASSUME A STRONG LEADERSHIP ROLE BY EXPEDITING THIS PROCEEDING AND ENSURING UNIFORM NATIONAL NUMBERING GUIDELINES AND ADMINISTRATION

The comments reflect widespread agreement among carriers from all industry segments about the critical need for the Commission to maintain federal leadership and control over numbering issues.[2] These carriers recognize that Commission involvement is crucial to ensuring a uniform national system of numbering administration that is efficient, economical, and non-discriminatory. PCIA urges the Commission not to lose sight of the absolute importance of a federal numbering scheme and of the primacy of the Commission's role therein. Accordingly, the Commission must take a strong leadership role in developing uniform national number optimization and administration policies, and ensuring that NANP resources are utilized efficiently.

The Commission should assert that role immediately, and take all actions necessary to articulate clear rules, methods and processes for numbering administration and optimization. Time is of the essence, as many numbering optimization measures are most effective on a prospective basis. It is much easier to prevent future causes of artificial numbering exhaust than to address past inefficiencies or reallocate currently assigned numbering resources.[3] With each passing day, new carriers enter the market, consumers request new services, and state

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2 *See, e.g.,* Ad Hoc Telecommunications Users Committee Comments at 3-4; Airtouch Comments at 2-3, 11-14; ALTS Comments at 3; Ameritech Comments at 8, 55; AT&T Comments at 5-11; Bell Atlantic Comments at 12-13; BellSouth Comments at 4-6; Choice One and GST Comments at 2-3; CTIA Comments at 6-7; GTE Comments at 29-30; Level 3 Comments at 8-10; Nextel Comments at 5-9; NEXTLINK Comments at 3-4, 12-13; MCI WorldCom Comments at 45-47; Omnipoint Comments at 2-5; PageNet Comments at 2; RCN Comments at 7-8; Sprint Comments at 6; Time Warner Comments at 4-5; US West Comments at 2-3, 6-7, 16-17; USTA Comments at 6, 14-15; Voicestream Comments at 7-8; WinStar Comments at 4-6, 21-25.

3 With each passing day that the Commission does not create additional incentives for the states to implement rate center consolidation, NPAs are being assigned unnecessarily.

commissions file petitions requesting additional authority over numbering administration. Each new carrier that enters the market under the current numbering allocation scheme represents a lost opportunity to forestall premature exhaust of NANP numbering resources, because the carrier is forced to request more NXX codes than necessary to serve consumer demand (e.g., less NXXs are necessary where rate centers have been consolidated to the greatest extent possible). Each customer that requests a new service in an area code where jeopardy has been declared either will not receive service if there are insufficient numbers to satisfy the order or will hasten the depletion of currently available numbering resources to satisfy other customer orders. Each time a state commission files a petition with the Commission requesting additional authority over numbering administration, the time and money of the Commission, the industry and the states themselves are squandered. Even worse, elimination of the root causes of artificial numbering exhaust are further delayed.

Because time is of the essence, the Commission must act now to address crucial numbering issues, expediting this proceeding to the greatest extent possible. PCIA urges the Commission to give this proceeding the highest priority and conclude it within the next 120 days. By adopting uniform national guidelines for numbering administration as soon as possible, the Commission will have taken the most important step to solving the numbering crises facing the states, the industry and consumers today.

PCIA also urges the Commission to issue an initial order mandating certain number optimization means as soon as possible, even before the Commission is able to conclude this proceeding on an expedited basis. The initial order should mandate number optimization means that enjoy widespread industry support, can be implemented easily, and will assist the Commission and the states to address immediate numbering crises while this proceeding is

pending. PCIA believes that there is no reason for the Commission to delay adoption of certain measures until its consideration of all measures is completed.

In this way, the Commission can provide relief as soon as possible while giving itself the time to consider fully the more controversial issues. By taking definitive steps at the national level to address the numbering crises immediately at hand, the Commission can ensure that carriers have sufficient numbering resources to meet consumer demand. Moreover, the Commission can stem the tide of individual state requests for additional authority, which consume the resources of the Commission and carriers, as well as the states themselves, and distract attention from developing long-term solutions to numbering questions.[4] In identifying which number optimization measures to adopt immediately, the Commission should consider what PCIA and the states believe are among the most pressing needs, including NANPA's need to determine number utilization and predict exhaust more accurately.[5]

PCIA submits that the states already have many means available to prevent numbering exhaust and implement area code relief as necessary. For example, the states already have the authority to consolidate rate centers, and they should do so to the greatest extent possible. As discussed in the following sections and in past PCIA pleadings, rate center consolidation allows the most effective means of number utilization. Therefore, states must consolidate rate centers to the greatest extent feasible and as soon as possible. Moreover, the states have the authority to implement area code relief in the form of an all-service overlay or a geographic split. The states should also implement as many new area codes as necessary to

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4 Each state request jeopardizes the Commission's ability to establish a uniform federal numbering system.

5 If NANPA received more accurate and relevant information on a timely basis, it could better ensure the availability of adequate numbering resources.

ensure that adequate numbering resources are available to all carriers. Understandably, state commissions often focus on minimizing the short-term impact of area code relief on consumers rather than on implementing the area code relief or the numbering optimization measure that best ensures the availability of adequate numbering resources. This results in the implementation of stopgap measures that exacerbate numbering exhaust and the avoidance of area code relief or numbering optimization measures that may be perceived as having negative impacts on consumers.[6] Numbering exhaust is a barrier to entry by new competitors and an impediment to the introduction of new services. It harms consumers by limiting the carriers and services from which they can choose and results in artificially inflated prices for the services that are available.

PCIA agrees with the states, however, that the Commission should amend the current reporting requirements so that NANPA and the states can better predict numbering exhaust. Therefore, PCIA urges the Commission immediately to adopt the Hybrid reporting approach recommended in the NANC report. The Hybrid reporting approach is widely supported in the industry, and its implementation should be relatively easy. The Commission should adopt a rule requiring carriers to provide reports to the NANPA on a semi-annual basis using the Hybrid reporting approach. LNP-capable carriers should be required to report on a 1000 block basis, and non-LNP-capable carriers should be required to report on a NPA-NXX basis. By requiring carriers to report using the Hybrid model, the NANPA will gain more accurate information about numbering utilization trends, which may have a significant impact on this proceeding.

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6 PCIA also urges the Commission to continue to hold firm in its position that mandatory 10-digit dialing must be used where overlay area codes have been implemented. PCIA accordingly requests the Commission to reject the Illinois Commerce Commission's recent petition for relaxation of the mandatory 10-digit dialing rule.

In order to expedite implementation of the Hybrid model, the Commission should order NANC to revise the COCUS as quickly as possible. As soon as NANC has completed the necessary revisions, the Commission should order the Hybrid model to be implemented.

The Commission should also identify optimization measures that are extremely effective means of delaying current number exhaust. However, the Commission should not take any action at this time that will limit or restrict federal control over numbering administration or that will interfere with the development of a uniform national approach to numbering administration and optimization. If individual states were allowed to consider numbering issues before the conclusion of this proceeding, they would inevitably implement different measures, or even the same measures in different orders or timeframes, which would put carriers that serve states with inconsistent rules into untenable positions. This proceeding is the first effort to promulgate uniform national numbering policy and rules for a competitive telecommunications environment, and its significance cannot be underestimated. PCIA urges the Commission not to lose sight of its ultimate goal of establishing and implementing a *uniform national* numbering policy.

The states, like the Commission, clearly want to implement numbering optimization means that lead to the more effective utilization of numbering resources. However, a few states have implemented means that lead to the stranding of numbers and thus the inefficient utilization of numbering resources. For example, there is a disturbing trend among states to split existing rate centers along municipal boundaries when implementing area code relief in the form of a geographic split.[7] Splitting rate centers imposes significant costs on

[7] For example, Arizona, Minnesota and New York have adopted geographic splits that divide currently existing rate centers. *See* ALTS Comments at 29.

carriers, and thus consumers, leads to significant technical difficulties, and exacerbates numbering exhaust by increasing the number of rate centers that new entrants are required to request. PCIA submits that there can be no justification for splitting rate centers. Indeed, the practice of splitting rate centers flies directly in the face of widespread industry support for rate center consolidation, which is exactly the opposite of rate center splitting. Therefore, PCIA urges the Commission to clarify that the states do not have the authority to split rate centers.

The Commission should also use this proceeding to clarify that the states do not have the authority to order certain numbering measures. First, the Commission should reiterate that the states cannot order non-LNP-capable carriers to participate in number pooling. Second, the Commission needs to clarify that the states cannot require carriers that do not participate in number pooling to use numbers sequentially. Third, the Commission must forbid the states from ordering carriers that do not participate in number pooling to return numbers in blocks of less than 10,000. Fourth, the Commission must reaffirm its requirement of mandatory ten-digit dialing where overlay area codes have been implemented. By identifying impermissible state actions and drawing bright lines between permissible and impermissible actions in this order, the Commission can avoid future disputes about numbering issues.

III. THE COMMENTS REFLECT GROWING INDUSTRY SUPPORT FOR FURTHER RATE CENTER CONSOLIDATION

Rate center consolidation is the cornerstone to effective number conservation, as the overwhelming majority of comments recognize. There is widespread industry consensus that

further rate center consolidation should be explored, particularly in areas where number pooling is being considered.[8]

The Commission should welcome this consensus about the need for rate center consolidation, and should mandate it as part of its numbering plan. Furthermore, the Commission should create incentives for state commissions to ensure that rate centers have been consolidated to the greatest extent feasible before any other form of number optimization is implemented. As PCIA and most of the industry explained in their comments, the Commission can create the proper incentives by requiring rate center consolidation before other forms of number optimization are implemented.

The Commission has already taken the important step of delegating the authority to the states to consolidate rate centers. Now the Commission should guide the states' use of this authority by requiring state commissions to give rate center consolidation priority over less effective and more onerous forms of number optimization. This can be accomplished on a nationwide basis without requiring the Commission to micro-manage the states' exercise of delegated authority. The Commission can allow states to determine when rate centers have been

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8 *See, e.g.,* Ad Hoc Telecommunications Users Committee Comments at 16-17; Airtouch Comments at 4-8; ALTS Comments at 8, 20-22; AT&T Comments at 33-35; BellSouth Comments at 7, 20-21; Cablevision Lightpath Comments at 7; CBT Comments at 9-10; Colorado PUC Comments at 8-11; Connect Comments at iv, 14-15; Cox Comments at 10-13; CTIA Comments at 18-22; GTE Comments at 33-35; Level 3 Comments at 11-12; Liberty Comments at 3-4; MCI WorldCom Comments at 21-24, Attch. I; Michael A. Sullivan Comments at 3-4; Nextel Comments at 12-16; NEXTLINK Comments at 5-9; Omnipoint Comments at 5-14, 18; PageNet Comments at 3-5; PrimeCo Comments at 5-6; Qwest Comments at 2-3; RCN Comments at 10-12; SBC Comments at 105-106; Sprint Comments at 2-5, 21-22; Time Warner Comments at 10-14; Voicestream Comments at 22-23; WinStar Comments at 11-15. The Commission should pay particular attention to rate center consolidation, because few measures facing the Commission receive the nearly unanimous support of all carriers that rate center consolidation enjoys.

consolidated to the greatest extent possible.[9] However, PCIA believes that the Commission must create incentives for the states to undertake rate center consolidation, and find that rate centers have been consolidated to the greatest extent possible.

IV. THE COMMENTS REFLECT WIDESPREAD OPPOSITION TO TECHNOLOGY-SPECIFIC OVERLAYS

Just as the industry is unified in its support for rate center consolidation, the industry is unified in its opposition to technology-specific overlays.[10] The Commission should embrace this consensus and continue to maintain its current prohibition of technology-specific overlays. This widespread opposition to technology-specific overlays by all types of carriers is not surprising. As the Commission has repeatedly recognized, technology-specific overlays do not lead to the more efficient utilization of numbering resources, and they discriminate against various types of carriers and consumers.[11]

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9 PCIA also believes that the Commission should provide the states with guidelines on when rate centers have been consolidated to the maximum extent possible. For example, where there are multiple rate centers in a local calling area, the multiple rate centers should be consolidated to one rate center. In addition, the Commission should require states within one year to ensure that they have reduced rate centers by 50% from the number they had on passage of the 1996 Act.

10 *See, e.g.,* AT&T Comments at 68-70; Bell Atlantic Comments at 38-39; BellSouth Comments at 19; Colorado Public Utility Commission Comments at 13; GTE Comments at 74-76; MCI WorldCom Comments at 64; Nextel Comments at 24-25; PageNet Comments at 5-9; PrimeCo Comments at 11; SBC Comments at 100-104; US West Comments at 8 & n.9; USTA Comments at 15; Voicestream Comments at 30-31; WinStar Comments at 45-46.

11 *See, e.g., Implementation of the Local Competition Provisions of the Telecommunications Act of 1996,* Second Report and Order and Memorandum Opinion and Order, 11 FCC Rcd 19392, ¶ 285 (1996) (finding that service- or technology-specific overlays "would be unreasonably discriminatory and would unduly inhibit competition"); *Proposed 708 Relief Plan and 630 Numbering Plan Area Code,* Declaratory Ruling and Order, 10 FCC Rcd 4596 (1995) (same). *See also* Letter from Ronald R. Conners, Director, North American Numbering Plan Administration, to Geraldine A. Matise, Chief, Network Services Division, Common Carrier Bureau, FCC (March 21, 1996) (explaining that service- and technology-specific overlays "will almost certainly lead to waste of valuable numbering resources, and that they could be viewed as discriminatory").

Despite almost universal opposition, Omnipoint asks the Commission to reconsider the use of wireless-only or technology-specific overlays "as an additional means of addressing number resource optimization."[12] PCIA agrees with Omnipoint that wireless providers are comparatively blameless for the current number resource shortages. Therefore, the promise of having a ready-supply of numbering resources allocated solely to wireless carriers is seductive. However, PCIA believes that the better solution is to address the root causes of numbering exhaust.

In any event, PCIA reiterates its belief that there is no justification for implementing discriminatory forms of area code relief like technology-specific overlays because their problems far outweigh their benefits. Technology-specific overlays increase the risk of stranded numbers by reducing the types of carriers that can use any given number.

The Commission should use this proceeding to reemphasize its prohibition on technology-specific overlays, reaffirm that it will not consider requests for authority to implement technology-specific overlays under any circumstances, and clarify that states should not waste precious resources considering the potential merits of technology-specific overlays. The Commission can again close the case on technology-specific overlays and focus on implementing effective and non-discriminatory number optimization measures.

V. THE COMMISSION SHOULD REQUIRE MANDATORY NATIONAL TEN-DIGIT DIALING

PCIA believes that ten-digit dialing is inevitable.[13] Therefore, the entire nation will have to experience the short-term inconveniences associated with implementation of ten-

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12 Omnipoint Comments at 19.

13 The carriers that support mandatory ten-digit dialing also believe that ten-digit dialing is inevitable. *See supra* note 13.

digit dialing at some point in the future. PCIA submits that the inconveniences, the costs, and the political resistance to ten-digit dialing could all be lessened if the Commission mandates ten-digit dialing throughout the nation, at the same time.[14]

The comments reflect growing industry consensus for implementation of mandatory ten-digit dialing on a nationwide basis within the next three years.[15] Implementation of ten-digit dialing would remove the largest hurdle to implementing area code relief in the form of all-service overlays and adopting the most efficient means of number optimization: pressure to maintain seven-digit dialing. All service overlays are also the least disruptive form of number relief because existing customers are not required to change their current telephone numbers.

The desire to maintain seven-digit dialing at all costs creates enormous political tensions at the state level, which interferes with the implementation of area code relief and the adoption of numbering optimization means. When numbering administration choices are made to preserve seven-digit dialing rather than to use numbering resources efficiently, numbering resources are squandered and area codes enter jeopardy prematurely. The Commission could eliminate this tension and free the states to make more rational number administration choices by mandating national ten-digit dialing. Moreover, mandatory ten-digit dialing would facilitate

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14 It could nonetheless be implemented on a permissible basis, in areas not facing the same number utilization pressures.

15 *See, e.g.,* Bell Atlantic Comments at 15-19, 38-39; BellSouth Comments at 15-18; CBT Comments at 14-15; Colorado Public Utility Commission Comments at 11-14; Florida Public Service Commission Comments at 10-11; GTE Comments at 33-37; Liberty Comments at 1-3; Nextel Comments at 23; PrimeCo Comments at 6-7; Small Business Alliance Comments at 8-10; Voicestream Comments at 22-25; US West Comments at 4, 12-16; USTA Comments at 7; WinStar Comments at 9-13, 18-20, 43-45. *See also* ALTS at 28-32 (mandatory where overlay area codes); Ameritech at 35-36 (imposed nationally on a specific date or eliminated); AT&T at 36 (recognizing that ten-digit dialing is inevitable); Connect Comments at 15-16 (recognizing usefulness of ten-digit dialing).

expansion of the NANP in the future if required, and provide the Commission and the states with more flexibility in addressing numbering exhaust.

VI. ALL CARRIERS MUST DO THEIR SHARE TO ENSURE THAT NUMBERING RESOURCES ARE UTILIZED EFFICIENTLY

PCIA agrees with the idea expressed in many comments that all carriers share an equal responsibility to ensure that numbering resources are utilized efficiently. Not all carriers must, or even can, meet this burden in the same way. As such, PCIA takes no position with respect to whether number pooling should be implemented for wireline carriers. However, PCIA would like to reiterate wireless carriers should not, and cannot, be required to participate in number pooling.[16] Nonetheless, wireless carriers should be required to continue to utilize numbers as effectively as carriers that participate in number pooling.

A. There Is No Basis For Requiring CMRS Providers To Participate In Number Pooling

PCIA notes that there is no record support for requiring CMRS providers to participate in number pooling. Representatives from virtually all industry segments agree that there is no justification for requiring CMRS providers to participate in number pooling.[17] As PCIA explained in its comments, it is far from certain that there is any benefit to be gained by requiring CMRS carriers to participate in pooling. Wireless carriers, by anyone's measure, are the most efficient users of numbering resources. Moreover, CMRS carriers would be subjected

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16 This is equally the case for those CMRS carriers that are not required to implement LNP.

17 *See, e.g.,* BellSouth Comments at 22-24; CTIA Comments at 25-31; GTE Comments at 38-40, 48-51; Omnipoint Comments at 22-23; US West Comments at footnote 37; Voicestream Comments at 26.

to significant additional costs to participate in number pooling.[18] PCIA submits that the Commission should not impose costs when there is no proven benefit to be gained. Imposing costs where there is no identifiable benefit would be directly contrary to the 1996 Act and the Commission's policies. Every dollar spent on numbering optimization measures that do not result in tangible benefits is squandered, and prevents carriers from installing switches in other markets or adding new services. This is equally true for the wireless affiliates of ILECs, who are sometimes the 5th or 6th entrant to certain wireless markets, which means that these carriers must carefully manage available resources to compete effectively.

B. Non-LNP-Capable Carriers Cannot Participate In Number Pooling

Carriers that cannot port numbers, or that have not implemented SS7, cannot participate in number pooling, as the Commission and the industry has long recognized.[19] Only carriers that are capable of porting numbers can provide services to their customers in a number pooling environment in the same way as they can in a non-pooling environment. By requiring non-LNP-capable carriers to use Type 1 interconnection, and only Type 1 interconnection, it might be possible for non-LNP-capable carriers to receive numbers in blocks of 1,000. With this

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18 Indeed, there are numerous reasons why CMRS carriers cannot be subject to number pooling. First, a significant segment of the CMRS industry is not SS7 compliant, so they are incapable of dealing with LRN/LNP. Second, those carriers that are SS7 compliant nonetheless are not LNP-capable, so they cannot utilize number pooling in the same way as wireline carriers who are both SS7 and LNP-capable.

19 *See, e.g.,* ALTS Comments at 23-24; Ameritech Comments at 37-40, 43; AT&T Comments at 45-48; BellSouth Comments at 22-24; CBT Comments at 11; Cox Communications, Inc. Comments at 14-15; CTIA Comments at 25-30; GTE Comments at 43-44, 48-53; Level 3 Comments at 12-14; Nextel Comments at 19-20; NEXTLINK Comments at 9-10 & nn.21-22; NTCA Comments at 5; Qwest Comments at 4; SBC Comments at 75-79; Time Warner Comments at 6-8; US West Comments at 23 n.37; Voicestream Comments at 25-26.

limitation, however, non-LNP-capable carriers would not truly be able to "participate" in number pooling in any meaningful way.

Requiring non-LNP-capable carriers to use Type 1 interconnection, and only Type 1 interconnection, would be extremely discriminatory and contrary to the 1996 Act and the Commission's numbering policies. This is particularly true because the wireless industry as a whole is moving towards the use of Type 2 interconnection, which is generally more efficient than Type 1 interconnection.[20] Limiting available interconnection models in the name of number optimization would truly be letting the tail wag the dog, particularly when no long-term benefits will be gained.

PCIA submits that no number utilization measure should ever be adopted if it limits the way in which carriers are able to interconnect. This position is consistent with, and indeed required by, the 1996 Act and the Commission's numbering policies, and is supported by widespread industry consensus. For this reason, CMRS carriers should not be required to participate in number pooling until they can port numbers, because they would not be able to provide services in the same way as they can in a non-pooling environment or as LNP-capable carriers can in a pooling environment.

Moreover, if number pooling for wireless carriers were implemented prior to LNP, there could only be one wireless carrier in each rate center (because software cannot make the translations necessary to support two or more wireless carriers in one rate center), and that wireless carrier must be the code holder and its switch must be LRN-capable. Further, only

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[20] Moreover, many interconnection agreements between ILECs and CMRS carriers require CMRS carriers to move away from Type 1 interconnection over time.

uncontaminated 1000 blocks could be used. PCIA submits that none of these conditions is acceptable, and therefore number pooling cannot be implemented prior to LNP.

C. Non-Pooling Carriers Must Utilize Numbers As Efficiently As Pooling Carriers

PCIA supports CTIA's proposal to set the minimum utilization threshold at 60% initially and to increase to 70% over time.[21] For purposes of meeting the utilization threshold, utilization must be measured at the rate center level. PCIA believes that all carriers can equally share the burden of using numbering resources efficiently if the same minimum utilization threshold applies to both carriers who can participate in number pooling and those who cannot.

This number utilization standard would apply to requests for new NXXs in a particular rate center. In addition, PCIA supports allowing carriers to receive codes when they have less than this utilization rate if: (1) they can show that they will need the code within the ordering interval; and (2) certain recently acquired codes are discarded for purposes of calculating the utilization rate.

VII. THE COMMISSION SHOULD AUTHORIZE NANPA TO BE THE SOLE COLLECTOR OF NUMBERING DATA

There is a growing trend among the states to request additional information directly from carriers about their utilization of numbering resources. Although some states request information on a voluntary basis, most state commissions subpoena carriers and threaten sanctions for non-compliance. The requests rarely if ever provide for any protection of the confidential and proprietary information that carriers must divulge to comply with the requests. Moreover, the requests often seek different information, or information in a different format,

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21 CTIA Comments at 10-12.

than the COCUS. Finally, in many instances, these requests are sent to the wrong office, or to the wrong employees, which delays timely responses.

The burden imposed by these individual state data requests is enormous. Many carriers have developed software to assist them in gathering the information necessary to comply with the COCUS reporting requirements on a nationwide basis. However, requests for data by states for different information or information in a different format than the COCUS cannot be gathered from software designed to comply with COCUS. Consequently, carriers must manually gather data to comply with these requests.

The differences between the individual state requests are striking. For example, requests that seek the same information as the COCUS require different degrees of granularity. Many requests seek information not required for COCUS. Individual requests are often based on unique or ambiguous definitions of the status of numbers. Some requests require response within less than one week.[22] Various requests seek information dating back to 1990, which carriers frequently did not record in the granularity requested, if at all.[23] Other requests impose sanctions for non-compliance.[24] Several requests ask for quarterly forecasts for the upcoming year(s).[25] Each of these differences pose unique problems for carriers forced to respond to individual data requests.

The following examples of state data requests that PCIA members have received illustrate the differences between various data requests:

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22 *See, e.g.,* data requests from Illinois and Massachusetts attached hereto.

23 *See, e.g.,* data request from Tennessee attached hereto.

24 *See, e.g.,* data requests from Illinois, Massachusetts and Pennsylvania attached hereto.

25 *See, e.g.,* data requests from Tennessee, Illinois, Massachusetts, Pennsylvania and Texas attached hereto.

- Tennessee. On July 9, 1999, the Tennessee Regulatory Authority required carriers to provide the following information to the National Regulatory Research Institute no later than August 13, 1999:

  1. Total telephone numbers in use by the company in the NPA.
  2. Projected average monthly growth of assigned telephone numbers.
  3. Total numbers of NXXs assigned by Rate Center (List).
  4. For 1990 to Present list the date each NXX was assigned and the total NXXs assigned prior to 1990.
  5. List NXXs and percentage of current use by your company (NXX in use is defined as having one or more numbers assigned out of the 10,000 available).
  6. Projected average monthly growth of assigned numbers in each rate center.
  7. List rate centers that are LNP capable.
  8. Total number of NXXs with less than 10% contamination (contamination is defined as individual telephone number assignments), including the total 1000 blocks uncontaminated (uncontaminated is defined as having all numbers in the 1000 block unassigned), and the total 1000 blocks with less than 10% contamination.
  9. Total number of NXXs with less than 45% contamination, including the total 1000 blocks uncontaminated, and the total 1000 blocks with less than 10% contamination.
  10. Carriers were also required to send a check for $100 to cover the costs of data analysis.

  A copy of the data request is attached.

- Illinois 1. On July 9, 1998, the Illinois Commerce Commission ordered carriers to provide the following information by July 10, 1998:

  1. The quantity of codes, by wireline and wireless, that were assigned by the Number Administrator prior to April 1, 1998 that have not yet been activated.
  2. The reason those codes have not been activated.
  3. The quantity of codes, by wireline and wireless, that have been returned to the Number Administrator since jeopardy was declared in the 847 NPA.
  4. A count of telephone numbers unavailable for assignment within each block of 1000 numbers assigned to each NXX code in the company's possession. A telephone number is considered unavailable for assignment if its is: (a) assigned to an end user; (b) reserved for an end user; (c) used for testing; (d) in aging; or (e) "otherwise unassignable."

  Wireline carriers were also required to provide:

5. The information that was provided to the pooling administrator regarding blocks that the company agreed to donate to the number pools.
6. A report, by rate center, of the quantity of thousand blocks the company has in the 847 NPA with no numbers assigned.
7. A report, by rate center, of the quantity of thousand blocks the company has in the 847 NPA with 100 or fewer numbers assigned.

A copy of the data request is attached.

- Illinois 2. On February 9, 1999, the Illinois Commerce Commission ordered carriers to provide the following information by March 12, 1999:

1. A count of telephone numbers unavailable for assignment within each block of 1000 numbers assigned to each NXX code in a carrier's possession. A telephone number is considered unavailable for assignment if its is: (a) assigned to an end user; (b) reserved for an end user; (c) used for testing; (d) in aging; or (e) "otherwise unassignable." Carriers shall provide the data in Microsoft Excel 97/95 workbook file with one row for each NPA-NXX. The first column should identify to which NPA each NXX is assigned. The second column should identify the NXX being reported on. The third column should identify to which rate center each NXX is assigned. The fourth column should identify the date of activation of the NXX. The fifth column should identify the NXX-0 block. The sixth through the fourteenth columns should identify the NXX-1 through –9 blocks. The date on which these counts were made should also be supplied. The data should be collected by all carriers for each calendar quarter and continually supplied throughout the length of this docket within three weeks of the conclusion of each quarter.
2. Forecast data by thousand block and rate center for wireline carriers, and by 10,000 block and rate center for wireless carriers, for the upcoming eight quarters. The first quarter for which forecast data shall be supplied shall be the first quarter of 1999. The data should be collected by all carriers for each calendar quarter and continually supplied throughout the length of this docket within three weeks of the conclusion of each quarter.
3. For each NXX assigned to a carrier, including NXX codes not yet registered on the LERG, the identification of the rate center the NXX is associated with, and the date that the NXX was activated. The data should be collected by all carriers for each calendar quarter and continually supplied throughout the length of this docket within three weeks of the conclusion of each quarter.

A copy of the data request is attached.

- Massachusetts. On June 8, 1998, the Massachusetts Department of Telecommunications and Energy sent a Subpoena Duces Tecum to carriers requiring them to provide the following information by June 12, 1998:

1. The number of exchange codes the company currently holds in the 617, 508, 978 and 781 area codes.
2. For each exchange code, how many thousands blocks currently free (*i.e.*, not being used by or assigned to customers).
3. For each thousands block in each exchange code, how many numbers are currently being used by or assigned to customers, including a list of all phone numbers in use or assigned to customers for each thousands block.
4. The forecasted need for exchange codes in the 617, 508, 978 and 781 area codes for the period beginning now until January 2002, broken down by three month periods.
5. The forecasted need for thousands blocks for the period beginning now until January 2002, in the 617, 508, 978 and 781 area codes, broken down by three month periods.

A copy of the data request is attached.

- Pennsylvania. On May 30, 1997, the Pennsylvania Public Utility Commission ordered carriers to provide the following information by September 30, 1997:

1. The number of telephone numbers currently being used by the company in each NXX-X block of 1,000 numbers within the NXX code(s) assigned to the company for the 215, 412, 610, 717, and 724 area codes. A telephone number is considered being used if it is: a) assigned to an end user; b) specifically allocated to an end user; or c) used for testing. Carriers must show separate 1,000 blocks for each NXX that is assigned to the company and the use of each block.
2. The estimated future telephone number demand by 1,000's block, or NXX code where appropriate, for each rate center (including for all rate centers where telephone number demand is projected, including rate centers where you have no telephone number assignments today).
3. The quantity of NXX-X blocks of 1,000 numbers that can be returned to the Neutral Code Administrator for reassignment.

A copy of the data request is attached.

- Texas 1. On September 4, 1997, the Public Utility Commission of Texas required carriers to provide the following information by September 30, 1997:

1. The number of NXX-XXs assigned to and currently in use by an end user per one thousand block.
2. The number of NXX-XXs unavailable per one thousand block. If a telephone number is not assigned to and currently in use by an end user, but is considered by the company to be otherwise "unavailable" for assignment, the company must specify exactly why those telephone numbers are unavailable, and for how long the numbers will remain unavailable.

3. For each rate center where the company is assigned an NXX, the number of NXX-XXs the company expects to activate for each quarter beginning with the 4th quarter of 1997 through the 4th quarter of 1999.

A copy of the data request is attached.

- Texas 2. On June 15, 1998, the Public Utility Commission of Texas required carriers to provide the following information by July 1, 1998 (512), July 6, 1998 (713 and 281), July 8, 1998 (409), July 10, 1998 (214 and 972), July 14, 1998 (817), and July 17, 1998 (210).

1. For each rate center that the company is assigned an NXX, identify the NXX and provide the information by thousand number block. Each NXX should have its own data file and the rate center name exactly as it appears in the provided table.
2. The thousand number block forecast for each NXX beginning with the third quarter of 1998 and ending with the fourth quarter of 1999. Those carriers that are not LNP capable and will require whole NXX's should enter how many full NXX's you will need in each rate center.
3. Carriers must track the number of service orders issued each month that involve an addition/change of telephone numbers (see attached form).

A copy of the data request is attached.

These requests are representative of the differing individual data requests that PCIA members have received from various state commissions.

Individual and unique data requests from state commissions impose costs on carriers for compliance, including the costs for labor and for diverting existing staff from other priorities. For example, some PCIA members need more than double the time to prepare a response to a special request from a state commission than to a COCUS request. Moreover, carriers that operate in multiple states frequently must hire additional staff solely to respond manually to individual and unique data requests from various states. Some PCIA members believe that they will have to double the staff assigned to numbering resource management simply to comply with individual state data requests.

There is also no guarantee that information provided to states will receive confidential treatment. This forces carriers to decide whether to comply and risk disclosure of sensitive information or to refuse to answer the data request which could lead to sanctions or damage the carrier's relationship with the state commission. Neither choice is acceptable to carriers that wish to comply with state requirements and protect their confidential and sensitive information. Finally, in the case of many CMRS carriers, which are not regulated by state commissions, the carrier has to employ local counsel and incur additional expenses.

PCIA urges the Commission to authorize NANPA to be the sole collector of numbering data, and clarify that states have no authority to request numbering utilization data from individual carriers. States and all other interested parties should request information directly from NANPA. PCIA supports efforts to revise the reporting requirements so that the states can get all the information that they need from NANPA. Moreover, PCIA supports mandatory reporting requirements using the Hybrid model on a semi-annual basis. Finally, because of the confidential and sensitive nature of this information, NANPA should only release the information on an aggregate basis without identifying the source.

The benefits from consolidating all reporting requirements under NANPA are multifold. First, carriers will be able to optimize their reporting systems to comply with the single reporting requirements, which will reduce costs. Second, states will no longer have to expend resources to receive the information they need about numbering issues. Third, the information gathered will be much more accurate, and the uniformity of the information will allow NANPA, the Commission and the states to see numbering trends on a national level, or to compare numbering usage patterns in a particular state with those in other states across the nation. Fourth, carriers will not have to spend scarce resources by hiring additional employees

and local regulatory counsel simply to respond to individual state request or track multiple and conflicting requests. Finally, carriers will have increased incentives to comply with the reporting requirements because they can be assured that the information will receive confidential treatment.

VIII. THE COMMENTS REFLECT UNIVERSAL OPPOSITION TO PAYMENT FOR NUMBERING RESOURCES

PCIA concurs with the broad consensus that carriers should not be required to pay for numbering resources.[26] Payment for numbering resources is not a valid means of number optimization or allocation. In addition to the practical and economic problems, requiring payment for numbering resources raises significant legal issues. PCIA submits that it would not be consistent with the 1996 Act to require carriers to pay for numbering resources. The 1996 Act is premised on the idea of fostering competition and tearing down market entry barriers. Requiring carriers to pay for numbering resources would create new entry barriers, inhibit competition, and discriminate against various classes of carriers and consumers.

Economic theory posits that the highest use of a resource may be to deny it to competitors. Any payment scheme will create incentives for large, well-funded carriers to inhibit competition by buying all the number resources so their less well-funded competitors will fail. In addition, not all uses of numbers can be valued equally. For example, a higher revenue service, such as broadband PCS ($50 average monthly revenue per unit), will support a higher cost per number than a lower revenue service, such as the paging ($9 average monthly revenue

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26 *See, e.g.,* Ameritech Comments at 53-57; AT&T Comments at 61-63; Bell Atlantic Comments at 6-7; Choice One and GST Comments at 5; GTE Comments at 60-63; Liberty Comments at 6; MCI WorldCom Comments at 48-50; NEXTLINK Comments at 21-24; Omnipoint Comments at 31-34; Qwest Comments at 6-7; Time Warner Comments at 22-23; USTA Comments at 12; WinStar Comments at 38-41.

per unit). The Commission cannot and should not discriminate between telecommunications carriers or services in this fashion.

CONCLUSION

For the foregoing reasons, PCIA respectfully requests the Commission first to require rate center consolidation to the greatest extent feasible, and then to explore number optimization means that are consistent with the PCIA Blueprint for Efficient Number Utilization attached to PCIA's comments. The Commission should adopt mandatory national numbering rules and guidelines governing the allocation and use of numbering resources. In any event, the Commission's primary goal should be to provide carriers with adequate numbering resources to satisfy consumer demand.

Respectfully submitted,

PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION

By: Mary McDermott

Mary McDermott
Chief of Staff and Senior Vice President
Government Relations
Robert L. Hoggarth
Senior Vice President, Paging and Messaging
Harold Salters, Director
Government Relations
PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION
500 Montgomery Street, Suite 700
Alexandria, Virginia 22314-1561
703-739-0300

August 30, 1999

Attachment A

TENNESSEE REGULATORY AUTHORITY

Melvin Malone, Chairman
Lynn Greer, Director
Sara Kyle, Director

460 James Robertson Parkway
Nashville, Tennessee 37243-0505

July 9, 1999

Tennessee Telecommunications Providers

RE: Information Request

Dear Sir or Madam,

The ever-increasing need to add new area codes ("NPA") in Tennessee has resulted in the Tennessee Regulatory Authority ("TRA") recommending that an industry task force be formed to investigate and provide recommendations on the utilization of Tennessee's numbering resources. The Task Force was formed and is headed by the Tennessee Telecommunications Association ("TTA"). The Task Force consists of ILEC, CLEC, Independent and Wireless service providers and TRA staff. In order to make its recommendations, the Task Force needs information concerning the current utilization of Tennessee's numbering resources. We are therefore requesting number utilization information from all regulated and unregulated telecommunications service providers operating in Tennessee.

Recognizing the sensitive nature of the data requested, the Task Force contacted the National Regulatory Research Institute ("NRRI"), and they have agreed to a contract to collect and analyze the data submitted and to prepare an aggregated report for submission to the Task Force. The NRRI has signed a non-disclosure contract to ensure that no company specific information will appear in the final report. This will protect the proprietary nature of the submitted data. Accordingly, your company should submit its data directly to the NRRI. The information submitted by each carrier will be aggregated into an NPA specific database. Analysis of this data will provide an overview of number utilization within each Tennessee NPA without disclosing individual company statistics. Only NRRI personnel will have access to company specific information.

The NRRI has agreed to collect and analyze the data and prepare the number utilization study for a cost of $7,500. We are requesting that each company with an assigned NXX pay a portioned share of that expense, a total of $100.00, to cover the cost of the NRRI study. Enclosed is an invoice along with the address to send your check. Please ensure that checks are made payable to the Tennessee Telecommunications Association. Your company will receive a copy of the final NRRI report. Thank you for your cooperation in helping fund the study.

The NRRI study will be able to provide a complete, as of June 1999, picture of where Tennessee stands in telephone numbering utilization. It will also aid the TRA in

determining what conservation measures might work in Tennessee. The goal of the project is to better utilize Tennessee's numbering system.

We seek your cooperation in providing the information requested below:

A. Total telephone numbers in use by your company in the NPA.

B. Projected average monthly growth of assigned telephone numbers

C. Total number of NXXs assigned by Rate Center (List).
(1) ILEC ONLY – List assigned NXXs by Wire Center

D. For 1990 to Present List the Date each NXX was assigned.
(1) Total NXXs Assigned Prior to 1990.

E. List NXXs and Percentage of current use by your company (List).[1]
(1) Projected Average Monthly Growth for NXXs (%)

F. Projected average monthly growth of Assigned Numbers in Each Rate Center
(1) ILEC ONLY – Projected average monthly growth of Assigned Numbers in each Wire Center (%).

G. List Rate Centers that are LNP Capable

H. Total number of NXXs with less than 10% contamination.[2]
(1). Total 1000 blocks uncontaminated.[3]
(2). Total 1000 blocks with less than 10% contamination.

I. Total number of NXXs with less than 45% contamination.
(1). Total 1000 blocks uncontaminated.
(2) Total 1000 blocks with less than 10% contamination.

Please respond to all of the items listed above completely and accurately. The information should be disaggregated to each Tennessee NPA that your company serves. Your submission will be treated as proprietary, and all carriers' information will be aggregated into one database for each of the NPAs. In order to aggregate the data from all companies, it is requested that your submission be in both electronic form and paper form. The electronic version of your data submission should be in the Excel format and on diskette, or e-mailed to NRRI. The e-mail address for submission is **Davis.241@osu.edu.** A sample format for the paper submission of the information is enclosed (Table 1 and Table 2), and the Excel Format tables may also be found on the

[1] NXX in use is defined as having one or more numbers assigned out of the 10,000 available.
[2] Contamination is defined as individual telephone number assignments
[3] Uncontaminated is defined as having all numbers in the 1000 block unassigned.

TRA Web Site at www.state.tn.us/tra/utilization.htm then click the page to download. The paper form of your submission should be mailed directly to

All data submitted should include your June 1999 information. If your company has resold services with an assigned NXX, we request that you pass this data request on to your customer. We also request that all companies with affiliate companies ensure that the affiliate is provided the data requested as well. Please ensure all submissions are received by the NRRI no later than August 13, 1999. ILECs may request up to 30 additional days for submission of data at the Rate Center level (Table 1 Columns C1 and F1). Your submission should be delivered or mailed directly to:

Dr. Vivian Davis
NRRI
Room 372
1080 Carmack Road
Columbus, Ohio 43210

E-mail Address: davis.241@osu.edu
Phone: 614-292-9423

If you have any questions regarding this request call Dr. Davis at 614-292-9423.
Your cooperation in this effort is vital in determining the utilization of Tennessee's numbering resources and is greatly appreciated.

Sincerely,

Eddie Roberson, Chief
Consumer Services Division

Ellen Bryson, Executive Director
Tennessee Telecommunications Association

Enclosures

EXAMPLE

Company XYZ/123 SERVICE PROVIDED: Wireline _____ Wireless _____ NPA XXX

A Total Telephone Numbers In this NPA In Use By Your Company	B Projected Average Monthly Growth of Assigned Telephone Numbers (%)	C List Assigned NXXs By Rate Center	C1 ILEC ONLY List Assigned NXXs by Wire Center	D For 1990 to Present List Date NXX was Assigned (Mo/Yr)	D1 Total NXXs Assigned Prior to 1990	E List NXXs and % of Current Use	E(1) Projected Average Monthly Growth for NXXs (%)	F Projected Average Monthly Growth of Each Rate Center (%)	F1 ILEC ONLY Projected Average Monthly Growth of Each Wire Center (%)
eg	eg	eg		eg	eg	eg	eg	eg	
123,456	2.3	896 ABC123 788 XYZ456 288 1234DEF 324 GHI444		3/97 497 5/98 10/98	xx2,345	X 63% X 74% X 6.9%	X 1.21 % X .32 % X.02 %	ABC113 .08% XYZ456 1.1% 1234DEF 2.3% GHI444 .06%	

ABLE 1 PREPARED BY; _____ TEL: _____

Company_____SERVICE PROVIDED: Wireline____Wireless____ NPA _____

A Total Telephone Numbers In this NPA in Use by Your Company	B Projected Monthly Growth of Assigned Telephone Numbers (%)	C List Assigned NXXs By Rate Center	C(1) ILEC ONLY List Assigned NXXs by Wire Center	D For 1990 to Present List Date NXX was Assigned (Mo/Yr)	D(1) Total NXXs Assigned Prior to 1990	E List NXXs and % of Current Use	E1 Projected Average Monthly Growth for NXXs (%)	F Projected Average Monthly Growth of Each Rate Center (%)	F(1) ILEC ONLY Projected Average Monthly Growth of Each Wire Center (%)

TABLE 1

PREPARED BY:_____TEL:_____

EXAMPLE

Company XYZ /123 SERVICE PROVIDED; Wireline Wireless NPA XXX

G List Rate Centers That Are LNP Capable	H List NXXs Less Than 10% Contaminated	H(1) List By NXX Uncontaminated 1000 Blocks	H(2) List By NXX 1000 Blocks Less Than 10% Contaminated	I List NXXs Less than 45% Contaminated	I(1) List By NXX Uncontaminated 1000 Blocks	I(2) List By NXX 1000 Blocks Less Than 10% Contaminated
eg	eg	eg	eg	eg	eg	eg
ABC123 XYZ456 GJI444	324 288	324-1,3,5 & 8000 All	324 -9000 896-2000 896-5000	896	NONE	896-9000

\BLE 2 PREPARED BY:_____ TEL:_____

Company_____ SERVICE PROVIDED: Wireline Wireless_____ NPA_____

G List Rate Centers That are LNP Capable	H List NXXs Less Than 10% Contaminated	H(1) List By NXX Uncontaminated 1000 Blocks	H(2) List By NXX 1000 Blocks Less Than 10% Contaminated	I List NXXs Less than 45% Contaminated	I(1) List By NXX Uncontaminated 1000 Blocks	I(2) List By NXX 1000 Blocks Less Than 10% Contaminated

TABLE 2 PREPARED BY:_____ TEL:_____

INVOICE

COMPANY NAME:_____

DATE:_____

PAYMENT AMOUNT: $100.00

CHECK NUMBER:_____

REASON FOR PAYMENT: NRRI TENNESSEE NUMBER UTILIZATION STUDY

PLEASE MAIL YOUR CHECK AND A COPY OF THIS INVOICE TO:

TENNESSEE TELECOMMUNICATIONS ASSOCIATION
SUITE 212
226 CAPITOL BLVD
NASHVILLE, TN 37219

THANK YOU FOR YOUR COOPERATION. YOUR CONTRIBUTION
MAKES THIS STUDY POSSIBLE.

Company_____ SERVICE PROVIDED: Wireline Wireless_____ NPA_____

G List Rate Centers That are LNP Capable	H List NXXs Less Than 10% Contaminated	H(1) List By NXX Uncontaminated 1000 Blocks	H(2) List By NXX 1000 Blocks Less Than 10% Contaminated	I List NXXs Less than 45% Contaminated	I(1) List By NXX Uncontaminated 1000 Blocks	I(2) List By NXX 1000 Blocks Less Than 10% Contaminated

TABLE 2 PREPARED BY:_____ TEL:_____

EXAMPLE

Company XYZ /123 SERVICE PROVIDED; Wireline Wireless NPA XXX

G List Rate Centers That Are LNP Capable	H List NXXs Less Than 10% Contaminated	H(1) List By NXX Uncontaminated 1000 Blocks	H(2) List By NXX 1000 Blocks Less Than 10% Contaminated	I List NXXs Less than 45% Contaminated	I(1) List By NXX Uncontaminated 1000 Blocks	I(2) List By NXX 1000 Blocks Less Than 10% Contaminated
eg	eg	eg	eg	eg	eg	eg
ABC123 XYZ456 GJ1444	324 288	324-1,3,5 & 8000 All	324 -9000 896-2000 896-5000	896	NONE	896-9000

ABLE 2 PREPARED BY:_____TEL:_____