

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the matter of:

Petition for Declaratory Ruling and
Request for Expedited Action on the
July 15, 1997 Order of the Pennsylvania
Public Utility Commission Regarding
Area Codes 412, 610, 215, and 717.

NSD File No. L-99-74

Implementation of the Local
Competition Provisions of the
Telecommunications Act of 1996

CC Docket No.96-98

**REPLY COMMENTS OF THE CALIFORNIA PUBLIC
UTILITIES COMMISSION AND OF THE PEOPLE OF
THE STATE OF CALIFORNIA**

The California Public Utilities Commission and the People of the State of California (CPUC or California) submit to the Common Carrier Bureau of the Federal Communications Commission (FCC or Commission) these Reply Comments on the Petition for Additional Delegated Authority filed by the Public Utilities Commission of Ohio (PUCO or Ohio). Ohio seeks authority to implement the following five conservation measures:

- 1) enforcing current standards for number allocation, or setting and enforcing new standards and requirements;
- 2) ordering the return of unused, improperly used, reserved, and/or protected NXX codes (and/or thousand blocks if number pooling is implemented);
- 3) ordering efficient number use practices within NXX codes;

- 4) investigating and ordering additional rationing measures; and
- 5) requiring number pooling where and when the PUCO determines it to be appropriate.

To date, twelve state commissions have filed requests for additional authority to grapple with the area code crisis confronting so many states nationwide. California filed its own such request on April 26, 1999, and has supported similar requests from many other states.¹ On September 15, 1999, the FCC granted petitions by California, Florida, Massachusetts and New York in substantial part, and later granted relief for Maine. Given that this FCC action is so very recent, the area code crisis continues to escalate in severity nationally. Plainly, more states, including Ohio, need the means to tackle the problems they face daily.

For the same reasons set forth in each of our filings in support of the previous respective state petitions, the CPUC fully supports the PUCO's request. The CPUC is extremely grateful for the additional tools the Commission has provided California to use in our efforts to stem the flow of numbering resources. We believe firmly that every state, large and small, with one area code or with twenty-five area codes, should have the same opportunity accorded us to use these tools to get a firm grasp on the area code crisis confronting us.

We note that the Ohio request substantially parallels the relief sought by other filing states. California has little to add to what we have already said about the urgent need for state authority to do more than create new area codes simply because the industry wants an unending supply of free numbers at public expense.

We urge the FCC to grant not only the request of Ohio, but also the requests of the other filing states who have not yet been granted the relief sought.

¹ Most recently, the Indiana Utility Regulatory Commission filed a petition on October 21, 1999, and the FCC issued a

Respectfully submitted,

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