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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 9, 2000

HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington DC 20554

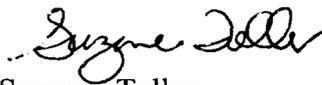
Ex Parte Presentation Public Notice on North American Numbering Council
Numbering Resources Optimization Report CC Docket No. 99-200, RM No.
9258; Implementation of the Local Competition Provisions of the
Telecommunications Act of 1996, CC Docket No. 96-98.

Dear Ms. Salas:

Douglas Brandon, Frank Simone and the undersigned of AT&T met with Jordan Goldstein today on the above-captioned matter. Enclosed is a hand-out that we presented to Mr. Goldstein. The points raised at the meeting are also reflected in the comments filed by AT&T in the above-referenced dockets and proceedings.

Pursuant to sections 1.1206(b)(1) and (b)(2) of the Commission's rules, an original and one copy of this letter and enclosure are being filed with the Office of the Secretary. Copies of the letter are also being served on the Mr. Goldstein and the other Commissioners' offices.

Sincerely,


Suzanne Toller

Enclosure

cc: Dorothy Attwood
Rebecca Beynon
Jordan Goldstein
Peter Tenhula
Sarah Whitesall

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Numbering Resource Optimization NPRM



The FCC Should Retain Exclusive Jurisdiction

- The FCC should maintain exclusive jurisdiction over numbering and limit delegation to the states
 - essential to integrity of PSTN (as prior orders hold)
 - provides carriers the numbers they need to compete and serve customers
- NANP administration should remain in hands of a single party (currently NeuStar)
 - issuing and reclaiming codes
 - gathering utilization and forecast data
 - pooling administration
 - area code relief and planning



State Delegation Should Be Limited

- If the FCC gives the states a larger role in number administration, it should, at minimum:
 - adopt binding national standards for number administration.
 - limit any delegation of authority to implementation of those national standards
 - ensure that carriers are provided with numbers they need to serve customers
 - create a federal “safety net” to clarify standards or resolve disputes
- The Commission must balance states’ desire to control number resources with integrity of PSTN and efficiencies of national standards



National Standards Are Critical

- Protect integrity of PSTN
- Ensure that carriers have an adequate supply of numbers to serve customers and compete
- Permit multi-state carriers to administer numbers in consistent, efficient, cost-effective manner
- Ensure conservation methods are put in place in all states quickly
- Permit states and industry to focus on implementation, not development of state-by-state methods -- no need to “re-invent the wheel”



Key Conservation & Administration Issues that Require National Standards

- Pooling
 - Guidelines should be binding on states
 - non-LNP capable carriers exempt
- Telephone Number Status Definitions and Reporting
 - National number status definitions (*e.g.*, assigned, reserved) and common categorizations (unavailable and available numbers)
 - Single national standard format for forecast and utilization reporting
 - Reasonable reporting requirements (*e.g.*, semi-annually, not quarterly)
- Criteria for Initial and Growth Codes
 - Standards must afford sufficient flexibility to meet customers' numbering needs

