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March 9, 2000

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, DC 20554

RECEIVED
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 99-200

Dear Ms. Salas:

On March 9, 2000, Randy Sanders, Bill Shaughnessy, and I, all representing BellSouth, held a teleconference with Jordan Goldstein, Legal Advisor to Commissioner Ness, Rebecca Beynon, Legal Advisor to Commissioner Furchtgott-Roth. The purpose of our call was to discuss what roles of the FCC, the states and industry guidelines should play in optimizing number resources used in the provision of telecommunications. The attached document provided the basis for that discussion.

As required by Section 1.1206(b)(2) of the Commission's rules, I am filing two copies of this notice and ask that you place this notification in the record of the proceeding identified above. Thank you.

Sincerely,



Kathleen B. Levitz

Attachments

cc: Jordan Goldstein (w/o attachment)
Rebecca Beynon (w/o attachment)

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List ABCDE

Number Resource Optimization

Bellsouth Telecommunications

EE Becker et al.

Agenda...

- FCC Role in Number Optimization
- Role of Industry in Number Optimization
- Role of States in Number Optimization

Needed FCC Direction in Number Optimization

- INC's 1K Pooling Guidelines Must Be Adopted
 - Service providers are required to plan for pooling
 - Guidelines provide fundamental decisions on how pooling will work
- Cost Recovery Must Be Addressed by FCC
 - Pooling costs are not state specific
 - Pooling is number administration
 - Pooling benefits all carriers, including non pooling carriers
- Pooling Trials After 1st Qtr/2000 Should Use NPAC 3.0 Software
 - Carriers should implement pooling using the national standard.
 - Waiting to implement 2.0/1.4 software will not significantly extend the life of 10 digit dialing.
- FCC Must Regulate Transition Towards 10 Digit Dialing

Industry Numbering Committee Guidelines...

- **Industry Developed Guidelines Must be the National Standard**
 - Provide parameters for uniform implementation of pooling
 - Provide a constant on which to measure benefits of pooling
 - Guidelines can be modified if needed
- **Industry Developed Guidelines Were Developed in an Open Forum By Numbering Experts**
 - Ad Hoc changes by states to guidelines does not allow proper evaluation of change
 - States can and should attend INC meetings to propose changes
- **States Exceeded their Authority By Proposing Changes to Industry Developed Guidelines Without Industry Input**
 - For example, the number of states to “conduct ... pooling trials in accordance with industry wide thousands-block pooling guidelines”

Number Pooling Implementation...

- **Must Use Incentive to Avoid Exceeding the National Standard**
- **Should Use 1st/2nd/3rd/4th/5th/6th/7th/8th/9th/10th/11th/12th**
 - **New transactions with existing NPAs should not be allowed after 1st/Qtr 2000**
- **Should Not Be Implemented in NPAs That Will Exhaust in Less Than 12 Months**
- **Must Use a Phased-In Approach**
 - **All Uniform Schedules Among States Within the Same NPAC Region Must Be Approved by the State**
 - **Should not be Used with a Resolution to Cost Recovery**

Role of States in Number Optimization...

- States Have a Critical Role to Play in Number Optimization But...
 - States Must Be Open to New Ideas
 - Continued Efforts to Eliminate 7 Digit Dialing When Addressing NPA Relief
 - States Must Examine Revenue Neutral Rate Center Consolidation
- Must Not Abdicate Their Obligation to Perform Timely NPA Relief
 - Rationing of Codes to Extend the Life of NPAs is not Optimization
- States Should Work With the Industry To Modify Guidelines
 - No Evidence to Support Existing 1k Guidelines Need Modification
 - States Should Work With Industry to Eliminate NPA
 - States Should Work With Industry to Eliminate NXX Codes

Blueprint for True Number Optimization

- Service Providers Must Use Their Own Guidelines and Be Subject To Audits to Ensure Their Compliance
- The Commission Should Adopt The Work Accomplished By The NANC / NRO On COOL Enforcement
- The Commission Should Work With State Commissions to Establish A Transition Plan To Mandatory Ten-Digit (10-D) Dialing
 - The Commission should encourage all carriers to allow 10-D "permissive"
 - The Commission should mandate 10-D dialing for all interstate calls
 - Mandatory 10-D dialing should be imposed whenever an NPA goes into jeopardy

The FCC and state commissions should adopt NPA Overlays as the Primary NPA Selection Choice

Thousands of New Numbers should Be Implemented in a Phased Approach Starting