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IOWA UTILITIES BOARD  
IOWA DEPARTMENT OF COMMERCE

April 25, 2000

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APR 26 2000

Ms. Magalie R. Salas, Secretary  
Federal Communications Commission  
TW-A325  
445 12th St. SW  
Washington, DC 20554

FCC MAIL ROOM

RE: In the Matter of Iowa Utilities Board Petition for Delegation of Additional  
Authority and Request for limited Waiver, CC Docket No. 96-98/NSD  
File No. L-99-96, DA 99-2770

Dear Ms. Salas:

Enclosed for filing in the above docket is an original and 11 copies of the Supplemental  
Information Regarding the Petition of the Iowa Utilities Board.

One additional copy has been included to be date-stamped and returned in the self-  
addressed envelope.

Sincerely,

William H. Smith, Jr.  
Iowa Utilities Board

Enclosures

No. of Copies rec'd 0711  
List ABCDE

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

IOWA UTILITIES BOARD	)	
PETITION FOR DELEGATION OF	)	CC Docket No. <u>96-98</u> /
ADDITIONAL AUTHORITY AND	)	NSD File No. <u>L-99-96</u>
REQUEST FOR LIMITED WAIVER	)	DA 99-2770

**SUPPLEMENTAL INFORMATION REGARDING  
THE PETITION OF THE IOWA UTILITIES BOARD**

On November 10, 1999, the Iowa Utilities Board (IUB) filed a petition for delegated authority to order thousands-block number pooling and to implement certain other telephone number conservation measures. Specifically, the IUB requested delegation of authority to: (a) Institute mandatory thousand block number pooling (TBNP), (b) Reclaim unused and reserved exchange codes, and (c) Monitor the use of numbering resources. The IUB also requested a partial waiver of the Commission's ten-digit dialing requirement, to be used if the IUB decides to implement an overlay relief mechanism.

Pursuant to the Commission's order, initial public comments on the IUB petition were filed on January 10, 2000, and reply comments were filed on January 24, 2000.

On March 31, 2000, the Commission issued its "Report And Order And Further Notice Of Proposed Rulemaking" in Re: Numbering Resource Optimization, CC Docket No. 99-200 (the Report and Order). In paragraph 170 of the Report and Order, the Commission required that states that have pending petitions for pooling authority submit supplemental information in support of their

petitions. Specifically, the Commission required that each state show (1) that an NPA in its state is in jeopardy, (2) the NPA in question has a remaining life span of at least one year, and (3) the NPA in question is in one of the largest 100 MSAs or, alternatively, the majority of wireline carriers in the NPA are LNP-capable. The IUB is making this filing to provide this supplemental information to the Commission.

The 515 area code satisfies all three of the Commission's criteria. Moreover, the IUB believes the 319 area code should also be considered for TBNP, because it is on the verge of jeopardy, has a projected life of over two years, and contains at least one MSA that is just outside the top 100 (specifically, 109<sup>th</sup>). The 319 area code just misses on two of the three criteria, but the relatively longer remaining projected life may make it a more attractive candidate for TBNP than the 515 area code, at least in the short run.

**1. The 515 area code is in jeopardy and the 319 area code may be soon**

On December 1, 1999, representatives of NANPA called IUB staff to informally notify the agency that the 515 area code had entered jeopardy status, meaning there are no longer enough available NXX codes to last until the expected date of implementation of area code relief, based upon the projected rate of usage. This was an unexpected event, triggered by a request by a single CLEC for a relatively large number of central office codes.

Prior to that request, the 515 area code had 133 available NXX codes. At the projected usage rate of three to four NXX codes per month, those codes were expected to last until the second quarter of 2001, according to the 1999

COCUS. The industry petition for area code relief then being considered by the IUB proposed that the IUB adopt overlay relief with permissive dialing beginning on July 1, 2000, and mandatory dialing on November 1, 2000. On that schedule, area code relief would have been in place well in advance of the projected exhaust date, and the 515 area code was not in jeopardy.

However, in late November of 1999 a competitive local exchange carrier requested 58 NXX codes in the 515 area code to permit it to begin offering competitive service in an equivalent number of central offices. This reduced the number of available NXX codes to 75, which NANPA considered an insufficient number to accommodate the projected usage rate through November 1, 2000. NANPA accordingly declared jeopardy and began rationing NXX codes under an interim rationing plan, pending a meeting of the interested telephone industry members to consider a final rationing plan.

Under the final plan adopted by consensus among the participating industry representatives, no more than seven central office codes will be issued in the 515 area code in any month, subject to two exceptions. First, if all seven codes are not assigned in any given month, the unassigned codes will roll over and be available in the following months. Second, a separate pool of 15 central office codes was created for the exclusive use of new entrants; each new CLEC entering the 515 area code may request one of the 20 reserved codes in addition to its allocation from the seven-per-month pool.

The industry also adopted one more restriction on the availability of central office codes: No carrier may request more than three central office codes in any given month from the seven-per-month pool.

The 319 area code, in eastern Iowa, is also the subject of area code relief proceedings. That NPA is not yet in jeopardy status, with a projected exhaust date in the third quarter of 2002, but Iowa's experience in the 515 area code demonstrates how quickly that situation can change. The 515 area code entered jeopardy status literally overnight, as the result of market entrance by a single CLEC. The same could happen in the 319 area code.

**2. The 515 area code has a projected life of at least one year and the 319 area code has a projected life of over two years**

The official projected exhaust date for the 515 area code, based on the January 18, 2000, update to the 1999 COCUS, is the third quarter of 2001. The official projected exhaust date for the 319 area code is the third quarter of 2002.

**3. The 515 area code includes one of the largest 100 MSAs**

The 515 area code includes the city of Des Moines, Iowa, and the surrounding metropolitan area, which is one of the largest 100 MSAs in the United States. According to the official United States Census Bureau rankings, as of June 30, 1996 (the most recent data available on the Census Bureau's web site), the Des Moines, Iowa, MSA ranks 92<sup>nd</sup> in the metropolitan area rankings.

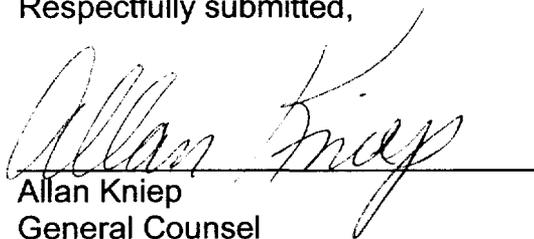
The 319 area code, covering the eastern third of Iowa, does not include an MSA ranked in the largest 100, but it includes two metropolitan areas in the next 100 and three in the third group of 100. The Davenport-Moline-Rock Island MSA

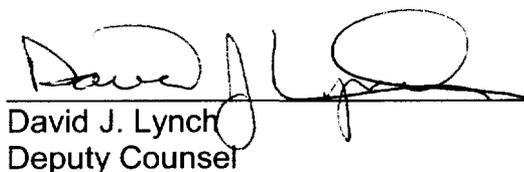
is ranked 109<sup>th</sup>; the Cedar Rapids MSA is 171<sup>st</sup>; the Waterloo-Cedar Falls MSA is 231<sup>st</sup>; the Iowa City MSA is 252<sup>nd</sup>; and the Dubuque MSA is 264<sup>th</sup>.

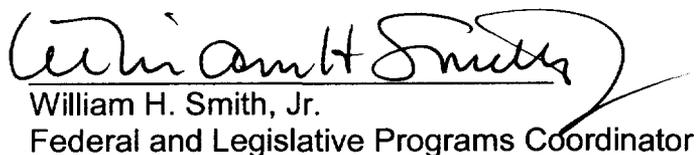
### Conclusion

The IUB believes that the conservation measures it seeks to implement will **not** significantly slow the introduction of the new 641 area code split in the 515 area code, and may not slow the need for area code relief in the 319 area code. However, prompt implementation of number conservation could delay the need for relief in the 712 area code, in western Iowa, and should also delay the need for a second round of relief proceedings for the customers in the existing 515 and 319 area code proceedings.

Respectfully submitted,

  
Allan Kniep  
General Counsel

  
David J. Lynch  
Deputy Counsel

  
William H. Smith, Jr.  
Federal and Legislative Programs Coordinator

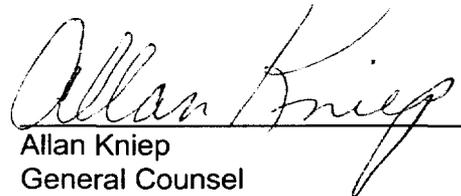
April 25, 2000

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## CERTIFICATE OF SERVICE

I, Allan Kniep, do hereby certify that I caused (1) the foregoing Initial Comments of the Iowa Utilities Board to be filed electronically with the FCC by using its Electronic Comment Filing System, (2) a courtesy copy of the comments to be served, via first class United States mail, postage pre-paid, upon the persons listed on the attached service list.

  
Allan Kniep  
General Counsel

April 25, 2000

**SERVICE LIST**  
**CC Docket No. 96-98**  
**NSD File No. L-99-96**  
**DA 99-2770**

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