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**Public Service Commission**

May 9, 2000  
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**MAY 10 2000**

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

**FCC MAIL ROOM**

Re: CC Docket No. 99-200, Numbering Resource Optimization

Dear Ms. Salas:

Enclosed are the original and five (5) copies of the Florida Public Service Commission Petition for Reconsideration of Report and Order and Comments in the Further Notice of Proposed Rulemaking in the above-noted docket. Please date stamp and return one copy in the enclosed self-addressed envelope.

Sincerely,

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Bureau of Intergovernmental Liaison

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In response to the Further Notice of Proposed Rule Making, we also recommend the following:

1. Require CMRS carriers to participate in pooling effective January 1, 2001,
2. Impose fill rate requirements for all carriers.

#### **BACKGROUND**

On April 2, 1999, the Florida Public Service Commission (FPSC) filed a petition before the Federal Communications Commission (FCC) requesting that the FCC delegate to the FPSC authority to implement various number conservation measures. On June 2, 1999, the FCC issued a Notice of Proposed Rule Making (NPRM) on Numbering Resource Optimization. The NPRM solicited comments on a variety of measures intended to increase the efficiency with which telecommunications carriers use telephone numbering resources. In the NPRM, the FCC clearly acknowledged the existence of serious problems with the utilization of numbering resources, addressed the underlying causes of area code exhaustion, and expressed concern that consumers should be spared the enormous costs and inconveniences associated with the introduction of new area codes. The FCC recognized that implementing new area codes is not a solution that can continue indefinitely, considering the finite number of area codes.

On September 15, 1999, the FCC granted five state commissions (including Florida) additional interim number conservation authority. Later in the year, the FCC delegated similar authority to other state commissions. To exercise this interim authority, on February 29, 2000, the FPSC issued a Proposed Agency Action (PAA) which would have required various number conservation measures including number pooling in three area codes. Two of the area

codes (954 and 561) were to utilize NPAC software release 1.4 starting in May and July of 2000, with the 904 area code to use NPAC software release 3.0 beginning on October 1, 2000. Several code holders filed a petition on April 6, 2000, requesting that certain number pooling provisions in the PAA be reversed, notably the time line and required software release.

On March 31, 2000, the FCC issued its Report and Order and Further Notice of Proposed Rule Making. The FPSC agrees with the majority of the FCC's administrative and technical measures to monitor the way numbering resources are used within the North American Numbering Plan (NANP). Florida and other states are thankful to the FCC for realizing the importance of this matter and delegating authority for interim number conservation. The FPSC has some concerns, however, and will address these issues within this filing.

#### **PETITION FOR RECONSIDERATION OF REPORT AND ORDER**

**1. Require all carriers seeking growth numbering resources to submit utilization reports.**

In paragraph 104, the FCC states that the Months to Exhaust (MTE) worksheet may not be the sole criterion for evaluating need. We agree. However, the FCC further states that all non-pooling carriers should report their utilization data at the NXX level. We disagree. We believe that both MTE and utilization level information at the 1,000-block level must be reported in order to evaluate need by all carriers when they request additional codes. In Florida, we have observed through our utilization surveys that many code holders retain many 1,000-blocks with very low utilization. While the overall utilization for the Central Office Code (COC) may suggest that a carrier needs an additional code,

data at the 1,000-block level may indicate that there is ample room for growth. Thus, we are concerned with the FCC's way of evaluating a carrier's need. Code holders need to understand the importance of conservation in extending the lives of area codes in the nation.

**2. Require that any substitute NPA to be placed on the pooling rollout schedule have a life expectancy of at least 18 months.**

In paragraph 165, the FCC states that as long as the life span of a Numbering Plan Area (NPA or area code) is at least one year and is located within one of the 100 MSAs, state commissions will be permitted to substitute a new NPA on the rollout schedule. We are concerned with this provision since pooling may not appreciably extend the life of an NPA which is one year from exhaust. Depending on the relative number of CMRS and paging companies/customers in an NPA, wireline pooling may be insufficient to materially affect the exhaust date. Our analysis of Florida's NPAs indicates that there are situations where up to 45% of the assigned NXXs in an NPA are held by CMRS and paging companies.

**3. Require NANPA to perform all verification activities since NANPA is the entity that administers the telephone numbers.**

In paragraphs 40-62, the FCC sets out certain responsibilities of NANPA. In addition, we believe the NANPA should perform all the necessary numbering activities, which should include the responsibility to check the validity of a new COC application. In addition, NANPA should keep track of all necessary forms and applications when state commissions require verification of a COC holder's past history. We believe that NANPA should be required to ensure that a carrier has a license to operate a business and provide telecommunications services.

We ask the FCC to require NANPA to withhold future codes for violation of state, industry, and federal rules and orders. The NANPA should be fined for code assignments to any unlicensed carriers or individuals. Similarly, the carriers or individuals who receive codes should be fined and/or consideration might even be given to revocation of their licenses due to state or federal violations relating to code assignments. States have almost uniformly advocated that the FCC adopt binding rules rather than rely upon industry guidelines. We know that neither the guidelines nor the process for enforcing those guidelines is working. Carriers obtain numbering resources from NANPA in violation of the guidelines without consequence. This lack of compliance action makes the guidelines completely ineffective and severely hampers NANPA's ability to fulfill its duties. If the FCC adopts changes to the guidelines but does not make them binding rules or provide for their enforcement by NANPA and/or state commissions, we believe that nothing will be gained.

**4. Require all carriers to submit annually to the NANPA at least 18-month forecasts (rather than five-year forecasts).**

In appendix A, Section 52.15(4)I) states that "[R]eporting carriers shall submit to the NANPA a five year forecast of their yearly numbering resource requirements." It's been the FPSC's observation that the carriers' forecasts change as rapidly as technology changes. In addition, some carriers overestimate, and some underestimate. Therefore, we believe that a five-year forecast would encourage the NANPA to declare extraordinary jeopardy in too many NPAs, causing rationing measures to be imposed prematurely. We do not support such a forecast. We believe that an 18-month forecast should be adequate for planning purposes. We believe that this 18-month period is also sufficient for the Pooling

Administrator to calculate the need for uncontaminated 1,000-blocks for pooling purposes.

**5. Implement thousand-block number pooling in the top 100 MSAs at a rate of 6 NPAs per quarter, per NPAC region.**

In paragraph 159, the FCC sets forth the rollout of pooling at 3 NPAs per quarter, per region. We believe that the current technology allows carriers to be able to port larger volumes of numbers and implement thousand-block number pooling. At our May 5, 2000, Special Agenda, NeuStar indicated that a greater rollout is feasible. NeuStar indicated the timeframe for completion of the necessary administrative work to enable an NPA to be ready to pool could be less than three months. Therefore, we recommend that pooling should be implemented in at least 6 NPAs per quarter, per NPAC region, from the top 100-MSAs.

**6. Allow the use of NPAC software release 1.4 until and unless NPAC software release 3.0 becomes available.**

While the FCC states that release 3.0 has Efficient Data Representation (EDR), this software will not be available until December of 2000 according to NeuStar and the industry. We also believe that software release 3.0 may not be available as presently scheduled, since time frames have changed over the past year. Therefore, we believe that software release 1.4 should be allowed until software release 3.0 become available. We also note that in some MSAs where pooling may be implemented, there may be minimal demand for Local Number Portability (LNP). This means such areas may still use 1.4 even if 3.0 is available.

**COMMENTS IN THE FURTHER NOTICE OF PROPOSED RULE MAKING**

**7. Require CMRS carriers to participate in pooling effective January 1, 2001.**

In paragraph 249, the FCC seeks comments related to CMRS carriers' participation in pooling upon expiration of the LNP forbearance on November 24, 2002. Florida is very concerned that the majority of the current area code jeopardy situations may be attributed to CMRS and paging companies. Based on our latest utilization survey, we have observed that CMRS carriers have more COCs than wireline carriers in some rate centers. If CMRS carriers are not required to participate in any pooling trials, pooling will be far less effective. Most incumbent wireline carriers (ILECs) have demonstrated that they have high number utilization. Therefore, we ask the FCC to reconsider its November 24, 2002, deadline, and recommend that the CMRS carriers and paging companies be required to participate in pooling trials effective January of 2001. We believe that the technology is rapidly improving, and therefore, CMRS providers and paging companies should be able to join the pooling trials sooner than originally anticipated.

**2. Impose fill rate requirements for all carriers.**

In paragraph 248, the FCC seeks further comments on what specific utilization threshold non-pooling carriers should be required to meet prior to requesting new numbering resources. In our comments in this docket, we stated that the utilization rates vary by area code, by rate center, and by carrier. We suggest that there should be a higher fill rate requirement for major market areas and extraordinary jeopardy areas than for non-jeopardy areas. Through our utilization surveys, we have observed that the level of carriers' need for numbering resources may vary widely from one area to another and by rate center; consequently, we suggest that the FCC adopt an acceptable range and allow state commissions to set target utilization thresholds within that range.

**ADDITIONAL COMMENTS**

Our October, 1999, number utilization survey was completed in January of 2000. Only 44 companies (out of 298 code holders in Florida) responded with valid and complete responses. Based on this data, we observed that 213 NXXs were uncontaminated and unused. While we ordered the reclamation of all unused and reserved NXXs from all of Florida's area codes, feedback indicates that only 29 NXXs have been returned to NANPA. The summary of this information is provided below:

Area Code	Unused NXXs
305	10
352	37
407	16
561	33
727	8
786	10
813	11
850	34
904	17
941	19
954	18

On January 20, 1999, staff from various state commissions met with the FCC staff. During this meeting, the FCC staff asked each state commission for any utilization information. Therefore, we provide Florida's October, 1999, utilization summary in the table that follows:

Florida's Area Code Utilization Information						
A	B	C	D	E	F	G
Florida's Area Codes*	Current Exhaust Date (Dec 99 COCUS)	Number of Available NXXs per NPA (as of 11/30/99 by NANPA)	Total Number of Unused and Reserved NXXs	Available NXXs with less than 10% contamination (%)	Available 1,000 blocks with less than 10% contamination (%)	Utilization Rates (%)
305	2001 2Q	21	10	7	10	50
352	2008 1Q	481	37	12	22	65
407	2004 1Q	45	16	37	39	42
561	2002 4Q	210	33	18	22	53
727	2009 3Q	383	8	11	14	57
786	2003 2Q	619	10	31	35	16
813	2006 4Q	350	11	10	12	59
850	2004 2Q	378	34	12	17	38
904	2002 2Q	175	17	11	18	59
941	2002 4Q	70	19	20	21	51
954	2002 3Q	186	18	10	12	43

\* The 321 NPA went into effect in January 2000. The 863 NPA went into effect in September 1999.

We urge the FCC to require that LNP/LRN capability be deployed by all code holders, and 1,000-block pooling be mandated to resolve the nation's numbering crisis.

The NANPA recently estimated that competitive LECs use less than six percent of the numbers assigned to them. Low competitive LEC utilization levels are caused by the combination of assigning numbers in blocks of 10,000 and the continued use of small rate centers established many years ago. The recent experience in Massachusetts, where two competitive LECs returned over 200 NXXs, confirms that some competitive LECs have been hiding a huge inventory of numbers. These 200 NXXs were never used at all! This appears to explain why Florida has a low utilization rate. There are five area codes presently in extraordinary jeopardy: 904, 561, 954, 305, and 786. The FPSC staff predicts that the 941, 407, 321, and 850 area codes will exhaust within the next two years. Consequently, there will be 23 area codes to serve a 15-million population. To achieve full utilization, this means every Florida

citizen must have 13 phone numbers by 2004 if this analysis is applied!

We believe that states must have the ability to change the industry numbering guidelines where it is found to be in the best interest of the public. Each state has its own unique characteristics. For example, at this time, any carrier currently may receive an initial NXX code upon certifying a need for numbers in a new area and representing that it is licensed or certified to operate in the area. However, some carriers have used this liberal standard, designed to facilitate new entry, to build an inventory of numbers for future use. Measures that enable carriers to establish a service footprint with number blocks smaller than an NXX code are the only near-term proposals that remedy the immediate problem in a competitively neutral way.

All the switches within Florida's largest MSAs, where permanent LNP must be implemented per the FCC, have been converted. Some individuals are concerned that some carriers are not LRN/LNP capable as directed by the FCC. Thus, we ask the FCC to find a way to check the validity of these concerns.

The FPSC strongly suggests in this imminent numbering crisis that state commissions be given additional, immediate authority to expand the deployment of LNP to accommodate 1,000-block number pooling and, if necessary, 100-block number pooling.

In keeping with the rationale for number pooling, the FPSC recommends that a portion of the unused telephone numbers within a given provider's NXX code be assigned to other providers operating in the same area or rate center. We believe that code sharing has many benefits, especially for areas which are not in the top 100 MSAs or areas which are in the top 100 MSAs but waiting to implement 1,000-block pooling in the near future. This would

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require collaboration between providers and the pooling administrator. The FPSC suggests that NeuStar serve as the 1,000-block Pooling Administrator. We believe that sequential number assignment in conjunction with 1,000-block pooling would be an effective way to use telephone numbers.

The FPSC, along with other state public utility commissions, faces an enormous burden in determining when, and in what form, to implement area code relief. The FPSC has expanded its resources to convene public service hearings and workshops and to plan for different area code relief strategies depending upon the geographic structure of the region being considered. The FPSC works closely with NANPA and the industry to choose an effective area code relief plan, which will address the needs of the customers and the community of interest, and it bears the costs of notifying the public. As the FCC notes, all state commissions also inevitably bear the brunt of consumer dissatisfaction with whatever method of area code relief is chosen.

In conclusion, we thank the FCC for its efforts to enable state commissions to solve the numbering crisis puzzle.

Respectfully submitted,



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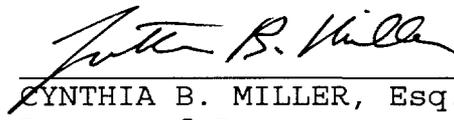
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DATED: May 9, 2000

Florida Public Service Commission  
CC Docket No. 99-2000

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing  
Petition and Comments of the Florida Public Service Commission is  
being furnished to the parties on the attached list.



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