

May Y. Chan  
Director – Regulatory Matters



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June 26, 2000

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re:    Ex Parte            Number Resource Optimization – CC Docket Nos. 99-200

Dear Ms. Salas:

On June 22, 2000 GTE representatives met with members of the Common Carrier Bureau and Wireless Telecommunications Bureau of the Commission to discuss the questions and proposed answers we submitted in our June 13, 2000 ex parte filing. During the meeting we also raised one additional clarification question that is not in the June 13, 2000 filing and identified concerns that we have with the “draft” FCC Form 502, North American Numbering Plan Number Resource Utilization/Forecast Report posted in the NANPA.com webpage on June 15, 2000. The attachment contains the additional issues we discussed with the FCC attendees.

Chuck Keller, Jeannie Grimes, Aaron Goldberger, and Sanford Williams of the Common Carrier Bureau and Peter Wolfe of the Wireless Telecommunications Bureau were present at the meeting. GTE representatives at the meeting were John Rollins, Norman Epstein, Richard Round, and the undersigned.

Pursuant to Section 1.1206 of the Commission's rules regarding ex parte communications, please include a copy of this letter in the public record of the above-captioned proceeding. Please contact the undersigned should you have any questions.

Sincerely,

May Y. Chan

cc:    Charles Keller, Chief, Network Services Division, CCB  
      Aaron Goldberger, CCB  
      Jeannie Grimes, CCB  
      Sanford Williams, CCB  
      Peter Wolfe, WTB

**Issues Regarding FCC Form 502, North American Numbering Plan Number Resource Utilization/Forecast Report:**

1. Is a separate file / submission required for each OCN? GTE Network Services (GTENS) has 7,194 NXX's assigned in 51 OCN's. This is 51 report submissions.

To prepare the utilization reports, 360,000 manual entries are required for the category information, plus the NPA-NXX must be entered, the pool donation indicator at the block level where applicable, the name of recipients of intermediate numbers. In addition, the company information sheet must be completed, and the forecast data either at the rate center level for pooling NPA's, or NPA level in non-pooling areas must be entered.

Based on the 51 reports to be submitted, using 24 hours average per report as estimated by FCC Form 502, GTENS will expend 1,224 hours to prepare the reports which is approximately 1 person 1/2 year. With reports due semi-annually, this reporting requirement equates to 1 full time person for GTENS. In view of the fact the August 1 reports are for data as of June 30th, and February 1 reports are as of December 31, GTENS must dedicate at least 8 employees full time for the month prior to the report date solely performing data entry work to meet the deadlines. Additional time / resources will need to be assigned to attempt to satisfy the requirement noted in question 7 below, generate the data, perform general administrative and project management, and properly retain the required information for the 5 year records retention requirement.

We feel this reporting format is unduly burdensome for service providers, in large part, due to the manual nature of providing the data. Even if we were able to automate some of the process, time must be taken to create the software for this reporting format, time for generation of the data, both utilization and forecast, manual entry of both, etc.

GTE Wireless has 16 OCNs.

2. What's the definition or distinction between carrier and non-carrier?

3. Why is rate center not on form U1?

4. Second paragraph of usage categories for intermediate states "For intermediate numbers provided by carriers to non-carrier entities, the providing carrier must report utilization for these numbers. Numbers assigned to end users by a non-carrier entity should be reported by the providing carrier as "Assigned." Any remaining numbers held by a non-carrier entity that are not assigned to end users shall be reported by the providing carrier as "Intermediate."

The FCC should reconsider this and rule that any company providing numbers to an end user has responsibility of reporting utilization. The problem is if they do not comply, service providers would have to be in the position to refuse providing additional numbers.

5. Is it true that changes to the format of FCC form 502 may be made prior to the next report on 2/1/2001?

6. An 'X' is to be entered in the "Donated to Pool" category (U1). Does this also include donated blocks that have been allocated to another service provider?

How will the pooling administrator know the utilization level for contaminated blocks in the pool unless they are going to some sort of NPAC query?

7. For purposes of forecasting, at what time does an NPA become forecasted as pooling (F1B) as opposed to being provided at the NXX level (F3B)?

This relates to NPAs with pooling implementation ordered and/or in progress at the data reporting date. If an NPA will implement pooling prior to the next NRUF reporting, should it be reported as pooling even though it may not be implemented for several months? Do carriers have to re-submit an NRUF for an NPA at implementation time?

8. GTENS is repositioning out some offices with an effective date of 7/01/2000. With the first reporting period ending as of June 30th, will we need to report these as they are technically still ours?

**Additional Clarification Question:**

1. Do all non-working, non-assigned numbers fall into the 45-day limitation for reserved numbers? That is, if a carrier has assigned 80% of a thousands block of numbers to one customer and has restricted assignment in the other 20% to save them for future growth for that customer, how can they be protected after the 45 day period expires? There are also new businesses that request numbers as much as a year to 18 months ahead of time so that they will have time to construct a building and move into it. Knowing the numbers ahead of time allows them to provide notice to their customers so that communications is not interrupted when they move. In both cases, what category should these numbers be counted in on the utilization and forecast reports.