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BELLSOUTH

BellSouth
Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463-4113
Fax 202 463-4198

kathleen.levitz@bellsouth.com

July 14, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

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

Re: CC Docket No. 99-200

Dear Ms. Salas:

On July 13, 2000, Al Bolden, Angela Brown, Bill Shaughnessy, and I, representing BellSouth, met with Diane Griffin Harmon, Josephine Scarlett, Leslie Selzer, and Aaron Goldberger of the Commission's Common Carrier Bureau. The purpose of our meeting was to discuss issues raised by the Report and Order and Further Notice of Proposed Rule Making in CC Docket No. 99-200 on which we propose to seek reconsideration or on which we have already commented in the further rule making proceeding. The attached document formed the basis for our presentation to the staff.

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

Attachment

cc: Diane Griffin Harmon (w/o attachment)
Josephine Scarlett (w/o attachment)
Leslie Selzer (w/o attachment)
Aaron Goldberger (w/o attachment)

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Number Resource Optimization

*BellSouth Corporation
CC Docket 99-200*

Discussion Points

- **Concerns With Report and Order in CC Docket 99-200:**
 - Primary Number Categories
 - Intermediate Numbers
 - Reserved Numbers
 - Calculation of Utilization Levels
 - Forecast & Utilization Reporting Requirements
 - Reporting deadline
 - Number Pooling Concerns
 - Cost Recovery
 - Schedule
 - Technical Limitations of IAESS Switches
 - Calculation of Life of NPAs

Reserved Numbers

- **Reserved numbers are not the primary driver for number optimization.**
 - No data exists to support such stringent action by FCC.
- **Customer needs will not be met with a “45 day” limit on reserved numbers:**
 - For many businesses and municipalities, maintenance of established telecommunications services will become unmanageable
 - Time limit imposed on number reservations is both impractical and, as evidenced by consumer response, not consumer friendly
 - Number optimization procedures should not introduce a parity issue between PBX and Centrex users
- **Number reservations must have a longer “life” than 45 days.**
 - FCC should stay the “45 day” time limit until the record is complete.
 - BellSouth supports the time limit recommended by the NANC NRO Working Group: One year reservation period with a one-time six month extension.
- **Regardless of the time limit on reservations, the FCC must allow a reasonable transition period to address existing reserved numbers so that the necessary customer contacts can be made.**

Calculation of Utilization Levels

- **Formula for calculation of utilization as defined in the NRO Order is misleading and should be modified to reflect those numbers that are unavailable for assignment:**
 - Presently, “*assigned numbers*” are the only numbers counted in the utilization level calculation
- **Results of formula for calculation of utilization as defined in the NRO Order is not “true” utilization. This can lead to erroneous conclusions and policies.**
- ***Administrative, aged and reserved* numbers are all numbers that cannot be used and should be included in the numerator of the utilization formula.**
 - Carriers providing *intermediate numbers* to carriers should be able to count the *intermediate numbers* as utilized, as well.
- **In sum, the utilization formula should include *assigned, intermediate, reserved, aged and administrative* numbers in the numerator.**

Forecast & Utilization Reporting

- **Time intervals associated with the NRO Order are insufficient to allow service providers to meet the 8/1/00 filing deadline:**
 - Order released 3/31/00 and appeared in Federal Register 6/19/00
 - Reporting forms approved by OMB on 6/26/00
- **BellSouth has approximately 7800 NXXs in over 1500 rate centers:**
 - Manually preparing a report containing 80,000 lines of data is not feasible.
 - Development of mechanization to extract and compile the data cannot be finalized (and should not begin) until the requirements for the COCUS data elements are correctly and fully defined
 - New TN administration systems will facilitate future reporting
 - BellSouth in process of replacing existing TN Administration systems
 - Full mechanization will not be complete by 8/1/00 or 2/1/01 reporting dates
- **Based on 7/00 NANC meeting, NANPA will not have mechanism in place to deal with industry data on 8/1/00.**
 - Spreadsheets just recently provided are impractical for large carriers.

Forecast & Utilization Reporting

- **BellSouth will:**
 - File a Request for Waiver of the 8/1/00 filing deadline:
 - Ask Commission to allow the use of the current COCUS for 8/1/00 filing.
- **BellSouth can submit the following:**
 - Wireline data:
 - On 8/1/00: NXX forecasts at the NPA level
 - After 8/1/00: Counts of *aged*, *reserved* and “*assigned*” numbers at 1000 block level:
 - *Administrative & Intermediate* will be included as part of “*assigned*”/ “*reserved*”
 - Wireless data:
 - On 8/1/00: Counts of *aged*, *reserved*, *assigned*, *administrative* and *intermediate* numbers at 1000 block level.
- **BellSouth is analyzing if the 2/1/01 reporting deadline can be fully satisfied:**
 - COCUS based on new requirement requires intensive manual effort
 - Implementation of new TN administration systems begins 2001.

Number Pooling Costs

- **Number pooling impacts most network elements that use the “NXX” as information:**
 - BellSouth has identified 50+ OSS systems that will require modifications due to number pooling.
- **Number pooling costs are incremental to number portability costs:**
 - Cost classifications are similar to number portability classification (e.g. Type 1, Type 2, etc.)
- **BellSouth estimates its 5-year cost (2000-2004) for number pooling to be \$300M.**
- **Type I and Type II number pooling costs should be recoverable:**
 - The simplest cost recovery mechanism is to allow ILECs to temporarily modify the existing end user line for LNP.

Number Pooling Implementation

- **The national number pooling implementation schedule must be coordinated with existing state trials and with future grants of existing state petitions.**
 - Schedules (national & state) must not exceed 3 NPAs per quarter per NPAC region.

- **Per NRO Order (Para 162), NPAs that exhaust in less than a year will not be treated as priority NPAs for pooling purposes.**
 - The FCC needs to clarify that the “life” of the NPA used to justify pooling is based on the "true" life of the NPA--that is, the exhaust projection without rationing.

Number Pooling Implementation

- **T1S1.6 Technical Requirements recognize that certain switch types have limitations with number pooling.**
- **BellSouth has 1AESS switches in the following MSAs:**
 - AL: Birmingham, Mobile, Montgomery
 - FL: Jacksonville, Ft. Lauderdale, West Palm Beach, Miami
 - LA: New Orleans, Shreveport, Lafayette
 - GA: Atlanta
 - TN: Memphis, Nashville
 - KY: Louisville
- **These switches have high utilization rates and few 1K blocks with less than 10% contamination.**
- **1AESS Vendor does not plan to provide support for number pooling.**
- **BellSouth does not plan to equip the 1AESS switches for number pooling.**