

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

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In the Matter of)
)
Numbering Resource Optimization)
)
Petitions for Reconsideration)
And Clarification)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
CC Docket No. 99-200

**PETITION FOR RECONSIDERATION AND CLARIFICATION
OF WORLDCOM, INC.**

WorldCom, Inc. ("WorldCom") hereby submits this Petition for Reconsideration and Clarification of the Commission's Report and Order released on March 31, 2000 ("*NRO Order*"). Therein, the Commission delegated substantial additional authority to state commissions, yet failed to provide an expedited process for review of state commission decisions that violate the Commission's rules or the Telecommunications Act. The Commission must recognize that in some cases state commissions are making delay of area code relief the primary numbering administration policy. Delaying tactics such as arbitrary reductions in lottery allocations will inevitably fail to prevent area code relief, but will stifle competition and innovation. An expedited review process would give all parties greater certainty that the Commission's competition policy will not be thwarted by a small number of state commissions on a futile quest to prevent the inevitable. The *NRO Order* included several additional conclusions that the Commission should also reconsider or clarify.

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List A B C D E

I. A process for expedited review of state commission numbering administration decisions is needed to protect the Commission's competition policy.

The Commission has now delegated substantial authority over numbering administration to state commissions. In addition to overseeing area code relief, state commissions are authorized to: make determinations on the validity of data submitted to the North American Numbering Plan Administrator ("NANPA") (§ 54); gather numbering data for specific purposes (§ 76); affirm or overturn decisions by NANPA to withhold initial numbering resources (§ 98); investigate and determine whether code holders have "activated" NXXs assigned to them within the appropriate time frame and order NANPA to reclaim an NXX code if it has not been activated within the appropriate time frame (§ 237). The Commission has also delegated additional authority to individual state commissions to conduct thousand-block pooling trials and certain other conservation measures.¹ And the Commission has indicated that it will continue to delegate pooling authority until national pooling begins (§ 169).

WorldCom is confident that most state commissions will exercise their substantial delegated authority in conformance with the Commission's rules and the Telecommunications Act. Nonetheless, in some instances it is apparent that state commissions may elevate the desire temporarily to delay area code relief over other important policy considerations.² In so doing, states may fail to comply with the statutory mandate that numbers be made available on an equitable basis.³ Numbers are

¹ See, e.g., *California Delegation Order*, 14 FCC Rcd at 17490-96.

² For example, a letter to the Chief of the Common Carrier Bureau, jointly filed on May 12, 2000 by carriers doing business in California, demonstrates that the California Public Utility Commission has unilaterally turned to code rationing to artificially extend the life of California area codes.

³ 47 U.S.C. § 251(e)(1).

not available on an equitable basis whenever a new entrant cannot obtain sufficient numbers to compete with incumbent carriers that already have numbers. Moreover, the Commission's rules also require that numbering resources be made available on an efficient, timely basis.⁴ This requirement explicitly applies to any authority delegated to state commissions.⁵

While reductions in lottery allocations and other policies may delay area code relief, they will not prevent it. There is nothing to be gained by the failure to provide timely area code relief. But such failure will inevitably harm competition and innovation by denying carriers, particularly new entrants, equitable access to numbering resources. To remedy this significant harm, WorldCom recommends that the Commission reconsider its failure to adopt an expedited review process of state commission action pursuant to delegated authority over numbering matters. The Commission should establish expedited review procedures under which the Chief of the Common Carrier Bureau would be required to consider and resolve all petitions for review of state commission action within 90 days. Such a process would be consistent with the Commission's commitment to closely monitor state commission action to ensure that federal numbering policies are followed (§ 171).

Unless, the Commission provides for such expedited review, carriers will be forced to seek judicial review of state commission decisions.⁶ Time-consuming litigation will never provide full relief. By the time a court actually reaches a decision, competition may be delayed for years. This is unacceptable in fast-moving telecommunications

⁴ 47 C.F.R. § 52.9(a)(1).

⁵ 47 C.F.R. § 52.9(b).

⁶ For example, it was recently reported that a carrier has filed suit against the California Public Utility Commission.

markets. Only an expedited review process by the Commission can ensure that the Commission's competition policies will not be thwarted by futile attempts to prevent area code relief.

The Commission should also clarify that states may not use lotteries and rationing as a way to extend an NPA's life and thereby make the NPA eligible for pooling. When an NPA is close to exhaust it is preferable to order relief with pooling in the relief NPA, than to attempt to save a doomed NPA through the costly and futile process of imposing pooling in the jeopardy NPA. It is more costly to initiate pooling in an existing NPA because of the costs associated with contaminated blocks, block identification, and block donation. It is pointless to incur these costs if an NPA is so close to exhaust that rationing is needed.

The Commission has indicated that it will continue to consider state requests for delegation of pooling authority.⁷ The Commission should clarify that states receiving such delegations must either select an administrator for state-ordered pooling, or must give the industry sufficient time to conduct a competitive bidding process for such an administrator. The Commission cannot allow states that seek to benefit from pooling to sidestep this critical first step of selecting a pooling administrator.

The Commission should also make clear that only those pooling trials already underway have until 9/1/2000 to conform to the national rules. Any state-initiated pooling in additional NPAs must conform from the outset. Otherwise, state commissions may attempt to rush implementation of additional trials before 9/1/2000. Such a strategy might enable those states to impose non-standard contamination levels or other requirements at variance with the national rules. The Commission can prevent such

activity by making clear that additional trials must conform to the national rules from the beginning.

II. Other Issues

The Commission concluded that ported-out numbers should be categorized as *assigned* numbers by the donating carrier, and should not be classified at all by the receiving carrier.⁸ This conclusion appears to be based in part on the misapprehension that ported numbers are numbers that would be classified as *assigned* in lieu of the porting activity. In fact, *reserved* numbers can also be ported. Under the Commission's scheme a *reserved* number could be transformed into an *assigned* number simply by being ported to another service provider. The Commission should reconsider this conclusion and require donating carriers to continue to report reserved ported numbers as *reserved* until they are either assigned or returned to the donating carrier.

The *NRO Order* is silent on the treatment of blocks donated to the pooling administrator. But the new COCUS reporting forms clearly describe that the donated blocks be identified. The Commission should clarify the reporting of blocks related to pooling. WorldCom suggests that the pooled-out blocks be reported at the block level. The block recipient should treat any assigned blocks as new inventory. The block donor would treat contaminated numbers as a recipient carrier in a porting environment. The block recipient would report contaminated numbers as ported-out, as with other ported numbers.

⁷ *NRO Order* at ¶ 169.

⁸ *Id.* at ¶ 18.

In the *NRO Order* the Commission adopted a five-day limit on the time that a number may be held in pending status in the *assigned* category.⁹ The Commission must reconsider this conclusion. Telephone numbers are typically placed into pending status while awaiting activation. Activation often depends upon the delivery of loop facilities by the incumbent local exchange carrier (“ILEC”). The Commission should be well aware that the installation interval for these facilities can extend far beyond five days. More importantly, competitive local exchange carriers (“CLECs”) have no control whatsoever over when these facilities will ultimately be delivered. The Commission should permit numbers to be held in pending status for up to 60 days. Such an interval would more accurately reflect the ILECs’ provisioning ability.

The Commission’s rules for the treatment of *intermediate* numbers are inconsistent and will inevitably introduce confusion and errors into the reporting process. *Intermediate* numbers are numbers made available for use by another carrier or non-carrier entity.¹⁰ Inexplicably, the Commission has required these numbers to be treated differently depending on whether they are made available to a carrier or a non-carrier entity. When assigned to a carrier, the assigning carrier must always treat the numbers as *intermediate*. When assigned to a non-carrier, the assigning carrier must reclassify the numbers as *assigned* when the non-carrier entity assigns them to an end user or customer. This disparity will inevitably introduce confusion and error into the reporting process. It will not always be clear whether a particular entity is or is not a carrier. A single company may consist of many separate subsidiaries, divisions, and business units, only some of which are engaged in common carriage. The North American Numbering Plan

⁹ *Id.* at ¶ 19.

¹⁰ *Id.* at ¶ 21.

Administrator (“NANPA”) will have no way to determine who should report on when a particular *intermediate* number is ultimately assigned. The Commission should reconsider this conclusion and require in all instances that the entity that owns the switch to which the numbers are assigned must do the reporting. A reseller that obtains *intermediate* numbers should have no reporting obligation irrespective of whether that reseller is a carrier or a non-carrier entity.

The Commission has limited the amount of time that numbers may be held in *reserved* status to 45 days.¹¹ This limit is completely at odds with established industry practice and customer expectations. The Commission must establish a mechanism for extending number reservations beyond 45 days as an exception. Otherwise, large users such as government agencies will see the numbers that they need vanish. In some cases, they will be claimed by other customers. In others, they may be donated to the pooling administrator. In still others, customers who are negotiating service delivery while hoping to preserve number assignments will be harmed. In any case, a 45-day limit will severely disrupt the operations of organizations that depend upon an inventory of reserved numbers.

The Commission has ordered forecast data to be reported at the thousands-block per rate center level by pooling carriers in pooling areas, and at the NXX per NPA level in non-pooling areas. The Commission should clarify that pooling carriers may elect to report at the thousands-block level for all areas. Allowing such an election could simplify the reporting process for pooling carriers without diminishing in any way the value of the information reported. Moreover, it would reduce the burden on carriers that would otherwise be required to report in two different formats.

While prohibiting states from imposing additional regularly scheduled reporting requirements on carriers, the Commission has allowed states to gather data for specific purposes on an ad hoc basis.¹² The Commission should clarify that states may only seek data for the categories of number use that the Commission has adopted. The Commission should not permit states to impose disparate classification systems as part of an ad hoc data collection process.

The Commission has required applicants for initial numbering resources to show: (1) that the applicant is authorized to provide service in the area for which the resources are requested; and (2) that the applicant is or will be capable of providing service within 60 days of the numbering resources activation date.¹³ It is unclear what the Commission means by the phrase “numbering resources activation date.” If this is the LERG-effective date, then the Commission must reconsider this time frame. It is unrealistic to expect carriers to assign numbers to customers within 60 days of the LERG-effective date for the NXX from which the numbers are drawn. Carriers must fully test all routing and trunking before assigning numbers from NXXs that have been recently activated in the LERG.¹⁴ Given the extent of testing required, 120 days would be a far more reasonable time frame than 60 days.

The Commission should also clarify the nature of the proof that is required for initial resources. It is critical that carriers be able to submit the same type of proof in every state where they do business. A uniform showing will allow carriers to standardize their processes and will avoid confusion over the idiosyncratic requirements of a

¹¹ *Id.* at ¶ 23.

¹² *Id.* at ¶ 76.

¹³ *Id.* at ¶ 96.

particular state. There is no reason why the type of proof should vary among states. If the Commission does not specify the type of showing required, it should at least create a presumption that any proof sufficient in one state will also suffice in all other states.

Under the Commission's framework for the rollout of thousands-block pooling, where an NPA encompasses areas both within and outside of a qualifying MSA, pooling will be required only in those rate areas in the NPA which are part of the MSA. WorldCom urges the Commission to reconsider this conclusion. When pooling is implemented in an NPA, all LNP-capable carriers should participate in pooling in all rate areas in which they do business. If an LNP-capable carrier does business in a rate area within the NPA, but outside of the MSA, there is no reason why that carrier should not participate in pooling in that rate area. Such participation will enhance conservation benefits without creating any significant additional burden. The distinction the Commission has made does not advance its goals for conservation.

The Commission's adoption of the T1S1.6 Technical Requirements is an unprecedented and unnecessary step. Even when the Commission mandated that carriers provide local number portability, it never mandated any particular technical standard. Instead, the Commission adopted certain performance criteria and mandated conformance to those criteria. There is no reason to take a different approach here. Carriers should be free to implement or not implement the T1S1.6 pooling requirements. There is no need to order carriers to implement this standard. The Commission should simply mandate that carriers support thousands-block pooling.

¹⁴ Regardless of whether the code is an initial code or a growth code, additional interconnect and 911 trunking is generally required. The testing for these resources with the interconnect carrier and emergency services providers cannot even be scheduled until after the LERG-effective date.

WorldCom urges the Commission to reconsider its conclusion that unassigned number porting (“UNP”) is insufficiently developed for adoption at this time. Since the original record was developed in this proceeding, WorldCom and Focal Communications have demonstrated that existing systems are sufficient to support certain UNP applications.¹⁵ At the very least the Commission should authorize a state to perform a mandatory UNP trial. A number of states have sought such authority. Further evaluation of UNP’s utility requires that the Commission allow a mandatory trial with ILEC participation.

The Commission should not allow states to initiate reclamation activity within 60 days of expiration of the applicable activation deadline. As we have shown above, assuming that the deadline is the LERG-effective date, 60 days is an insufficient amount of time to determine that resources should be reclaimed. Testing and other activities that must occur before assignments can begin will inevitably take longer than 60 days. The Commission should reconsider this conclusion and allow at least 120 days before reclamation could begin.

The Commission should clarify that a genuine request from a customer is a sufficient reason to assign numbers out of sequence. If the Commission does not allow such assignments, it will encourage customers to number-shop, and then port their service to the carrier of their choice. The Commission should instead clarify that all carriers may assign out of sequence to meet any genuine customer request.

II. Conclusion

¹⁵ See WorldCom/Focal ex parte letter filed March 27, 2000.

WorldCom urges the Commission to reconsider and clarify the *NRO Order* in accordance with this petition. In particular, the Commission should establish an expedited process for review of state commission decisions taken pursuant to delegated numbering administration authority. Needless delays in implementation of area code relief can only harm competition without providing any countervailing benefits.

Respectfully submitted,
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I, Vivian Lee, do hereby certify that copies of the foregoing In the Matter of Numbering Resource Optimization, Petitions for Reconsideration and Clarification of WorldCom, Inc. were sent via first class mail, postage paid, to the following on the 17th day of July 2000.

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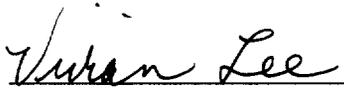
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