

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Number Resource Optimization) CC Docket No. 99-200

PETITION OF SBC COMMUNICATIONS INC. FOR EXTENSION OF TIME AND PARTIAL WAIVER
OF REPORTING REQUIREMENTS

SBC Communications Inc. (SBC) on behalf of its subsidiary, Ameritech,¹ requests an emergency extension of time and partial waiver of the mandatory reporting requirements adopted in the Report and Order in this proceeding.² Despite its best efforts, Ameritech has been unable to identify and report intermediate numbers; these numbers are currently included as assigned numbers in its inventory.³ For the reasons discussed below, SBC requests that the Commission grant Ameritech a partial waiver of the Section 52.15 reporting requirements allowing Ameritech to file the data as specified by the Commission's rules, with the exception of intermediate numbers, on or before the August 1, 2000 deadline date. In addition, it requests the Commission grant Ameritech an extension until September 29, 2000, to permit Ameritech the

¹ SBC Communications will be able to meet these reporting requirements with respect to its other subsidiaries by the August 1, 2000 due date.

² Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, FCC 00-104, released March 31, 2000 (Report and Order).

³ With the exception of the intermediate number category, Ameritech will file data in the remaining numbering categories. Intermediate numbers will be included in the assigned number category.

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time necessary to file an amended report which will separately identify intermediate numbers and correct the data provided in the assigned number category on August 1, 2000.

Section 52.15(f)(6) of the Commission's new rules specifies that carriers are to file forecast and utilization reports semi-annually on or before February 1 for the preceding reporting period ending on December 31, and on or before August 1 for the preceding reporting period ending on June 30. The first of these mandatory reports is to be filed on or before August 1, 2000. As several petitioners have demonstrated, significant modifications to existing processes and systems have been necessary in order to compile and categorize the data required by Form 502. Prior to the release of the Report and Order three months ago, there was no reason for carriers to maintain this information in this format. There was no national reporting requirement nor was there a mandatory categorization of numbering resources.

The burden of complying with the new reporting requirements has proven particularly onerous with respect to intermediate numbers. Ameritech's systems cannot yet separately identify intermediate numbers; such numbers are currently tracked as assigned numbers. The only manner in which Ameritech can identify intermediate numbers at this time is to review its billing records utilizing USOCs as the search criteria. Programs must be written for each of Ameritech's two billing systems identifying the related USOCs. The numbering information obtained through the running of these programs must then be compared to the utilization report spreadsheet and intermediate numbers subtracted from the assigned number total. These results must then be recorded in the CD-ROM format. Clearly, this method is both time-consuming and complex. Although Ameritech initiated these necessary modifications in a timely fashion, it cannot complete this activity until September 29, 2000.

The waiver and extension of time sought through the filing of this Petition will not disrupt the reporting process. Data shall be filed with the NANPA which will enable it to initiate its compilation and analysis of carrier reports.⁴ The granting of this Petition will not adversely impact NANPA's activity in this regard nor will it detrimentally effect any other party.

Conclusion

SBC and all of its subsidiaries remain committed to fulfilling the reporting requirements of the Commission. All SBC subsidiaries have dedicated significant resources in order to comply with these reporting mandates by the August 1, 2000 due date. Because of these efforts, all but Ameritech will file the data required in the format specified by the reporting date. With respect to Ameritech, only one of the Commission's reporting requirements, that involving intermediate numbers, has proven to be beyond its abilities. Despite its best efforts, Ameritech will be unable to segregate and separately report intermediate numbers by August 1, 2000. The granting of a limited waiver for good cause and a 60-day extension of time under these circumstances is clearly warranted.

⁴ As identified by Bell South in its Emergency Petition for Partial Waiver and Extension of Time, filed in this proceeding on July 24, 2000, NANPA as a preliminary matter must deal with certain issues inherent in the first reporting of data. *See* p. 5 of the Bell South Petition.

Respectfully Submitted,

SBC COMMUNICATIONS INC.

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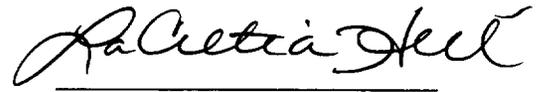
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July 27, 2000

CERTIFICATE OF SERVICE

I, Loretia Hill, do hereby certify that on this 27th day of July 2000, a copy of the foregoing "Petition" was served by U.S. first class mail, postage paid, to the parties listed on the attached sheets.

A handwritten signature in cursive script, reading "Loretia Hill", is written above a horizontal line.

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