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FCC MAIL ROOM

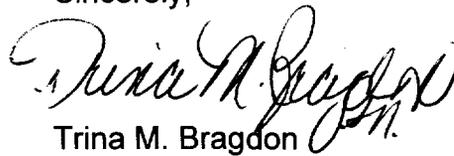
Margalie Salas, Secretary
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Portals II
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Re: Numbering Resource Optimization, CC Docket No. 99-200

Dear Ms. Salas:

Enclosed for filing please find an original and 4 copies of the Maine Public Utilities Commission's Petition for Reconsideration and Clarification in the above-captioned matter.

Sincerely,


Trina M. Bragdon

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Before the
Federal Communications Commission
Washington, D.C. 20554

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JUL 26 2000

In the Matter of)	FCC MAIL ROOM
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Connecticut Department of Public Utility Control)	RM No. 9258
Petition for Rulemaking to Amend the)	
Commission's Rule Prohibiting Technology-)	
Specific or Service-Specific Area Code Overlays)	
)	
Massachusetts Department of Telecommunications)	NSD File No. L-99-17
And Energy Petition for Waiver to Implement a)	
Technology-Specific overlay in the 508, 617, 781,)	
And 978 Area Codes)	
)	
California Public Utilities Commission and the)	NSD File No. 99-36
People of the State of California Petition for)	
Waiver to Implement a Technology-Specific or)	
Service-Specific Area Code)	
)	
North American Numbering Council)	NSD File No. 99-51
Recommendation Concerning Replacement of)	
Central Office Code Utilization Survey)	

**PETITION FOR RECONSIDERATION AND
CLARIFICATION BY MAINE PUBLIC UTILITIES COMMISSION**

The Maine Public Utilities Commission (MPUC) respectfully submits this Petition for Reconsideration and Clarification of the Federal Communications Commission's (FCC) March 31, 2000 Report and Order and Further Notice of Proposed Rulemaking (Order).

I. SUMMARY

The MPUC requests that the FCC reconsider and modify the following provisions of the Order:

- 1. Current Order:** Paragraph 103 disallows the use of utilization rates for pooling carriers' requests for growth codes.

Modification: Apply a 75% utilization rate requirement to all pooling carriers' requests for growth blocks.
- 2. Current Order:** Paragraph 169 requires state pooling trials to conform to the national framework by September 1, 2000.

Modification: Allow states to continue to administer pooling trials in accordance with their delegated authority until the rollout of national pooling.
- 3. Current Order:** Paragraph 183 allows the Industry Numbering Committee (INC) to continue to promulgate guidelines which apply to all carriers, the North American Numbering Plan Administrator (NANPA), and the Pooling Administrator (PA) without requiring any federal or state regulatory review of the guidelines.

Modification: Require a joint federal and state committee to review and approve the INC guidelines.
- 4. Current Order:** Paragraph 111 allows carriers to exclude resources assigned within the past 90 days from the carriers' utilization rate.

Modification: Include all resources in a carrier's inventory when calculating utilization rate for purposes of growth code and block assignments.

The MPUC further requests clarification of the following provisions of the Order:

- 1. Order:** Paragraphs 75, 82, and 94 provide states with access to all semi-annual utilization and forecast data as well as code and block applications submitted to NANPA and the PA.

Clarification: Clarify that state commissions have access to all data collected by NANPA and that NANPA and the PA must provide state commissions with contemporaneous notification of all code and block applications.

II. ISSUES FOR RECONSIDERATION

A. Utilization rate requirements should be applied to pooling carriers.

In Paragraph 103 of the Order, the FCC adopted utilization threshold requirements for non-pooling carriers seeking growth NXX codes, though it declined to adopt a specific threshold. The Commission concluded that pooling carriers should be exempt from utilization rates “in recognition of their requirement to donate to the pool uncontaminated and lightly contaminated thousands-blocks that are not needed to maintain short-term inventory levels.” *Id.* The Commission left open, however, the possibility that it might “revisit the question of whether all carriers should be subject to meeting a utilization threshold to obtain growth numbering resources if we find that such thresholds increase numbering use efficiency”. *Id.* The MPUC urges the FCC to reconsider its exclusion of pooling carriers from utilization rate requirements and require pooling carriers to comply with a 75% utilization rate for the purposes of growth codes.

1. Utilization rates promote efficient number usage.

As detailed in the California Public Utility Commission’s Petition for Reconsideration (CPUC Petition), utilization rates have already proven to increase numbering use efficiency in the California pooling trial. Specifically, the CPUC has found that carriers forecast the need for many more blocks than they actually qualify for under the CPUC’s utilization requirements. Thus, the application of utilization requirements has ensured that only those blocks that are actually needed are assigned.

We expect similar results here in Maine because we have already seen this result in the application of utilization rates to non-pooling carriers. Specifically, since utilization rates were imposed in November 2000, not one carrier has requested a growth code in Maine.

Further, as discussed more fully in the CPUC Petition, the FCC should not assume that carriers will only ask for the resources they need and give back any that they do not need. As the CPUC states, "it is a rare carrier that will voluntarily donate unused blocks. Rather, most carriers will wait until they are threatened by or compelled by a state commission's order to donate unused blocks, or for that matter, unused NXX codes." Further, the INC pooling guidelines contain no explicit provision mandating that carriers continue to donate blocks to a number pool. In fact, Section 8.4.1 states that carriers "will not be required to donate contaminated thousands-blocks for ongoing replenishment of the industry inventory pool" (emphasis added).

2. Utilization rates mitigate the impact of carrier reliance upon subjective, overly-optimistic forecasts.

The MPUC believes that the imposition of objective utilization rate requirements is the only way to ensure that numbering resources are not prematurely assigned. Under the FCC's approach, pooling carriers may acquire new resources by submitting a "months to exhaust" calculation which relies upon a carrier's subjective projection of its future numbering needs. Carriers' projections regarding their numbering needs, however, are often very inaccurate.

For example, during the planning phase of the Maine pooling trial, a carrier submitted a block forecast that indicated the need for multiple blocks in more

than 10 rate centers. When MPUC staff contacted the carrier, staff was told that the forecast was based upon “numbers” from the marketing group. Further, that although the carrier representative did not believe the forecasts from the marketing department to be accurate, the forecasts could not be changed. The carrier contact literally stated, “It makes no sense to me. Will people be talking to trees?” Hearing this, the MPUC staff suggested that the carrier re-think its forecast or be prepared to back-up its forecast in detail. Days later a new forecast was submitted which requested only 1 block per rate center.

This example shows that reliance upon subjective standards for number assignment invariably leads to inefficient allocation of numbering resources. If the carrier above had been requesting growth codes in those rate centers and there were no utilization rate requirements in place, all of the requested blocks would likely have been assigned. The carrier would have submitted a “months to exhaust” worksheet which relied upon over-inflated projections from its marketing department. In the case of the Maine pool, it would have prematurely opened several NXX codes to replenish the rate center pool and meet the carrier’s request.

The imposition of objective criteria, such as utilization rates, eliminates the dangers associated with subjective, overly-optimistic projections of growth. It also eliminates the need for detailed review of months to exhaust worksheets on the part of NANPA or the PA. Thus, the MPUC urges the FCC to require all carriers, both pooling and non-pooling, in a pooling NPA to meet a 75% utilization threshold.¹

¹As stated in our earlier comments, to the extent that any carrier can show specific circumstances that warrant waiver of the requirement, such waiver can and should be granted.

B. State pooling trials should be allowed to continue until national pooling is implemented.

In paragraph 169 of its Order, the FCC requires all state pooling trials to comply with the national "framework" by September 1, 2000. According to the FCC's July 12, 2000 Responses to Questions in the Numbering Resource Optimization Proceeding (Clarification Notice) in this docket, compliance with the national framework means discontinuing utilization rates for pooling carriers and following federal sequential numbering requirements. The MPUC respectfully requests that the FCC defer compliance with the national framework until national pooling is rolled out.

First, the FCC's current schedule calls for rollout of national pooling nine months after a national pooling administrator is selected. At present, there is considerable confusion and uncertainty surrounding the implementation of the Order and selection of the pooling administrator. It is possible that national pooling will not be implemented until late 2001 or early 2002. If this is the case, the FCC should use this opportunity to gather more information and experience from those states which have implemented conservation measures. This is especially appropriate for the issue of applying utilization rates to pooling carriers because, as described above, the FCC has already indicated an interest in reconsidering its current position.

Second, states have already shown that they can coordinate their policies on numbering issues and thus concerns regarding differences between the states should be minimal. The National Association of Regulatory Commissions (NARUC) and, more specifically, the State Coordination Group, have made great efforts to ensure that all states are aware of what each state is doing on numbering issues and to encourage coordination and similarity in approach. These efforts have resulted in the adoption of

the same 75% utilization rate in Maine, New Hampshire, Massachusetts, New York, and California as well as unified state positions on almost all numbering issues.

Continued flexibility, especially in the application of utilization rates to pooling carriers, benefits all parties: the FCC gains more real-world experience, the industry has more resources available to it, and the states delay exhaust. If, by the time national pooling rolls out, the FCC still believes utilization rates should not apply to pooling carriers, the states can phase out their use. If, however, the states' experience shows that utilization rates improve pooling carriers' efficiency without denying them timely access to needed resources, the utilization rates can become part of the national framework.

C. All changes to the INC Guidelines should be reviewed and approved by a joint federal and state committee.

In paragraph 183 of its Order, the Commission directed the industry and the PA to follow the INC Thousand Block Pool Administration Guidelines, noting that the requirements of the Order and any future orders or directives should be incorporated into the guidelines. In addition, in Section 52.13 of its Rules, the Commission requires NANPA to abide by any guidelines published by INC. The collective effect of these provisions is to give industry-drafted guidelines, which can be changed at any time by the industry, the force of law without any provision for regulatory review of those guidelines or any changes made to them. The Commission should take the crucial additional step of requiring regulatory review, thus ensuring consideration of the public interest and likely diminishing controversy regarding numbering policies. Thus, the MPUC urges the FCC to require regulatory review of the INC guidelines by a joint federal and state committee before they are given the effect of law.

1. The industry dominates the INC and does not adequately consider of the impact of numbering policies on the public.

The FCC and state commissions have been forced to devote significant resources to numbering issues over the past two years because the industry has failed to fairly and efficiently administer public numbering resources on its own. Indeed, in both its Opening and Reply comments in this docket, the MPUC detailed the many ways the INC guidelines failed to provide for the efficient administration of numbering resources as well and the lack of compliance with the guidelines by the industry. The Telecommunications Act of 1996 makes the industry's self-enforcing system obsolete; carrier self-interest and competitive pressures preclude them from making the difficult decisions needed to ensure that public numbering resources are not squandered. Carriers provide themselves with nothing less than unfettered access to numbering resources without consideration of the impact on the public.

As even its name implies, the INC is controlled by the industry with little participation by the public directly and, as explained more fully below, very little participation by public representatives such as state commission staff. By not requiring regulatory review, the FCC denies the public the right to ensure that a scarce public resource is fairly and efficiently allocated and that sufficient consideration is given to the costs borne by the public. The FCC also jeopardizes the neutrality of both NANPA and the PA by effectively giving the industry control over their activities. Given the importance of numbering issues across the nation and the very substantial costs that have already been borne by the public, the MPUC believes that regulatory review of the guidelines is essential to protecting the public interest.

2. State commissions do not have the financial or staffing resources to actively participate in INC.

Both industry members and FCC staff have suggested over the past two years that state commissions with concerns relating to the INC guidelines should attend INC meetings and become involved in the process. These remarks ignore stark realities:

- Most state commissions do not have the financial resources to support staff travel to the various INC meetings which take place all over the country. Indeed, in states like Texas, staff out of state travel is all but prohibited by state law.
- Most state commissions do not have the staffing resources to assign one or two staff people to participate in the INC. Full-time devotion to numbering issues is impossible for most state commissions, even for larger commissions like California.
- Even if one or two state staff could participate, the INC is dominated by the industry. It is unlikely that the state staff could significantly affect the INC process.
- Because the INC is dominated by carriers who compete against one another, progress is often incredibly slow because individual carrier interests and agendas preclude quick agreement.

Given these realities, the simple suggestion that states participate in INC is not the answer.

3. Creation of a joint federal-state committee would facilitate state participation and would protect the public's interest in numbering administration.

One way that the FCC and states could participate in the INC process would be through a joint federal/state review of the guidelines and any changes to them. State involvement will ensure that the FCC hears first-hand how any proposed changes to the guidelines would impact number conservation efforts. A committee could be created which would meet via conference call to review the guidelines. NARUC could

coordinate the appointment of state members while the Network Services Division Chief could appoint NSD staff to participate. Once the initial review of all of the guidelines was completed, the workload of this committee could likely be met through a one hour monthly conference call.

The MPUC urges the FCC to establish such a committee as soon as possible. The INC is currently revising both the Central Office Code and Thousand Block Pooling Administration Guidelines. The current working documents purport to reflect the requirements of the Order. However, a detailed review reveals that they do not incorporate all of the Order's requirements. Thus, it is essential that regulatory direction be given as soon as possible so that NANPA and the PAs in the state pooling trials can modify their practices as needed.

D. Carriers should be required to include all resources in their utilization rate calculation, especially any recently acquired resources.

Paragraph 111 of the Order provides that carriers may exclude all resources obtained in the previous 90 days from their utilization rate calculations when submitting code applications. The FCC's Clarification Notice states that while "new" resources are excluded for the purposes of calculating utilization rates, they are included for the purposes of calculating months to exhaust. Thus, if a carrier meets the utilization rate threshold but not the months to exhaust threshold, the carrier will not qualify for additional resources.

Exclusion of newly acquired numbers is counter-intuitive; the disposition of these resources is critical to the determination of the future need for numbers. If newly acquired resources are available to meet a carrier's projected need, those resources

must be included in the calculation of a utilization rate that is used to determine whether a carrier has a need for additional resources. To do otherwise encourages carriers to develop a scheme to circumvent the utilization requirements.

For example, under the FCC's system, a carrier could acquire a new code on Day 1 based upon a showing that it met the established utilization rate and its resources would exhaust in 6 months. On Day 2, that same carrier could acquire another code in that same rate center by relying on the same utilization rate and modifying its months to exhaust worksheet. This is especially so if the NANPA and the PA do not closely review the exhaust worksheets or rely solely on a mechanized review.

Thus, the MPUC urges the FCC to reconsider its finding and modify its Rules to require the inclusion of all numbering resources when calculating a carrier's utilization rate.

III. ISSUES FOR CLARIFICATION

A. The MPUC supports the CPUC's request that the FCC resolve the question of state access to data collected by NANPA.

First, the MPUC supports the CPUC's request that the FCC clarify that NANPA must provide state commissions, upon request, with any information it has collected from carriers. NANPA recently refused to provide the MPUC with the names of all carriers who submitted a COCUS forecast in January 2000. The MPUC needs this information in order to calculate an accurate exhaust date for the 207 NPA. NANPA refuses to provide the information claiming that the INC guidelines prevent it from doing so. The MPUC believes that the Order clearly provides states with access to all information collected by NANPA regardless of what the INC guidelines provide. Thus,

the MPUC requests that the FCC make that explicit clarification and require NANPA to cooperate with state efforts.

B. The MPUC requests that the FCC clarify the obligations of NANPA and the PA to notify state commissions of all code and block applications.

Paragraphs 82 and 94 of the Order clearly provide state commissions with access to all code and block applications. In order for state access to those applications to be meaningful, the access must be contemporaneous with the filing of the applications with NANPA or the PA. Post-assignment notification of the application, as suggested by NeuStar in its July 30, 2000 Petition For Compensation Adjustment, does not allow for commission review of the carrier's support for their request.

The MPUC has received contemporaneous notification of all code requests since January of 1998. By checking each application against the Commission's records, the Commission has saved over 100 codes from premature assignment. As the FCC itself noted in Paragraph 94 of the Order, such a system ensures that numbering resources are not prematurely assigned. Indeed, the FCC encourages other states to follow in the MPUC's footsteps. However, for other states to achieve the same efficiencies and for the MPUC to continue its efforts, states must be given notice of all code and block applications, if they so request. This is the only way to ensure that carriers are actually complying with the FCC's Order, especially the 6 month inventory limitation and sequential numbering requirements.

NeuStar's Petition provides only for monthly post-assignment reports for most states, in part because NeuStar believes it is limited by its current process and staffing levels. The FCC should clarify that post-assignment monthly reports do not meet the

requirements of the Order and that NANPA must make all necessary arrangements for state commissions to be contemporaneously notified of all code requests. The MPUC believes that notice could be provided without significant additional cost by: (1) modifying NANPA's interface to include automatic notification to state commissions when the application is received electronically or manually entered into the NANPA system by NANPA personnel (NeuStar is already providing this functionality for Maine's pooling trial); and (2) requiring a 3-day interval between electronic receipt or entry of an application and the actual processing of the application (which would provide states time to review the application).

IV. CONCLUSION

The MPUC respectfully requests that the FCC make each of the modifications and clarification discussed above as soon as possible in order to maximize conservation efforts at both the state and federal level.

Respectfully submitted,

MAINE PUBLIC UTILITIES COMMISSION

A handwritten signature in black ink, reading "Trina M. Bragdon", is written over a horizontal line. The signature is cursive and extends to the right of the line.

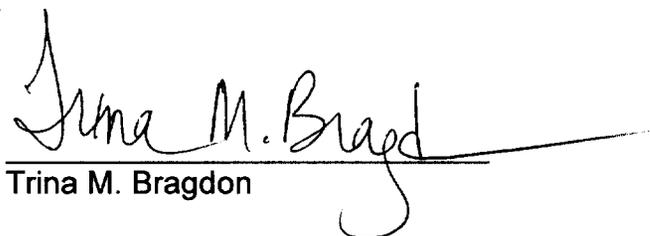
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Dated: July 14, 2000

Certificate of Service

I, Trina M. Bragdon, certify that on July 17, 2000 the Maine Public Utilities Commission's Petition for Reconsideration and Clarification was served via first-class mail to the persons on the attached service list.


Trina M. Bragdon

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