

1. The INC process should not be disturbed and not be subject to additional governmental oversight

Maine uses the Commission's adoption of INC guidelines for administering thousand block pooling to attack the process by which INC developed its guidelines.² Specifically, Maine complains about the fact that INC is controlled by the industry, "with little participation by the public directly" and that there is "very little participation by public representatives such as state commission staff."³ In expansion of its complaint, Maine contends that "State commissions do not have the financial or staffing resources to actively participate in INC" and that, as a consequence, "It is unlikely that the state staff could significantly affect the INC process" and that "progress is often incredibly slow because individual carrier interests and agendas preclude quick agreement."⁴

In response to Maine's request, it first should be noted that the relief it seeks is beyond the scope of the *Order* or reconsideration of that *Order*. Maine is seeking a change in the INC process, which was not established by the *Order*. Thus, its request should be dismissed on procedural grounds.

Beyond that, Maine's attack on the whole industry process requires a substantive response. In any industry forum activity, as far as USTA is aware, in order to participate effectively, participants require two basic resources, in addition to an interest in the proceeding at issue and a willingness to participate. First is the availability of experts in the discipline at issue to engage in the discussions in an effective and meaningful manner in order to contribute to resolving the issues at hand. The second is the financial support

² Maine Public Utilities Commission Petition for Reconsideration and Clarification (Maine Petition) at 7-10.

³ *Id.* at 8.

⁴ *Id.* at 9.

necessary to support engagement in the process. In this regard, INC is no different from any other consensus forum or national standards body of which we are aware. In this regard, INC is also not different from the various Work Groups set up by the North American Numbering Council (NANC) itself to resolve many of the issues at hand.⁵

The Commission has repeatedly stated its intent to develop a consistent, nationwide system for administration of numbering resources.⁶ The Commission established the NANC to assist in development of the standards necessary. USTA believes that the Commission was correct in its determinations, and USTA has repeatedly favored measures that would serve to support this goal.⁷ The process that has been employed in the industry to develop standards and requirements has been practiced successfully for many years. While it has its limitations, the process provides an opportunity for experts in the subject matter at hand from all over the United States as well as other countries involved in the North American Numbering Plan (NANP) to work together to develop the best technical result. The participants are experts in numbering matters and knowledge of the systems that exist in the industry to administer them. Rational development of requirements is dependent on an understanding of the implications of specific proposals on the systems that exist, those that must be built, and the software that will need to be developed to make them function. Such experience and expertise necessary to engage productively in this activity is uniquely found in the

⁵ In an attempt to include everyone possible in the process, ATIS, the association that serves as secretariat to the INC, has waived all fees to federal and state regulatory participants that are paid by employees of commercial companies to attend INC meetings.

⁶ See *Numbering Resource Optimization*, CC Docket No. 99-200, Notice of Proposed Rulemaking, FCC 99-122, at ¶¶ 18, 38, released June 2, 1999.

⁷ See USTA Comments on Maine Public Utilities Commission's Petition for Additional Authority to Implement Number Conservation Measures, NSD File No. 99-27, filed May 3, 1999.

industry. However, commission staff members have participated in INC meetings; their contributions have been well received and have influenced the proceedings.

We also must observe that this is a process that is directed toward the highest quality result possible on a national basis. Maine complains that the INC is “industry dominated.” If Maine wants to influence the details of developments in the INC, it should recognize that it will be required to provide competent representation and that it will also be required to support the efforts of those representatives. Absent such support, the efforts of Maine to gain special status in influencing the activities of a national consensus body dedicated to development of the highest possible quality of a national requirement must not be supported by this Commission.

We also take note of the complaint of slow progress due to “individual carrier interests.” Surely, the various carriers involved have different interests on many issues, for, as Maine has observed, they are competitors. On the other hand, it is remarkable how many times competing carriers have numbering issues in common. When INC encounters a divisive issue that is of a policy nature, unless it receives guidance on that issue, the process can bog down. In its numbering activities, the INC is closely associated with NANC. When INC encounters a policy issue that cannot be resolved in that forum, it brings that issue to the NANC for resolution and guidance. Representatives from Maine have attended NANC meetings and have been witness to that process. When policy issues have been resolved, INC can reach consensus very quickly, as is evidenced by development of the *Administration Guidelines for the Pooling Administrator*.

To address its complaint, Maine suggests that “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.”⁸

Any attempt to influence industry-developed consensus agreements by means of post development review will certainly frustrate development of effective and rational guidelines in a timely manner. Maine and other state interests have gained considerable influence on the NANC due to recent membership changes. These greater influences come with a greater degree of responsibility. These interests would best be served by positive assistance in resolution of the policy issues that provide the basic instruction set that guides INC’s efforts. To the extent that Maine or any other party can provide effective representation in the INC process to improve the quality of those results, they should join in those activities.

The Commission already has great discretion in review of any requirements that might be sanctioned for use in the industry. Federal and state regulatory interests are well represented in this process. Although Maine has not taken advantage of the opportunities available, it now seeks further influence in the proceedings that must not be permitted. Such action would further delay the industry’s efforts to develop and implement national requirements that are responsive to the Commission’s stated objectives for a uniform national set of standards. Maine’s request must be rejected as being unworkable and counterproductive.

⁸ Maine Petition at 9.

2. The Commission’s newly established utilization thresholds for non-pooling carriers should not be extended or changed until experience can be analyzed

Maine and California seek to extend the utilization threshold requirements for non-pooling carriers to pooling carriers.⁹ Similarly, Ohio advocates that pooling carriers should achieve a 75 percent assignment level before they can receive an additional thousand block of numbers.¹⁰ Florida petitions the Commission to allow states to set target utilization thresholds within a federally-adopted range.¹¹

The Commission adopted a policy of utilization thresholds for non-pooling carriers, but declined to impose utilization thresholds on thousand block pooling carriers.¹² The basis for this determination was sound and well-reasoned. The reasons were that pooling carriers will be required to identify unused or lightly-used thousands blocks to be contributed back to the pool and to demonstrate forecasted need before they can receive an additional thousand block of numbers, thereby ensuring that pooling carriers will use numbers efficiently.¹³ The Commission also determined that it would be “unnecessarily burdensome” to require pooling carriers to comply with utilization thresholds and that pooling carriers could be competitively disadvantaged by thresholds.¹⁴

⁹ Maine Petition at 3-5; California Public Utilities Commission and the People of the State of California Petition for Reconsideration and Clarification (California Petition) at 3-5.

¹⁰ Public Utilities Commission of Ohio Petition for Reconsideration and Motion for Clarification (Ohio Petition) at 18-19.

¹¹ Florida Public Service Commission Petition for Reconsideration (Florida Petition) at 7.

¹² *Order* at ¶¶ 141-142.

¹³ *Id.* at ¶ 142.

¹⁴ *Id.*

These are compelling reasons for not establishing utilization thresholds for thousand block pooling at this time. The states have not come forth with convincing reasons for the Commission to overturn its well-reasoned determination. The Commission, the states and the industry should gain experience with both thousand block pooling and specific utilization thresholds for non-pooling carriers before any determinations concerning specific utilization thresholds are established. The states' petitions for additional imposition of utilization thresholds should be denied.

3. The states should not be granted authority to order carriers to implement LNP

California asks the Commission for authority to order a carrier to implement LNP and instruct the North American Numbering Plan Administrator (NANPA) to not provide the non-compliant carrier with additional numbering resources.¹⁵ When the Commission determined that only LNP capable carriers would be required to participate in thousand block pooling,¹⁶ it applied its previously-determined LNP standards to this concept. It did not open up the existing LNP requirement to additional enforcement by the states or the applicability of the LNP requirement to additional carriers. California is attempting to gain reconsideration of the Commission's earlier determination that LNP requirements would be federally administered and enforced. It further attempts to extend that requirement by tying compliance to a carrier's ability to obtain additional numbering resources. This attempt is inappropriate and must be denied.

¹⁵ California Petition at 15.

¹⁶ Order at ¶ 125, n. 270.

4. Implementation of service specific overlays has already been denied and should not be reconsidered in this proceeding

Ohio seeks authority to impose service and/or technology specific overlays.¹⁷

This is a request that is clearly beyond the scope of the *Order* in this proceeding. The Commission specifically stated that it did not address the use of technology-specific overlays and that, in the interim, its existing rules and policies prohibiting technology-specific overlays remain in effect.¹⁸ Ohio is seeking reconsideration of an issue that was initially decided in 1995.¹⁹ Its request is untimely and should be dismissed.

¹⁷ Ohio Petition at 19-20.

¹⁸ *Order* at ¶ 9.

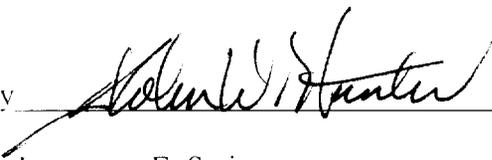
¹⁹ Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech-Illinois, *Declaratory Ruling and Order*, 10 FCC Rcd 4596, 4610-12 (1995).

Conclusion

USTA urges the Commission to deny the issues raised by the states cited above in their petitions for reconsideration and/or clarification.

Respectfully submitted,

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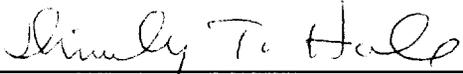
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I, Shirley T. Hall, do certify that on August 15, 2000 the above Reply Comments of the United States Telecom Association was delivered via the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.



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