

# STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

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October 2, 2000

Hon. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals II  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Reply Comments on the Thousand-Block Pooling Administrator  
Technical Requirements - CC Docket No. 99-200

Dear Secretary Salas:

The New York State Department of Public Service ("NYDPS") submits this reply to the Federal Communications Commission's ("Commission") public notice soliciting comments on the thousand-block pooling administrator technical requirements. Specifically, the Commission requested comments on whether the technical requirements in the proposed Pooling Administration Requirements Documents are sufficiently detailed, comprehensive and clear and whether they adequately describe the duties and scope of the National Thousand-Block Pooling Administrator's responsibilities. The NYDPS supports the joint comments filed by the Maine, New Hampshire and California Public Utilities Commissions, and the Public Utilities Commission of Texas.

Specifically, the State Commissions recommended that the proposed Pooling Administration Requirements Document ("PARD") incorporate State regulatory requirements as well as industry guidelines and regulatory orders issued by the Commission. Moreover, the State Commissions encouraged the Commission to require the Pooling Administrator to provide disaggregated data on number usage to the State Commissions.

We support these recommendations for the following reasons. First, the Commission's *Number Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574 (2000) (*NRO Order*) delegated certain authority to State Commissions (e.g. reclamation) which may impact the duties and responsibilities of the Pooling Administrator. Accordingly, the final PARD should adhere to regulatory orders issued by State Commissions. Second, NYDPS supports access to disaggregated pooling data because there will be instances where a State Commission needs carrier specific information to fulfill its duties and the PARD as

proposed only requires the Pooling Administrator to provide aggregated data. Therefore, the final PARD should reflect the requirement of the FCC's NRO Order that states have access to disaggregated data.

In sum, the NYDPS supports the comments made by the Maine, New Hampshire, and California Public Utilities Commissions and the Public Utilities Commission of Texas.

Respectfully submitted,

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PR/bpo/sjr  
cc: Al McCloud