

ORIGINAL

**BELLSOUTH**

**BellSouth**  
Suite 900  
1133-21st Street, N.W.  
Washington, D.C. 20036-3351

kathleen.levitz@bellsouth.com

**Kathleen B. Levitz**  
Vice President-Federal Regulatory

202 463-4113  
Fax 202 463-4198

EX PARTE OR LATE FILED

October 19, 2000

EX PARTE

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> St. S.W.  
Washington, DC 20554

RECEIVED  
OCT 19 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: CC Docket No. 99-200

Dear Ms. Salas:

On October 18, 2000, Angela Brown, Bill Shaughnessy, Nancy Smith, Doug McCullough and I, representing BellSouth, met with Chuck Keller, Diane Griffin Harmon, Cheryl Callahan, Sanford Williams, and Aaron Goldberger of the Common Carrier. The purpose of our meeting was to continue our discussion about the impact upon BellSouth of the Commission's recently adopted rule that conditions a carrier's ability to receive additional numbering resources on its demonstrating that its numbering resources will exhaust in a rate center in six months. In particular, BellSouth explained why it would be unable to rely upon the porting of unassigned numbers from one BellSouth switch to another to meet the needs of individual wire centers for such resources. The attached document formed the basis for our presentation.

As required by Section 1.1206(b)(2) of the Commission's rules, I am filing two copies of this notice and ask that you place this notification in the record of the

No. of Copies rec'd \_\_\_\_\_  
List ABCDE \_\_\_\_\_

0/2

proceeding identified above. Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathleen B. Levitz".

Kathleen B. Levitz

cc: Chuck Keller (w/o attachment)  
Diane Griffin Harmon (w/o attachment)  
Cheryl Callahan (w/o attachment)  
Sanford Williams (w/o attachment)  
Aaron Goldberger (w/o attachment)

---

# *Number Resource Optimization*

*BellSouth Corporation*

*CC Docket 99-200*

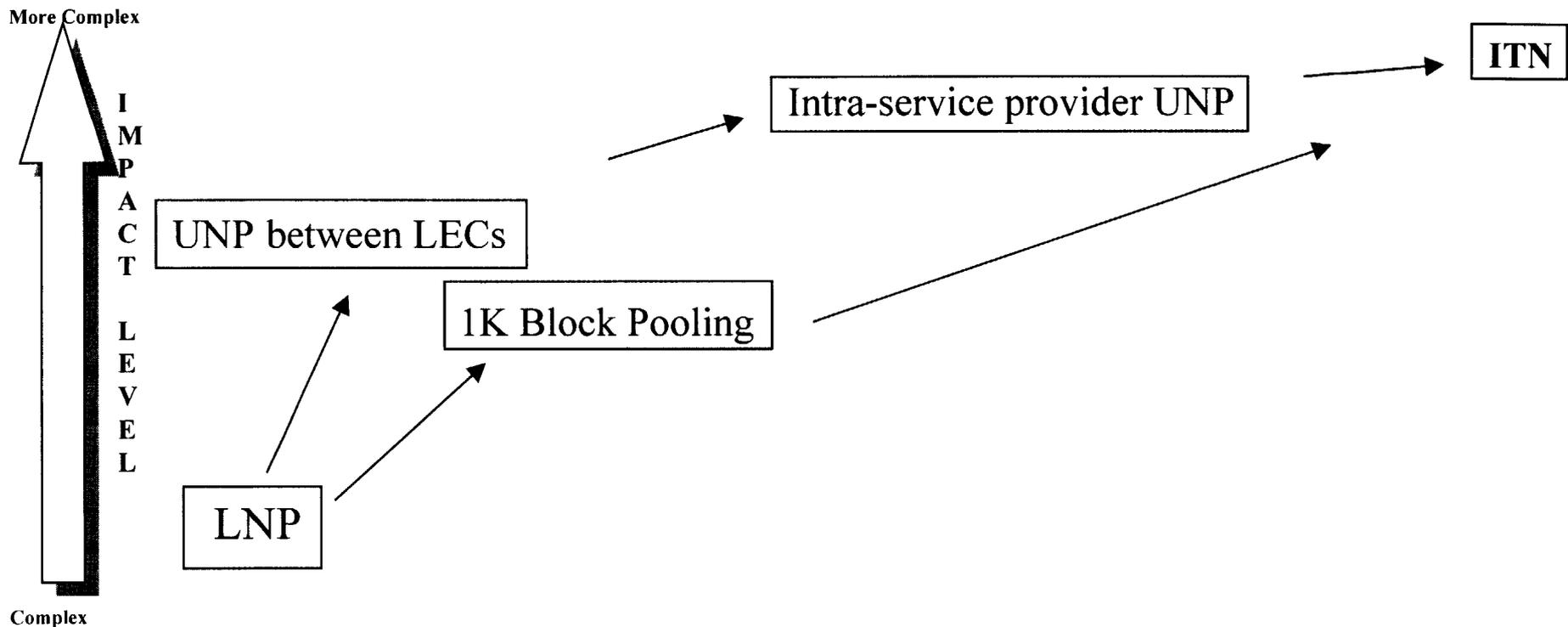
*October 18, 2000*



## Fact: LNP ≠ UNP ≠ 1k Pooling

*UNP and 1k pooling are technically feasible given reasonable implementation schedules.*

*Although each functionality is similar and uses LNP routing, the system impacts of LNP ≠ the system impacts of 1k Pooling ≠ the system impacts of unassigned number porting.*



# ***SYSTEM REQUIREMENTS FOR NUMBER POOLING***

---

## **Pre-Ordering**

- Systems Impacted – BONIS, COFFI, PSIMS
  - These systems must have the capability to recognize NPA-NXX-X.

## **Ordering**

- Systems Impacted – ACCESS, CSPS, LESOG, RIGHTTOUCH, RNS, ROS, SOCS, SONGS, DBAS II, DOE/DSAP, LIDB, CARE, MISOP, BCOS, VNS, MECHSO, LIST.
  - These systems must have the capability to recognize and process exchange keys and location routing numbers on all inward action orders.

## **Provisioning**

- Systems Impacted – ATLAS, ARTS, HAL, LEACS, LEIS, MARCH, NSDB, OM, PAWS, SOAC, SWITCH, WFA/C, BAC, DBRT, LAUTO, LION, RSAG, CNUM, ISP, LNP Gateway.
  - These systems must have the capability to recognize and process exchange keys and location routing numbers on all inward action orders.

## **Billing**

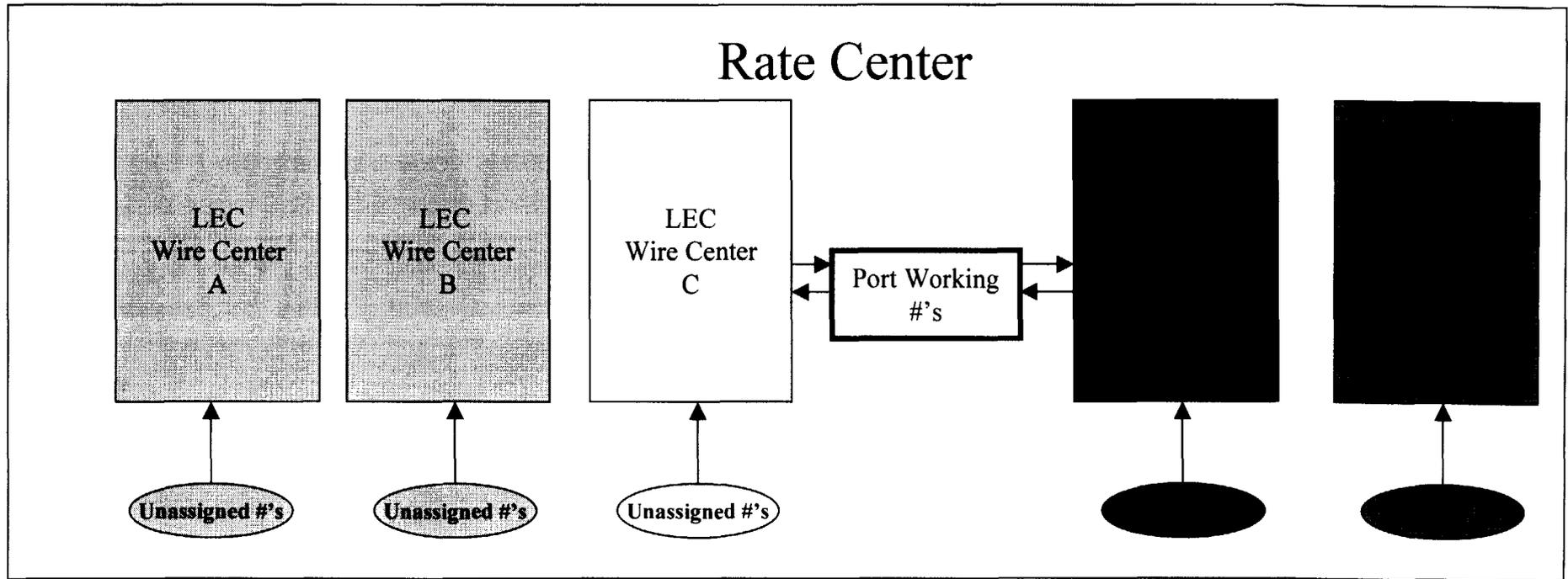
- Systems Impacted – CABS, CRIS, MATV, BAMS, BOCABS
  - These systems must have the capability to recognize, store, and bill on Toll Traffic Rate Area (“TTRA”) passed on the service order. Currently TTRA equates to an ***NPA-NXX***, which is no longer specific enough for billing purposes.

## **Maintenance and Repair**

- Systems Impacted – LMOS FE, LMOS HOST, SNECS, TAFI, LNP TAG, TAP, PREDICTOR
  - These systems must have the capability to recognize and properly route trouble based on NPA-NXX-X.

Modifications made to systems to accommodate porting of NPA-NXX-X blocks are not sufficient to accommodate porting of unassigned NPA-NXX-NXXXs (UNP).

# Local Number Portability



## OSS Functionality:

- Port *working* numbers between LECs and CLECs.
- Must maintain porting status (ported in, ported out) of *working* TNs
- NPA-NXXs are assigned to a Wire Center, thus no change on how unassigned numbers are tracked/treated internally across OSSs since they are always associated with home wire center.

Pre-Order

Ordering

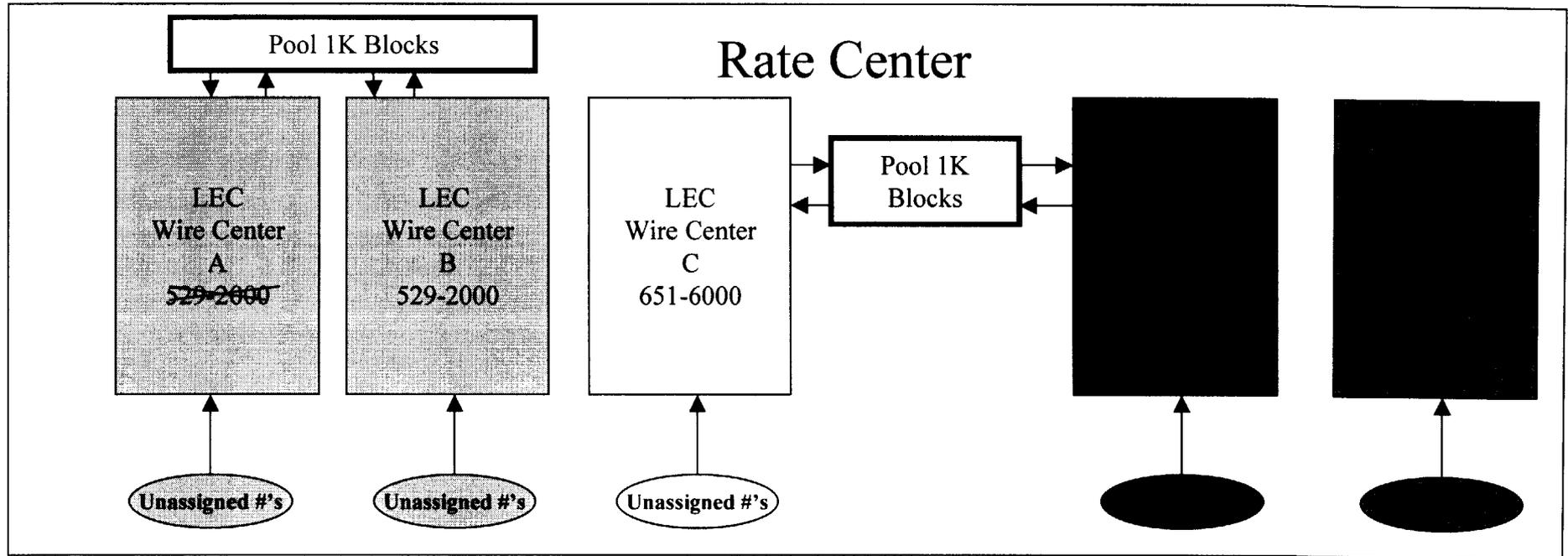
Provisioning

Billing

Maintenance & Repair

911

# Thousands-Block Number Pooling



## OSS Functionality:

- Port *working* numbers AND blocks of *unassigned* numbers between LECs and CLECs
- Must maintain porting status of working TNs (ported in, ported out).
- Even though 529 NXX originally assigned to LEC Wire Center A, no longer is the “NXX” sufficient to determine where a thousands-block is allocated. Every system must now be able to recognize numbers at the NPA-NXX-X level.

Pre-Order

Ordering

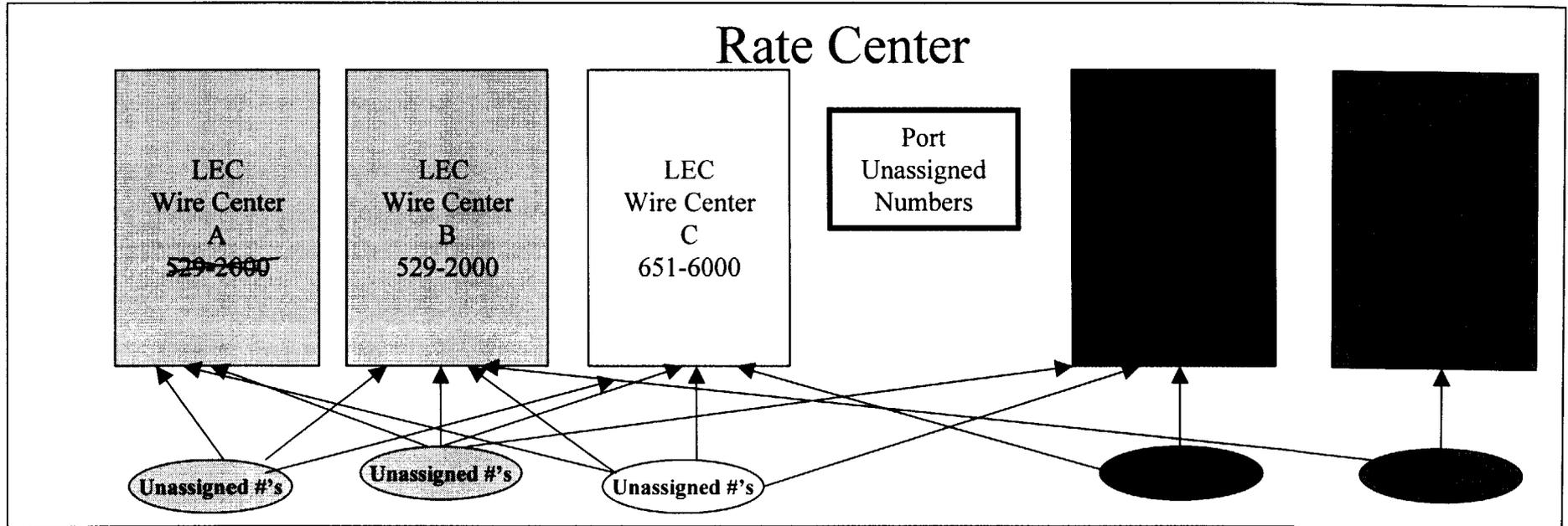
Provisioning

Billing

Maintenance & Repair

911

# Unassigned Number Porting



## OSS Functionality will need to be defined:

- Port *working* numbers AND blocks of *unassigned* numbers AND individual *unassigned* numbers between LECs/CLECs.
- Must maintain porting status (ported in, ported out)
- Unassigned numbers (NPA-NXX -XXXX) can be allocated to any wire center. Logic developed for 1k pooling to track 1k blocks is no longer sufficient to maintain information on unassigned numbers. Information is now needed at NPA-NXX-NXXX level.

Pre-Order

Ordering

Provisioning

Billing

Maintenance & Repair

911

## ***Key Points***

---

- LNP functionality is the backbone for thousands-block number pooling and unassigned number porting. The system impacts of thousands-block pooling and unassigned number porting are incremental to the system impacts of LNP.
- BellSouth cannot support intra-service provider porting of 1k blocks between switches in the same rate center until thousands-block pooling is implemented.
- It is unreasonable to expect service providers to intra-service provider port blocks of numbers with levels of contamination greater than 10%-15% to satisfy specific switch needs.
- The implementation of thousands-block number pooling on a wide-scale basis will take time. In the meantime, carriers are being denied codes today because of the current MTE rule. Carriers need relief now.

# Summary

---

- **Carriers should be allowed to calculate Months-to-Exhaust on a wire center basis for growth numbering resources when carriers have multiple switches or a large number of NXXs within a rate center.**
  - Unreasonable utilization levels must be achieved before a carrier can meet the 6 Months-to-Exhaust requirement on a per rate center basis.
- **Alternatively, the Commission could allow carriers to calculate Months-to-Exhaust on a per wire center basis once the rate center utilization level reaches the threshold set for non-pooling carriers.**
- **Exceptions to the Months-to-Exhaust on a per rate center basis should be allowed. Some situations where exceptions should be allowed include:**
  - Specific requests to meet customer needs, including requests for sequential blocks of numbers when the carrier does not have such a sequential block in its TN inventory.
- **Carriers should be allowed to calculate Months-to-Exhaust on a wire center basis in areas where pooling is not implemented.**