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November 28, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

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

Re: CC Docket No. 99-200

Dear Ms. Salas:

On November 27, 2000, Bill Shaughnessy and I, representing BellSouth, met with Kyle Dixon, legal advisor to Commissioner Powell. The purpose of our meeting was to discuss BellSouth's position on four issues presented in the Commission's numbering resource optimization docket. These issues are: the treatment of reserved numbers under the Commission's rules; the formula the Commission has adopted for calculating number utilization levels, the costs of implementing number pooling and the need for a national implementation schedule to govern its introduction; and the reasonableness of the rules governing carrier access to numbering resources. The views we expressed already appear in BellSouth's filings in the docket. 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 proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz

cc: Kyle Dixon (w/o attachment)

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Number Resource Optimization

BellSouth Corporation
CC Docket 99-200
November, 2000

Discussion Points

- **Reservations for Telephone Numbers**
- **Calculation of Utilization Levels**
- **Number Pooling Concerns**
- **Obtaining Growth Number Resources**

Reserved Numbers

- **Reserved numbers are not the primary driver for number optimization.**
 - There is no evidence in the record to support the 45 day reservation limitation.
- **Customer needs will not be met with a “45 day” limit on reserved numbers:**
 - For many businesses and municipalities, maintenance of established telecommunications services will become unmanageable
 - Number optimization procedures should not introduce a parity issue between PBX and Centrex users
- **Number reservations must have a longer “life” than 45 days.**
- **FCC must allow a reasonable transition period to address the treatment of existing reserved numbers and provide appropriate customer notification.**

Calculation of Utilization Levels

- **The FCC's formula for calculating utilization does not reflect "true" utilization. Reliance on this formula to establish numbering policies could lead to disastrous results.**
- **Administrative, aged, reserved, intermediate numbers are all numbers that cannot be assigned.**
- **In sum, the utilization formula should include assigned, reserved, aged, administrative and intermediate numbers in the numerator.**

Number Pooling Costs

- **Number Pooling costs are incremental to number portability costs:**
 - Cost classifications are similar to number portability classification (e.g. Type 1, Type 2, Type 3.)
 - Type I and Type II number pooling costs should be recoverable.
- **The simplest cost recovery mechanism is to allow ILECs to temporarily modify the existing end user line for LNP.**
- **Estimated 5-year cost (2000-2004) for number pooling for BellSouth alone is \$300 M.**
- **Any federal cost recovery mechanism for number pooling must allow carriers to recover all eligible number pooling costs, including those not covered at the state level.**

Number Pooling Implementation

- **The national number pooling implementation schedule must be coordinated with existing state trials.**
 - Schedules (national & state) must not exceed 3 NPAs per quarter per NPAC region.
- **A national implementation schedule must be established as soon as possible.**
- **FCC should require that additional states granted authority to do number pooling coordinate schedules throughout the NPAC region.**
 - Service providers must be allowed to assess existing implementations of number pooling and complete currently scheduled implementations.
 - States within the same NPAC region are not coordinating number pooling schedules.

Obtaining Growth Numbering Resources

- **“Carriers should never be in the position of being unable to provide service to prospective customers because that carrier does not have access to numbering resources.”** *(Para 17, Delegation Order, Rel. July 20, 2000)*
- **Meeting a six months-to-exhaust requirement on a per rate center basis to obtain growth codes is difficult, and in some cases impossible.**
- **Months-to-Exhaust criteria on a switch basis for growth numbering resources should be allowed when carriers have multiple switches in a rate center.**
- **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 criteria must be allowed to meet specific customer needs.**