

FEB 12 2001

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Minnesota Public Utilities Commission)	NSD File No. L-01-206
Petition for Additional Delegated Authority)	
to Implement Number Conservation Measures)	
)	
Vermont Public Service Board)	NSD File No. L-01-272
Petition for Additional Delegated Authority)	
to Implement Number Conservation Measures)	
)	
Indiana Utility Regulatory Commission)	NSD File No. L-01-273
Petition for Delegated Authority to Implement)	
Mandatory Thousands-block Number Pooling)	
)	
West Virginia Public Service Commission)	NSD File No. L-01-274
Petition for Additional Delegated Authority)	
to Implement Number Conservation Measures)	
)	
Missouri Public Service Commission)	NSD File No. L-01-275
Petition for Additional Delegated Authority)	
to Implement Number Conservation Measures)	
)	
Oklahoma Corporation Commission)	NSD File No. L-01-276
Petition for Additional Delegated Authority)	
to Implement Number Conservation Measures)	
)	
Tennessee Regulatory Authority)	NSD File No. L-01-277
Petition for Additional Delegated Authority)	
to Implement Number Conservation Measures)	
)	
Implementation of the Local Competition)	CC Docket No. 96-98
Provisions of the Telecommunications Act of 1996)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	

**COMMENTS
OF THE
UNITED STATES TELECOM ASSOCIATION**

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ABCDE

The United States Telecom Association (USTA)¹ hereby files its comments on the above-referenced petitions filed by the Minnesota Public Utilities Commission (Minnesota), the Vermont Public Service Board (Vermont), the Indiana Utility Regulatory Commission (Indiana), the West Virginia Public Service Commission (West Virginia), the Missouri Public Service Commission (Missouri), the Oklahoma Corporation Commission (Oklahoma), and the Tennessee Regulatory Authority (Tennessee) for delegation of additional authority to implement various number conservation methods in the above-captioned proceedings.

In each of the petitions, the states seek delegated authority to institute or extend mandatory thousand block pooling. In addition, Minnesota requests authorization to reclaim unused or underused thousand number blocks and to institute other delegations as necessary. West Virginia asks for authority to enforce current standards or set and enforce new standards for numbering allocation, maintain rationing procedures for six months following area code relief, order the submission of utilization and forecast data from all carriers and audit such reporting, order carriers to return unused, reserved or under-utilized portions of NXX codes, require sequential number assignments, and hear and address claims of carriers seeking numbering resources outside the rationing process. Oklahoma also seeks authority to conduct audits of carriers' use of numbers.

In its *Report and Order and Further Notice of Proposed Rule Making* in CC Docket No. 99-200 (*First Report and Order*),² the Commission adopted a mandatory utilization data requirement, a uniform set of categories of numbers to be used by carriers to report their number

¹ The United States Telecom Association, formerly the United States Telephone Association, is the nation's oldest trade organization for the local exchange carrier industry. USTA represents more than 1200 telecommunications companies worldwide that provide a full array of voice, data and video services over wireline and wireless networks. USTA members support the concept of universal service and are leaders in the deployment of advanced telecommunications capabilities to American and international markets.

² 15 FCC Rcd 7574 (2000).

utilization, and a utilization threshold framework, which are collectively designed to increase carrier accountability and incentives for carriers to use numbers efficiently. The Commission also adopted mandatory thousand block number pooling as a nationwide resource optimization strategy. The Commission further addressed numbering conservation issues in its *Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200 (Second Report and Order)*.³

Most of the specific relief measures requested by the states have been addressed by the Commission in its *First Report and Order* and *Second Report and Order*. Although these comments addressing the states' requests reflect that much of the relief requested generally has been accorded to all states by the Commission's previous actions, USTA does not necessarily agree with each of the Commission's determinations as the best way to develop and implement a nationwide, uniform system of numbering. The Commission has consistently stated that it intends to develop a nationwide, uniform system of numbering and that such a system is "essential to the efficient delivery of telecommunications services in the United States."⁴ The Commission has further recognized that the industry, the Commission, and the states should work together to develop national methods to conserve and promote efficient use of numbers, but that those attempts "cannot be made on a piecemeal basis without jeopardizing telecommunications services throughout the country."⁵

³ FCC 00-429, released December 29, 2000.

⁴ Memorandum Opinion and Order and Order on Reconsideration, Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215, and 717, NSD File No. L-97-42, 13 FCC Rcd 19009 at ¶ 21 (1998).

⁵ *Id.*

USTA believes that the Commission should adhere to its policy that orderly national numbering conservation and administration measures are essential to the optimization of the North American Numbering Plan (NANP). USTA will evaluate the Commission's actions against the overarching need to preserve and enhance effective nationwide number planning, conservation and administration.

A majority of the states have filed requests with the Commission since February 1999 seeking similar individual state relief to deal with number shortages.⁶ The Commission has now granted portions of 25 of the states' requests.⁷ USTA has filed comments on each of the petitions, opposing the states' requests for additional authority that would jeopardize the industry

⁶ New York Department of Public Service Petition, NSD File No. L-99-21 (New York Petition); Massachusetts Department of Telecommunications and Energy Petition, NSD File No. L-99-19 (Massachusetts Petition); Maine Public Utilities Commission Petition, NSD File No. L-99-27 (Maine Petition); Florida Public Service Commission Petition, NSD File No. 99-33 (Florida Petition); Californian Public Utilities Commission and People of the State of California Petition, NSD File No. 98-136 (California Petition); Texas Public Utility Commission Petition, NSD File No. 99-55 (Texas Petition); Connecticut Department of Public Utility Control Petition, NSD File No. 99-62 (Connecticut Petition); Wisconsin Public Service Commission Petition, NSD File No. L-99-64 (Wisconsin Petition); New Hampshire Public Utilities Commission Petition, NSD File No. L-99-71 (New Hampshire Petition); the Public Utilities Commission of Ohio Petition, NSD File No. L-99-74 (Ohio Petition); Indiana Utility Regulatory Commission Petition, NSD File No. L-99-82 (Indiana Petition); Nebraska Public Service Commission Petition, NSD File No. L-99-83 (Nebraska Petition); Utah Public Service Commission Petition, NSD File No. L-99-89 (Utah Petition); Missouri Public Service Commission Petition, NSD File No. L-99-90 (Missouri Petition); Iowa Utilities Board Petition, NSD File No. L-99-96 (Iowa Petition); Tennessee Regulatory Authority Petition, NSD File No. L-99-94 (Tennessee Petition); Virginia State Corporation Commission Petition, NSD File No. L-99-95 (Virginia Petition); Georgia Public Service Commission Petition, NSD File No. L-99-98 (Georgia Petition); North Carolina Utilities Commission Petition, NSD File No. 99-97 (North Carolina Petition); Arizona Corporation Commission Petition, NSD File No. 99-100 (Arizona Petition); Pennsylvania Public Utility Commission Petition, NSD File No. L-99-101 (Pennsylvania Petition); Colorado Public Utilities Commission Petition, NSD File No. L-00-16 (Colorado Petition); Public Service Commission of Kentucky, NSD File No. L-00-08 (Kentucky Petition); Oregon Public Utility Commission Petition, NSD File No. L-00-29 (Oregon Petition); New Jersey Board of Public Utilities Petition, NSD File No. L-00-95 (New Jersey Petition); Massachusetts Department of Telecommunications and Energy Petition, NSD File No. L-00-169 (Second Massachusetts Petition); Louisiana Public Service Commission Petition, NSD File No. L-00-170 (Louisiana Petition); and Maryland Public Service Commission Petition, NSD File No. L-00-171 (Maryland Petition).

⁷ Order on New York Petition, 14 FCC Rcd 17467 (1999) (*New York Order*); Order on Massachusetts Petition, 14 FCC Rcd 17447 (1999) (*Massachusetts Order*); Order on Florida Petition, 14 FCC Rcd 17506 (1999) (*Florida Order*); Order on California Petition, 14 FCC Rcd 17486 (1999) (*California Order*); Order on Maine Petition, 14 FCC Rcd 16440 (1999) (*Maine Order*); Order on Connecticut Petition, 15 FCC Rcd 1240 (1999) (*Connecticut Order*); Order on New Hampshire Petition, 15 FCC Rcd 1252 (1999) (*New Hampshire Order*); Order on Ohio Petition, 15 FCC Rcd 1268 (1999) (*Ohio Order*); Order on Texas Petition, 15 FCC Rcd 1285 (1999) (*Texas Order*); Order on Wisconsin Petition, 15 FCC Rcd 1299 (1999) (*Wisconsin Order*); and Order on Arizona, Colorado, Georgia, Indiana, Iowa, Kentucky, Missouri, Nebraska, North Carolina, Oregon, Pennsylvania, Tennessee, Utah, Virginia, and Washington Petitions, DA 00-1616, released July 20, 2000 (*Multiple State Order*).

processes underway for comprehensive nationwide number conservation. USTA has also addressed the issue of the states' authority to implement conservation measures on an individual basis in its comments and reply comments in response to the Commission's *Notice of Proposed Rulemaking* in CC Docket No. 99-200 (*Notice*).⁸

Notwithstanding the Commission's partial grant of some of the states' requests and the Commission's decisions in the *First Report and Order* and *Second Report and Order*, USTA continues to be concerned over grant of additional authority to individual states in contravention of nationwide number conservation policies and procedures. To the extent that the petitioning states seek additional authority that would frustrate the national number conservation plan, USTA opposes those requests for the reasons articulated in its earlier pleadings. Rather than repeat the reasons stated therein, USTA hereby incorporates by reference all of its pleadings filed in the proceedings listed in footnotes 6 and 8, *supra*.

USTA provides the following comments on the states' specific requests for authority in light of the Commission's *First Report and Order*, *Second Report and Order* and *Multiple State Order*.

1. Thousand Block Number Pooling Trials

Each of the petitioning states seek authority to implement thousand block pooling. USTA has continuously expressed concern over the deployment of software version 1.4 in state pooling trials. None of the petitioners specify whether they would use version 1.4 or 3.0. A broad range of carriers, including ILECS, AT&T and WorldCom, have objected to additional deployment of version 1.4 on technical grounds. USTA observes that the Commission's own schedule calls for implementation of the national plan for pooling within approximately 12

⁸ 14 FCC Rcd 10322 (1999).

months.⁹ The Commission has emphasized that individual state pooling trials will be required to conform to the national standard, when available, and are given a transition period of three months.¹⁰

Under these circumstances, granting additional authority to states to deploy pooling structures that are not consistent with the national standard makes no sense. Such an exercise would be counter-productive to the states, the carriers and the public at large. Carriers would incur additional unnecessary expense, which would ultimately be borne by the public. Rather, the Commission should redouble its efforts to work with the industry to take all necessary steps to implement the national plan and then be able to implement pooling on a broad, national, consistent and rational manner.

2. Number Allocation Standards

West Virginia seeks authority to enforce current allocation standards, including fill rates, or to set and enforce new standards. The Commission adopted a nationwide utilization threshold for non-pooling carriers in the *First Report and Order*¹¹ and for pooling carriers in the *Second Report and Order*.¹² The Commission also adopted specific threshold levels and a transition to those levels.¹³ In so doing, the Commission declined to delegate additional authority to the states to set different utilization thresholds, except on an interim basis where states are currently using

⁹ In the *First Report and Order* at 7643, the Commission stated that thousand block pooling would be implemented within nine months of the selection of a national Pooling Administrator. In the *Second Report and Order* at ¶ 37, the Commission indicated that the Pooling Administrator selection would be made in the first quarter of 2001.

¹⁰ The specific date for state conformance to the national framework is to be three months from publication of the *Second Report and Order* in the Federal Register. See ¶ 46.

¹¹ *First Report and Order* at 7621, 7685.

¹² ¶¶ 10, 27-28.

¹³ *Second Report and Order* at ¶¶ 10, 22, 26.

different thresholds pursuant to existing delegated authority.¹⁴ The Commission made clear that the thresholds it adopted are to be applied on a “uniform nationwide basis.”¹⁵ Since West Virginia did not have delegated authority for imposing its own fill rates when the *Second Report and Order* was adopted, it does not qualify for the exception that the Commission allowed. Rather, West Virginia must follow the prescribed national utilization factors. West Virginia’s request must be denied.

USTA remains concerned that, if a single rate center is served by multiple switches operated by a single entity, a single carrier may be forced to port numbers between switches, which is burdensome, and in some cases impossible.¹⁶ The requirement to calculate fill rates on a rate center basis could constitute a powerful disincentive to rate center consolidation. Nevertheless, the Commission declined to adopt switched-based utilization in the *Second Report and Order*.¹⁷

3. Revised Rationing Procedures

West Virginia requests authority to impose rationing procedures and maintain such measures for six months following an NPA relief plan. USTA believes that this proposal must be rejected for two reasons. First, the West Virginia request lacks precision and justification. The authority requested is vague and does not observe the concerns stated by the Commission in its authority granted to New York.¹⁸ Without additional specificity, the Commission must reject this proposal. Second, rationing is inconsistent with the Commission’s new numbering rules, as adopted in the *First Report and Order*. Specifically, the new eligibility requirements for initial

¹⁴ *Id.* at ¶ 23.

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ ¶ 32.

¹⁸ *New York Order* at 15.

and growth codes and thousand blocks and the requirements for assignment on a first-come, first-served basis make rationing unwarranted and incompatible with this new scheme. There is no valid reason to grant West Virginia's request for rationing.

4. Utilization and Forecast Data and Auditing

West Virginia seeks authority to require carriers to submit utilization and forecast data and to audit those reports. Oklahoma also requests authority to audit carriers' use of numbering resources. The Commission delegated to the states authority to determine validity of utilization and forecast data initially reported to the North American Number Plan Administrator (NANPA).¹⁹ In addition, the Commission granted access to carriers' semi-annual reported data.²⁰ This right was clarified in the *Second Report and Order*.²¹ Therefore, states are given access to carrier data and authority to determine its validity.

Also, the Commission granted authority to the states to investigate and determine whether code holders are using numbers in accordance with Commission-specified guidelines.²² Furthermore, the states can direct the NANPA to reclaim codes if a carrier's usage is not in compliance with Commission specifications. Therefore, West Virginia does not need additional authority to carry out this function.

With regard to audits, the Commission declined to delegate authority to the states to perform audits under the federal auditing program.²³ However, the Commission is seeking comment on whether to give states authority to conduct "for cause" or "random" audits.²⁴ Until

¹⁹ *First Report and Order* at 7598-99.

²⁰ *Id.* at 7606.

²¹ ¶ 118.

²² *First Report and Order* at 7680-81.

²³ *Second Report and Order* at ¶ 91.

²⁴ *Id.* at ¶¶ 92, 155.

that issue is resolved, there is no need or justification for granting the West Virginia and Oklahoma requests.

5. Reclamation of Unused, Reserved or Under-utilized Portions of NXX Codes

West Virginia and Minnesota request delegated authority to reclaim unused and reserved NXX codes. In the *Multiple State Order*,²⁵ the Commission stated that it had already addressed this optimization measures in the *First Report and Order*, and that it would not rule on those aspects of the pending state petitions. Neither West Virginia nor Minnesota has demonstrated any reason for the Commission to take any different action on the subject requests. Therefore, USTA urges the Commission not to rule on this portion of the West Virginia and Minnesota petitions.

6. Sequential Number Assignment

West Virginia seeks authority to require sequential number assignment within an NXX or thousand block in connection with its pooling trials. In the *First Report and Order*,²⁶ the Commission mandated that carriers first assign all available numbers within an opened thousand blocks before opening another block for carriers' existing and new numbering resources, unless the available numbers are not sufficient to meet a customer's request. While the Commission gave the states oversight authority over sequential numbering assignments, it required that states conform their existing sequential number assignment requirements to the Commission's new policy.²⁷ Thus, the Commission's newly-established policy stated above is in force and has supplanted all inconsistent state delegated authority on sequential number assignment. This renders West Virginia's request moot. It should therefore be dismissed.

²⁵ *Multiple State Order* at 4.

²⁶ 15 FCC Rcd at 7684.

²⁷ *Id.*

Conclusion

To the extent that the Commission has already generically granted the relief sought by the petitioning states, USTA submits that the state petitions are moot. To the extent that the petitioners seek additional authority beyond that granted to the states or that specified in the *First Report and Order* or *Second Report and Order*, USTA opposes the requests as frustrating the need for nationwide number conservation and administration standards.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION

By 

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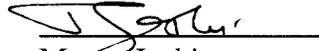
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February 12, 2001

CERTIFICATE OF SERVICE

I, Meena Joshi, do certify that on February 12, 2001, Comments Of The United States Telecom Association was either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the attached service list.


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