

EXHIBIT C

DICKINSON
WRIGHT PLLC

215 S. WASHINGTON SQUARE, SUITE 200
LANSING, MICHIGAN 48933-1816
TELEPHONE: (517) 371-1730
FACSIMILE: (517) 487-4700
http://www.dickinson-wright.com

December 12, 2000

JOHN M. DEMPSEY
jdempsey@dickinson-wright.com
(517) 487-4763

18

Via Hand-Delivery

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
Lansing, MI 48911

MICHIGAN PUBLIC SERVICE
COMMISSION

DEC 12 2000

FILED

Re: In the matter, on the Commission's own motion, to consider
implementation of an 248 area code relief plan
MPSC Case No. U-12721

Dear Ms. Wideman:

Enclosed for filing in the above-referenced matter, please find the original and fifteen copies of
Ameritech Michigan's Comments. Also enclosed please find the original *Proof of Service*.

If you should have any questions, please contact me.

Very truly yours,

John M. Dempsey

JMD/mds
Enclosure

LANSING 34060-2 273126

Post-It® Fax Note	7671	Date	5-14	# of pages	25
To	Carrie	From			
Co./Dept.	M ^r Leure	Co.	Dan Kearney		
Phone #		Phone #	517 241 6206		
Fax #		Fax #			

C O U N S E L L O R S A T L A W

DETROIT BLOOMFIELD HILLS LANSING GRAND RAPIDS ANN ARBOR
WASHINGTON, D.C.

MICHIGAN PUBLIC SERVICE
COMMISSION
DEC 12 2000

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

FILED

In the matter, on the Commission's own motion,)
to consider implementation of an 248 area code)
relief plan.)
_____)

Case No. U-12721

18

AMERITECH MICHIGAN'S COMMENTS

Ameritech Michigan,¹ pursuant to the Commission's November 20, 2000 Order and Notice of Hearing in this matter (the "Order"), hereby submits its written comments regarding the area-code relief plan referenced in the Order.

INTRODUCTION

With these comments, Ameritech Michigan provides the Commission information to assist it in setting the proper implementation schedule for the upcoming relief plan for the 248 area code. Ameritech Michigan does not, however, take a position with respect to the most appropriate form of relief plan. Also, Ameritech Michigan seeks to avoid in this proceeding the difficulties associated with Case No. U-12552, regarding the implementation schedule for the 517-area-code relief plan. Accordingly, Ameritech Michigan will present in these comments specific information regarding appropriate implementation timelines for certain of the relief plans under consideration.

These comments are divided into four sections. First, Ameritech Michigan describes some the key implementation issues that should inform the Commission's analysis.

¹ Michigan Bell Telephone Company d/b/a Ameritech Michigan, a Michigan corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Ameritech Corporation is a wholly owned subsidiary of SBC

B. Ameritech Michigan's Proposed Implementation Schedules

While the Commission has the discretion to order a number of different relief plans, Ameritech Michigan herein sets forth proposed implementation schedules for what appear to be the main relief plans under consideration. These proposals take into account the many factors outlined in Section A, *supra*, as well as the implementation schedule ordered in connection with the 810-area-code relief plan, as set forth in the Commission's December 11, 2000 Opinion and Order in Case No. U-12588. In general, Ameritech recommends that there be a minimum of three (3) months between the mandatory date of 810-area-code split and the permissive date for 248-area-code relief. For an overlay of the 248 area code, Ameritech recommends a minimum of four (4) months between permissive and mandatory dialing. For a split of the 248 area code, Ameritech recommends a minimum of six (6) months between permissive and mandatory dialing. Should there be a material delay in the Commission's final decision for the 248 area code, these proposed dates would be subject to adjustment.

248 Overlay:

Permissive dialing: June 22, 2002

Mandatory dialing: October 26, 2002

248 Split:

Permissive dialing: June 22, 2002

Mandatory dialing: January 25, 2003

C. Comments on Number Conservation Measures

Ameritech Michigan continues to advocate for the efficient utilization of numbering resources, and indeed supports number pooling in areas where its deployment will considerably extend the life of the particular NPA. Number pooling, however, should only be deployed if it can extend the life of the NPA by three-to-five years.

Ameritech Michigan anticipates that the FCC will order a national rollout of number pooling late next year. If this Commission ordered a state trial of number pooling, FCC approval would be required. Indeed, the FCC has enumerated specific criteria for states requesting additional delegated authority for number pooling trials:

* * * * Furthermore, to ensure that pooling is implemented in areas where it has the potential to be most beneficial, we require that states include a showing of specific criteria in their petitions for pooling authority. Each petition must demonstrate that: 1) that an NPA in its state is in jeopardy, 2) the NPA in question has a remaining life span of at least a year, and 3) that NPA is in one of the largest 100 MSAs, or alternatively, the majority of wireline carriers in the NPA are LNP-capable. * * * * (Footnotes omitted.)

Report and Order and Further Notice of Proposed Rule Making, CC Docket 99-200 (rel. March 31, 2000), ¶170. In addition, the Commission would have to establish a cost recovery mechanism and technical workshops with the industry before implementing a pooling trial. Once the Commission received approval from the FCC, Ameritech Michigan would require at least six-to-nine months to deploy the initial state trial, and six-to-eight weeks between additional trials.

Ameritech Michigan also is not, in principle, opposed to rate-center consolidation as long as local calling scopes and rate plans are not changed, and such consolidation would not result in any adverse revenue impact to Ameritech Michigan. However, in Michigan, rate-center consolidation currently would not reduce LEC demand for NXXs. Ameritech Michigan has multiple switches within a rate center, and these switches currently are configured based on each switch having its own unique set of NXXs. As a result, Ameritech Michigan currently does not share NXXs among its switches. Moreover, the FCC's guidelines require that growth-NXXs be assigned to incumbent LECs based on overall utilization levels of all of the incumbent LEC's NXXs within a rate center. Because of this restriction, an incumbent LEC may be denied a NXX to serve growth in one switch in a rate center based on the fact that other NXXs assigned to other

switches in the same rate center may be underutilized. Thus, Ameritech Michigan opposes the consolidation of any of its rate centers in Michigan at this time.

D. Impact of Section 303(5) of the MTA

Section 303(5) of the MTA, recently added to the MTA by amendments signed into law on July 17, 2000, reads as follows:

To the extent that it is technically and economically feasible, the commission shall issue orders requiring the modification of all area code boundaries in this state to insure that they conform to county lines.

The question is whether the Commission should require that area code boundaries conform to county lines in connection with the 248 area-code relief plan. The answer is that it would be neither technically or economically feasible to do so.

In the context of an overlay plan for the 248 area code, Section 303(5) is not, in truth, even implicated because there would be no new area code boundary to establish. The existing boundary of 248 would also be the boundary of the new overlay area code. Therefore, in this particular overlay situation the area code boundary could not conform to county lines unless the entire 248 area code were to be redrawn. To do so, however, would be an utterly wasteful and terribly disruptive exercise, and certainly would not advance the completion or attributes of an area-code overlay.

In the context of a split, the analysis is somewhat more complex, but nonetheless just as forcefully compels a finding that area-code boundaries not conform to county lines. In this circumstance, providers with exchanges adjacent to the new boundary will be required to physically reconstruct their cable and wire networks. This would involve, among other things, obtaining new rights-of-way, building new underground structures and laying new cables. Conservative estimates are that this type of physical reconfiguration would take at least eighteen

EXHIBIT D

Post-it® Fax Note	7671	Date	5-14	# of pages	2
To	Carrie	From			
Co./Dept.	Mr. Leure	Co.	Dan Kearney		
Phone #		Phone #	517 241 6206		
Fax #		Fax #			

WHERE HAVE ALL THE NUMBERS GONE? (SECOND EDITION)

Rescuing the North American Numbering Plan from Mismanagement and Premature Exhaust

The Ad Hoc Telecommunications Users Committee



June 2000

 **ECONOMICS AND TECHNOLOGY, INC.**

ONE WASHINGTON MALL • BOSTON, MASSACHUSETTS 02108

Rate Center Consolidation

State	Annual IntraLATA Toll Revenue ¹	Switched Access Lines	Monthly Revenue per Access Line	State	Annual IntraLATA Toll Revenue ¹	Switched Access Lines	Monthly Revenue per Access Line
Arizona	\$36,000,000	2,758,819	\$1.09	Indiana	\$159,000,000	3,400,340	\$3.90
Nevada	\$18,000,000	1,220,341	\$1.09	Oregon	\$94,000,000	1,943,250	\$4.09
Minnesota	\$39,000,000	2,291,580	\$1.42	Iowa	\$72,000,000	1,975,007	\$4.36
Georgia	\$78,000,000	4,385,449	\$1.48	Utah	\$60,000,000	1,105,479	\$4.62
New York	\$230,000,000	12,317,812	\$1.56	Washington	\$198,000,000	3,489,191	\$4.73
Florida	\$206,000,000	10,781,047	\$1.59	Rhode Island	\$38,000,000	658,581	\$4.81
Hawaii	\$14,000,000	724,851	\$1.61	Wisconsin	\$160,000,000	2,831,035	\$5.07
Virginia	\$89,000,000	4,591,784	\$1.62	Missouri	\$201,000,000	3,226,588	\$5.19
Delaware	\$11,000,000	565,706	\$1.62	Mississippi	\$83,000,000	1,266,368	\$5.46
Maryland	\$73,000,000	3,728,363	\$1.83	California	\$1,501,000,000	22,485,133	\$5.56
Louisiana	\$46,000,000	2,315,246	\$1.66	Kansas	\$95,000,000	1,372,899	\$5.77
North Carolina	\$95,000,000	4,380,721	\$1.81	Montana	\$27,000,000	367,290	\$6.13
Illinois	\$219,000,000	7,761,293	\$2.35	Wyoming	\$18,000,000	244,520	\$6.13
Kentucky	\$56,000,000	1,947,289	\$2.40	New Jersey	\$520,000,000	6,653,656	\$6.51
Ohio	\$211,000,000	6,502,068	\$2.70	Connecticut	\$191,000,000	2,366,008	\$6.73
Alabama	\$72,000,000	2,195,439	\$2.73	Massachusetts	\$363,000,000	4,485,040	\$6.74
Texas	\$307,000,000	11,789,583	\$2.73	Oklahoma	\$142,000,000	1,753,083	\$6.76
Tennessee	\$96,000,000	2,699,322	\$2.76	South Dakota	\$24,000,000	278,951	\$7.17
South Carolina	\$71,000,000	1,637,600	\$3.37	Vermont	\$29,000,000	336,610	\$7.16
Colorado	\$117,000,000	2,678,488	\$3.84	New Hampshire	\$71,000,000	761,406	\$7.57
West Virginia	\$27,000,000	825,822	\$3.73	Arkansas	\$100,000,000	1,008,568	\$7.87
Nebraska	\$42,000,000	933,783	\$3.75	North Dakota	\$27,000,000	255,839	\$8.79
Pennsylvania	\$383,000,000	7,913,473	\$3.82	Michigan	\$773,000,000	6,065,172	\$10.02
New Mexico	\$41,000,000	880,722	\$3.84	Maine	\$129,000,000	883,556	\$15.73
Idaho	\$31,000,000	665,698	\$3.98	Total	\$2,676,000,000	80,724,100	\$3.87

Sources: Federal Communications Commission, Common Carrier Bureau, *Statistics of Communications Common Carriers*, December 9, 1999, Table 2.4: Switched Access Lines by Type of Technology for Reporting Local Exchange Carriers as of December 31, 1999; FCC, Industry Analysis Division, *State-by-State Telephone Revenue and Universal Service Data*, January 2000, Table 2.13: Local Exchange Carrier (LEC) Intrastate Toll Revenue: 1998.
¹ Rounded to nearest one-million.

If the industry trend is to remove mileage from the price of a call, and rate center consolidation offers the ability to significantly reduce the quantity of NXX codes assigned to carriers, why is rate center consolidation not wholeheartedly embraced by regulators and carriers alike? As a consequence of decreasing the number of rating areas in a region, the local calling area of all affected exchanges must necessarily be increased. Enlarging the local calling area produces a corresponding reduction in the volume of intraLATA toll calling, thereby eroding ILEC revenues and potentially blocking interexchange carriers from providing intraLATA calling services in competition with the ILEC. Moreover, because intraLATA toll calls are typically priced at large multiples of their underlying cost — making intraLATA toll one of the most profitable of all ILEC offerings — ILECs are extremely resistant to any measure that would require them to forego this profitable source of revenue. It is essential that regulators come to recognize the interrelationship between ILEC efforts to preserve their intraLATA toll revenue stream and the ultimate exhaust of the NANP: clearly, if a direct consequence of preservation of distance-based intraLATA pricing is the \$150-billion hit on the US economy to pay for NANP expansion, any remaining justification for retaining these archaic pricing devices quickly disappears.

EXHIBIT E

The

State Scene

A Numbering Resource Publication for State Public Utility Commissions

November

December

2000

Inside This Issue:

NANPA Forms Reclamation Group ...	2
Conference Call-Schedule	2
NRUF Submissions Contain Errors ...	3
State Commissioner Profiles	4

NARUC HOLDS ANNUAL MEETING, FILES EX-PARTE WITH FCC

From November 10-15, state public service commission staff and commissioners met in San Diego for the annual meeting of the National Association of Regulatory Utility Commissioners (NARUC). While no new numbering resolutions were passed, on November 30, NARUC filed an Ex-Parte with the Federal Communications Commission (FCC) regarding numbering matters. In the Ex-Parte NARUC reiterated the position it took following its July meetings, including its desire for the FCC to:

- Appoint three additional NARUC members to the North American Numbering Council (NANC)
- Set forth parameters on technology specific overlays
- Authorize the establishment of one or more national non-service-specific area codes
- Act on pending State petitions for additional delegated authority
- Ensure carrier data is readily available at no charge to the individual States
- Affirm authorized State commissions' orders regarding telephone numbering decisions and the States' ability to exercise their delegated authority on numbering issues and require carriers to comply with previous State commission decisions and orders
- Not change the November 24, 2002, deadline for all wireless providers to be LNP-capable.

NARUC further expressed its desire for direct access to the North American Numbering Plan Administration (NANPA) Code Administration system in order to obtain specific code assignment information. **NeuStar**

STATE ROUNDUP

CPUC Issues 2001 Pooling Schedule

On November 21, the California Public Utilities Commission (CPUC) issued an order laying out California's pooling implementation schedule for 2001. The Order adopted five criteria on which to base the implementation schedule:

1. The FCC's restriction on number pooling in the top 100 MSA boundaries
2. Whether other NPAs exist within the top 100 MSA boundaries in which number pooling trials have already been initiated or ordered
3. Expected NPA exhaust date
4. Number of rate centers in the NPA
5. The expected conversion date for NPAC software Release 3.0.

The schedule includes 10 area codes, but dates were set for only one NPA. Pooling has been mandated by March 24, 2001, for the 818 NPA, which serves the area just north of downtown Los Angeles. NeuStar, the Pooling Administrator for the 818 NPA, conducted an implementation meeting on December 7.

Virginia Requests PA Proposals

On November 16, the Virginia State Corporation Commission (VSCC) issued a request for

(continued on page 6)

NEU STAR

Trusted to Bring Networks Together.

1000 Corporate Blvd
Washington, DC 20000
202-223-1100
www.nestars.com

NANPA RECEIVES NRUF SUBMISSIONS, BUT MANY CONTAIN ERRORS

With the NRO Order, the FCC directed new data reporting requirements for service providers. The requirements included the submission of utilization and forecast data to the NANPA by September 15. As of late November, NANPA had received over 3,700 submissions (i.e., Form 502). Unfortunately, more than 2,400 of these submissions contained errors.

More than 1,700 submissions contained the following types of errors:

- Failure to provide an entry in the Parent Company Name or OCN fields
- Unrecognizable NPA codes
- Invalid rate center name
- No recognizable forecast provided

More than 750 submissions contained errors so severe that they could not be processed and had to be rejected. Examples of these errors included:

- No Operating Company Number (OCN) in the service provider OCN field
- Multiple OCNs in the service provider OCN field
- A non-valid OCN format (i.e., OCN must be a four-digit, numeric number; if the OCN is in any other format, submission will be rejected)
- A non-valid OCN; the reported OCN cannot be found in the LERG
- Key information is missing (e.g., service provider name, company address, city, state, zip, contact name and contact telephone number.)
- Utilization or forecast data is missing (i.e., the individual utilization and forecast forms contain no data)
- Service provider modified the spreadsheet (e.g. eliminated workbooks).

Because carriers must have an NRUF on file to obtain central office code assignments, NANPA is focusing first on those carriers whose submissions have been rejected. Service providers will be allowed up to five days from date of notification to address these situations and respond to NANPA. Service providers that fail to correct the problem(s) during that period will be deemed, for purposes of applications for numbering resources, not to have an NRUF on file.

Carriers sometimes find it necessary to update their NRUF submissions, either to correct errors like those described above or to supply additional data. NANPA will accept updates and/or corrections to previously submitted NRUF submissions associated with the current reporting cycle, provided the carrier submits all the previously reported data contained on the 502 Form for the OCN in question, as well as the revision/update. This revised 502 Form will completely replace the existing data for that OCN.

In November, NANPA began sending out lists of codes to states to be reclaimed. In all, 17 states responded to the NANPA saying they would like to take part in the reclamation process. For the remainder of the states, lists of codes to be reclaimed were sent to the FCC. One issue has arisen regarding accuracy of carrier contact information on Part 1s originally sent to the NANPA. Some states have had difficulty contacting carriers whose codes face reclamation. The NANPA is working with the states to address this issue, and it was discussed at the November NANC meeting. **NeuStar**

To be added to *The State Scene* mailing list, please email your name and address to Rebecca Barnhart at rebecca.barnhart@neustar.com

EXHIBIT F

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of:)
)
)
The Michigan Public Service Commission) File No. _____
)
)
Petition for Delegation of Additional Authority)
Pertaining to NXX Code Conservation Measures,)
)
)
and)
)
)
Number Resource Optimization) CC Docket No. 99-200

MICHIGAN PUBLIC SERVICE COMMISSION
PETITION FOR ADDITIONAL DELEGATED AUTHORITY
TO IMPLEMENT NUMBER CONSERVATION MEASURES

Pursuant to the Federal Communication Commission's ("Commission") March 31, 2000 *Numbering Resource Optimization First Report and Order* ("Order"),¹ the Michigan Public Service Commission ("MPSC") hereby seeks additional delegated authority to implement mandatory thousands-block pooling in the state of Michigan. More specifically, MPSC requests Thousand Blocks Number Pooling for the Detroit and Grand Rapids Metropolitan Statistical Area (MSA). Additionally, the MPSC requests authority to order sequential number assignment to minimize thousand block contamination as well as authority to maintain NXX code rationing

¹ Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574 (2000).

procedures following area code relief to prevent a surge in demand for codes. In lieu of pooling authority, in whole or in part, or due to the selection of a national Pooling Administrator, the MPSC requests that the Detroit and Grand Rapids MSAs be placed in the initial round of national pooling.

In its March 31 Order, the Commission directed that those state commissions seeking thousands block number pooling authority demonstrate that “1) a numbering plan area (NPA) in its state is in jeopardy; 2) the NPA in question has a remaining life span of at least a year; and 3) the NPA is in one of the largest 100 MSAs, or alternatively, the majority of wireline carriers in the NPA are LNP-capable.” *Id.* at ¶ 170. In addition, the Commission recognized that “special circumstances” may exist in which pooling would be authorized “upon a satisfactory showing by the state commission of such circumstances.” *Id.* Finally, in the case of pooling in more than one MSA, the Commission has stated that pooling in a second MSA is to be implemented “only after having implemented pooling in the initial MSA and after allowing carriers sufficient time to undertake necessary steps to accommodate thousands-block number pooling, such as modifying databases and upgrading switch software.” *Id.* As described below, the MPSC meets the three criteria of paragraph 170 of the Order for this additional authority or, alternatively, qualifies based on special circumstances.

I. BACKGROUND

On July 17, 2000, Governor John Engler signed legislation that granted authority to the MPSC to exercise authority delegated by the Commission to implement area code relief in Michigan. MCL 484.2303; MSA 22.1469(303). Under this legislation, on August 1, 2000, the MPSC accepted authority from the Commission relative to the approval of area code relief plans.

Public hearings have been held for NPA 517, 810, 248, and 734, with area code relief, in the form of geographic splits, ordered for NPA 517 and 810. Implementation dates, however,

remain 18 months apart,² with NPA 517 mandatory dialing planned to begin October 6, 2001 and mandatory dialing for NPA 810 planned to begin March 23, 2002. A January 16, 2001 industry conference regarding jeopardy procedures in NPAs 517, 810, 248, and 616, reiterated the need for further numbering conservation efforts due to the exhaust periods, particularly in light of actual area code relief dates. NPA 517 and 810 both exhaust in July 2001, leaving the industry with no available NXX codes in 517 for five months and nearly 10 months in 810. Currently, the MPSC is anticipating further information from Michigan's largest incumbent local exchange carriers regarding implementation dates for NPA 248 and 734, rate center consolidation, and Thousand Blocks Number Pooling. Two additional area codes, NPA 313 and 616, have yet to be addressed. These facts notwithstanding, it is reasonable to state that the Detroit MSA has more than a year left since the 313 projected exhaust date is in the first quarter of 2002 and the 734 exhaust date has just been extended to 2002.

II. MICHIGAN MEETS THE REQUIRED CRITERIA FOR ADDITIONAL AUTHORITY

1. The MPAs in Michigan are in Jeopardy.

The NPAs in the Detroit and Grand Rapids MSAs are in jeopardy. Area code relief for the NPA 616, a geographic split with the current NPA 231, was completed in October 1999 by the industry. However, extraordinary jeopardy was declared for NPA 616 on November 29, 1999, less than two months after mandatory dialing commenced. The numbering plan for the Detroit MSA is also in jeopardy, *i.e.*, is in a situation "where central office codes may become exhausted before an area code relief plan can be implemented." 47 CFR § 52.7(b).

2. The NPAs in Question Have a Remaining Life Span of At Least One Year

The NPAs in the referenced MSAs have a remaining life span of at least one year. For example, with regard to the NPAs in the Detroit MSA there is more than one year left because

² Case No. U-12721, 1 Tr. 39.

the NPA 313 project exhaust date is the first quarter of 2002 and the NPA 734 exhaust date has just been extended until 2002.

Even if the Commission determined that MPSC did not meet the third criterion, the MPSC meets the special circumstances the Commission recognized might exist when it discussed waiving some of the requirements of paragraph 170. This point is discussed in Section III below.

3. The Detroit and Grand Rapids MSAs are Among the Nation's 100 Largest MSAs.

The last criterion for obtaining pooling authority is that the MSAs in question be among the 100 largest in the United States. Both the Detroit and Grand Rapids MSAs are among the nation's 100 largest MSAs.

III. WHETHER OR NOT THE CRITERIA HAVE BEEN MET, SPECIAL CIRCUMSTANCES WARRANT RELIEF.

As noted at the outset of this petition, the Commission has recognized that, even where the conditions for pooling relief have not literally been satisfied, authority to implement pooling measures may be granted upon a showing of special circumstances. Such circumstances are present here.

In rejecting calls for the imposition of rigid time limits for implementation of area code relief, the Commission emphasized just last month: it was "sensitive to states' desire to minimize the consumer impact of area code relief by not implementing new area codes any sooner than necessary." *Numbering Resource Optimization, Second Report and Order*, CC Docket No. 99-200 at ¶ 58 (December 29, 2000). The MPSC has previously asserted to the Commission that, until legislation was signed by Governor Engler in July of last year, it had no authority to implement area code relief. Upon receiving authority over area code relief, the MPSC moved quickly to establish public hearings and approve relief plans. The current problem is the inability

of the industry to implement relief plans prior to the exhaust of numbering resources.³ The Michigan Telecommunications Act's general purposes include to "allow and encourage competition" and "encourage the development of a competitive telecommunications industry." MCL 484.2101; MSA 22.1469(101). Currently, Michigan has 155 competitive local exchange carriers that may be trying to institute service in affected areas; however, with a limited number of available NXX codes, or no available codes, increased competition becomes difficult or impossible to implement.

Therefore, the MPSC seeks authority to institute Thousand Blocks Number Pooling in the Detroit MSA, including NPAs 810 (586), 248, 734, and 313. The MPSC understands that number conservation is not a substitute for timely area code relief and that, although the Detroit MSA as a whole is more than one year from exhaust, many of the affected NPAs within the Detroit MSA are within one year of exhaust. The Detroit MSA will continue to be in constant need of numbering resources. In addition to Thousand Blocks Number Pooling, therefore, MPSC requests authority to order sequential number assignment to minimize thousand block contamination and to maintain NXX code rationing procedures following area code relief to prevent a surge in demand for codes. In lieu of pooling authority, in whole or in part, or due to the selection of a national Pooling Administrator, the MPSC requests that the Detroit MSA be placed in the initial round of national pooling.

Similar concerns warrant relief in the Grand Rapids MSA. Area code relief for the NPA 616, a geographic split with the current NPA 231, was completed in October 1999 by the industry; however, extraordinary jeopardy was declared for NPA 616 on November 29, 1999, less than two months after mandatory dialing commenced. An industry conference, on January 16, 2001, provided only ten months of rationing before there will be a complete exhaust of numbering resources in the NPA 616. As is the case with the Detroit MSA, the MPSC

³ The MPSC has also made reclamation efforts. On November 2, 2000, the MPSC ordered its staff to investigate and reclaim NXX codes with delinquent Part 4 forms (Confirmation of Code in Service). Working with the NANPA, approximately 45 codes have been addressed; however, only three have been reclaimed. Although the concept has merit, the actual reclamation of codes has yielded few numbering resources.

understands that number conservation is not a substitute for timely area code relief and intends to move forward to ensure needed relief. The industry, however, indicates that the implementation of area code relief plans will be completed in a sequential manner, with projected completion in several years. The MPSC, therefore, requests authority for a Thousand Blocks Number Pooling trial in the NPA 616 (the Grand Rapids MSA), authority to order sequential number assignment to minimize thousand block contamination, and authority to maintain NXX code rationing procedures following area code relief to prevent a surge in demand for codes. In lieu of pooling authority, in whole or in part, or due to the selection of a National Pooling Administrator, the MPSC requests the Grand Rapids MSA, like the Detroit MSA, be placed in the initial round of national pooling.⁴

CONCLUSION

The MPSC respects and supports the Commission's efforts to address the numbering resources situation at the national level. The MPSC realizes that number conservation, in any form, is not a substitute for timely area code relief, and the MPSC is working toward completion of the implementation of area code relief plans in Michigan. However large metropolitan areas such as the Detroit and Grand Rapids MSAs require further numbering resource optimization measures. Having met the criteria established by the Commission for additional delegated authority, or alternatively having demonstrated special circumstances, the MPSC requests delegated authority to (1) implement Thousand Blocks Number Pooling, based on national guidelines in the Detroit MSA and the Grand Rapids MSA, (2) order sequential number

⁴ The MPSC recognizes the Commission's statement in its March 31 Order that, in the case of pooling in more than one MSA, the Commission has stated that pooling in a second MSA is to be implemented "only after having implemented pooling in the initial MSA and after allowing carriers sufficient time to undertake necessary steps to accommodate thousands-block number pooling, such as modifying databases and upgrading switch software." *First Report and Order, supra* at ¶ 170. MPSC requests waiver of this limitation, but should the Commission conclude that such a condition is necessary in this case, MPSC requests that the Commission permit it to implement pooling in the Detroit MSA first.

assignment to minimize thousand block contamination, and (3) continue rationing procedures for six months following area code relief plan implementation.

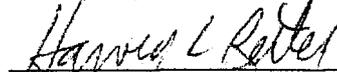
Respectfully submitted,

MICHIGAN PUBLIC SERVICE COMMISSION

By Its Attorneys,

JENNIFER M. GRANHOLM
Attorney General

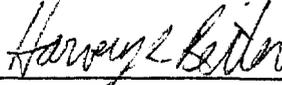
David A. Voges
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Suite 15
Lansing, MI 48911
Telephone: (517) 241-6680
Fax: (517) 241-6678



Harvey L. Reiter
David D'Alessandro
Carrie L. McGuire
Morrison & Hecker L.L.P.
Special Assistant Attorneys General
1150 18th Street, NW, Suite 800
Washington, DC 20036-3816
Telephone: (202) 785-9100

CERTIFICATE OF SERVICE

I, Harvey L. Reiter, hereby certify that I have, this 26th day of January, 2001, served the foregoing document upon each person identified below:



Harvey L. Reiter

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Michael Powell, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Susan Ness, Commissioner
Federal Communications Commission
445 12th Street, SW – 8th Floor
Washington, DC 20554

Harold Furchgott-Roth, Commissioner
Federal Communications Commission
445 12th Street, SW – 8th Floor
Washington, DC 20554

Gloria Tristani, Commissioner
Federal Communications Commission
445 12th Street, SW – 8th Floor
Washington, DC 20554

Lawrence E. Strickling, Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW - Room 5-C450
Washington, DC 20554

Yog R. Varma, Deputy Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW – Room 5-C352
Washington, DC 20554

Jeannie Grimes
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW – Room 6-A401
Washington, DC 20554

Al McCloud
Network Services Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW – Room 6-A423
Washington, DC 20554

Johanna Mikes
Common Carrier Bureau
445 12th Street, SW – Room 5-C163
Washington, DC 20554

Jared Carlson
Network Services Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW – Room 6-A331
Washington, DC 20554

International Transcription Service
445 12th Street, SW – Room CY-B402
Washington, DC 20036