

network's ability to recognize telephone numbers and properly route calls in a system with consolidated rate centers." (Comments, 17) SBC, Winstar and Global NAPs were among the carriers discussing RCC effects on 9-1-1.

Several commenters requested that the FCC sponsor a national workshop regarding RCC. This idea was supported by a state coordination group representing utility commission staff of several states, including California, Connecticut, Florida, Indiana, Maryland, Maine, Michigan, Nebraska, New Hampshire, New York, Oklahoma, Texas, Utah and Vermont. Winstar said the Commission "should also hold hearings and workshops with state public utility commissions and the industry, including public safety officials and incumbent local exchange carriers." (Comments, 4)

We strongly concur with the suggestions to have an FCC-sponsored national workshop regarding RCC. We also offer NENA's support to help ensure that 9-1-1, public safety and emergency services are represented and will be considered.

Criteria for cost-effective RCC

In NENA's original comments (page 2), we listed three criteria, which we felt were essential to minimize 9-1-1 impacts in RCC:

- (1) Upgrading 9-1-1 networks to more current technology across the country, thereby reducing ANI (automatic number identification) failures and the resulting default problems;
- (2) Upgrading 9-1-1 database systems and the corresponding service provider 9-1-1 processes so that they are capable of real-time changes – such as in the Number Portability Administration Center Service Management System -- rather than batch processing, done once daily or every several hours, resulting in transactions taking days to complete; and
- (3) Keeping RCC within common 9-1-1 default boundaries, which usually are counties or similar areas.

We also mentioned that costs were involved. We felt that the FCC should start realizing and considering these 9-1-1 costs that are created because of number resource optimization methods. One of the criteria we felt was necessary in an area of RCC was upgrading the area's 9-1-1 network to SS7. Metrocall, a national paging company, believes paging phone numbers should not be considered for pooling because "requiring competitive message carriers to employ SS7 on their networks would be enormously expensive." (Comments, 4) To prevent degradation of 9-1-1 networks and systems in areas of number portability, number pooling, escalating area codes, and RCC, the upgrade to SS7 is needed and Metrocall's statement also applies. It is enormously expensive. The FCC should consider where the payment for these increased costs to service providers and 9-1-1 systems is going to come from.

Global NAPs (Comments, 6) supported keeping RCC within common default boundaries: "Global NAPs believes that implementing a mandatory federal program of rate center consolidation is the only true solution to the numbering resource crisis," and suggested a geographic radius minimum "of at least 25 miles." NENA recommends that the geographic minimum should, as much as possible, conform to local 9-1-1 systems, many of which are approximately within the 25-mile diameter or larger.

Service-specific area code overlays

NENA's original comments stated that if specialized services were unlikely to create a 9-1-1 call, the impact on 9-1-1 could be minimized. The Ohio Public Utility Commission's comments in support of such overlays (pages 5-16) gave examples that included point of sale terminals, remote ATMs, coin-operated telephones, data-only lines (even second lines in the home strictly for computer use) and any numbers without public

telephone number association such as numbers in a hunt group. NENA points out that, while the listed examples may be used to eliminate the need for local 10-digit dialing as in regular overlays, virtually all the examples cited would require changes to local 9-1-1 networks and other parts of the systems, just as with any other overlay, since they could generate 9-1-1 calls.

Campuses and NXX assignments

The Association for Telecommunications Professionals in Higher Education said in its Summary, arguing for permission to accumulate blocks of sequential numbers, that "on many campuses, the association between numbers and dormitory rooms allows for calling locations to be identified in order to facilitate implementation of E911 systems. As a result, telecommunications administrators on college and university campuses are able to link a specific abbreviated telephone number (usually four or five digits) with a specific room or location. This speeds access to emergency services, including fire, police and medical."

As the FCC considers the various number resource optimization methods, NENA suggests that there be special provisions to ensure that those campus and other institutional users of private switch systems providing 9-1-1 address location information and appropriate routing not be disadvantaged by the chosen optimization methods.

Conclusion

NENA is quite willing to join with state utility commissions, local exchange carriers and others in FCC-sponsored national workshops on RCC. We trust that the participation of representatives for 9-1-1, public safety and emergency services will be encouraged.

The FCC must begin considering the costs that are impacting 9-1-1 networks, service providers and systems throughout the country, due to local phone competition and the need to conserve and optimize number resources. It should actively consider putting related 9-1-1 network and data change costs, plus other local service provider-related costs, into a national cost allocation/recovery system such as number portability/pooling. The impact of each number resource optimization method on 9-1-1 services must be carefully considered.

Respectfully submitted,

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