Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Numbering Resource Optimization	)	CC Docket No. 99-200
	)	
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	)	CC Docket No. 96-98

REPLY COMMENTS OF QWEST CORPORATION

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TABLE OF CONTENTS

Page

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I. INTRODUCTION AND SUMMARY

Qwest Corporation ("Qwest"),[1] through counsel, herein replies to comments filed regarding the Commission's Second Further Notice of Proposed Rulemaking ("Second Further Notice").[2] In this Reply, Qwest focuses on four issues raised by commentors: rate center consolidations, the need for a "safety valve" for those carriers who cannot meet the Commission's number utilization formula as a predicate for securing additional needed numbering resources, the pressing need to move forward with a cost recovery model, and the theory of separating number assignment from call rating and routing. Qwest **supports** those commentors who argue that rate center consolidations are matters that must be left up to the

[1] On June 30, 2000, Qwest merged with U S WEST to become a multi-faceted telecommunications provider with a major presence as an incumbent local exchange carrier ("ILEC"), an interexchange carrier ("IXC") and a competitive local exchange carrier ("CLEC"). As such, the "new" Qwest is forced to balance many of the same competing interests in developing internal policy positions that the Federal Communications Commission ("Commission") grapples with on a regular basis in developing industry-wide rules.

[2] In the Matter of Numbering Resource Optimization, 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, CC Docket Nos. 99-200 and 96-98, Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket

states to resolve on a case-by-case basis. While such consolidations raise serious and thorny problems associated with previous rating schemes, these problems do not lend themselves to federal resolution. This Commission is simply not in a position to "make carriers whole" (from both a revenue and expense perspective) within the context of rate center consolidations. It should not even try.

Qwest also **supports** those commentors who support the need for a "safety valve" to allow carriers an efficient and expeditious vehicle to secure additional numbers when carriers cannot demonstrate the need for the additional numbers through the mathematics associated with the Commission's number utilization formula. While some states express the need for caution in this area, Qwest is confident that a solid safety valve mechanism can be outlined within this proceeding. In addition to that, we recommend the Commission send the matter to the Industry Numbering Committee ("INC") for further investigation on the matter of whether additional factors should trigger the "safety valve" mechanism.

Qwest **supports** the comments of those who argue that the Commission must move forward expeditiously with a cost recovery model for federal number pooling. The Commission need not await the identification of the Pooling Administrator ("PA") in order to move forward and it should not wait. As commentors argue, there is little in the way of avoided costs (or "savings") associated with number pooling, so the Commission need not spend more time trying to wrest such savings from the filings of those seeking full cost recovery.

Qwest **opposes** the proposal of WorldCom, Inc. ("WorldCom") for separating numbers from all rating and routing intelligence *ala* a number portability model. As WorldCom concedes,

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No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, FCC 00-429, rel. Dec. 29, 2000; Errata, rel. Jan. 24, 2001.

the proposal amounts to a call for geographical number portability. While there may have been some good reasons for pursuing such portability prior to the Commission's determination to adopt thousands-block number pooling, there are no good reasons to pursue the matter at this time. Furthermore, the Commission would need to establish a separate rulemaking to assess the viability and reasonableness of pursing such a model.

II. RATE CENTER CONSOLIDATION ISSUES MUST BE LEFT TO THE STATES

A. The States Themselves Should Work Through The Matter With Affected Parties

The "problem"[3] of rate center consolidations within the context of number utilization and optimization is highlighted in the comments. Some states suggest that such consolidation is (fairly permanently) out of the question.[4] Other commentors state that, while such consolidations have been considered, the inability to secure an industry consensus around the consolidation has led to an end of the discussion (or stymied it, at a minimum).[5] These comments are contrasted against those of other commentors who contend that the failure to consolidate rate centers is the primary (and lingering) reason for the inefficient allocation of numbers.[6] These commentors argue that the Commission should take no further action in the area of number allocations until it corrects the rate center consolidation problem.[7]

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[3] Note the Commission's reference to this matter as "The Rate Center Problem." Second Further Notice ¶¶ 144, 146.

[4] New Hampshire Public Utilities Commission ("New Hampshire PUC") at 2-3; New York State Department of Public Service ("New York") at 3.

[5] California Public Utilities Commission and the People of the State of California ("California PUC") at 6; Iowa Utilities Board ("Iowa") at 2-3; Michigan Public Service Commission ("Michigan PSC") at 4-5.

[6] See, e.g., Personal Communications Industry Association ("PCIA") at 2, 4-6.

[7] See, e.g., Global NAPs, Inc. ("Global NAPs") at 2-6.

Considered in their totality, the comments make clear that rate center consolidations must be left to the states,[8] as Qwest argued in our opening comments.[9] It is impossible for this federal Commission to undertake the task associated with changing the complex relationship between numbering and charging that is the legacy of the last century of telecommunications service provisioning.[10] And yet, ironically, while the above is impossible, commentors do point to federal action (or inaction) that may well be thwarting -- rather than promoting -- rate center consolidation itself.[11]

And, it is critical that any rate center consolidations be revenue and expense neutral[12] for those having provided that telecommunications service.[13] Therefore, the detail associated with the consolidations demands that the states assume primary responsibility in this area.

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[8] See, e.g., Focal Communications Corporation ("Focal") at 4-5; Organization for the Promotion and Advancement of Small Telecommunications Companies ("OPASTCO") at 2-3; State Coordination Group Outline ("SGO") (attached to the filed comments of California PUC; Connecticut Department of Public Utility Control ("Connecticut"), Maine Public Utilities Commission ("Maine PUC"), Maryland Public Service Commission ("Maryland PSC"), New Hampshire PUC and the Pennsylvania Public Utility Commission ("Pennsylvania PUC")).

[9] Qwest Comments at 3-4.

[10] OPASTCO at 3 (noting that a change in even one carrier's rate center configuration can affect other carriers).

[11] BellSouth Corporation ("BellSouth") at 11-17; SBC Communications Inc. ("SBC") at 3-6 (both noting the problem with the Commission's number utilization formula in conjunction with further pursuing rate center consolidations; and SBC noting the problem of consolidating rate centers and then splitting them again with an area code split). See also Time Warner Telecom ("TWTC") at 7-8 (noting problem of moving numbers between switches). Compare Michigan PSC at 4-5.

[12] As commentors correctly observe, to accomplish this neutrality could well impact subscribers financially. See California PUC at 7; Michigan PSC at 4; New York at 3; Public Utilities Commission of Ohio ("Ohio PUC") at 17; Public Utility Commission of Texas ("Texas PUC") at 10 and n.4. And see Ad Hoc Telecommunications Users Committee ("Ad Hoc") at 17-18.

[13] Qwest opposes the Petition for Rulemaking proffered by Ad Hoc as an Attachment to its comments. While it can be argued that the elimination of rate centers may provide some benefit in regard to number conservation, the matter of whether the "benefits" outweigh the costs is a

B. The Matter Should Not Be Sent To A Numbering Body For Resolution

Qwest opposes the suggestion that the North American Numbering Council ("NANC") is the appropriate forum to evaluate the propriety of rate center consolidations.[14] The NANC is a numbering advisory body. The issues associated with rate center consolidations are broader than numbering. If they were not, the matter would obviously be much simpler. It is simply not appropriate to send this type of service provisioning, rating and billing issue to an advisory council with a charter as limited as that of the NANC.

Some commentors (including the SGO) suggest that the Commission sponsor a workshop to discuss, educate and evaluate rate center consolidation issues.[15] This approach may be productive and reasonable, primarily from an education perspective. However, it has been Qwest's experience that the numbering "education" around rate center consolidations (e.g., that numbers from the west side of the state with a consolidated rate center still will not be able to be moved to the east side of the state with a different consolidated rate center) is not terribly complex. It is the matters of billing and rating that create the complexity. It is not clear that such matters can be resolved in the absence of specific facts associated with specific geographies

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matter best left to state jurisdictions to flesh out. Clearly, the record demonstrates that there may be adverse consequences to a carrier's operations (e.g., revenues, separations, universal service, local rate structures, etc.) that would impact productivity, cost recovery, and possibly consumers. Prior to initiating any such rulemaking as proposed by Ad Hoc, the Commission must allow its current numbering optimization and utilization rules to take hold in order to assess their affect. Federal insinuation into the matter of consolidating local and state rate centers raises serious questions of jurisdiction as well as notions of federal comity. Qwest urges the Commission to refrain from entertaining Ad Hoc's Petition at this time.

[14] See Association for Local Telecommunications Services ("ALTS") at 9; VoiceStream Wireless Corporation ("VoiceStream") at 32-33 (also suggesting the North American Numbering Plan Administration ("NANPA") might be an appropriate study body); Winstar Communications, Inc. ("Winstar") at 3-4.

and specific carriers. However, should the Commission determine that a workshop approach is a sound idea, Qwest would be happy to participate as appropriate.

III. THERE MUST BE AN EFFICIENT, EXPEDITIOUS "SAFETY VALVE"

The record is now replete with support for the establishment of a "safety valve" to enable carriers in need of numbering resources to secure them when carriers are unable to secure the resources through the Commission's utilization formula. Some commentors propose facts that should "trigger" the safety valve (e.g., a customer needing a block of numbers, sometimes sequential, beyond the existing inventory of the carrier[16] or the placement of a new switch in the network architecture);[17] others propose certain mathematical factors that would trigger the safety valve.[18] Qwest supports allowing the triggering of a safety valve in both circumstances.[19]

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[15] See California PUC at 7; Florida Public Service Commission ("Florida PSC") at 7; Maine PUC at 2; PCIA at 5-6.

[16] See, e.g., Ad Hoc at 36-37; ALTS at 18; BellSouth at 31; Cingular Wireless LLC ("Cingular") at 26; Cellular Telecommunications & Internet Association ("CTIA") at 5; Focal at 7; SBC at 28-30; TWTC at 8-9; Verizon Communications ("Verizon") at 2; VoiceStream at 9-10 and n.14.

[17] See, e.g., ALTS at 18-19; TWTC at 7-8; Verizon at 2-3. Compare Cingular at 26.

[18] See, e.g., AT&T Corp. ("AT&T") at 18 (a *bona fide* need for numbers would be established when a carrier's months-to-exhaust worksheet projects that its available numbers in a rate center will exhaust in 90 days or less and its average projected monthly activation rate is within 15% of its historical activation rate or the carrier can provide other credible evidence that a higher projected activation rate is anticipated); PCIA at 12-13 (a "three-month or less supply of numbering resources using a regression analysis based on their prior six months' historical utilization"); VoiceStream at 8 (three month or less supply of numbering resources); Winstar at 9 (three months or less supply of numbering resources).

[19] Other "facts" that would support the triggering would include unanticipated (or anticipated but seasonal) customer demand (ALTS at 18; AT&T at 15; Cingular at 26-27; Focal at 7; Verizon Wireless at 15; VoiceStream at 10 n.14), growth in a particular switch outpacing the growth in the other switches in a rate center (rate center diversity) or carrier technical limitations (inability to intra-carrier port in a non-pooling environment).

The "process" associated with triggering the safety valve should be simple. It should allow carriers to gain relief quickly. It should provide for direct submission of the carrier request to the NANPA[20] with expedited (i.e., 10 days) handling of the request.

SBC is correct that the Commission's determination on the safety valve issue should not be delayed by consideration of other aspects of this Second Further Notice[21] (those other aspects requiring more and longer deliberation). Qwest recommends the Commission tentatively approve the use of the safety valve mechanism when carriers are affected by both the facts and math outlined above. Beyond these circumstances, it should delegate to the INC the task of formulating the additional (if necessary) factors that might trigger the safety valve, as well as the appropriate language to be included in the industry guidelines.

IV. A COST RECOVERY MODEL SHOULD BE FORMULATED NOW

Qwest supports those who argue that neither the lack of detailed cost information nor the absence of the identity of the PA should preclude the Commission from establishing a federal cost recovery mechanism.[22] The absence of detailed cost information in the Local Number Portability ("LNP") proceeding did not prevent the Commission from establishing the cost recovery mechanism and it should not do so here.[23]

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[20] See, e.g., ALTS at 19; AT&T at 18; Cingular at 29; CTIA at 5; Level 3 Communications, LLC ("Level 3") at 14.

[21] SBC at 28.

[22] See BellSouth at 27-28; National Exchange Carrier Association, Inc. ("NECA") at 2-3.

[23] After this filing round, the Commission should have considerably more cost information than it had previously. To be sure, the costs keep declining. However, that is no reason to postpone crafting the cost recovery mechanism in hopes that the regulatory lag will continue to depress the costs needed to be recovered.

Qwest opposes Ad Hoc's position that "there is no need for separate recovery of 'direct' costs associated with thousands-block number pooling (whether shared or carrier specific), because the incremental costs of implementing thousands-block pooling are less than the costs associated with the perpetuation of current area code 'relief' practices."[24] As BellSouth correctly argues, "[a]lthough number pooling may extend the life of specific NPAs, it does not eliminate the need for NPA relief. Thus, on an NPA-by-NPA basis, the only cost savings from number pooling will be the time value of money associated with the deferral of NPA relief -- which would be a minimal figure."[25]

V. WORLDCOM'S PROPOSAL FOR TRANSPARENT NUMBERS SHOULD BE REJECTED

Qwest opposes WorldCom's "transparent number" proposal.[26] As WorldCom concedes, its proposal is a call for geographic number portability.[27] While Qwest (then U S WEST) once supported moving to geographic number porting over the Commission's proposal for number

[24] Ad Hoc at 31.

[25] BellSouth at 29-30. And see NECA at 3 and n.10; Verizon at 5-6. Qwest (then U S WEST Communications, Inc.) originally made this point in our Numbering Resource Optimization Comments in CC Docket No. 99-200 on May 22, 2000 at 11.

[26] WorldCom at 5-9. See also ALTS at 9.

[27] WorldCom at 7. WorldCom tries to differentiate its proposal from prior notions of geographic number portability on the theory that "geographic number portability was conceived to allow a customer to keep his or her telephone number when changing service providers *and* moving beyond the rate area associated with that number. We use the term 'transparent numbers' to reflect a broader user of geographic number portability technology, to include its use for telephone numbers available for assignment." Id. at 7 (emphasis in original). Qwest is not certain the expansion of the term or idea changes any of the fundamentals. The proposal is still for geographic number portability but without the concept of having an "assigned" number to an individual as numbers might be moved about. See Focal at 5; Ohio PUC at 18.

pooling,[28] having proceeded with the Commission's proposals to optimize numbering resources through a thousands-block pooling mechanism, we are skeptical of the propriety of now moving to geographic number porting.

WorldCom's remark that "transparent numbers could achieve the conservation benefits of rate center consolidation while avoiding the need for revenue adjustments"[29] is only true because the entire WorldCom proposal would burden the industry with costs as opposed to revenue generation. WorldCom itself acknowledges the multitude of changes that would be required to move in the direction of its advocacy. Such changes would involve network and Operational Support Systems ("OSS") architectures, switch design, NPAC and LNP databases, and signaling systems.[30]

At a minimum, the Commission would be required to commence a new proceeding to address the WorldCom proposal and to create a full record before it could proceed in such a direction. It certainly could not proceed based on the skinny proposal outlined by WorldCom. But one has to wonder whether moving directly to NANP expansion could be any more complex or costly for an increasingly diverse telecommunications industry than the WorldCom proposal.[31]

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[28] See Comments of U S WEST Communications, Inc., NSD File No. L-98-134, filed Dec. 21, 1998 at 27-29.

[29] WorldCom at 7.

[30] Id. at 8-9.

[31] Thus, it begs the question to assert, as WorldCom does, that a favorable impact (although it does limit the "favorable" nature to consumers) of its proposal would be a "delay in having to deal with an expanded NANP". Id. at 8. It might well be the case that a sound cost/benefit analysis would demonstrate WorldCom's proposal to be seriously infirm in its aspirations of benefit.

VI. CONCLUSION

For the above reasons, the Commission should leave the matter of rate center consolidations to the states. It should expeditiously outline the parameters of a "safety valve" mechanism. It should move forward with a cost recovery mechanism. And, it should reject the advocacy of WorldCom to extend the current rulemaking into complex areas that have little definition.

Respectfully submitted,

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March 7, 2001

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused 1) the foregoing **REPLY COMMENTS OF QWEST CORPORATION** to be filed electronically with the FCC by using its Electronic Comment Filing System, and 2) a copy of the **REPLY COMMENTS** to be served, via hand delivery (marked with an asterisk), or first class United States mail, postage prepaid, upon the persons/entity listed on the attached service list.

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March 7, 2001

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