

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

MAR 12 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

**PETITION FOR CLARIFICATION AND/OR RECONSIDERATION
OF THE
UNITED STATES TELECOM ASSOCIATION**

The United States Telecom Association (“USTA”)¹ hereby seeks clarification and/or reconsideration of portions of the Commission’s *Second Report and Order* in the above-captioned proceeding.² USTA has been an active participant in all phases of this proceeding.

In its *Second Report and Order*, the Commission adopted several measures that it stated are designed to ensure that the numbering resources of the North American Numbering Plan (“NANP”) are used efficiently and that all carriers have access to the numbering resources they require. Several aspects of the rules and policies adopted in the Order, particularly concerning calculation and application of the utilization threshold, and the Commission’s audit program, raise questions that are the subject of this petition. Several of those issues need to be clarified;

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 *Numbering Resource Optimization and 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 and Second Further Notice of Proposed Rulemaking*, FCC 00-420 (rel. Dec. 29, 2000) (“*Second Report and Order*” and “*Second Further Notice*”).

SEARCHED _____
SERIALIZED _____
INDEXED _____
FILED _____
MAR 12 2001
FBI - WASHINGTON
OT4

others require reconsideration. Therefore, USTA seeks reconsideration or clarification of the following issues.

I. Utilization Threshold

In the *Second Report and Order*, the Commission took several actions that extended and further refined the application of its utilization threshold requirements that carriers must follow in order to obtain additional numbering resources.³ USTA is concerned about several of the Commission's determinations relating to utilization thresholds as more fully set forth below.

A. Carriers should not be required to meet both a utilization threshold and a months-to-exhaust requirement in order to receive additional numbering resources.

The Commission extended its utilization threshold requirement to pooling carriers as well as non-pooling carriers.⁴ It also affirmed its determination that carriers must meet both a utilization threshold requirement and a months-to-exhaust ("MTE") requirement before it can obtain additional numbers.⁵ By expanding the applicability of these two requirements, the Commission, whether that was its intent or not, has significantly complicated the ability of carriers of all types to obtain the numbering resources that they need to serve customers. The Commission should not require this two-pronged test. The effect of this over-zealous regulation aimed at number conservation will be to deprive the public of telecommunications services that it demands.⁶ There is no evidence in the record that a multiple test is required.

³ *Second Report and Order* at ¶¶ 18-33.

⁴ *Id.* at ¶ 28.

⁵ *Id.* at ¶ 29.

⁶ The Commission has recognized that it would be "unnecessarily burdensome" to require pooling carriers to comply with both tests. *Numbering Resource Optimization and 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, *Report and Order and Further Notice of Proposed Rulemaking*, 15 FCC Rcd 7574, 7636 (2000) ("*First Report and Order*").

The problem with the two-pronged test is the supposed correlation between the two prongs, and applying them in both pooling and non-pooling areas. The two sets of data are based on different criteria. Thus, they provide different, often conflicting results. This is exacerbated by rate center consolidation, particularly because the rate center may not approach the required utilization threshold to obtain additional numbers, but a single switch in the rate center may be out of numbers. Also, differences between pooling and non-pooling areas will have different effects on the utilization levels.⁷

For the foregoing reasons, USTA urges the Commission to reconsider its determination that carriers must satisfy both the utilization threshold and the MTE tests before they can obtain additional numbering resources.

B. If utilization threshold and months-to-exhaust requirements are retained, distinctions between wireline and wireless carriers and between pooling and non-pooling areas must be recognized.

If the Commission does not reverse its requirement for a two-pronged test for carriers to obtain additional numbers, USTA urges the Commission to take into account several differences in situations and adjust the applicable utilization threshold and MTE levels accordingly. First, the conditions applicable to wireline carriers are different from those characteristic of wireless carriers. Second, as indicated in Section I (A) above, the differences between pooling and non-pooling areas require adjustment to the utilization threshold and MTE calculations. In a non-pooling environment, reporting should be at the switch level and numbers should be administered on a per-switch basis.⁸ In pooling areas, it may be more appropriate to report usage

⁷ The Commission has recognized the competitive disadvantage of pooling carriers if utilization levels are not adjusted to take into account the differences between pooling and non-pooling carriers. *First Report and Order* at 7636-37.

⁸ The Commission should be aware that the requirement that the calculation of either MTE or utilization threshold by rate center in non-pooling areas provides a powerful disincentive for carriers to agree to rate center consolidation. We believe that rate center consolidation is beneficial from the perspective of improved overall

at the rate center level. Adjustments to the levels for both utilization thresholds and MTE should be made to reflect these differences.

USTA also seeks clarification of one aspect of the *Second Report and Order* relating to the Commission's determination that the utilization threshold should be calculated on a rate center basis. The Commission stated that most parties agree with that conclusion and cited USTA among those in agreement.⁹ What USTA said in its comments was that, if utilization is based on rate centers, the utilization calculation should be done on a per-switch basis if a carrier operates multiple switches in a single rate center.¹⁰ USTA's position was and continues to be that utilization threshold calculations must be on a switch basis where a carrier operates multiple switches in a single rate center.

C. *Intermediate* numbers should be included in calculating utilization levels.

The Commission determined that *intermediate* numbers should not be included in calculating the utilization level.¹¹ This decision means that *intermediate* numbers must be included in the denominator for such calculations. USTA strongly urges the Commission to reverse this ruling and to allow *intermediate* numbers to be included in the numerator; otherwise, carriers will not be able to meet the 60 percent utilization threshold. Although the Commission acknowledged that carriers would be able to meet a higher utilization threshold if they could include more than *assigned* numbers in the numerator,¹² it made no adjustment to the threshold

utilization of numbering resources. We submit that it is counterproductive for the Commission's rules to constitute a disincentive to measures that would preserve numbering resources.

⁹ *Second Report and Order* at ¶ 31, n. 60.

¹⁰ Comments of USTA filed May 19, 2000 at 4.

¹¹ *Second Report and Order* at ¶ 30.

¹² *Id.* at ¶ 30, n. 58.

level to take this fact into account. *Intermediate* numbers are working in the public switched telephone network, which meets the Commission's definition of *assigned* numbers. Exclusion of *intermediate* numbers does not provide a reasonable basis for determining when a carrier can meet its utilization threshold in order to provide numbering resources demanded by customers. In addition, *intermediate* numbers are not distributed uniformly across switches in the network, but are clustered in groups, *e.g.*, where more pagers are operational, and thus different areas may be disproportionately affected. Carriers have no control over when or where *intermediate* numbers may be needed and therefore cannot accurately predict demand for them.

The Commission acknowledged that some adjustment to calculations is required, when it said that "we believe that carriers would be able to meet a higher utilization threshold before needing additional numbering resources if they could include numbers other than *assigned* in the numerator."¹³ The Commission's acknowledgement that an adjustment is warranted along with the non-uniform nature of the use of *intermediate* numbers supports the position that accommodation must be accomplished by changing the calculation method. Therefore, USTA seeks reconsideration of the Commission's failure to include *intermediate* numbers in the numerator of the utilization formula.

D. Increases in the utilization level beyond 60 percent are premature.

The Commission determined that the 60 percent level of utilization threshold should be increased 5 percent annually until a level of 75 percent is achieved.¹⁴ This determination is premature and the Commission should not order such increases at this time. Rather, experience

¹³ *Id.*

¹⁴ *Id.* at ¶ 26.

with the data to be submitted by the carriers should be gained first. USTA suggests that the 60 percent level be retained until at least two NRUF reporting cycles are obtained and evaluated.

E. The basis for calculating the utilization level applicable to states on delegated authority should be clarified.

The Commission granted one exception to its determination that states cannot use different utilization thresholds. Those states which have set utilization thresholds that do not exceed 75 percent are allowed to maintain their existing threshold levels, so long as those levels are calculated in a manner consistent with the Commission's determination, *i.e.*, that only assigned numbers are included in the numerator.¹⁵ This requirement, if fully implemented, will result in disparate treatment for carriers operating in those states than for the rest of the country. This would occur because those states that fit into this exception are employing a vastly different formula for calculating the utilization threshold. If they are forced to use the Commission-mandated method of including only *assigned* numbers in the numerator, they will be forcing carriers to prove higher utilization levels than under the federal standard.

USTA believes that implementation of this policy will result in unintended and uneven treatment of carriers in the states from those operating in the rest of the country. Carriers operating in those states would have to prepare separate NRUF submissions for those states than for the other states not under the exception. USTA seeks clarification that the states that have been granted authority to enforce higher utilization levels either be allowed to continue to use their own formula for calculating those levels or be required to adjust the utilization threshold down to the 60 percent level.

¹⁵ *Id.* at ¶ 23.

II. Audits

The Commission adopted an audit program that consists of “random” and “for cause” audits.¹⁶ Rather than adopt a specific cost recovery mechanism for the audit program, the Commission decided that costs associated with numbering should be borne by all telecommunications carriers on a competitively neutral basis.¹⁷ USTA is concerned that this policy establishes a funding mechanism for the auditing program that is unchecked and could encourage more audits than would be necessary to maintain the integrity of the numbering audit program. Other audits conducted under the Commission’s auspices are paid for by the carriers who participate in the audits, not the industry as a whole. USTA sees no reason to deviate from this well-established policy.

III. Conclusion

USTA urges the Commission to reconsider its determination that carriers must meet both a utilization threshold and months-to-exhaust in order to obtain additional numbering resources. However, if the Commission retains this two-pronged standard, USTA advocates that distinctions between wireline and wireless carriers and between pooling and non-pooling areas should be factored into the applicable requirements. USTA also seeks inclusion of *intermediate* numbers in the numerator of the utilization formula. The Commission should not increase the 60 percent utilization threshold until it gains additional industry information. Furthermore, the Commission should clarify that the two states granted authority to continue using their own utilization threshold levels should continue to calculate those levels on their existing formulas.

¹⁶ *Id.* at ¶¶ 81-99.

¹⁷ *Id.* at ¶¶ 98-99.

Finally, the Commission should follow the same funding mechanism for numbering audits as it has for other carrier audits.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION

By 

Its Attorneys:

Lawrence E. Sarjeant
Linda L. Kent
Keith Townsend
John W. Hunter
Julie E. Rones

1401 H Street, N.W.
Suite 600
Washington, D.C. 20005
(202) 326-7375

March 12, 2001

CERTIFICATE OF SERVICE

I, Meena Joshi, do certify that on March 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.



Meena Joshi

Jeannie Grimes
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

John W. Betkoski, III
Linda Kelly Arnold
Connecticut Department of Public Utility Control
Ten Franklin Square
New Britain, CT 06051

Peter Arth, Jr.
Lionel B. Wilson
Helen M. Mickiewicz
PUC of California
505 Van Ness Avenue
San Francisco, CA 94102

Donald L. Dear
City of Gardena
P.O. Box 47003
Gardena, CA 90247

Marc D. Poston
William K. Haas
Dan Joyce
Missouri PSC
301 West High Street, POB 360 - Room 530
Jefferson City, MO 65101

Bob Pinzler
South Bay Cities Council of Governments
5033 Rockvalley Road
Rancho Palos Verdes, CA 90275

Mark J. Burzych
Foster Swift Collins & Smith, PC
(Thumb Cellular)
313 South Washington Square
Lansing, MI 48933

Donald W. Downes
Glenn Arthur
Jack R. Goldberg
Connecticut Department of Public Utility Control
Ten Franklin Square
New Britain, CT 06051

Geraldine Matisse
Network Services Division
Federal Communications Commission
2000 M Street, NW
Room 235
Washington, DC 20554

Douglas F. Carlson
P.O. Box 12574
Berkeley, CA 94712

Henry G. Hultquist
WorldCom
1133 19th Street, NW
Washington, DC 20036

Carl K. Oshiro
Small Business Alliance for Fair Utility Regulation
100 First Street - Suite 2540
San Francisco, CA 94105

Karlyn D. Stanley
Cole, Raywid & Braverman, LLP
(Centennial Cellular Corp.)
1919 Pennsylvania Avenue, NW - Suite 200
Washington, DC 20006

Susan W. Smith
Centurytel Wireless, Inc.
3505 Summerhill Road
No. 4 Summer Place
Texarkana, TX 75501

Kenneth E. Hardman
Moir & Hardman
(Trillium Cellular)
1828 L Street, NW - Suite 901
Washington, DC 20036

W. Robert Keating
Paul B. Vasington
Eugene J. Sullivan, Jr.
Massachusetts Department of Telecomms. and Energy
One South Station - Second Floor
Boston, MA 02110

Robert H. Bennink, Jr.
Erin K. Duffy
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603

Lynda L. Dorr
PSC of Wisconsin
610 N. Whitney Way
P.O. Box 7854
Madison, WI 53707

Howard J. Symons
Sara F. Seidman
Uzoma C. Onyeije
Mintz, Levin, Cohn, Ferris, et al (AT&T)
701 Pennsylvania Avenue, NW - Suite 900
Washington, DC 20004

Douglas I. Brandon
AT&T
1150 Connecticut Avenue, NW
Suite 400
Washington, DC 20036

John M. Goodman
Michael E. Glover
Bell Atlantic
1300 Eye Street, NW
Washington, DC 20005

Janet Gail Besser
James Connelly
Massachusetts Department of Telecomms. and Energy
One South Station
Second Floor
Boston, MA 02110

Lawrence G. Malone
NYDPS
Three Empire State Plaza
Albany, NY 12223

Michael A. Sullivan
15 Spencer Avenue
Somerville, MA 02144

Theresa Fenelon Falk
Pillsbury Madison & Sutro, LLP
(Saco River Telegraph and Telco.)
1100 New York Avenue, NW - Ninth Floor, East Tower
Washington, DC 20005

Mark C. Rosenblum
Roy E. Hoffinger
James H. Bolin, Jr.
AT&T
295 North Maple Avenue - Room 3245H1
Basking Ridge, NJ 07920

Daniel Mitchell
Commonwealth of Massachusetts
200 Portland Street
Boston, MA 02114

John F. Raposa, HQE03J27
GTE
600 Hidden Ridge
P.O. Box 152092
Irving, TX 75015

Andre J. Lachance
GTE
1850 M Street, NW
Washington, DC 20036

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
555 Walnut Street
Forum Place - Fifth Floor
Harrisburg, PA 17101

Joseph Assenzo
Sprint Corp.
4900 Main - 11th Floor
Kansas City, MO 64112

Kathryn Marie Krause
James T. Hannon
U S WEST
1020-19th Street, NW
Suite 700
Washington, DC 20036

James S. Blaszak
Levine, Blaszak, Block and Boothby, LLP
(Ad Hoc Telecomm.)
2001 L Street, NW
Suite 900
Washington, DC 20036

Elizabeth G. Kistner
(ALTS)
Three Spoede Ridge
St. Louis, MO 63141

Michael F. Altschul
Randall S. Coleman
Lolita D. Smith
CTIA
1250 Connecticut Avenue, NW - Suite 800
Washington, DC 20036

Katherine M. Harris
Stephen J. Rosen
Daniel J. Smith
Willey, Rein & Fielding (PCIA)
1776 K Street, NW
Washington, DC 20006

Bruce E. Beard
Jeanne A. Fischer
SBC Wireless, Inc.
13075 Manchester Road
St. Louis, MO 63131

Jay C. Keithley
Sprint Corporation
401 Ninthth Street, NW, #400
Washington, DC 20004

Lee L. Selwyn
Helen Golding
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02108

Teresa K. Gaugler
Jonathan Askin
ALTS
888-17th Street, NW
Suite 900
Washington, DC 20006

Peggy Arvanitas
RE/MAX First Class
621 Bypass Drive
Clearwater, FL 33764

David Ellen
Cablevision Lightpath, Inc.
1111 Stewart Avenue
Bethpage, NY 11714

Cherie R. Kiser
Gil M. Strobel
Carlos A. Gutierrez
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, PC
(Cablevision Lightpath)
701 Pennsylvania Avenue, NW - Suite 900
Washington, DC 20004

Dana Frix
Swidler, Berlin, Shereff, Friedman, LLP
(Choice One Comms. & GST Telecomms.)
3000 K Street, NW
Suite 300
Washington, DC 20007

Raymond L. Gifford
Vincent Majkowski
Robert J. Hix
Colorado PUC
1580 Logan Street, Office Level Two
Denver, CO 80203

Larry A. Blosser
Kemal Hawa
Swidler, Berlin, Shereff, Friedman, LLP
(Connect Comms.)
3000 K Street, NW, Suite 300
Washington, DC 20007

Richard Eyre
P.O. Box 2408
Tempe, AZ 85280

Richard L. Jones
INENA
c/o Loves Park 9-1-1
540 Loves Park Drive
Loves Park, IL 61111

Richard M. Rindler
Ronald W. Del Sesto, Jr.
Swidler Berlin Shereff Friedman, LLP
(Level 3 Comms.)
3000 K Street, NW, Suite 300
Washington, DC 20007

Douglas F. Carlson
P.O. Box 12574
Berkeley, CA 94712

Marsha N. Cohen
2201 Lyon Street
San Francisco, CA 94115

Werner K. Hartenberger
J.G. Harrington
Dow, Lohnes & Albertson, PLLC
(Cox Comms.)
1200 New Hampshire Avenue, NW, Suite 800
Washington, DC 20036

Cynthia B. Miller
Florida PSC
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

William P. Hunt, III
Level 3 Comms., Inc.
1450 Infinite Drive
Louisville, CO 80027

Edward A. Yorkgitis, Jr.
Kelley, Drye & Warren, LLP
(Liberty Teleco)
1200-19th Street, NW
Suite 500
Washington, DC 20036

Reginald N. Todd
County of Los Angeles
440 First Street, NW
Suite 440
Washington, DC 20001

Susan M. Eid
Tina S. Pyle
Richard A. Karre
MediaOne Group, Inc.
1919 Pennsylvania Avenue, NW - Suite 610
Washington, DC 20006

James R. Hobson
Donelan, Cleary, Wood & Maser, PC
(NENA)
1100 New York Avenue, NW, Suite 750
Washington, DC 20005

L. Marie Guillory
Jill Canfield
NTCA
4121 Wilson Blvd.
10th Floor
Arlington, VA 22203

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
Nextel Comms.
2001 Edmund Halley Drive
Reston, VA 20191

Daniel M. Waggoner
Robert Tanner
Davis Wright Tremaine, LLP
(NextLink Comms.)
1500 K Street
Washington, DC 20005

Trina M. Bragdon
Maine PUC
242 State Street
18 State House Station
Augusta, ME 04333

H. Gilbert Miller
Mitretek Systems
Center for Telecommunications and Advanced Technology
7525 Colshire Drive
McLean, VA 22102

W. Mark Adams
NENA
491 Cheshire Road
Sunbury, OH 43074

Lawrence G. Malone
NYDPS
Three Empire State Plaza
Albany, NY 12223

John J. Farmer
Frederick F. Butler
New Jersey Board of Public Utilities
124 Halsey Street, Fifth Floor
P.O. Box 45029
Newark, NJ 07101

J.G. Harrington
Laura Roecklein
Dow, Lohnes & Albertson, PLLC
(Nextel Comms.)
1200 New Hampshire Avenue, NW - Suite 800
Washington, DC 20036

Gerard Salemme
Daniel Gonzalez
Jason Williams
Nextlink Comms.
1730 Rhode Island Avenue, NW - Suite 1000
Washington, DC 20036

Robert H. Bennink, Jr.
Erin K. Duffy
North Carolina Utilities Comm.
430 N. Salisbury Street
Raleigh, NC 27603

Benjamin H. Dickens, Jr.
Michael B. Adams, Jr.
Blooston, Mordkofsky, Jackson & Dickens
(Omnipoint Comms.)
2120 L Street, NW
Washington, DC 20037

Alfred G. Richter, Jr.
Robert K. Toppins
John S. DiBene
SBC Comms.
1401 I Street, NW, Suite 1100
Washington, DC 20005

Carl K. Oshiro
Small Business Alliance for Fair Utility Regulation
100 First Street
Suite 2540
San Francisco, CA 94105

Richard A. Askoff
Regina McNeil
NECA
100 South Jefferson Road
Whippany, NJ 07981

Betty D. Montgomery
Duane W. Luckey
Jodi J. Bair
Robert A. Abrams
PUC of Ohio
180 E. Broad Street - Seventh Floor
Columbus, OH 43215

Richard-Michelle Eyre
REC Networks
P.O. Box 2408
Tempe, AZ 82580

Carol Salva
632-14th Street
Santa Monica, CA 90402

Joseph Assenzo
Sprint PCS
4900 Main Street - 12th Floor
Kansas City, MO 64112

Alberto Levy
Melissa Caro
Texas Office of Public Utility Counsel
1701 N. Congress - Suite 9-180
P.O. Box 12397
Austin, TX 78711

Brian Conboy
Thomas Jones
David Don
Willkie Farr & Gallagher (Time Warner Turner)
1155-21st Street, NW
Washington, DC 20036

Brian Thomas O'Connor
Robert A. Calaff
VoiceStream Wireless Corp.
1300 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004

Gilbert J. Yablon
SMART Dialing Systems
21914 Dumetz Road
Woodland Hills, CA 91364

Teresa K. Gaugler
Jane Kunka
Qwest
4250 North Fairfax Drive
Arlington, VA 22203

Kathryn Marie Krause
QWEST
1020 19th Street, NW
Suite 700
Washington, DC 20036

David L. Heaton
Office of the State's Attorney - Cook County, Illinois
Public Interest Bureau
69 West Washington
Chicago, IL 60602

James Bradford Ramsay
NARUC
1101 Vermont Avenue, NW
Suite 200
Washington, DC 20005

Howard J. Symons
Sara F. Seidman
Amy Bushyeager
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo, PC
701 Pennsylvania Avenue, NW - Suite 900
Washington, DC 20004

Mark C. Rosenblum
Roy E. Hoffinger
James H. Bolin, Jr.
AT&T
295 North Maple Avenue - Room 3245H1
Basking Ridge, NJ 07920

Pamela J. Riley
David A. Gross
AirTouch Comms.
1818 N Street, NW - Suite 800
Washington, DC 20036

Don Woodford
Mobility Canaca
1420 Blair Place
Suite 800
Gloucester, Ontario K1J 9L8
Canada

Rogers Cantel, Inc.
333 Bloor Street East
Toronto, Ontario
M4W 1G9
Canada

Brian Conboy
Thomas Jones
Christi Shewman
Willkie Farr & Gallagher
3 Lafayette Centre
1155 21st Str. NW
Washington, D.C. 20036

Russell C. Merbeth
Daniel F. Gonos
Winstar Communications, Inc.
1615 L Street, NW, Suite 1260
Washington, DC 20036

Robert L. Hoggarth
Harold Salters
Personal Communications Industry Assoc.
500 Montgomery Str. Suite 700
Alexandria, VA 22314-1561

Danny E. Adams
Todd D. Daubert
Kelley Drye & Warren LLP
1200 19th Street, NW
Suite 500
Washington, DC 20036

John T. Scott, III
Verizon Wireless
1300 I Street, NW, Ste. 400 West
Washington, DC 20005

Deanne M. Brutts
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Teya M. Penniman
Oregon Public Utility Commission
Department of Justice
1162 Court Street NE
Salem, OR 97310

New Hampshire Public Utilities Commission
E. Barclay Jackson, Esq.
8 Old Suncook Road
Concord, NH 03301

Michael E. Glover
Edward Shakin
John M. Goodman
Verizon
1300 Eye Street, NW
Washington, DC 20005

Michael F. Altschul
Cellular Telecommunications Industry Assoc.
1250 Connecticut Avenue, NW
Suite 800
Washington, DC 20036

George N. Barclay
Michael J. Ettner
General Services Administration
1800 F Street, NW, Rm. 4002
Washington, DC 20405

M. Robert Sutherland
Angela N. Brown
BellSouth Corp.
1155 Peachtree Street, NE, Suite 1700
Atlanta, GA 30309-3510

Cheryl Tritt
Morrison & Foerster, LLP
(NeuStar)
2000 Pennsylvania Avenue, NW
Washington, DC 20006

Michael S. Slomin
Telcordia Technologies, Inc.
445 South Street, MCC-1J130R
Morristown, NJ 07960

Louise M. Tucker
Telcordia Technologies, Inc.
2020 K Street, NW
Suite 400
Washington, DC 20006

Mike Hatch
Karen Finstad Hammel
Minnesota Public Utilities Commission
445 Minnesota Street, #900
St. Paul, MN 55101-2127

K. David Waddell
Tennessee Regulatory Authority
460 James Robertson Pkwy
Nashville, TN 37243-0505

Patrick W. Pearlman
West Virginia Public Service Commission
201 Brooks Street, P.O. Box 812
Charleston, WV 25323

Michael T. Batt
Indiana Utility Regulatory Commission
302 W. Washington St., Room E306
Indianapolis, IN 46204-2764

Lynn Lane Williams
Oklahoma Corporation Commission
P.O. Box 52000-2000
Oklahoma City, OK 73142-2000

Michael H. Dworkin
Vermont Public Service
112 State Street
(Chittenden Bank Bldg.)
Drawer 20
Montpelier, VT 05620-2701