

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

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Implementation of the Local Competition Provisions of the Telecommunication Act of 1996)	CC Docket No. 96-98
)	
)	
Petitions for Delegated Authority:)	
)	
Iowa)	NSD File No. L-01-74
_____)	

SPRINT CORPORATION COMMENTS

Sprint Corporation, on behalf of its local, long distance and wireless divisions, submits these limited comments in response to the Iowa Utilities Board (“IUB”) Petition for Delegation of Additional Authority.¹

In its petition, the IUB seeks delegated authority “to require non-LNP-capable carriers to participate in authorized pooling trials.”² Sprint PCS assumes that the IUB request is limited in scope to landline local exchange carriers (“LECs”) that are capable of upgrading their networks to local number portability (“LNP”), and that the IUB does not seek to require commercial mobile radio service (“CMRS”) carriers to implement LNP so they can participate in pooling arrangements. Further, Sprint urges the Commission to exercise caution in delegating additional authority that undermines its national policies. For example, the Commission has already provided requirements as to which area codes are eligible for pooling trials and it should be careful before it deviates from those guidelines.

¹ See *Public Notice*, “Common Carrier Bureau Seeks Comment on the Iowa Utilities Board Petition for Delegation of Additional Authority,” DA 01-948 (April 19, 2001).

² See IUB Petition at 5. See also *id.* at 1 (“The IUB requests additional delegated authority . . . to require non-LNP-capable carriers to participate in the 319 pooling trial, especially major carrier Iowa Telecom Services, Inc. [formerly GTE].”)

A carrier can participate in thousands-block pooling only if it deploys certain technological platforms that are also required for the porting requirements of LNP. CMRS carriers are not now LNP-capable, and under current Commission requirements, they need not become LNP-capable before November 24, 2002.³ In the past, the Commission has declined to permit states to require CMRS carriers to deploy LNP in advance of the national LNP conversion date because such an order would result in mobile customers being unable to roam:

[E]ven if wireless carriers could overcome the technical burdens and implement LNP in Pennsylvania, the repercussions could be widespread. Because of the manner in which wireless carriers offer their services, they cannot develop a localized number portability method without affecting the other states in their service areas and the carriers with whom they have roaming agreements across the country. Forcing wireless LNP implementation before the Commission's deadline would have an impact on more than just the Pennsylvania area codes at issue, even if wireless carriers only had to implement LNP in Pennsylvania.⁴

In summary, if the Commission decides to grant the IUB request to order certain carriers to upgrade to LNP, it should clarify that this delegated authority does not pertain to CMRS carriers.

Respectfully submitted,

SPRINT SPECTRUM L.P. d/b/a SPRINT PCS

May 4, 2001

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³ See *CTIA LNP Forbearance Order*, 14 FCC Rcd 3092 (1999), *recon. denied*, 15 FCC Rcd 4727 (2000).

⁴ *Pennsylvania Numbering Order*, 13 FCC Rcd 19009, 19035-36 ¶ 41 (1998).

CERTIFICATE OF SERVICE

I, Tina Michelle Hall, hereby certify that on this 4th day of May 2001, I served a copy of the foregoing Sprint Comments by U.S. first-class mail on the following persons:

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