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May 18, 2001

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**VIA HAND DELIVERY**

Magalie Roman Salas  
Commission Secretary  
Federal Communications Commission  
Portals II, 445 12th Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

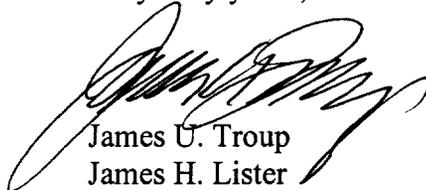
**Re: Reply Comments of Iowa Telecommunications Services, Inc. in Regard  
to the Iowa Utilities Board's Petition for Delegation of Authority, CC  
Dockets 96-98 and 99-200, File No. NSD-L-01-74**

Dear Ms. Salas:

Transmitted herewith, on behalf of Iowa Telecommunications Services, Inc. ("ITS"), are the original and four copies of ITS's Reply Comments in regard to the Iowa Utilities Board's Petition for delegation of authority as referenced above.

Please date-stamp and return the enclosed extra copy of this filing in the self-addressed envelope contained herein. Should you have any questions regarding this filing, please do not hesitate to contact Adrian B. Copiz at 202-775-4498.

Very truly yours,



James U. Troup  
James H. Lister  
Adrian B. Copiz

Counsel to  
Iowa Telecommunications Services, Inc.

Enclosures

cc: Carmell Weathers, Network Services Division, FCC  
Barbara Bouley, Iowa Telecommunications Services, Inc.

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In the Matter of	)	
	)	
Iowa Utilities Board Petition for	)	NSD File No. L-01-74
Delegation of Authority	)	
	)	
Implementation of the Local	)	CC Docket No. 96-98
Competition Provisions of the	)	
Telecommunications Act of 1996	)	
	)	
Numbering Resource Optimization	)	CC Docket 99-200

To: The Commission

REPLY COMMENTS  
OF  
IOWA TELECOMMUNICATIONS SERVICES, INC.

Iowa Telecommunications Services, Inc. ("ITS"), an incumbent local exchange carrier, hereby submits its Reply Comments on the Iowa Utilities Board's ("IUB") second Petition requesting additional delegated authority to conduct a thousands-block numbering pool ("TBNP") trial in the 319 area code.

Grounds for eviscerating the Commission's policy on LNP-capability<sup>1</sup> simply are not present in this case. On this point all parties, except the IUB, are in agreement. As ITS previously discussed in its Comments submitted to the Commission in this proceeding, the IUB does not meet the requirements by which a waiver may be granted.<sup>2</sup>

Additionally, it would not be in the public interest to grant such a waiver even if the IUB were to meet the waiver requirements, which it does not. Requiring implementation of LNP-capability at this time would be financially onerous for ITS and many other rural carriers in the 319 area code. This substantial expense would limit ITS' and other rural carriers' ability to

<sup>1</sup> *Numbering Resource Optimization First Report and Order, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574, 7652 (2000).*

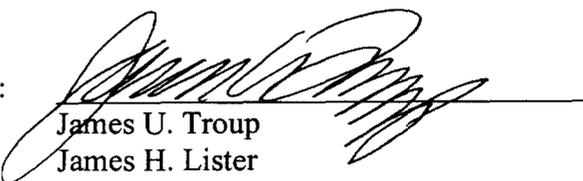
invest in providing new and innovative telecommunications services to the residents and businesses of Iowa.

Rather than face a deluge of petitions for pooling authority from various states, by which, when granted, a piecemeal system of number conservation will develop, the FCC should pursue the implementation of a nationwide plan. As the Commission itself has stated, a uniform system of numbering is “essential to the efficient delivery of telecommunications services in the United States.”<sup>3</sup>

For the reasons stated above, Iowa Telecommunications Services, Inc. respectfully requests that the Commission deny the Iowa Utilities Board’s request for authority to compel carriers that lack LNP capability to participate in thousands-block number pooling trial in the 319 area code.

Respectfully submitted,

**Iowa Telecommunications Services, Inc.**

By:   
James U. Troup  
James H. Lister  
Adrian B. Copiz

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Counsel for  
Iowa Telecommunications Services, Inc.

Dated this 18th day of May, 2001.

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<sup>2</sup> Comments of Iowa Telecommunications Services, Inc. at page 5.

<sup>3</sup> *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*, Memorandum Opinion and Order on Reconsideration, NSD File No. L-97-42, 13 FCC Rcd 19009, 19023 (1998).