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EX PARTE OR LATE FILED

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October 24, 2001

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: Ex Parte Statement  
CC Docket No. 99-200  
(Number Resource Optimization)

Dear Ms. Salas:

On October 23, 2001, Don Cain, Bill Brown, Gary Fleming, Deborah Bell, and I on behalf of SBC Communications, Inc. met with Jeff Carlisle, Senior Deputy Chief, Common Carrier Bureau, and members of his staff (Diane Griffin Harmon, Cheryl Callahan, and Margaret Dailey). The purpose of our meeting was to discuss number pooling trials. The attached presentation formed the basis for our presentation.

As required by section 1.1206(b)(2) of the Commission's rules, I am filing two copies of this notice and ask that you place this notification in the record of the proceeding identified above.

Please call me if you have any questions regarding this matter.

Sincerely,

Attachment

CC: Jeff Carlisle  
Diane Griffin Harmon  
Cheryl Callahan  
Margaret Dailey

**MS. MAGALIE ROMAN SALAS  
SECRETARY  
FEDERAL COMMUNICATIONS COMMISSION  
CAPITOL HEIGHTS  
9300 EAST HAMPTON DRIVE  
CAPITOL HEIGHTS, MD 20743**

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List A B C D E

# Number Pooling

- Commission expectation in delegation orders was that states would provide carriers with adequate transition time to deploy trials. In the NRO, the Commission established 3 NPAs/NPAC Region/Quarter as an appropriate conversion rate.
- State coordination has not occurred, and there are several instances exceeding conversion rate threshold.
- The recent schedule may result in more state trials being ordered prior to the beginning of the national rollout.
- The potential impacts of exceeding industry's ability are significant:
  - Potential network service disruptions to existing customers in donated blocks
  - Increased consumer costs for conversion prior to EDR

# Number Pooling

- Recommended deployment actions:
  - Grant no additional state authority for number pooling trials
  - In states already granted authority, rescind authority for any trials not already ordered by the state.
  - Require states to coordinate rescheduling of trials to ensure that they do not exceed the NRO prescribed 3 NPAs per quarter.
  - Define and publish criteria for prioritizing and scheduling NPAs for pooling beyond initial rollout recognizing the decrease in code demand with the current economic conditions.
- Cost Recovery
  - Need Commission to initiate steps to allow recovery of the costs of Number Pooling coincident with the national rollout.

# SBC Proposal for NPA Prioritization Beyond Initial Rollout

- NPA in the top MSAs
- NPAs not in jeopardy whose projected exhaust date is greater than one year at the time pooling is implemented in the NPA.
- The determination of the sequencing of NPAs should be developed in the order of projected exhaust date -- i.e. 2<sup>nd</sup> quarter 2003, 3<sup>rd</sup> quarter 2003, etc.
- If projected exhaust dates are the same, priority should be given to NPAs facing a split to delay possible number changes.