



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

November 5, 2001

*via electronic filing*

Magalie R. Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
Portals II  
445 Twelfth Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

**Re: Reply Comments of the Pennsylvania Public Utility Commission  
In the Matter of Numbering Resource Optimization  
CC Docket No. 99-200 ; CC Docket No. 96-98; NSD-L-01-113; DA 01-2174**

Dear Ms. Salas:

Attached for filing in the above matter please find one copy of the Pennsylvania Public Utility Commission's Reply Comments, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200; CC Docket No. 96-98; NSD-L-01-113; DA 01-2174.

Sincerely,

Deanne M. O'Dell  
Assistant Counsel

Enclosure

cc: per certificate of service

**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 Telecommunications Act of	)	CC Docket No. 96-98
1996	)	
	)	
Petition of Representative Keith R. McCall	)	
And Members of the Northeast Delegation of	)	
the Pennsylvania House of Representatives	)	NSD-L-01-113
Requesting that Additional Authority Be	)	
Delegated to the Pennsylvania Public Utility	)	
Commission to Implement Additional	)	DA 01-2174
Number Conservation Measures in CC	)	
Docket No. 99-200	)	

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**REPLY COMMENTS OF THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Dated: November 5, 2001

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## **INTRODUCTION**

The Pennsylvania Public Utility Commission (PAPUC) submits the following reply comments in response to comments filed by Representative Keith R. McCall, the Pennsylvania Office of Consumer Advocate (OCA) and the Cellular Telecommunications and Internet Association (CTIA) regarding the Petition of Representative Keith R. McCall and Members of the Northeast Delegation of the Pennsylvania House of Representatives Requesting that Additional Authority be Delegated to the Pennsylvania Public Utility Commission to Implement Additional Number Conservation Measures in CC Docket No. 99-200 (Rep. McCall's Petition). As stated in our comments filed October 23, 2001 in support of Rep. McCall's Petition, the PAPUC requests the Commission to clarify that both the 717 and 570 accelerated voluntary pools will become mandatory pools a part of the national network on or before March 15, 2002. If the Commission chooses not to grant this requested clarification, then the PAPUC requests that the Commission grant Rep. McCall's Petition to permit the voluntary pools progressing in the 717 and 570 NPAs to become mandatory in advance of national thousands-block number pooling rollout.

## **DISCUSSION**

As discussed in the initial comments, the PAPUC adopted an order on August 9, 2001 directing that voluntary pools be implemented in the 570 NPA and the 717 NPA on February 28, 2002 and March 14, 2002, respectively. Though the OCA, Rep. McCall, and the PAPUC agree that these two voluntary pools need to be recognized as mandatory pools, there are differing opinions regarding when and by whom this can be done.

Because OCA and Rep. McCall have received NeuStar's opinion that the voluntary pools will be transitioned to the national platform on or before national rollout, they ask the Commission to defer any decision on Rep. McCall's Petition until February 28, 2002.<sup>1</sup> Because the PAPUC recognizes the Commission as the ultimate decision-maker regarding pooling and the Commission has been silent regarding the transition of voluntary pools so close to national rollout, we reiterate our request that the Commission clarify the status of the two voluntary pools in the 717 and 570 NPAs and decide when these two pools will become mandatory. In the absence of granting our requested clarification, the PAPUC asks the Commission to grant Rep. McCall's Petition and delegate to the PAPUC the authority necessary to make the voluntary pooling scheduled for the 717 and 570 NPAs mandatory.

**I. The Commission Should Grant the PAPUC's Request for Clarification Regarding the Status of the 717 and 570 Voluntary Pools to Make Clear that these Two Pools Will Be Transitioned to the National Pooling Platform on or Before March 15, 2002**

According to Rep. McCall and OCA, the pools will become mandatory pools part of the national network on or before March 15, 2002 because NeuStar has indicated that they would be grandfathered into the national system.<sup>2</sup> However, the Commission has

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<sup>1</sup> If, on February 28, 2002 the voluntary pools have not become mandatory then the OCA supports granting Rep. McCall's petition at the time. Comments of OCA at 5. If, on February 28, 2002, the voluntary pools are not implemented, then Rep. McCall requests the Commission to either reconsider his petition at that time or to grandfather the 570 NPA to the national platform on that date. Comments of Representative Keith R. McCall at 7.

<sup>2</sup> Comments of Representative Keith R. McCall at 6. Comments of OCA at 4.

plenary jurisdiction regarding numbering issues in the United States,<sup>3</sup> therefore, the Commission is the ultimate decision-maker regarding when the 717 and 570 voluntary pools should be transitioned to the national platform.

The PAPUC cannot underscore enough the importance of having the Commission determine when and how these two voluntary pools will become mandatory. Until such a determination is made, there are limitations on the ability of the PAPUC to ensure that these two pools are successful. For example, if a new CLEC were to come into the 570 NPA market and seek 50 initial NXX codes, the PAPUC would not have the authority to mandate that CLEC's participation in the pools since it was not a signatory of the initial joint petition. Further, from the experience of the PAPUC in implementing three mandatory pools in the Commonwealth, some carriers with significant numbering resources have difficulty contributing these resources to the pool even though they are required to do so by law.<sup>4</sup> Finally, until these pools are mandatory, the future participation of the wireless industry will be uncertain.<sup>5</sup> Without clear direction from the

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<sup>3</sup> The Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 U.S.C. § 251(e)(1).

<sup>4</sup> For example, using its delegated authority, the PAPUC ordered its first mandatory pool to be implemented in Pennsylvania's 610/484 NPAs on April 29, 2001. Thus, all LNP-capable carriers with NXX codes in these NPAs were required to submit to NeuStar their forecast reports and block donation identification forms by March 19, 2001. These forms are extremely important in assessing the future success of the pool as they indicate the needs of the participating carriers and the amount of blocks the carriers will be able to donate. Out of the 32 carriers currently participating in this pool, only five carriers submitted one or both of these forms on the date they were due. Through the efforts of PAPUC staff to contact the other carriers believed to have NXX codes in the 610/484 NPAs, an additional 26 companies submitted forms between March 20, 2001 and June 7, 2001. By June 7, 2001, the Law Bureau Prosecutory Staff of the Commission began to inform the remaining carriers with NXX codes in the 610/484 NPA that complaint actions and fines would be pursued if they continued to remain unresponsive. As a result of these letters, three carriers returned all their 610/484 NPA NXX codes to the NANPA, two carriers explained their non-LNP status, and one carrier donated approximately 70 uncontaminated thousands blocks to the pool.

<sup>5</sup> According to the Commission, carriers must be LNP-capable to participate in pooling. *Report and Order and Further Notice of Proposed Rulemaking in the Matter of Numbering Resource Optimization*, CC Docket No. 99-200, 15 FCC Rcd 7574, ¶ 116 (2000). Currently, the wireless industry does not need to

Commission regarding when these two voluntary pools will become mandatory, the PAPUC will have limited regulatory authority to ensure the full success of these two pools.

The actions of the Commission to seek comment regarding Rep. McCall's Petition and to not place the 717 and 570 NPAs on the tentative national rollout schedule have cast doubt regarding when the Commission intends the 717 and 570 NPAs to become part of the mandatory scheme.<sup>6</sup> Further, this question is an issue of first impression for the Commission since Pennsylvania is the first state to implement voluntary pools so close to national rollout.<sup>7</sup> These are the reasons that the PAPUC submitted its Request for Clarification Regarding Mandatory Pooling in the 717 and 570 NPAs along with its Comments to Rep. McCall's Petition. If the Commission grants the

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become LNP-capable until November 24, 2002. *In the Matter of Cellular Telecommunications Industry Association's Petition for Forbearance From Commercial Mobile Radio Services Number Portability Obligations and Telephone Number Portability*, Memorandum Opinion and Order, WT Docket No. 98-229, 14 FCC Rcd 3092 (1999). Therefore, members of the wireless industry have not agreed to participate in the voluntary pools in the 717 and 570 NPAs. Currently, there are 14 wireless companies with NXX codes in Pennsylvania's 717 NPA and 16 wireless companies with NXX codes in Pennsylvania's 570 NPA. As the PAPUC has advocated and continues to advocate to the Commission, the participation of these wireless companies in pooling is essential. See Reply Comments of the PAPUC to Verizon Wireless' Petition Pursuant to 47 U.S.C. § 160 For Partial Forbearance From The Commercial Mobile Radio Services Number Portability Obligation, Docket No. WT Docket No. 01-184, filed October 22, 2001). If the voluntary pools in the 717 and 570 NPAs are not relegated to mandatory/national status, then the PAPUC will be without the authority to ensure that the 31 wireless carriers in these two NPAs participate.

<sup>6</sup> Comments of the PAPUC at 4. If the Commission does not grant the PAPUC's requested clarification and does not grant Rep. McCall's Petition to delegate to the PAPUC the authority necessary to make voluntary pools in the 717 and 570 NPAs mandatory, then the PAPUC requests that the 717 and 570 NPAs be placed on the national pooling rollout schedule. See Comments of the PAPUC, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200; DA 01-2419, filed November 6, 2001.

<sup>7</sup> Parenthetically, we note that CTIA's comments in opposition to Rep. McCall's Petition do not reference or acknowledge the fact that there are voluntary pools in the 717 and 570 NPAs. Rather, CTIA's comments state that there is "no need to make further grants of interim authority to states to merely follow Federal requirements." Comments of CTIA at 4. In reply, the PAPUC emphasizes that the situation in the 717 and 570 NPAs is atypical because of the fact that voluntary pools are moving forward. We urge the Commission to recognize this fact and validate the efforts of the industry members and PAPUC to implement these pools by making them mandatory.

PAPUC's requested clarification then Rep. McCall's Petition becomes moot because the mandatory status of the 717 and 570 NPAs will be clear.

**II. In the Absence of Granting the PAPUC's Request for Clarification, the Commission Should Grant Rep. McCall's Petition and Delegate to the PAPUC the Authority Necessary to Make the Voluntary Pooling Scheduled for the 717 and 570 NPAs Mandatory**

The PAPUC asserts that the Commission's decision concerning these two NPAs in Pennsylvania is easy. Not only do the 717 and 570 NPAs meet the Commission's requirements for delegating authority to the PAPUC, but they have voluntary pools too. In addition, the voluntary pools are being implemented in accordance with the national pooling framework and guidelines. Thus, the Commission needs only to convert these voluntary pools to mandatory statute so that the benefits of pooling in these two NPAs will continue. If the Commission chooses not to do this by granting the PAPUC's requested clarification, then the PAPUC urges the Commission to grant Rep. McCall's Petition for two reasons. First, there is no clear reason for the Commission to either forbear or deny granting the PAPUC additional authority to make the present 717 and 570 voluntary pools mandatory. Second, the 717 and 570 NPAs meet the Commission's requirements necessary to authorize the Commission to delegate additional authority to the PAPUC to make the two voluntary pools mandatory.

**A. The Commission has continued to grant states delegated authority to implement pooling in advance of national rollout and it should likewise delegate to the PAPUC additional authority to make the present voluntary pools in the 717 and 570 NPAs mandatory**

The PAPUC submits that, in the absence of granting its requested clarification, the Commission should grant the PAPUC additional authority to permit the present pools in the 570 and 717 NPAs to become mandatory. CTIA argues that Rep. McCall's Petition should be denied because number conservation measures, such as thousands-block number pooling, should be developed at the national level.<sup>8</sup> Despite this argument, the Commission has continued to permit states to implement number optimization measures before pooling takes place on a national level. The Commission has been delegating authority to states before national rollout in response to supplemental petitions filed with the Commission during 2000 and 2001. As stated in its recent ruling concerning petitions filed by the Connecticut Department of Public Utility Control, the Michigan Public Service Commission, and the North Carolina Commission, the Commission has released orders on July 20, 2000, February 14, 2001 and March 14, 2001 addressing fifteen state commissions' petitions, four state commissions' petitions, and seven state commissions' petitions for additional delegated authority.<sup>9</sup> As recent as October 24, 2001, the Commission granted the Florida and South Carolina Commissions the authority to institute thousands-block number pooling trials.<sup>10</sup> Thus, if the

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<sup>8</sup> Comments of CTIA at 3.

<sup>9</sup> *Connecticut Department of Public Utility Control Expedited Petition for Additional Authority, Michigan Public Service Commission Petition for Additional Delegated Authority to Implement Number Conservation Measures, and Petition of the North Carolina Utilities Commission for Additional Delegated Authority to Implement Number Optimization Measures*, NSD-L-01-35, 36 and 75 (August 24, 2001).

<sup>10</sup> *Florida Public Service Commission Petition for Expedited Decision for Authority to Implement*

Commission declines to grant the PAPUC's request for clarification, then the Commission should grant Rep. McCall's Petition to delegate to the PAPUC the authority necessary to make the 570 and 717 NPAs voluntary pools mandatory as it has continued to do as recently as a few weeks ago.

**B. The Commission should not defer making a decision regarding Rep. McCall's Petition because pooling is already being implemented in the 717 and 570 NPAs and by February 2002 the Commission will not be delegating interim authority**

Both OCA and Rep. McCall request that the Commission defer consideration of Rep. McCall's Petition until February 28, 2002 which is the date the voluntary pool will be implemented in accordance with the PAPUC's August 9, 2001 order.<sup>11</sup> The PAPUC submits that there is no reason to defer making a decision on Rep. McCall's Petition because the accelerated pools in the 570 and 717 NPAs are already being implemented in accordance to the PAPUC's August 9, 2001 order. The only effect of granting Rep. McCall's Petition is to convert the voluntary pools to mandatory pools.<sup>12</sup> The pooling administrator, Neustar, has already convened the implementation meeting for the 717 and 570 NPAs on August 24, 2001 to establish the pooling timeline. In addition, the block protection date has already been implemented on August 27, 2001 for 570 NPA and September 4, 2001 for the 717 NPA. Since the pools in the 717 and 570 NPAs are

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*Thousands-Block Number Pooling in the 941 NPA, Iowa Utilities Board Petition for Delegation of Additional Authority, Petition of the Public Service Commission of South Carolina for Delegation of Authority Pertaining to NXX Code Conservation Measures*, NSD-L-01-109, 74, 87 (October 24, 2001).

<sup>11</sup> Comments of OCA at 5. Comments of Representative Keith R. McCall at 6.

<sup>12</sup> In Section I above, we discuss the importance of having these voluntary pools converted to mandatory pools so that the PAPUC can use its regulatory authority to ensure that they are successful.

progressing, the Commission should delegate authority to the PAPUC to simply allow the PAPUC to convert these progressing voluntary pools to mandatory status. No other aspect of the pools' implementation would change upon grant of this authority.

Moreover, the PAPUC is very concerned that consumers covered by the 570 NPA will not receive the full benefit of pooling if the PAPUC has to wait until February 28, 2002 to seek delegated authority from the Commission to make the 570 NPA pool mandatory. The Commission has already determined that it will not grant interim authority to state commissions who have filed petitions on or after June 18, 2001 because national pooling will be implemented in March 2002.<sup>13</sup> Consequently, because February 28, 2002 is so close to national rollout of pooling, the PAPUC is fearful that the Commission will not consider delegating interim authority to the PAPUC at that time. Without a delegation of authority and assuming the Commission has not granted the PAPUC's requested clarification, the citizens in central Pennsylvania will not receive the benefit of mandatory pooling in their 717 and 570 NPAs.

On the contrary by granting Rep. McCall's Petition now, the Commission will continue fulfilling its policy of implementing number optimization measures in any and all NPAs throughout the United States. In addition, the Commission's determinations here will permit the benefits of mandatory pooling to be realized in Pennsylvania and nationwide as soon as possible.

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<sup>13</sup> See *Common Carrier Bureau Declines to Address the Remaining Requests of the Georgia Public Service Commission, the Kentucky Public Service Commission and the Louisiana Public Service Commission for Delegated Authority to Implement Number Conservation Measures*, DA 01-2174 at 3 (released October 9, 2001.)

**C. The 717 and 570 NPAs meet the Commission’s requirements necessary to authorize the Commission to delegated additional authority to the PAPUC to make the two voluntary pools mandatory**

On March 31, 2000, the Commission released its *Report and Order and Further Notice of Proposed Rule Making on Numbering Resource Optimization*, CC Docket No. 99-200. In paragraph 170 of this Report and Order, the Commission directed states with pending petitions for delegated authority to file supplements demonstrating that:

- 1) an NPA in the state is in jeopardy,
- 2) the NPA in question has a remaining life span of at least a year, and
- 3) that the NPA is in one of the largest 100 MSAs, or alternatively, that the majority of wireline carriers in the NPA are LNP-capable.

Further, the Commission recognized that “special circumstances” might exist where pooling would be of benefit in NPAs that do not meet the above criteria and invited states to delineate any such situations. The Commission has continued to rely on these criteria in granting state petitions for delegated authority.<sup>14</sup> Both the 570 and 717 NPAs meet the Commission’s requirements to grant additional authority to the PAPUC to implement mandatory thousands-block pooling in these area codes; therefore, in the absence of granting the PAPUC’s Request for Clarification Rep. McCall’s Petition should be granted.

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<sup>14</sup> See *Connecticut Department of Public Utility Control Expedited Petition for Additional Authority*, Order, NSD-L-01-35, *Michigan Public Service Commission Petition for Additional Delegated Authority to Implement Number Conservation Measures*, Order, NSD-L-01-36, *Petition of the North Carolina Utilities Commission for Additional Delegated Authority to Implement Number Optimization Measures* CC Docket No., 96-98, Order, NSD-L-01-75, 2001 FCC LEXIS 4601, at ¶ 22 (2001).

**1. The 717 and 570 NPAs have a remaining life span of at least a year and are within the largest 100 MSAs**

At the present time, the 570 and 717 NPAs have a life span of at least a year. As of June 1, 2001, the projected exhaust date for the 570 NPA is during the fourth quarter 2003 and the projected exhaust date for the 717 NPA is during the second quarter 2003.<sup>15</sup> Also, the 570 NPA covers two MSAs that are within the top 100 MSAs. One MSA is the Allentown-Bethlehem-Easton MSA which is ranked 66<sup>th</sup> and the other MSA is the Scranton-Wilkes-Barre-Hazleton MSA which is ranked 68<sup>th</sup>. Similarly, the 717 NPA covers two MSAs that are within the top 100 MSAs. One MSA is the Harrisburg-Lebanon-Carlisle MSA which is ranked 67<sup>th</sup> and the other MSA is the Lancaster MSA which is ranked 89<sup>th</sup>.<sup>16</sup>

While neither the 717 or the 570 NPA have been declared in jeopardy, these area codes meet all of the remaining requirements set forth by the Commission. Thus, the PAPUC requests that the Commission grant additional authority to Pennsylvania as it did in its recent October 24, 2001 concerning Florida and South Carolina. The Commission found that thousands-block number pooling would be beneficial in Florida's 941 NPA although this area code was not in jeopardy.<sup>17</sup> The Commission held that the 941 NPA in Florida had met its other criteria and, thus, granted authority to Florida to implement thousands-block pooling in that area code. In this same decision, the Commission grants

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<sup>15</sup> NANPA's "2001 NRUF and NPA Exhaust Analysis, June 1, 2001 Update, available at <http://www.nanpa.com>.

<sup>16</sup> See "Census 2000 PHC-T-3. Ranking Tables for Metropolitan Areas: 1990 and 2000, Table 3: Metropolitan Areas Ranked by Population: 2000," available at <http://www.census.gov>. Maps of the 570 and 717 NPAs are available on the PAPUC's web site at [http://puc.paonline.com/telecomm/Area\\_Codes.asp](http://puc.paonline.com/telecomm/Area_Codes.asp).

<sup>17</sup> *Id.* at ¶ 17.

thousands-block pooling for two NPAs in South Carolina based on sound reasoning.<sup>18</sup>

The PAPUC asserts that nearly identical circumstances exist in the 570 and 717 NPAs in Pennsylvania.

**2. Special circumstances exist in the 717 and 570 NPAs that warrant granting Rep. McCall's Petition thereby delegated to the PAPUC the authority necessary to make the on-going voluntary pooling in these two NPAs mandatory**

Beyond these two criteria, the 570 and 717 NPAs meet the Commission's standard of "special circumstances" which demonstrate that mandatory pooling would be beneficial in these area codes. While in this case two voluntary pools are being implemented in the 717 and 570 NPAs, the PAPUC strongly advocates the conversion of these two voluntary pools to mandatory pools as soon as possible. The Commission itself has recognized the value of mandatory pooling over voluntary pooling in making its decision to implement mandatory nationwide pooling rather than voluntary pooling because successful pooling is dependent on the participation of as many carriers as possible.<sup>19</sup> Further, as demonstrated by the experience of the New York State Department of Public Service when it implemented two voluntary pools, voluntary pools will not be successful where the pooling participants do not donate all their available blocks to the pool.<sup>20</sup> While the PAPUC's August 9, 2001 order implementing the

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<sup>18</sup> *Id.* at ¶ 20.

<sup>19</sup> *Report and Order and Further Notice of Proposed Rulemaking in the Matter of Numbering Resource Optimization, CC Docket No. 99-200*, 15 FCC Rcd 7574, ¶ 125 (2000).

<sup>20</sup> In the New York State Department of Public Service's voluntary pool in the 212 NPA there were implemented in the 212 NPA endeavored to implement voluntary 1K pooling in the 212 NPA in July 1998 and in the 718 NPA in March 1999. There were 26 potential pooling participants in the 212 NPA and 24 potential participants in the 718 NPA. As of March 2000, only five service providers in the 212 NPA

voluntary pools in 717 and 570 NPAs has tried to overcome these potential problems, there are still situations that may arise to undercut the effectiveness of the voluntary pools that the PAPUC is without the regulatory authority to control or prevent as long as these pools are voluntary and not mandatory.<sup>21</sup> Therefore, in the absence of granting the PAPUC's Request for Clarification, we ask the Commission to grant Rep. McCall's Petition and give the PAPUC the delegated authority necessary to convert these voluntary pools to mandatory pools to ensure their success.

## CONCLUSION

The PAPUC strongly urges the Commission to definitively determine when the 717 and 570 voluntary pools will become a part of the national framework. While the voluntary pools for the 717 and 570 NPAs will move forward as ordered by the PAPUC on August 9, 2001, their success necessarily hinges on a determination from the Commission when they will become mandatory. The PAPUC is confident that all the current voluntary participants will do their best to ensure the success of these voluntary pools, however, the PAPUC stresses that the success of these pools will be greatly increased once they are recognized as mandatory pools by the Commission. The

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donated blocks to the voluntary 1K pool and only six service providers received 1K blocks from the pool. Consequently, voluntary 1K pooling in New York's 212 NPA between July 1998 and March 2000 resulted in a savings of only eight NXXs. In the 718 NPA voluntary 1K pool, four participants donated blocks to the pool between March 1999 and March 2000, while no carriers received 1K blocks from the pool. Therefore, 1K voluntary pooling in the 718 NPA did not result in any number conservation. Moreover, by March 2000, the 212 NPA had exhausted and the 718 NPA only had seven NXX codes remaining. *Report and Order and Further Notice of Proposed Rulemaking in the Matter of Numbering Resource Optimization*, CC Docket No. 99-200, 15 FCC Rcd 7574 at footnote 274 (2000).

<sup>21</sup> See Section I above.

Commission can do this in two ways. First, the Commission can grant the PAPUC's requested clarification which essentially recognizes the understanding of all the parties involved in implementing the pool that they be grandfathered to the national pooling platform. Or, the Commission can grant Rep. McCall's Petition and delegate to the PAPUC the authority necessary to make the already progressing voluntary pools in the 717 and 570 NPAs mandatory.

Respectfully submitted,

PENNSYLVANIA PUBLIC  
UTILITY COMMISSION

By its counsel:

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Bohdan R. Pankiw  
Chief Counsel

Dated: November 5, 2001

**BEFORE THE  
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Requesting that Additional Authority Be	)	
Delegated to the Pennsylvania Public Utility	)	
Commission to Implement Additional	)	DA 01-2174
Number Conservation Measures in CC	)	
Docket No. 99-200	)	

**CERTIFICATE OF SERVICE**

I, Deanne M. O'Dell, hereby certify that I have on this 5<sup>th</sup> day of November 2001, filed a copy of the Pennsylvania Public Utility Commission's Reply Comments, upon the Secretary of the Federal Communications Commission by electronic filing and that I have served a true and correct copy of the Comments upon the other persons listed below by first class mail.

Via First Class Mail:

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