

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

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

**COMMENTS OF THE CELLULAR TELECOMMUNICATIONS & INTERNET
ASSOCIATION**

The Cellular Telecommunications & Internet Association (“CTIA”)¹ submits these comments in response to the Commission’s request for comment on the proposed national thousands-block number pooling (“pooling” or “TBNP”) rollout schedule.² The Commission’s pooling rollout schedule establishes the implementation of pooling in quarterly increments, beginning March 2002. In its Public Notice, the Commission states that pooling trials commencing before March 2002 must be transitioned into the pooling schedule prior to the national pooling rollout. CTIA has reviewed the proposed national rollout schedule for pooling and affirms its support for the Commission’s use of TBNP as a number conservation measure.

¹ CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service (“CMRS”) providers and manufacturers, including cellular, broadband PCS, ESMR, as well as providers and manufacturers of wireless data services and products.

² See *Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout Schedule*, Public Notice (rel. Oct. 17, 2001) (“Public Notice”).

The wireless industry remains committed to participating in number pooling by the November 24, 2002 deadline. Earlier this year, CTIA's numbering experts drafted a report that addresses the establishment of wireless number pooling and charts the implementation path for turning up wireless pooling in all numbering plan areas ("NPAs") where the Commission has ordered TBNP. The report also describes the technical challenges the telecommunications industry can expect when wireless carriers "turn up" pooling between August 1 and November 24, 2002. A broader group of industry numbering experts and the National Thousands-Block Number Pooling Administrator are currently reviewing this draft report.

CTIA reminds the Commission that the aggressive rollout schedule established for CMRS participation in TBNP will require a tremendous amount of work for both the wireless industry and the pooling administrator. Wireless carriers must implement the Location Routing Number ("LRN"), separate the Mobile Identification Number ("MIN") from the Mobile Directory Number ("MDN"), and complete other upgrades to their networks to be pooling capable.³ The Commission's thousand-block pooling mandate requires that approximately 160 NPAs will be engaged in pooling by November 24, 2002. In addition to the NPAs listed in the pooling schedule, the wireless industry must transition NPAs that are currently participating in pooling trials to the pooling schedule. Given the projected level of pooling volumes and the industry's unequivocal need for numbering resources, the wireless industry asks for assurances from the pooling

³ See CTIA's Comments on Wireless LNP Forbearance Petition Filed by Verizon Wireless, WT Docket No. 01-184 (Sept. 21, 2001) ("CTIA's Comments"); CTIA's Reply Comments on Wireless LNP Forbearance Petition Filed by Verizon Wireless, WT Docket No. 01-184 (Oct. 22, 2001) ("CTIA's Reply Comments").

administrator and the Commission that pooling volumes can be sufficiently accommodated under this aggressive rollout schedule.

As CTIA demonstrated in its recent comments, the impact of pooling on the existing number administration infrastructure pose significant challenges to the CMRS industry.⁴ While CTIA has predicted that 19,200 Thousands Blocks must be identified and donated to the pools, wireless carriers will undoubtedly require Thousands Blocks for all of the more than 160 NPAs involved in pooling.⁵ The risks associated with these extraordinarily high pooling volumes clearly warrant a cautious approach.

In its Public Notice, the Commission stated that state commissions may petition the Commission to substitute an alternative NPA for the NPA listed in the rollout schedule and outside of the top 100 MSAs and that the states may opt into the rollout schedule on a case-by-case basis.⁶ Given the challenges facing the wireless industry to meet the November 24, 2002 pooling deadline, the industry must be able to rely upon a consistent, nationwide schedule adopted by the Commission. The Commission must exercise caution in altering the national schedule and consider the challenges facing the wireless industry as it prepares to meet the Commission's thousand-block pooling mandate. While CTIA supports the pooling rollout schedule, CTIA respectfully requests that the Commission maintain its authority over the national rollout schedule for pooling so that it can prevent, or at least minimize, further complications to the pooling rollout and avoid jeopardizing the successful deployment of TBNP.

⁴ See CTIA's Reply Comments.

⁵ See CTIA's Reply Comments at 16.

Respectfully submitted,

/s/ _____

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⁶ See Public Notice at 2.