

and February 2002. Consequently, SBC's preparations to meet the national timeline would run concurrently with activity required for other state-ordered trials in the Southwest NPAC region.²

This concurrent activity is straining SBC's limited resources. Any additional state trials ordered at this time along with the national rollout of TBNP — as well as the myriad of other activities required by law — will further strain those resources. A state pooling trial has exactly the same requirements and work activities and will affect the same work groups as implementation of the national TBNP schedule. Whether it's a state trial or the national rollout, to implement TBNP, SBC needs to do all of the same time-consuming and resource-depleting tasks, which affect SBC's work force and systems, in each NPA. For example, in order to identify which thousands-blocks can be donated, SBC must verify and reconcile an average of four databases, such as billing databases, Local Service Management System (LSMS), End Office Switch, and SWITCH OSS. This verification and reconciliation process not only requires manual review and intervention, but also system processing and output.

These systems have limitations that additional manpower will not resolve. The systems can only provide a limited amount of output within a given timeframe. By way of illustration, in order for SBC to identify and validate block contaminants and protect blocks from further contamination, SBC must perform a SWITCH OSS utility, which can only be run at night. If not run at night, it would slow down service order processing. SBC recommends that states utilize their right to opt in and out of the national schedule rather than ordering additional number pooling trials. SBC repeats its request that the Commission revoke any authority delegated to the states for pooling trials that have not been ordered as of November 1, 2001.

B. Staggered Rollout of Three NPAs Per NPAC Region Per Quarter

In their comments, BellSouth Corporation (BellSouth) and United States Telecom Association (USTA) argued that the current schedule does not adhere to the Commission's own

² Two state pooling trials are scheduled in Missouri for January 22, 2002 and February 22, 2002. Texas also has a state pooling trial scheduled for January 1, 2002. Both Missouri and Texas are part of the Southwest NPAC region.

requirement that “the rollout should encompass a maximum of three NPAs per NPAC region per quarter.”³ Like other carriers, SBC configured its resources for implementation of TBNP based on this requirement. If the Proposed Schedule is retained, SBC believes that it will not be able to add to or otherwise augment its resources to meet the burdens of that schedule. Even if it were able to do so, which it cannot, SBC’s TBNP costs would be significantly higher. With the much lower demand for central office codes and the concomitant delay in anticipated NPA exhaust dates, there is no reason for such an aggressive rollout schedule — especially one that violates a principal finding of NRO I.

Limiting the number of NPAs to three per region per quarter will allow the National Pooling Administrator, NeuStar, Inc. (NeuStar), and service providers to rollout TBNP efficiently and without overburdening resources. States, too, have recognized that the Proposed Schedule is inconsistent with this staggered-rollout requirement. In its comments, the CPUC stated:

[W]e realize that the need to place more than one NPA per month into pooling could be a burden on carriers. That, in turn, could result in problems that might affect service quality, or even call completion. As a consequence, the CPUC is not opposed to revising the 1st quarter schedule that would reduce to three the number of area codes included.⁴

The Public Utility Commission of Texas (PUCT) has acknowledged the need to limit the number of pooling trials implemented per month per region.⁵

According to the North American Numbering Plan Administration’s (NANPA’s) code assignment activity reports, central office code usage and the demand for numbers has slowed

³ *In the Matter of Numbering Resource Optimization*, CC Docket 99-200, *First Report & Order*, 15 FCC Rcd. 7574, ¶ 159 (2000)(NRO I).

⁴ Comments by California Public Utilities Commission, pp.2-3

⁵ The PUCT determined that “the rollout of thousand-block pooling in the Houston metro area would be most effective if the implementation is staggered by NPA. This will allow carriers adequate time for personnel to complete the administrative preparations for pooling.” The Houston NPAs 832, 281, and 713 cover the same geographic area and were originally scheduled for state pooling trials on the same date, November 1, 2001. The PUCT subsequently modified its order to allow a schedule of one pooling trial per NPA per month. (*Thousand-Block Number Pooling Trials in Texas*, Public Utility Commission of Texas, Project No. 24186, August 15, 2001).

significantly. As a result, NPAs will not exhaust as quickly as originally anticipated. These factors, when coupled with the numerous state trials that have already been ordered, diminish any perceived need for an expedited schedule and further support a more deliberate implementation timeline — one consistent with the Commission’s own findings in paragraph 159 of NRO I.⁶

C. Rollout Should be Based on NPA Exhaust

SBC continues to support adjusting the rollout schedule to prioritize it based on NPA exhaust. In general, SBC recommends prioritizing NPAs in each NPAC region into three segments:

- Top 100 MSAs without relief dates scheduled;
- Top 100 MSAs with relief dates already scheduled; and
- Non-Top 100 MSAs.

Within each of these three segments, the NPA should be sorted by anticipated exhaust date.

Subject to the above-stated guidelines, SBC adds the following comments on specific states by NPAC region:

1. Southwest NPAC Region

a. MISSOURI

SBC supports the Public Service Commission of the State of Missouri’s (MoPSC) recommendation of removing NPAs 314 and 816 from the national schedule, because these NPAs are already scheduled for state trials in first quarter 2002. As for the other Missouri NPAs (417, 573, 636, and 660), SBC will defer their prioritization to the MoPSC. In spite of this, however, SBC urges that these NPAs remain lower priorities on the overall national schedule and that they not be moved to fill the slots created by removing NPAs 314 and 816. According to the NANPA forecast report, NPAs 417, 573, 636 and 660 exhaust no earlier than 2008. TBNP

⁶ SBC is unaware of anything in the record in this docket that would support an expedited schedule. In view of the Commission’s own findings with respect to a staggered rollout schedule employing the principle of three NPAs per NPAC region per quarter, this schedule is contrary to NRO I.

will be more beneficial for other NPAs within the Southwest NPAC region that will exhaust earlier and presumably will require area code relief sooner, helping to extend the life of the NANP.

b. OKLAHOMA

SBC supports the OCC's recommendation of repositioning NPAs 918, 405 and 580 to an earlier quarter in the deployment schedule. SBC does not support implementing any additional state trials; therefore, to satisfy the OCC's need for the earliest possible TBNP implementation date, SBC encourages the Commission to place NPAs 918 and 405 in the first quarter of the national TBNP schedule.

c. TEXAS

SBC supports the PUCT's recommendation to move the Dallas NPAs 214/972/469 ahead of the 409 NPA. Nevertheless, as stated in its Comments filed on November 6, 2001,⁷ SBC recommends that these NPAs be scheduled separately to allow service providers time to maximize their resources and minimize errors — a recommendation that is consistent with the Commission's "three NPAs per region per quarter" requirement. This echoes the PUCT's concern that service providers have adequate time to implement TBNP, because these overlay NPAs each require the same time-consuming and resource-depleting activities to implement TBNP as do other non-overlay NPAs.⁸

SBC supports the PUCT's request for clarification on how to handle NPAs that have areas that reside both inside and outside of the MSA.⁹ In its comments, the PUCT advises that there has been some communication with NeuStar suggesting that TBNP would be implemented in the entire NPA.¹⁰ In its Comments, SBC supported implementing pooling in the entire NPA, as opposed to a piece-meal approach.¹¹

⁷ SBC Comments, p. 3.

⁸ *Id.*

⁹ *See*, Comments of PUCT, p. 2. *See also*, NRO I, ¶ 158.

¹⁰ Comments by the PUCT. p.2.

¹¹ SBC Comments, p. 9.

2. Midwest NPAC Region

a. ILLINOIS

SBC supports the Illinois Commerce Commission's (ICC) recommendation to keep NPA 815 in the first quarter rollout and move NPA 618 up to the same quarter. SBC also supports the ICC's recommendation to give NPA 217 a higher priority on the national schedule, since it will require area code relief in the near future.

b. INDIANA

SBC supports the Indiana Utility Regulatory Commission's recommendation to move NPAs 765 and 812 into an earlier quarter on the rollout schedule.

c. MICHIGAN

Since the state pooling trial for NPA 313 is scheduled for February 24, 2002, SBC supports the Michigan Public Service Commission's recommendation to remove that NPA from the national schedule. SBC also supports the recommendation to move NPA 734 to the first quarter rollout. Nevertheless, SBC recommends that NPAs with relief already scheduled, such as NPA 248, not be given a high priority on the rollout schedule since other NPAs will benefit more from TBNP. If the Commission chooses to keep NPA 248 as a high priority, SBC recommends that NPAs 248 and 947 be moved back to at least the third quarter. The new overlay NPA 947 will not be activated until July 1, 2002. A third quarter rollout date on NPAs 248 and 947 will allow the industry time to finish up the mandatory work activity associated with the overlay area code relief and correct any potential problems.

d. OHIO

SBC supports the Public Utilities Commission of Ohio's recommendation to prioritize NPAs that do not have area code relief already scheduled since these NPAs will benefit more from pooling than those with relief already scheduled.

e. WISCONSIN

SBC supports the prioritization of NPAs recommended by the Public Service Commission of Wisconsin.

3. West Coast NPAC Region

CALIFORNIA

The CPUC has recently ordered two additional state pooling trials for NPAs that are currently reflected on the national schedule. As stated previously, due to the strain on SBC's resources, SBC does not support additional state trials; however, SBC supports and encourages the Commission to place NPAs 707 and 805 in the first quarter of the national TBNP schedule to satisfy the CPUC's need for the earliest possible TBNP implementation date.

D. Implementation Schedules Should be Determined by the PA and Industry

SBC supports the comments made by BellSouth and USTA that the detailed implementation schedules (milestone dates) for each NPA should be determined by NeuStar and the industry, and not be predetermined by the Commission. Allowing NeuStar and the industry the opportunity to establish milestone dates promotes flexibility as needed since each NPA has its own unique circumstances — e.g., number of carriers that are required to pool, the number of rate centers, the number of blocks that have been contaminated, and the like. These and other factors impact the amount of work required by each carrier.

E. Cost Recovery Mechanism Needs to be Established for National and State Trials

SBC strongly supports comments made by BellSouth, USTA, and Cincinnati Bell Telephone Company that the Commission should move forward with a national cost-recovery mechanism.¹² SBC and other carriers urge the Commission to have a cost recovery mechanism in place before the rollout of national TBNP schedule.

On a similar note, cost recovery for state trials has yet to be established by any state. SBC encourages the Commission to direct each state that has exercised its authority to conduct

¹² Comments of BellSouth, pp. 13-14; Comments of USTA, pp. 5-8; and Comments of Cincinnati Bell, pp. 6-7.

CERTIFICATE OF SERVICE

I, Regina Ragucci, hereby certify that a true and correct copy of the above and foregoing Reply Comments of SBC Communications, CC Docket No. 99-200, were served first class postage pre-paid to the parties listed below:

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