

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

In the Matter of	)	
	)	
Numbering Resource Optimization	)	CC Docket No. 99-200
	)	
National Pooling Rollout Schedule	)	DA 01-2419
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**SPRINT REPLY COMMENTS**

Sprint Corporation, on behalf of its local and wireless divisions, submits this reply to the comments on the national thousands-block pooling rollout schedule.<sup>1</sup>

The national pooling rollout schedule for wireline providers will commence in April 2002. Providers of commercial mobile radio service (“CMRS”), including Sprint’s wireless division (“Sprint PCS”), are scheduled to become pooling capable on November 24, 2002. Sprint’s local division and Sprint PCS are committed to becoming pooling ready by these dates.<sup>2</sup> However, it is essential that nationwide number pooling be implemented in an organized and thoughtful manner. In addition to the tremendous commitment of personnel and resources, Sprint PCS will spend an estimated \$58 million and Sprint’s local division will spend an estimated \$89 million to implement number pooling. These efforts to implement pooling will be undermined and the accompanying conservation benefits will be compromised if Sprint cannot assign pooled numbers to customers because of problems in the pooling process.

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<sup>1</sup> See *The Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout Schedule*, Docket No. 99-200, DA 01-2419, Public Notice, (Oct. 17, 2001).

<sup>2</sup> CMRS carriers are also scheduled to be capable of porting on this same date, and forbearance of this porting obligation would help ensure that CMRS carriers can meet the pooling-capable deadline, and that network reliability is not potentially compromised.

The number pooling rollout schedule did not present a conversion plan addressing CMRS assimilation into existing and proposed wireline number pools. NeuStar estimates that by November 24, 2002, there will be 152 area codes, or NPAs, in number pooling by the wireline industry.<sup>3</sup> A transition plan must be developed so the CMRS industry can “catch-up” in the wireline pools.

The Pooling Task Force of the Wireless Number Portability Operations Subcommittee<sup>4</sup> has begun addressing the subject of developing a transition plan for these NPAs.<sup>5</sup> The Pooling Task Force provides a forum for the identification and resolution of issues affecting wireless implementation of number pooling. The expectation is that a transition plan for CMRS pooling implementation will be developed before the end of the year. Sprint recommends that the Pooling Task Force be provided with the opportunity to address the administrative and logistical concerns of CMRS introduction into number pooling and to develop a set of recommendations to facilitate efficient CMRS participation in number pooling without disrupting service quality. Sprint supports this process and Sprint PCS has participated actively in Task Force meetings.

Another issue that should be emphasized is that the proposed pooling schedule is dependent upon carriers and vendors making necessary investments in resources and technology to accommodate the sizable increases in message volumes caused by the addition of CMRS carriers to the pooling process. If the necessary upgrades are not timely made, the entire process will be placed in jeopardy. NeuStar has disclosed plans to quadruple the capacity of its Number Port-

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<sup>3</sup> See NeuStar Reply Comments, *Petition Pursuant to 47 U.S.C. §160 For Partial Forbearance From the Commercial Mobile Radio Services Number Portability Obligation*, Docket No. 01-184, at 5 (Oct. 22, 2001). See also Comments of VoiceStream Wireless Corporation, *Proposed National Thousands –Block Number Pooling Roll-out Schedule*, Docket No. 99-200, DA 01-2419, at 4 (Nov. 6, 2001)(“VoiceStream Comments”)(estimating that there will be 157 “catch-up” NPAs).

<sup>4</sup> The Wireless Number Portability Operations Subcommittee is a subcommittee of the North American Numbering Council.

<sup>5</sup> See VoiceStream Comments at 5.

ability Administration Center (“NPAC”) hardware and to complete installation of NPAC software release 3.1 by May 2002.<sup>6</sup> These upgrades are critically important, and it is equally important that NeuStar complete these upgrades by May 2002, so CMRS carriers have adequate time for testing before the November 2002 start date.

However, NeuStar upgrades, important as they are, address only half of the increased traffic capacity issue. Additionally, Sprint’s Local Number Portability database that stores number pooling data is designed to support NPAC software release 3.1. If this release is delayed, Sprint will incur additional unnecessary expense to install additional database capacity on a temporary basis. The implementation of pooling imposes enough additional expenses on carriers; carriers should not be forced to incur unnecessary expenses. Local exchange carriers and other carriers that interact with the NPACs must be prepared for the increased demands upon their systems if NPAC release 3.1 is unsuccessful. Any database capacity issues will delay the implementation of number pooling.

The NPACs’ systems and the individual carrier systems that interconnect with the NPACs are currently designed to handle traffic volumes consistent with the existing wireline porting and pooling. At least one estimate is that the addition of CMRS carriers to pooling will nearly double these volumes — with existing volumes tripled if CMRS must also simultaneously convert to the porting obligations.<sup>7</sup> While NeuStar will be upgrading the capacity of its systems, all carriers that interconnect with the NPACs must make similar investments to handle the additional information that will be transmitted by the NPACs relative to CMRS pooling assignments (and perhaps LNP assignments). Currently, the entire system is subject to delays if even

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<sup>6</sup> See NeuStar Reply Comments, Docket No. 01-184, at 2 (Oct. 22, 2001).

<sup>7</sup> See Joint U.S. Cellular/VoiceStream Reply Comments, Docket No. 01-184, at 16 and Exhibit A (Oct. 22, 2001).

one carrier has insufficient capacity – the so-called “slow horse” problem. These problems will only be exacerbated unless carriers and vendors take action to upgrade capacity.

Sprint is firmly committed to its participation in number pooling. However, it is important to remember that number pooling will be successful only if carriers can timely use (*i.e.*, assign to customers) pooled numbers. The public interest is not served if carriers cannot provide service to customers because there are problems with pooled numbers — regardless of the cause of the problem. The Commission should ensure that carriers and vendors continue to make the necessary investments in resources and technology in order to timely implement number pooling in a manner that does not compromise network integrity or reliability. Sprint also urges the Commission to defer consideration of the CMRS pooling “catch-up” issue until the Pooling Task Force of the Wireless Number Portability Operations Subcommittee submits its recommendations.

Respectfully submitted,

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