FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

Numbering Resource Optimization	CC Docket No. 99-200

REPLY COMMENTS OF THE CALIFORNIA PUBLIC UTILITIES COMMISSION AND OF THE PEOPLE OF THE STATE OF CALIFORNIA

The California Public Utilities Commission and the People of the State of California (California or CPUC) submits these Reply Comments in response to the Public Notice in CC Docket 99-200 issued by the Common Carrier Bureau of the Federal Communications Commission (FCC or Commission October 17, 2001. In the Public Notice, the Common Carrier Bureau sought comments on the national thousands-block number pooling rollout schedule (rollout schedule).

In our Comments, we noted our intent to open two additional number pools in California prior to the start of the national rollout. Specifically, we stated an intent to open a pool in the 707 NPA on February 1, 2002, and a pool in the 805 NPA on March 1, 2002. We further indicated our expectation that we would issue a ruling regarding these two pools shortly and would attach a copy of the ruling to these Reply Comments. Accordingly, a copy of the Administrative Law Judge's Ruling is attached. We note also that the dates for opening the

pools in the 707 and 805 NPAs inadvertently were reversed in our Comments; the correct dates appear in the ruling.

We also wish to respond to the comments of SBC Communications on two points. First, SBC supports implementing pooling "across the entire NPA, not just [in] the rate centers within the MSA". (SBC Comm., p. 9.) In principle, we agree with SBC. But, as SBC notes, the FCC has determined that "where an NPA encompasses areas both inside and areas outside of the qualifying MSA, pooling will be required only in those rate centers in the NPA which are a part of the MSA".[1] The FCC limited pooling to those rate centers in the MSA because it concluded "that the greatest benefits from pooling are achieved when all, or most, participating carriers are LNP-capable, and thus are able to participate in pooling".[2] In California, many of our 25 NPAs cover geographic areas much larger than the relevant MSA. While we would greatly prefer to see pooling effected through all of every NPA in California, we recognize that in areas outside the top 100 MSAs, carriers have not deployed LNP. If the FCC agrees with SBC, as we do, then the FCC must require deployment of LNP in areas outside the MSA but within the NPA where pooling is scheduled to begin.

Finally, SBC also complains that the states have not acted on requests for recovery of costs associated with state pooling trials. California has issued several orders and rulings

[1] *Report and Order and Further Notice of Proposed Rulemaking*, FCC 00-104, Released March 31, 2000, ¶ 158. (SBC erroneously cited to ¶ 161.)
[2] Id.

pertaining to recovery of pooling costs. Earlier this year, we collected data from those carriers expecting to seek cost recovery. The issue is still pending before the CPUC, but we anticipate issuing an order in the near future.

Respectfully submitted,

GARY M. COHEN
HELEN M. MICKIEWICZ

By: /s/ HELEN M. MICKIEWICZ

Helen M. Mickiewicz

505 Van Ness Ave.
San Francisco, CA 94102
Phone: (415) 703-1319
Fax: (415) 703-4592

Attorneys for the
Public Utilities Commission
State of California

November 16, 2001