CELLULAR TELECOMMUNICATIONS & INTERNET ASSOCIATION

Number Resource Optimization & Local Number Portability

3 December 2001

TECHNOLOGY-SPECIFIC OVERLAYS

CTIA supports Technology-Specific Overlays ("TSO") provided that:

- **Any TSO is transitional;**

-- To minimize the discriminatory effect of disparate dialing plans, a TSO should end as soon as CMRS carriers can support Thousand Block Pooling (i.e., only until November 24, 2002);

- **There is no "take back"of legacy wireless codes**; and

- **TSOs would be used only in areas where pooling has been implemented and are relatively near exhaust.**

THE FCC HAS ALREADY REJECTED PERMANENT TSOs AND TAKE BACKS

- **Discriminatory:** The FCC rejected permanent TOSs due to their discriminatory impact on wireless carriers.
- **Anti-competitive:** The use of permanent TSOs frustrates the goal of encouraging wireline-wireless competition due to disparate dialing.
- **Inefficient:** Restricting NPAs to specific services is inefficient because only some carriers can draw numbers from the the release of a new TSO.

Example: Release of a new TSO in Connecticut would waste numbering resources. The total population of Connecticut = 3.4 M; One TSO area code = 8.0M numbers.

•*See* Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech-Illinois, FCC 95-19 (1995).

THERE ARE MANY NUMBERING RESOURCE ALTERNATIVES TO TSOs

- **Thousands-block number pooling**
- **Rate center consolidation**
- **Traditional overlays and splits.**

THE "SAFETY VALVE" MUST BE A NATIONAL RULE

- A "safety valve" allows carriers to obtain numbering resources under exceptional circumstances when it does not meet the utilization threshold.

  Exception circumstances may result from seasonal variations or expansion out of a traditional rate center.

- Wireless carriers are licensed and operate without respect to state lines – they require uniform rules.

THOUSANDS-BLOCK NUMBER POOLING AND LOCAL NUMBER PORTABILITY

- Pooling is a number resource optimization tool.
- Porting is a competition-based policy.

THE WIRELESS INDUSTRY IS COMMITTED TO MEET THE POOLING DEADLINE

- **National Pooling Schedule:** The wireless industry supports the proposed national rollout schedule and intends to be ready in all effected NPAs.
- **Progress Report:** CTIA submitted a voluntary report on November 21, 2001 to the FCC detailing the industry's progress to date and the tremendous challenges ahead.
- **Industry Outreach & Work Effort :** CTIA has hosted workshops and forums to facilitate the resolution of implementation issues and develop a "Pooling Readiness" strategy and draft report.

DELAYS IN INTER-CARRIER TESTING AND VENDOR READINESS MAY IMPAIR IMPLEMENTATION

- **Testing:** The North American Numbering Council ("NANC") is concerned that delays in the testing schedule could hurt the industry's ability to meet pooling and porting deadlines.
- **Vendor Readiness for Interoperability Testing:** A number of switch and network component vendors and back office system vendors have been unable to provide network system upgrades to meet wireless industry benchmarks. Vendors must complete upgrades in order for full inter-carrier testing to occur.

TESTING DEADLINES

Updated Testing and Deployment Timeline

Original Timeline	EVENT	Revised Timeline
Complete – 04/01	Inter-Carrier Communications Process	Not shown - complete
Complete – 04/00	Functional Specifications	Complete by 12/01
05/00 thru 01/01	System Development	Complete by 02/02
02/01 thru 04/01	Internal End-to-End Testing	02/02 thru 04/02
05/01 thru 09/01	NPAC Turn-up Testing	Complete by 04/02
Complete by 09/01	Inter-carrier test coordination and logistics	Complete by 04/02
10/01 thru 05/02	Inter-carrier testing	04/02 thru 09/02
06/02 thru 08/02	Deployment	09/02 thru 10/15/02
09/02 thru 11/24/02	Final Adjustments	10/15/02 thru 11/24/02

Updated Testing and Deployment Timeline, The Wireless Number Portability Operations Team (WNPO) (rel. Nov. 20, 2001). WNPO has indicated that the implementation targets are subject to change.

THE IMPLEMENTATION OF WIRELESS POOLING WILL POSE SIGNIFICANT CHALLENGES

- **Impacts to the Public Switched Telephone Network:** Both wireline and wireless carriers have expressed concerns about the risks associated with the forecasted pooling volumes.
- **MIN/MDN Separation:** Separating the Mobile Identification Number ("MIN") from the Mobile Directory Number ("MDN") is one of the most difficult challenges facing the wireless industry .
- **MIN Block Identifier Administration:** The schedule has been delayed, the wireless industry is making efforts to put the administration process back on track.
- **Pooling Administrator:** LECs have expressed concerns that pooling volumes may overwhelm the resources and ability of the Pooling Administrator to roll-out new pools.

THE FLASH-CUT DEPLOYMENT OF PORTING AND POOLING POSES ENORMORMOUS RISKS TO NETWORK RELIABILITY

- The simultaneous mandates will:

  1) Jeopardize the ability of carriers to successfully implement pooling;

  2) Divert valuable resources from carriers; and

  3) Thwart carrier efforts to implement number optimization measures.

- LECs have expressed concerns based upon the difficulties wireline carriers have encountered in their roll-out of number pooling and porting.

THE FCC SHOULD EXTEND THE WIRELESS PORTING DEADLINE FOR A MINIMUM OF TWO YEARS

- Verizon Wireless' Petition for Forbearance sets forth competition-based reasons to separate the two mandates.
- CTIA's Reconsideration Petition and recent *Ex Parte* set forth network integrity reasons for an extension.
- Extending the deadline will:

  1) Permit a phased-in deployment and reduce the risks to the network functions; and

  2) Facilitate the wireless industry meeting the pooling deadline.

UNRESOLVED POLICY ISSUES

- **Potential Impact on E-911:** There are some concerns that ported subscribers may not always be able to receive response calls from PSAPs.

- **Wireless to Wireline Portability Integration:** The FCC number portability mandate only applies to rate centers; however, wireless calling plans typically extend beyond several rate centers.

CONCLUSION

- The flash-cut implementation of porting and pooling, along with the unresolved policy issues, and risks of overloading the capacity of the existing network to meet wireless demand create a risk that pooling will be delayed.
- **Best Policy:** Proceed with pooling by permitting pooling before porting.