

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

In the Matter of)	
)	
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996)	CC Docket No. 96-98
)	
State of New York Public Service Commission's Request for Delegated Authority for Jurisdiction Over Area Code Changes)	NSD File No. L-01-159
)	

COMMENTS OF WORLDCOM, INC.

Pursuant to Public Notice DA 02-42 (rel. January 10, 2002), WorldCom, Inc. (WorldCom) hereby submits comments on the petition of the New York Public Service Commission (Petitioner) for broad delegated authority to make area code changes outside of the context of relief planning (filed October 15-2001). For a number of reasons, the Commission should deny this petition.

Petitioner seeks, in effect, plenary authority to alter the boundaries of existing area codes completely outside of the context of relief planning. The petition raises far more questions than it answers. Indeed, none of the most important questions can be answered without precise details of the contemplated boundary changes. Because Petitioner has not presented a specific plan, interested parties cannot make a reasoned evaluation of Petitioner's proposal.

The following is a non-exhaustive list of issues that could arise in the evaluation of a plan for area code boundary realignment:

- Does the plan require action by the North American Numbering Plan Administrator (NANPA)? If so, is that action included in NANPA's existing compensation mechanism or would alternative compensation arrangements be needed?
- Is there any impact on NPA exhaust? For example, would the plan entail splits of existing rate areas that might require duplication of a number of NXX codes, and thus accelerate NPA exhaust?
- Would the plan cause significant inconvenience to some end users by further complicating their dialing patterns?
- Will some customers require 6- or 10-digit number changes because their NXX or entire telephone number is already assigned in the NPA to which they are moving?
- Will carriers be able to provide the appropriate call-intercept treatment for misdialed calls to customers whose numbers have changed?
- What other inconveniences, typically associated with NPA splits, would customers encounter?
- Is there any impact on existing or future pooling or the Pooling Administrator?

The Commission cannot properly evaluate this petition without detailed information on all of these issues. Accordingly, the petition should be rejected.

Petitioner may, of course, present a more detailed plan that the Commission and interested parties could review.

Respectfully submitted,

WorldCom, Inc.

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