

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

In the Matter of

Petition of Connecticut Department of Public  
Utility Control

CC Docket No. 99-200

NSD File No. L-02-03

**COMMENTS OF VERIZON**

The “supplemental information” provided by the Connecticut DPUC in support of its request that the Commission give it authority to adopt two specialized overlay (“SO”) area codes does not cure the fundamental defect of the Petition — that the DPUC still has not provided the information required by the Commission in its *Third Report*.<sup>1</sup> As a result, it is still impossible for Verizon, or the Commission, to weigh the benefits of or problems with the DPUC’s proposal. However, the information that is provided suggests that the proposal is inconsistent with the Commission’s guidelines and would not be a good use of numbering resources.

The DPUC has still done nothing to satisfy the Commission’s directive that “states seeking to implement a SO must also demonstrate that the benefits will outweigh the costs of implementing the SO.”<sup>2</sup> Nor does the DPUC show “why the numbering resource optimization benefits of the proposed SO would be superior to implementation of an all-services overlay.”<sup>3</sup> Without these showings, the Petition must be denied.

One of the Commission’s requirements for approving a SO is that it make rationing unnecessary — “We find that any SO that achieves the purposes for which it is implemented

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<sup>1</sup> *Numbering Resource Optimization*, 17 FCC Rcd 252 ¶ 81 (2001) (“*Third Report*”).

<sup>2</sup> *Third Report* ¶ 80.

<sup>3</sup> *Third Report* ¶ 81.

(that is, the availability of numbering resources is increased for all carriers), should not need to be subject to rationing.”<sup>4</sup> At this time, both 203 and 860 are subject to rationing and have been for many months. Therefore, it would be impossible to achieve one of the theoretical benefits of an SO in these cases.

The latest information from the NANPA is that the 860 and 203 NPAs are now not expected to exhaust until the first and third quarters of 2004, respectively, in each case an extension of almost a year.<sup>5</sup> Nothing in the record suggests that the lives of these codes could be further extended by implementing SO’s at this relatively late date. In fact, if the Commission requires the end of rationing with the implementation of the SO (consistent with the *Third Order*), it may well hasten exhaust. At this point, the SO’s would have only a very short life before the scheduled exhaust, benefiting no one and only being an inconvenience for all concerned.

Respectfully submitted,

  
John M. Goodman

Attorney for the Verizon  
telephone companies

1300 I Street, N.W.  
Washington, D.C. 20005  
(202) 515-2563  
john.m.goodman@verizon.com

Michael E. Glover  
Edward Shakin  
Of Counsel

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<sup>4</sup> *Third Report* ¶ 93.

<sup>5</sup> Available at <http://docs.nanpa.com/pdf/NRUF/nruf061501results.pdf>.