

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

In the Matter of

Administration of the North American
Numbering Plan

Numbering Resource Optimization

CC Docket No. 92-237

CC Docket No. 99-200

COMMENTS OF VERIZON

Verizon¹ proposes two modifications to the comprehensive requirements for the new North American Numbering Plan Administrator. First, the Commission should modify the time frames associated with NANPA reports to a state to allow carriers time to correct anomalies in their data. Second, the requirements document should expressly state that the new NANPA will be able use existing NANPA assets and should indicate to potential bidders what those assets include.

Reporting of Data Anomalies

The requirements should be changed to ensure that NANPA does not report “anomalies” before a service provider has an opportunity to explain them or correct its data.

Section 8.2 permits a state to request a number utilization report 30 days after NANPA receives data from service providers and requires NANPA to provide the requested information within ten calendar days. Under section 8.2.1, this report must include a description of all data anomalies identified by NANPA.

¹ The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc., listed in Attachment A.

Section 6.1.11 does recognize that service providers should be given an opportunity to explain or correct their submissions before NANPA identifies any anomalies with their data and establishes a process to do that, but that process may not always be effective. Thus, it requires NANPA to “inform the submitting service provider of its findings, provide the specific data relevant to prove the significant inconsistency or anomaly in service provider reporting, and request a review and confirmation (written or oral) from the service provider,” and it gives the service provider five business days to respond. The requirements, however, do not prescribe when NANPA must provide this information to the service provider, and, as a result, a service provider might not be able to respond (and have NANPA act on its response) before NANPA is required to provide a report under section 8.2.

The time periods in these two provisions should, therefore, be changed. One way to fix the problem would be to modify section 6.1.11 require NANPA to give notice to the service provider within 20 days of receipt of the provider’s data and to require NANPA to act on the provider’s response within five business days and to modify section 8.2 to permit a state to request an NRUF report 45 days after NANPA receives data from service providers.

Transfer of Ownership

Section 52.13(g) of the Commission’s rules requires the current NANPA to “make available any and all intellectual property and associated hardware” to a successor NANPA. The requirements document should make this fact clear to potential successors and should advise them of what intellectual property and hardware will be available to them. This will assist them in preparing the best and most cost-effective response for the Commission.

Respectfully submitted,

John M. Goodman /s/

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

Dated: July 2, 2002