

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

In the Matter of	)	
	)	
Administration of the North American Numbering Plan	)	CC Docket No. 92-237
	)	
Numbering Resource Optimization	)	CC Docket No. 99-200

**WORLD COM REPLY COMMENTS**

WorldCom, Inc. (WorldCom) respectfully submits these reply comments on the North American Numbering Plan Administrator (NANPA) technical requirements. As a general matter, WorldCom concurs in the view of several commenting parties that the requirements are, by and large, sufficiently detailed, comprehensive, and clear to describe NANPA’s duties. In fact, WorldCom’s principal concern is that, in some cases, the requirements are perhaps too detailed and would require the NANPA to incur costs to support capabilities that are not necessary to the NANPA’s performance of its core duties, or to the efficient functioning of the public switched telephone network.

For example, Section 7.2 would require the NANPA to notify “clients” within five minutes of a system outage. It is not entirely clear what entities are included in “clients.” But more importantly, there does not appear to be any reason for including such a detailed requirement in this document. Particularly in regards to “clients” that do not have electronic access to the NANPA’s systems, implementation of this requirement could be needlessly costly for the NANPA.

The two-day disaster recovery requirement in Section 7.13 could also cause the NANPA to incur needless costs, depending on how it is implemented. Since carriers maintain a six-month inventory of numbers, the system could function equally well with a slightly longer disaster recovery requirement, such as one that only required the NANPA to maintain real-time data replication at a remote site.

WorldCom must also reply to several points made by NeuStar, Inc. in its comments. First, NeuStar seeks the creation of a Contracting Officer to serve as a single point of contact for questions and disputes that arise.<sup>1</sup> The Commission has previously delegated these functions to the North American Numbering Council (NANC), which has substantial expertise in these matters. NeuStar has provided no reason to supplant the NANC in this role.

WorldCom agrees with NeuStar that the cost of providing testimony in state hearings on relief planning should be included in the price of the NANPA contract, and not treated as an enterprise service.<sup>2</sup> Such participation appears to be the norm, not an exception and should be included among the ordinary services to be performed by the NANPA.

WorldCom supports NeuStar's request for clarification regarding the respective roles of the NANPA and the North American Numbering Plan Billing and Collection Agent (NBANC) in establishing the allocation methodology for sharing costs among NANP countries.<sup>3</sup> The Requirements Document should clearly reflect the current process and should not suggest that the NANPA take on additional responsibility.

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<sup>1</sup> NeuStar Comments at 3.

<sup>2</sup> *Id.* at 11.

<sup>3</sup> *Id.* at 12.

The Commission should not remove the administration of non-dialable toll points from the Requirements Document.<sup>4</sup> Until non-dialable toll points are completely phased out of the network it is useful to have the NANPA serve as a single point of contact for their administration.

WorldCom opposes NeuStar's request that the requirement to provide AOCN services as an enterprise service be ended.<sup>5</sup> Carriers continue to rely on the NANPA for this function. However, there may be merit to NeuStar's suggestion that the NANPA requires additional flexibility in pricing these services. The Commission should consider whether and how to achieve such flexibility.

Respectfully submitted,

WorldCom, Inc.

/s/

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<sup>4</sup> *Id.* at 14.

<sup>5</sup> *Id.* at 10.