BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

The Wireline Competition Bureau	)	
Seeks Comments on the North American	)	CC Docket No. 92-237
Numbering Plan Administrator Technical	)	CC Docket No. 99-200
Requirements	)	

To: Wireline Competition Bureau

REPLY COMMENTS OF VERIZON WIRELESS

Verizon Wireless hereby submits its reply comments in the above captioned proceeding. Verizon Wireless supports comments urging the Bureau to provide more details about NANPA's assets. Several commentors provided ample justification for amending the NANPA Technical Requirements Document ("Requirements Document") to include specific information about NANPA's intellectual property. These reply comments also address several proposals advanced by NeuStar.

I. THE RECORD SUPPORTS MODIFYING THE REQUIREMENTS DOCUMENT TO INCLUDE DETAILS ABOUT NANPA's ASSETS

Several competitive bidders on the next NANPA contract term submitted comments suggesting improvements for the Requirements Document that will enhance their ability to bid on the contract and better prepare them to serve as the NANPA if they are ultimately awarded the contract.[1] Verizon Wireless supports many of the suggested changes. The commentors have demonstrated the need for greater detail regarding

[1] *See* Comments by Telcordia Technologies, NCS Pearson, Inc., and Hewlett Packard.

NANPA's assets and transition plan, to minimize disruption in the provision of NANPA's services from one term to the next.

Specifically, Hewlett Packard, NCS Pearson, and Telcordia stress the importance of: (1) providing a complete listing of the current NANPA's inventory of databases, software, hardware and related equipment;[2] (2) documenting the system requirements and specifications for Code Administration System ("CAS"), Numbering Resource Utilization and Forecast ("NRUF"), and any other client facing systems;[3] (3) specifying the capabilities and other information required by systems analysts to determine the configuration, algorithms, capacities and fault tolerance mechanisms for the various NANPA systems.[4] This information should be provided because it will better inform bidders about the tools available to them to fulfill the NANPA function and will provide a basis for applicants to determine the amount of money necessary to maintain and/or enhance NANPA's current assets. Moreover, the requested information will help to ensure fairness in the contract selection process by leveling the playing field between incumbent and new applicants.

Given Telcordia's comments regarding potential confusion over which assets should be included or excluded from the transfer obligation of the Requirements Document, NANPA should categorize and provide details about its assets.[5] It is important that the industry, state regulators and the FCC have a working knowledge of the technological apparatus that enables the NANPA to fulfill its roles and responsibilities.

---

[2] *See* Hewlett Packard comments at 3; NCS Pearson comments at 1-2; Telcordia comments at 2-3.
[3] *See* Telcordia comments at 4; NCS Pearson comments at 2.
[4] *See* Telcordia comments at 4.
[5] *Id.* at 3.

II. NEUSTAR's PROPOSED CHANGES TO THE REQUIREMENTS DOCUMENT

As the current NANPA, NeuStar, Inc., provided an analysis of the Requirements Document grounded in its experiences. While Verizon Wireless does not support several of NeuStar's proposals in their entirety, NeuStar's ideas provide a baseline for thoughtful consideration of the NANPA's roles and responsibilities. Outlined below are Verizon Wireless's opposing and supporting comments regarding a number of NeuStar's proposals.

A. Opposing Comments

A significant portion of NeuStar's comments relate to its proposal to authorize the next NANPA to report exclusively to the FCC via a Contracting Officer who, among other things, would serve as a single point of contact for questions and disputes.[6] Verizon Wireless agrees in principle with having a single point of contact within the FCC to address NANPA contract and performance issues arising from the Requirements Document. Establishing a NANPA Contracting Officer position at the FCC, whereby a dedicated staff member is focused on the NANPA, would provide the same benefits as the Designated Federal Officer, who provides focused assistance to the NANC. However, Verizon Wireless strongly disagrees with NeuStar regarding the broad powers it would assign exclusively to the Contracting Officer. The Contracting Officer position should not usurp the industry's role of providing input, directly overseeing NANPA's activities, and rating its performance.

The NANC at large, and the NANPA Oversight Working Group ("NOWG") in particular, are composed of industry numbering experts who are familiar with NANPA's

---

[6] NeuStar comments at 3.

roles and responsibilities. Many NANC members have practical experience working with NANPA on behalf of their respective companies.[7] Given the industry's stake in ensuring the highest caliber NANPA performance, its practical experience, and the financial burden it bears in paying the NANPA's expenses, it is vital that the industry's representatives on the NOWG continue to oversee the NANPA.

NeuStar values the NANC's annual performance reviews as "informational" exchanges between the industry, state commissioners, and the NANPA.[8] Reducing the industry's input to conducting informational performance reviews, devoid of any ability to require changes to NANPA's performance objectives, would render the industry role meaningless. Designating a federal Contracting Officer focused on NANPA issues should not diminish the important function presently performed by the NANC and its subcommittees. For example, the FCC should reject NeuStar's proposal to eliminate Section 2.12, which provides for a dispute resolution process established by NANC in favor of a Contracting Officer whose duties include dispute resolution.[9]

NeuStar also proposed development of a formal complaint process for NANPA performance complaints. Only formal complaints would trigger the NANPA reporting requirement of Section 2.12. Verizon Wireless does not support limiting the NANC's dispute resolution process nor limiting NANPA's reporting obligation to formal complaints. The NANC needs to have a complete picture of all complaints against the NANPA, even those properly characterized as having resulted from "confusion or

---

[7] The NANC's committees are also staffed by state commission staffers and/or consumer advocates who also have practical experience in some cases with NANPA's operations.

[8] NeuStar comments at 3.

[9] *Id.* at 4.

occasional misinterpretation of the complex numbering guidelines or regulations."[10] If the essential concern is with reporting non-substantive complaints as required by 2.12, perhaps such complaints can be addressed in a more high-level, streamlined, or summary fashion without sacrificing or limiting the need for more detailed reporting of substantive, written, formal complaints. The NANC should be aware of both substantive and non-substantive complaints against NANPA, so it can recommend policies and initiatives to address them if warranted.

Similarly, NANPA's role with respect to non-dialable toll points should be maintained until the industry is sure that these NPAs are no longer being used.[11] The fact that NANPA does not assign these resources does not change NANPA's responsibility to administer the 886 and 889 NPAs. The Requirements Document should be amended to memorialize basic administrative procedures in the absence of formal guidelines and to recognize the imminent elimination of non-dialable toll points. Only once the elimination of non-dialable toll points is complete should the NANPA's limited role expire.

B. Supporting Comments

NeuStar's comments support the need for neutrality criteria.[12] Verizon Wireless supports the establishment of a specific neutrality policy as outlined in its initial comments. NeuStar's focus on process improvements, particularly the change management process, is also welcome. Some degree of change management funding should be built into the baseline cost of maintaining the NANPA contract based on the industry's experience over the last four years.

---

[10] *Id* at 6.
[11] *Id.* at 14.

A change management fund could facilitate quicker change-outs without the red tape and delays inherent in current procedures. The specific changes suggested by NeuStar address modifications to timeframes in order for the NANPA to learn about changes to the INC guidelines earlier.[13] While these changes may help to improve current processes somewhat, Verizon Wireless believes that a much a more streamlined and direct process could be formulated. As Verizon Wireless suggested in its initial comments, a routine procedure, fully funded under the NANPA contract, such as a change management fund, avoids existing inefficiencies and delays.

At some defined interval (*i.e.*, semi-annually or quarterly), an accounting could be done for purposes of: (1) rolling over excess unused funds or paying for any additional services not covered by the fund; and (2) allowing NANPA to "provide its interpretation of the change, its impact upon service, the date the new change is effective, what steps in current procedures shall change and when any new forms or procedures shall be required"[14] for all proposed changes that need to take place during the next time interval. Any changes required between accounting periods could be authorized by the NOWG and/or the full NANC, on an emergency basis, if the funds are there and available.

Verizon Wireless agrees with NeuStar that the NANPA should not be required to provide AOCN services as a required enterprise service.[15] Any company serving as the NANPA should be allowed to provide AOCN services on a competitive basis, separate from its function as the NANPA. However, the NANPA should be required to provide information about AOCN providers or links on the NANPA website on a non-

---

12 *Id.* at 13.
13 *Id.* at 8.
14 Requirements Document at § 2.10.
15 NeuStar comments at 10.

discriminatory basis. Similarly, Verizon Wireless agrees that the NBANC alone should continue to have the responsibility for allocating the costs of NANPA funding among NANP countries.[16] NANPA's current role in assisting the NBANC in understanding the work NANPA performs for other NANP countries is sufficient.[17]

Verizon Wireless supports NeuStar's comments that NANPA testimony in state area code relief proceedings should no longer be an enterprise service.[18] It may be more cost-efficient to spread the costs of this activity across the five year NANPA contract and across the industry. The NANPA should provide the NANC an accounting of the expenses associated with providing testimony at state area code relief proceedings. However, such testimony, as outlined in Verizon Wireless's initial comments, must be neutral and factual.

---

[16] *Id.* at 12.
[17] *Id.* at 13.
[18] *Id.* at 11.

III. CONCLUSION

For the foregoing reasons, the Bureau should revise the Requirements Document as outlined herein and in Verizon Wireless's initial comments in this proceeding. These measures will improve NANPA performance and consequently, NANP administration.

Respectfully submitted,

VERIZON WIRELESS

By: John T. Scott, III

John T. Scott, III
Vice President and Deputy General
Counsel - Regulatory Law

Anne E. Hoskins
Regulatory Counsel

Lolita D. Smith
Associate Director Regulatory Matters

1300 I St, N.W., Suite 400 West
Washington, D.C. 20005
(202) 589-3760

Its Attorneys

July 9, 2002