

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

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Petition of the California Public Utilities Commission)	
and the People of the State of California for Waiver of the)	DA 02-2822
Federal Communications Commission's Contamination)	
Threshold Rule)	

**AT&T CORP.
COMMENTS ON CALIFORNIA PETITION FOR WAIVER OF THE
CONTAMINATION THRESHOLD RULE**

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Pursuant to the Public Notice issued in the above-captioned proceeding,^{1/} AT&T Corp. ("AT&T") hereby submits its comments on the petition for waiver filed by the California Public Utilities Commission and the People of the State of California (collectively, "California"), which asks the Commission to waive the contamination threshold of ten percent for thousands-blocks donated to the number pool and permit California to increase the contamination threshold to 25 percent.^{2/} For the reasons set forth below, California's requested waiver should be denied.

INTRODUCTION AND OVERVIEW

California has not satisfied the Commission's waiver standard because it has not shown any special circumstances that warrant a deviation from the ten percent contamination threshold

^{1/} *Wireline Competition Bureau Seeks Comment on the Petition of the California Public Utilities Commission and the People of the State of California for Waiver of the Federal Communications Commission's Contamination Threshold Rule*, CC Docket No. 99-200, Public Notice, DA 02-2822 (rel. Oct. 24, 2002) ("Public Notice").

^{2/} Petition of the California Public Utilities Commission and the People of the State of California for Waiver of the Federal Communication Commission's Contamination Threshold Rule, CC Docket No. 99-200 (filed Sept. 5, 2002) and Motion to Accept Supplemental Data with Respect to the California Public Utilities Commission and the People of the State of California's

or that grant of its request would serve the public interest. To the contrary, the reason the Commission rejected a 25 percent contamination threshold three years ago and refused to grant individual states flexibility to adopt their own thresholds remains entirely valid today.

Specifically, the significant costs associated with donating and using highly contaminated thousands-blocks far outweigh the minimal benefits that might be gained.

As the record in this proceeding demonstrates, the donation to the number pool of thousands-blocks with more than a ten percent level of contamination would complicate the porting, pooling and number forecasting processes and put increased stress on numbering database capacity. When NXX blocks with contaminated numbers are ported to other carriers or donated to the pool, the contaminated numbers must be ported back to the original serving switch and marked as unavailable for assignment by the new carrier. The return of contaminated numbers often has to be accomplished manually, increasing the labor costs to carriers appreciably and substantially escalating the probability of mistakes in customer service.

While the Commission previously recognized that these costs would exist if it required the donation of blocks with *any* level of contamination, it determined that the benefits, in terms of the availability of additional numbering resources, would justify the detriments of establishing a ten percent contamination threshold. California has not demonstrated, however, that increasing the contamination rate to 25 percent would significantly slow the rate at which numbering resources in its state are depleted. Indeed, even California acknowledges that, in most cases, grant of its proposal would extend the life expectancy of the NPAs in question by only a matter of months. These meager results plainly do not warrant the well-documented costs and added stress on the pooling systems that would accompany grant of California's request.

AT&T fully supports California's efforts to ensure that all telecommunications carriers have access to the numbering resources they need to serve California customers. Rather than adjust contamination levels in a futile and costly attempt to accomplish this objective, however, California should comply with the Commission's long-held and explicit guidelines on area code relief. Specifically, in those NPAs that are near or at exhaust, California should implement an area code overlay or split at the earliest possible date.

I. CALIFORNIA HAS NOT SATISFIED THE COMMISSION'S WAIVER STANDARD.

Under Section 1.3 of the Commission's rules, to justify a waiver of the contamination threshold, California must demonstrate that special circumstances warrant a deviation from the general rule and that such deviation will serve the public interest.^{3/} As discussed below, California has not come close to satisfying this "good cause" standard. Almost three years ago, after extensive study and public debate, the Commission rejected the same 25 percent contamination rate that California now seeks to impose. California has not shown that the circumstances in California have changed in a way that would justify reversing that decision now.^{4/} California is no different than any other state with high number usage. In fact, New York, which has approximately the same mix of service offerings, number of carriers, and pooling procedures as California, has found that a ten percent contamination rate is reasonable and efficient.^{5/} More importantly, California ignores the significant costs to both carriers and consumers that would flow from grant of its request.

Rule, CC Docket 99-200 (filed Oct. 17, 2002) (collectively, "Petition").

^{3/} 47 C.F.R. § 1.3.

^{4/} Petition at 2.

^{5/} New York Department of Public Service at 11 (filed July 30, 1999) on *Numbering Resource Optimization*, 14 FCC Rcd 10322 (1999) ("*NRO NPRM*").

A. The Ten Percent Contamination Rate Represents an Appropriate Balancing of the Commission’s Various Numbering Resource Goals.

In the *NRO Orders*,^{6/} the Commission has consistently adopted policies to support a national number management scheme that ensures the efficient use of numbering resources, guarantees that all carriers have the numbering resources needed to compete in the marketplace, and minimizes the burdens on both carriers and consumers.^{7/} The current ten percent contamination threshold was established within this framework.^{8/} Specifically, in the *First NRO Order*, the Commission determined that a ten percent contamination threshold would be the most effective method of freeing up additional numbering resources while, at the same time, minimizing the burdens on carriers.^{9/} As a result, once pooling has been implemented in a specific rate center, carriers with number resources in that rate center must donate to the pool any thousands-blocks with a ten percent or less contamination level.^{10/}

Contrary to California’s argument, the ten percent threshold was not adopted solely to retrieve additional numbering resources.^{11/} Rather, the ten percent figure was the result of

^{6/} See generally *Numbering Resource Optimization*, 15 FCC Rcd 7574 (2000) (“*First NRO Order*”); *Numbering Resource Optimization*, 16 FCC Rcd 306 (2000) (“*Second NRO Order*”); *Numbering Resource Optimization*, 17 FCC Rcd 252 (2001) (“*Third NRO Order*”) (collectively, “*NRO Orders*”).

^{7/} *First NRO Order* ¶¶ 1, 3.

^{8/} 47 C.F.R. § 52.20(c).

^{9/} *First NRO Order* ¶ 191. Contamination occurs when at least one number within a block of one thousand numbers is not “available” for assignment (*i.e.*, those numbers that are categorized as assigned, aging, administrative, reserved, or intermediate). See *id.* at n.459.

^{10/} *First NRO Order* ¶ 191. Carriers, however, are permitted to retain at least one thousands-block regardless of contamination level as a “footprint” block to provide service to customers within the rate center. See *id.*

^{11/} Petition at 3-4.

considerable debate and compromise among state commissions, carriers, the Commission, and industry groups regarding the benefits, costs, and disadvantages of various thresholds. For instance, many of the state commissions, the North American Numbering Council (“NANC”), and most of the incumbent local exchange carriers (“ILECs”) supported a ten percent level to minimize the disruption to carriers and their customers and to ensure nondiscriminatory treatment among carriers.^{12/} SBC contended that a higher threshold would obligate carriers to engage in burdensome and unnecessary processes in order to prepare the contaminated blocks for donation.^{13/} In addition, GTE noted that using highly contaminated blocks would reduce carriers’ ability to take advantage of Efficient Data Representation (“EDR”) software and could increase the risk of consumers experiencing disruptions in service.^{14/} Meanwhile, some competitive carriers argued that the Commission should adopt a 25 percent threshold for incumbents and a ten percent threshold for competitors.^{15/} In contrast, WorldCom and GTE asserted that the practical and policy challenges resulting from the use of thousands-blocks with any level of contamination would override the benefits.^{16/} With these considerations of cost and feasibility in mind, the Commission appropriately balanced the interests of state governments, carriers, and consumers, and rejected both the exclusion of contaminated blocks altogether and

^{12/} See, e.g., Maine Public Utilities Commission at 25 on *NRO NPRM*; New York Department of Public Service at 11 on *NRO NPRM*; North Carolina Utilities Commission at 15 on *NRO NPRM*; Ameritech at 44 on *NRO NPRM*; BellSouth at 8 on *NRO NPRM*; SBC at 82-83 on *NRO NPRM*; USTA at 10 on *NRO NPRM*; *First NRO Order* ¶ 190 (citing NANC Report).

^{13/} SBC at 45 on *NRO NPRM*.

^{14/} GTE at 56 on *NRO NPRM*.

^{15/} See, e.g., MediaOne at 23-24 on *NRO NPRM*; Connect Communications at 17 on *NRO NPRM*; RCN at 14 on *NRO NPRM*.

^{16/} WorldCom at 15 on *NRO NPRM*; GTE at 54-55 on *NRO NPRM*.

the use of a 25 percent contamination rate in favor of a ten percent threshold.^{17/} As discussed below, the Commission’s reasons for doing so remain valid today.

B. Grant of California’s Request Would Complicate Porting, Pooling, Database Storage, and Forecasting Processes.

As several carriers demonstrated in response to the Commission’s initial inquiry into the appropriate contamination rate, the donation to the number pool of thousands-blocks with more than a ten percent level of contamination would increase the costs of both pooling and porting, as well as associated functions such as forecasting and database storage. Moreover, because higher contamination levels appreciably complicate the porting and pooling processes, consumers would face increased risk of experiencing disruptions in service. By focusing solely on increases in the amount of assignable numbers that might result from raising the contamination rate, the Petition fails to address the considerable burdens that would be placed on carriers and consumers by such action.

As an initial matter, California’s claim that NPAC Release 3.1 has made pooling with contaminated blocks “technically possible” is incorrect.^{18/} Pooling has *always* been technically feasible with the use of contaminated blocks, but the higher the contamination rate, the more cumbersome and costly the process of pooling becomes. NPAC Release 3.1 contains EDR functionality, which allows a Location Routing Number (“LRN”) to be associated with a thousands-block in a single record instead of one thousand separate records. While this extends database capacity at the carrier level, it does not facilitate a carrier’s ability to pool with

^{17/} *First NRO Order* ¶ 191.

^{18/} Petition at 5.

contaminated blocks.^{19/} Indeed, the donation and use of heavily contaminated blocks would reduce the benefits of EDR because considerably more individual ported number records would have to be generated in those circumstances.^{20/}

Moreover, the Petition fails to discuss the many complications to the porting and pooling processes and associated database and forecasting functions that would result from raising the contamination level. Porting and donating to the pool NXX blocks with ten percent contamination is often error prone and, with higher contamination levels, the likelihood of error only increases. This is because the contaminated numbers must be ported back into the original serving switch and marked as unavailable for assignment in the ported-to switch. And, if the contamination in the ported block is not sequential, individual number porting is required -- a process that the Commission specifically rejected as overly complicated for carriers to implement.^{21/} Additional intra-service provider ports (*e.g.*, ports from one AT&T switch to another AT&T switch) are also necessary in these circumstances to ensure that a carrier has an adequate supply of uncontaminated numbers in *each* switch in a rate center.

Further, the use of highly contaminated blocks degrades functions related to pooling and porting, such as database storage and forecasting. As discussed above, increasing the contamination rate creates the need for additional database storage capacity, which is required for the contaminated numbers ported back to the donor carrier. As a result, the number of

^{19/} Further, even if there were some association between the feasibility of pooling and NPAC Release 3.1, carriers are not required to incorporate the new functionality into their systems, which would limit its effectiveness.

^{20/} For example, an uncontaminated thousands-block could be stored using EDR technology with the use of only one record for the pooled block. By contrast, 25 percent contamination of the same block would require the storage of 251 records, one record for the block, and one record for each of the 250 contaminated numbers. Consequently, as the level of contamination rises, EDR becomes much less “efficient” as a means to expand database capacity.

^{21/} *First NRO Order* ¶ 230.

records in carriers' databases would expand considerably. Raising the contamination threshold also affects carriers' ability to forecast their number usage and the time needed to replenish their number inventory. Because all number usage forecasts are prepared in blocks of one thousand, not in blocks of 750 to one thousand, adjustments would be necessary to accommodate highly contaminated blocks. Moreover, the Pooling Administrator counts a block as a block, regardless of the contamination level, and the Commission's current rules contain no established method for compensating carriers in receipt of heavily contaminated blocks.^{22/} Acquisition of a 25 percent contaminated block would require a carrier to ask for additional numbering resources in a shorter amount of time than other carriers receiving minimally contaminated blocks. Thus, carriers receiving blocks with more than ten percent contamination would be disadvantaged *vis a vis* their competitors.

C. Carriers and Consumers Would Face Increased Costs by Grant of California's Request.

As numbering processes become more complicated, carriers' costs for those processes increase exponentially. Indeed, the large majority of ports of contaminated numbers back to the original serving switch would require labor-intensive manual processes. AT&T estimates that it would take approximately 120 manpower hours per NPA to implement the required changes if California's request is granted.

^{22/} See Letter to William Maher, FCC, from Robert Atkinson, NANC (Dec. 13, 2002), attaching *Report on the Technical Viability of Increasing the Pooling Contamination Threshold*, Prepared for the North American Numbering Council by the Contamination Levels Issue Management Group, at 11 (filed with the FCC in CC Docket No. 99-200) ("IMG Report"). The Issue Management Group, which was formed by the NANC to investigate California's Petition and of which the California Public Utilities Commission ("PUC") and AT&T are members, is filing its Report with the Commission today. NANC adopted the Report on December 11, 2002. The IMG was not tasked with assessing the costs associated with California's waiver request, only technical issues raised by the Petition and, thus, provides no cost analysis.

Ultimately, consumers would bear the brunt of a contamination rate increase. On numerous occasions, the Commission has recognized that manual processes escalate the probability for mistakes during the porting or pooling process, which could result in inadvertent dropped calls or service denials.^{23/} In addition, most carriers would be unable to absorb the additional costs associated with increasing the contamination rate, and these costs would have to be passed on to customers in the form of higher rates or increased end user surcharges.^{24/} Neither result would serve the public interest.

D. The Minimal Benefits of a Contamination Rate Increase Do Not Overcome the Significant Disadvantages.

Before it can determine whether the grant of California's request would further the public interest, it is necessary to balance the benefits offered by increasing the contamination rate versus the disadvantages to carriers and consumers resulting from such an increase.^{25/} While California contends that raising the contamination rate would make available additional numbering resources (which AT&T agrees are sorely needed in some California rate centers),^{26/}

^{23/} See, e.g., *Application of BellSouth Corp., et al. Pursuant to Section 271 of the Communications Act of 1934, as Amended, to Provide In-Region, InterLATA Services in South Carolina*, 13 FCC Rcd 539, ¶ 120 (1997) (concluding that BellSouth's provision of manual processes creates significant disadvantages for competing carriers because manual processes are less timely and more error prone than electronic interfaces).

^{24/} IMG Report at 16. Indeed, to the extent these costs are incurred as a result of the Commission's pooling mandate, the incumbents will likely recover their costs via access charges, which will ultimately result in higher end user rates. See, e.g., Letter to Marlene Dortch, FCC, from Patrick Merrick, AT&T (June 4, 2002) attaching *ex parte* presentation, *Number Pooling Costs Do Not Belong In Access Charges*, at 7 (filed with the FCC in CC Docket No. 99-200); AT&T Corp. Petition for Reconsideration, CC Docket No. 99-200, at 2 (filed May 6, 2002).

^{25/} When it initially adopted the ten percent threshold, the Commission contemplated the network and process implications of adopting a 25 percent threshold, not just the potential to recover additional numbering resources. See *NRO NPRM* ¶ 190.

^{26/} Petition at Attachment 1.

the evidence does not bear out California's assertion that a higher contamination rate "would dramatically slow the pace at which numbering resources in California are depleted."^{27/} Indeed, as the industry members of the IMG have concluded, a 25 percent threshold would only result in zero to nine months of extended life for the various NPAs.^{28/} California's estimates in NPA life expectancy increases are slightly higher -- ranging from one to 29 months, with only four out of 24 NPAs increasing more than a year and one increasing more than eighteen months.^{29/} This modest increase in the viability of current numbering resources surely does not justify the substantial costs and complications inherent in the grant of California's waiver request.

Moreover, as part of its cost-benefit analysis, the Commission should take into account that its current nationwide pooling and other conservation policies are having the intended effect on the availability of numbering resources.^{30/} The minimal benefits of California's request coupled with the increased technical complications and costs do not establish a sufficient basis to disturb the Commission's carefully considered ten percent contamination threshold.

Furthermore, as discussed below, area code relief, rather than the complicated and costly measure of raising the contamination threshold advocated by California, is the most appropriate method of making more numbering resources available. This is especially true in NPAs that are

^{27/} Petition at 5-6.

^{28/} IMG Report at 16-17.

^{29/} IMG Report at 4.

^{30/} In fact, the North American Numbering Plan Administrator ("NANPA") recently pushed-out the projected exhaust dates of nineteen California NPAs because of a decrease in demand for numbers. See 2002 NPA Exhaust Analysis (changes as of October 31, 2002) (noting that the estimated exhaust date for the 209, 323, 408, 415, 510, 530, 559, 619, 626, 650, 707, 714, 760, 805, 818, 909, 916, 925, and 949 NPAs had been extended between 3 and 75 months, depending on the NPA), available at http://www.nanpa.com/pdf/NRUF/10_31_delta_nruf.pdf. In addition, more than 5000 codes were returned to the NANPA in 2001 and more than 3000 were returned in the first ten months of 2002. See NANPA Report to the NANC, at 3 (November 19-20, 2002), available at http://www.nanc-chair.org/docs/Nov/Nov02_NANPA_Report.doc.

neering (or have reached) exhaust, where an increase in the contamination threshold would have little or no effect on the pace of number depletion.

II. CALIFORNIA’S REQUEST SHOULD BE CONSIDERED AGAINST THE BACKDROP OF THE COMMISSION’S NATIONAL NUMBERING POLICIES.

Modifications to the Commission’s national numbering regime, even if those changes occur only in California, have effects far beyond the borders of California. For this reason, the Commission specifically denied state commission requests for flexibility to change the contamination threshold when it initially adopted the ten percent rule.^{31/} Even when the Commission has delegated specific numbering authority to the states, it has made clear that the states must comply with the national industry pooling guidelines, including contamination thresholds.^{32/} Grant of California’s request would require the Commission to provide the same relief to any other state petitioning the Commission, which would undermine the Commission’s goal in maintaining uniform numbering policies nationwide.

More importantly, proper application by the states of the Commission’s area code relief policies is critical to achieving efficient and effective number resource management. Although the Commission has delegated NPA relief activities to the states, it has emphasized that the implementation of number resource optimization measures “does not eliminate the need for states to continue to implement area code relief in those area codes that are approaching depletion.”^{33/} In addition, the Commission has concluded that an area code split or overlay is

^{31/} *First NRO Order* ¶ 191, n.463.

^{32/} *See, e.g., New Hampshire Public Utilities Commission’s Petition for Additional Delegated Authority to Implement Number Optimization Measures in the 603 Area Code*, 15 FCC Rcd 1252, ¶ 22, n.42 (1999).

^{33/} *Second NRO Order* ¶ 60.

warranted in high usage or jeopardy areas with heavily contaminated thousands-blocks because pooling would not be effective in those circumstances.^{34/} Indeed, the FCC found that “[i]t is the availability of central office codes or NXX codes, not thousands-blocks, that determines when area code relief is necessary.”^{35/}

Two California NPAs will reach exhaust in less than six months,^{36/} and area code relief should have been well underway by this time.^{37/} It is not. Pooling with or without an increased contamination rate will not save these NPAs -- in fact, raising the contamination rate to 25 percent would provide at most a few months of additional life. Accordingly, rather than adjust contamination levels, the Commission should exercise its “right to take a stronger role in [the NPA relief] process”^{38/} and require California to “take all necessary steps to prepare an NPA

^{34/} *Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Petition of the Louisiana Public Service Commission for Expedited Decision for Additional Delegated Authority to Implement Numbering Conservation Measures; Petition of the Maryland Public Service Commission for Additional Delegated Authority to Implement Number Conservation Measures; Massachusetts Department of Telecommunications and Energy Petition for Delegation of Additional Authority to Implement Number Conservation Measures in Massachusetts; New Jersey Board of Public Utilities Petition for Delegated Authority to Implement Number Conservation Measures*, 16 FCC Rcd 3479, ¶ 15 (2001) (“*State Delegation Order*”) (“We require that the state commissions must take all necessary steps to prepare an NPA relief plan that may be adopted by the state commission when numbering resources in the NPA are in imminent danger of being exhausted.”).

^{35/} *State Delegation Order* ¶ 30.

^{36/} IMG Report at Appendix A (310 and 909 NPAs).

^{37/} The California PUC has suspended or delayed nearly all area code relief proceedings pending before it. *See, e.g.*, NANPA, *Status of Active or Suspended NPA Relief Projects*, December 5, 2002; NANPA Planning Letter No. PL-250, November 10, 2000 (noting that the California PUC will announce when the 310 split will take place); NANPA Planning Letter No. PL-230, May 31, 2000 (announcing the suspension of the 619 NPA split); NANPA Planning Letter No. PL-215, February 24, 2000 (stating that the PUC temporarily suspended the 909 NPA split) (all documents available at www.nanpa.com, under NPA Relief Planning).

^{38/} *Second NRO Order* ¶ 59.

relief plan that may be adopted by the state commission when [as now] numbering resources in the NPA are in imminent danger of being exhausted.”^{39/}

^{39/} *Second NRO Order* ¶ 60.

CONCLUSION

For the foregoing reasons, AT&T respectfully requests that the Commission deny California's request to increase the contamination rate from ten percent to 25 percent. A higher threshold would complicate critical numbering processes, harm both consumers and carriers, and undermine the Commission's national number management strategies.

Respectfully submitted,

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December 13, 2002

CERTIFICATE OF SERVICE

I, Angela Collins, do hereby certify that on this 13th day of December, 2002, a copy of the foregoing "AT&T Corp. Comments on California Petition for Waiver of the Contamination Threshold Rule" was served via electronic mail on the following:

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