

20. Austin 911 - Not Affected.

SWB 911 Routing, Provisioning & Database not Affected. Minor Affect -

Potential Increase to Existing Problems with Default Routing

Dallas 911 Constrained - Not provisioned by common 911 Database Mgt ; nor common Selective Router System. Implications to other Agencies besides PUC for , Eqpt ; Trnks, Contract & Database. -

Optimal RCC may not be reached. Can be Corrected within 6-9 mo timeframe.

Option No. 5

Consolidate with each other rate centers of non-metro contiguous exchanges of a single ILEC who currently have any form of expanded calling scopes into a metropolitan exchange.

# of Rate Centers Consolidated	Dls 12:2 GTE 16:4 SWBT Aus 5:1 SWBT 4:1 GTE Hou 13:3 GTE 5:1 SPRINT 2:1 FBTC
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ISSUES Associated with Proposal

1. Update TPM (Industry Document with Rate Center & V/H
2. OSS Update Reqts to reflect Rate Center Change i.e. TPM, Operator Tables
3. Implementation Estimated in 9-12 Months from Approval of Compliance Filing
4. Rate Center Name Change
5. Impact To Texas Pooling Alternative Settlement Practice
6. Customer Toll Charges Impacted.
7. Golden Harbor will return the following NXXs:
Dallas 214 - 0; 972 -9
Austin: 512 - 3
Houston : 713 - 0; 281 -6

8-9. If a CLEC enters NPA they would require: (i.e. the maximum # of NXXs to cover the RC);
Dallas: 12 RCs to 2 (GTE), 16 RCs to 4 (SWB)

Austin: 5 RCs to 1 (SWB); 4 RCs to 1 (GTE)
Houston : 9 RCs to 3(SWB);
13 RCs to 3 (GTE*); 5 RCs to 1 (Sprint);
2 RCs to 1 (Ft Bend)

10. No Mechanism to recover cost of RCC Implementation

11. ILECs do not expect to return any NXX codes as a result of RCC: no forced # changes; growth demand; presently cannot share NXXs between CO Switches

12. MCI would return any NXX codes in which no numbers had been assigned at the time the consolidation is implemented. However, based on MCI's marketing plans, and the TNC estimates of implementation timeframe for this consolidation, it is likely that MCI will have begun serving customers with most, if not all, of the NXXs allocated to MCI by that time. Thus, MCI would have few if any entire NXXs to return. However, given the current practice of sequential number assignment, if 1000 block number pooling were simultaneously implemented with the consolidation, MCI could potentially have a significant number of unassigned 1000 blocks to return to the pool once the consolidation and pooling is implemented.

13. Does affect local calling scopes

14. Can increase rate group size & associated rates in accordance with existing tariffs. Effects access revenues

15. The rating local area calls does not change. Toll call charges for interexchange and private line services (mileage sens. Rates) from outside the consolidated rate centers will change + or - or not at all. As rate center expands, the effect of toll change gets bigger.

16. Procedural Requirements - Tariff Filing req'd, (Private Line & Local) Interconnection Agreements brought into compliance with ordered plan. Expect Contested Case.

17. EAS,EMS,ELC impact. can allow "local" calling to calling scope in excess of that originally planned

Lost Toll - Possible Solutions:

- 1) Grandfather - No port out of ILEC WC
(Port In ILEC may req NXX)
- 2) Eliminate EAS/EMS/ELC
- 3) Expand Calling Scope for EAS Exchange

18. IXC Revenue & ILEC Access Payments will be +/- affected, depending whether local EAS scope remains or eliminated. While RCC eliminates Toll Calling, IntraLATA Toll revenues for all providers (ILECs& IXCs) reduced. As a result, access revenues for toll will also decrease. Reduction to revenues may prompt Local Rate Increase Request

19. Land to mobile call will continue to be rated the same as long the consolidated rate centers have all have expanded calling scope into a metro exchange.

20. Austin 911 - Not Affected

Houston 911 - GTE/ Sprint /Centel SWB 911 effected Full effect must be evaluated/
determined

Dallas 911 - GTE/ Sprint /Centel SWB 911 effected Full effect must be evaluated/
determined

Option No. 6

Consolidate non-metro and metropolitan rate centers of multiple ILECs who currently have mandatory local calling scopes.

# of Rate Centers Consolidated	Dls 28:1 Aus N/C Hous 32:1
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ISSUES Associated with Proposal

1. Update TPM (Industry Document with Rate Center & V/H.
2. OSS Update Reqts to reflect Rate Center Change i.e. TPM, Operator Tables
3. Implementation Estimated in 9-12 Months from Approval of Compliance Filing
4. Rate Center Name Change
5. Impact To Texas Pooling Alternative Settlement Practice
6. Customer Toll Charges significantly impacted.
7. Golden Harbor will return the following NXXs:
 - Dallas: 214 - 0; 972 -8
 - Austin: 512 -3
 - Houston : 713 - 0; 281 -5
- 8-9. If a CLEC enters NPA they would require: (i.e. the maximum # of NXXs to cover the RC) will reduce from 28 to 1 in Dallas.
 - Dallas: 28 RCs to 1 (All ILECs)
 - Austin: 0 RCs
 - Houston : 32 RCs to 1 (All ILECs);
10. No Mechanism to recover cost of RCC Implementation
11. ILECs do not expect to return any NXX codes as a result of RCC; no forced # changes; growth demand; presently cannot share NXXs between CO Switches
12. MCI would return any NXX codes in which no numbers had been assigned at the time the consolidation is implemented. However, based on MCI's marketing plans, and the TNC estimates of implementation timeframe

for this consolidation, it is likely that MCI will have begun serving customers with most, if not all, of the NXXs allocated to MCI by that time. Thus, MCI would have few if any entire NXXs to return. However, given the current practice of sequential number assignment, if 1000 block number pooling were simultaneously implemented with the consolidation, MCI could potentially have a significant number of unassigned 1000 blocks to return to the pool once the consolidation and pooling is implemented.

13. Does affect local calling scopes

14. Can increase rate group size & associated rates in accordance with existing tariffs. Effects access revenues

15. The rating local area calls does not change. Toll call charges for interexchange and private line services (mileage sens. Rates) from outside the consolidated rate centers will change + or - or not at all. As rate center expands, the effect of toll change gets bigger.

16. Procedural Requirements - Tariff Filing req'd, (Private Line & Local) Interconnection Agreements brought into compliance with ordered plan.
Expect Contested Case.

17. EAS,EMS,ELC impact. Can allow "local" calling scope in excess of that originally planned
Lost Toll - Possible Solutions:

- 1.) Grandfather - No port out of ILEC WC
Port In ILEC may req NXX)
- 2) Eliminate EAS/EMS/ELC
- 3) Expand Calling Scope for EAS Exchange

18. IXC Revenue & ILEC Access Payments will be +/- affected, depending whether local EAS scope remains or eliminated.. While RCC eliminates Toll Calling., IntraLATA Toll revenues for all providers (ILECs& IXCs) reduced. As a result, access revenues for toll will also decrease. Reduction to revenues may prompt Local Rate Increase Requests.

19. As long as CMRS carriers continue to have the ability to have EMS exchanges within the new consolidated rate center there would be no effect on CMRS carriers.

20. Austin 911 - Not Affected
Houston 911 - OK as soon as LNP is in place.

Dallas 911 Constrained - Not provisioned by common 911 Database Mgt ; nor common Selective Router System. Implications to other Agencies besides PUC for , Eqpt ; Trnks Contract & Database - Optimal RCC may not be reached. Can be Corrected within 6-9 months timeframe.

Note:

Examples of this includes incorporation of GTE's IRVING and PLANO with SWBT Dallas. Another example will be GTE's ARCOLA, SWBT's HOUSTON, and CENTEL's PORTER.

These combinations have similar problems and issues demonstrated in proposals #2 and #4. Some of these include:

- the larger the combined area, the more likely unique ELC calling scopes which reside on the outside of the combined area, will be impacted. This could create toll calling where local is required (see Porter and Conroe #13255)
- creates Local calling where only toll exists today (see Arcola to Porter)

To the extent you combine ILEC rate centers into a single, combined rate center, and to the extent ILEC specific agreements or services are effected, this option would eliminate the ability to distinguish between the ILECs.

Option No. 7

Consolidate some rate centers of some metropolitan exchanges of a single ILEC which an SWB and Golden Harbor have arbitrated/stipulated.

# of Rate Centers Consolidated	Dls 35:6
	Aus 19:3
	Hous 35:5

ISSUES Associated with Proposal

1. In place today for Golden Harbor.
2. Rate Center Name will, in some cases, differ from ILEC RC. GH does not participate in Texas PASP, no effect
4. Changes for ILEC Customer Toll Either + or -.
5. This is Golden Harbor's plan, so no impact on Golden Harbor NXXs.
6. New CLECs that choose this plan, would require reduced NXXs:
 - Dallas: 214 - N/C; 972 - 35 RCs to 6
 - Austin 19 to 3
 - Houston : 713 N/C; 281 - 35 RCs to 5;

If an ILEC/CLEC wanted to match both sets of rate centers (ILEC and IRC), additional codes would be required. No additional codes would be required for those ILECs staying with existing rate center structure; some reduction for those moving to IRC. PUCT should decide whether companies should be allowed to match both or choose 1 RC plan. Competitive issues may exist if choice is limited

7. In some cases local/toll call of ILEC/ILEC customers may be different than ILEC calling CLEC customers within the IRC.
8. Does not effect rate group or local exchange rates. Access revenues will change +/-.
9. The rating of local area calls does not change. Toll call charges for interexchange and private line services (mileage sens. rates) from outside the consolidated rate centers will change + or - or not at all. As rate center expands, the effect of toll

change gets bigger.

**10. Procedural Requirements - Rulemaking required
Interconnection Agreements brought into compliance with
ordered plan and equitable compensation.**

**11. Optional calling plan impact not an issue for CLECs
ELCs are allowable for ILECs only**

**12. IXC Revenue & ILEC Access Payments will be +/- affected,
depending whether local EAS scope remains or eliminated.**

13 No affect. CMRS carriers would continue use ILEC rate centers for call rating.

14. SWB 911 Routing, Provisioning & Database not Affected

15. Portability Issue with IRCs

- * Unresolved debate amongst TNC participants:
 - Technical feasibility of porting customers between networks using different Rate Center designs.
- * If a customer of a carrier using 1 RC structure ports to a carrier using a different RC structure some inbound calls to the ported-to carriers new customer may be rated differently than inbound calls to the ported-to carriers other customers.
- * In a number pooling environment, a separate number pool is required for each rate center. This represents an increase in RC pools from a "consistent" RC plan.
- * A billing problem occurs for a CLEC/ILEC customer if the customer ports to a different RC(location) as defined by the IRC.

Option No. 8

Consolidate with each other existing single ILEC rate centers of non-metro exchanges which currently have any form of expanded calling into the Metropolitan exchange, on an optional basis.

# of Rate Centers Consolidated	Dallas 56:6 Austin 29:4 Hous 56:6
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ISSUES Associated with Proposal

1. Update TPM (Industry Document with Rate Center & V/H. OSS Update Reqts to reflect Rate Center Change i.e. TPM, Operator Tables.
2. Does affect local calling scopes
3. The rating local area calls does not change. Toll call chgs for interexchange and private line services (mileage sens. Rates) from outside the consolidated rate centers will change + or - or not at all. As rate center expands, the effect of toll change gets bigger.
4. IXC Revenue & ILEC Access Payments will be +/- affected, depending whether local EAS scope remains or eliminated..
5. CMRS - Grand Prairie does have toll-free dialing access to all of Metro Ft Worth: therefore, RCC including Gr Prairie will open all the exchanges in the new rate center to CMRS toll free dialing from Ft Worth - Other Similar Arrangements May exist for CMRS
6. ILECs do not expect to return any NXX codes as a result of RCC due to : No forced # changes; growth demand; presently cannot share NXXs between Co Switches
7. Golden Harbor would be able to return the following codes:

Houston	14
Austin	8
Dallas	16
8. Austin 911 - OK as soon as LNP in place.
Houston 911 - GTE ,Ft Bend, Sprint /Centel
Dallas 911 -OK

9. Portability Issue with IRCs

- * Unresolved debate amongst TNC participants:
 - Technical feasibility of porting customers between networks using different Rate Center designs.
- * If a customer of a carrier using 1 RC structure ports to a carrier using a different RC structure some inbound calls to the ported-to carriers new customer will be rated differently than inbound calls to the ported-to carriers other customers.
- * In a number pooling environment, a separate number pool is required for each rate center. This represents an increase in RC pools from a "consistent" RC plan.
- * A billing problem may occur for a CLEC/ILEC customer if the customer ports to a different RC(location) as defined by the IRC.

Option No. 9

Consolidate with each other existing multiple ILEC rate centers of non-metro exchanges which have any form of expanded calling into the metro, on an optional basis.

# of NXXs Rate Centers Consolidated	Dallas N/A Austin 29:2 Hous N/A
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ISSUES Associated with Proposal

1. Update TPM (Industry Document with Rate Center & V/H)
2. OSS Update Reqts to reflect Rate Center Change
i.e. TPM, Operator Tables
3. ILECs do not expect to return any NXX codes as a result of RCC; no forced # changes; growth demand; presently cannot share NXXs between CO Switches
4. Does affect local calling scopes
5. The rating local area calls does not change. Toll call charges for interexchange and private line services (mileage sens. Rates) from outside the consolidated rate centers will change + or - or not at all. As rate center expands, the effect of toll change gets bigger.
6. Golden Harbor would be able to return the following codes:
Austin 11
7. Austin 911 None
Due to 911 constraints, Option 9 is removed from consideration for Dallas and Houston at the present time

Summary

Most participants agree that actual NXX conservation resulting from rate center consolidation will be a result of providers who will require fewer NXXs under a consolidated rate center structure or those who return NXXs already assigned, but not needed due to consolidation (RCC or IRC). ILECs are likely to continue to request whole codes, or blocks of numbers, on a wire center or central office basis. Options 1 thru 6 seeks to reduce the number of rate centers that exist in each NPA, thus reducing the number of codes required by a CLEC.

Options 7 thru 9 describe rate center consolidation plans that are inconsistent with the existing ILEC rate center structures. In this situation, CLECs, choosing the IRC structure, would require fewer NXXs than the ILECs rate center structure would normally require.

The Rate Center Consolidation options described in this report are not meant to represent "either/or" options. Several of the options can be implemented concurrent with one another—the options can build on each other.

Because many members of the TNC have raised numerous issues to the extensive rate center consolidation necessary of achieve the largest NXX conservation suggested in options one thru six, the concept of broader geographic rate centers for CLECs, inconsistent rate centers as compared to the ILEC rate centers, was discussed at length by the TNC. These inconsistent rate center options do not require an ILEC to match the new structure thereby reducing the numerous regulatory issues associated with consolidation options 1 thru 6.

A lengthy debate took place amongst the members of the TNC concerning implementation, technical and billing issues surrounding inconsistent rate centers. The debate primarily surrounded the compatibility if inconsistent rate centers and the initial deployment of Local Number Portability. Attachment 6, NANC-Architecture and Administrative Plan For Local Number Portability, Attachment 7-Position Paper-Location Portability Scope and Attachment 8-Report to the NANC, September 23, 1997 all relate to the scope LNP, and were introduced for consideration by the TNC. Attachment 9, Inconsistent Rate Centers, is a document submitted by Golden Harbor outlining its position on inconsistent rate centers.

As is pointed out earlier in this report, inconsistent rate centers for three separate CLECs , Golden Harbor, Kingsgate and American Telco, have been approved by the Commission. These rate centers structures are currently operational within various NPAs in Texas. For the purposes of this report, only the Golden Harbor rate center structure was considered. How these other plans would be accommodated in any deployment would have to be considered by the Commission.

911 Considerations

Summary of 9-1-1 Issues considered and discussed by the Task Force

The existing emergency service (911) arrangements in Texas might limit or impact certain rate center consolidation options. Most 9-1-1 problems should be able to be avoided or mitigated by performing a case-by-case evaluation of each rate center consolidation option. The task force performed an initial case-by-case evaluation at its meetings in Dallas on November 20th and 21st and that case-by-case evaluation is reflected in the body of the task force's report.

The three major 9-1-1 limitations/constraints on rate center consolidation considered by the task force are as follows:

Only rate centers within the geographic limits of a single 9-1-1 selective routing tandem should be consolidated. The existing 9-1-1 selective routing tandems and systems, as of this time, do not support a single NXX being applied across 9-1-1 selective routing tandem boundaries.

Rate centers of different ILECs should not be combined because of the current problems resulting from putting the same 9-1-1 data from two different 9-1-1 databases into the same 9-1-1 selective routing tandem and resulting from charging the 9-1-1 entities twice for the same 9-1-1 database records. A possible exception may exist if the applicable 9-1-1 entity can request that those different ILEC rate centers be modified to be served by a single 9-1-1 database and network. For the Austin area, ACSEC staff represented that the Capital Area Planning Council (CAPCO) might likely be agreeable to requesting modifications necessary to further the PUC's rate center consolidation efforts in their area, subject to an evaluation of any additional costs and any necessary approval by ACSEC, if applicable.

Re-homing some Public Safety Answering Points (PSAPs) to other 9-1-1 tandems to further rate center consolidation efforts (i.e., modifying 9-1-1 tandem boundaries) might be a possibility in some cases, but compatibility and Interoperability or timing and contractual/monetary issues might constrain actual re-homing or its usefulness. For example, 9-1-1 Customer Premises Equipment (CPE) from Nortel in a PSAP working off a 9-1-1 tandem that is a DMS-100, as well as CPE from Lucent in a PSAP working off a 9-1-1 tandem that is a 5ESS, might have compatibility and Interoperability problems with the potential 9-1-1 tandem proposed for re-homing. Furthermore, the time required to accomplish a re-homing might be too long to assist number conservation efforts, especially if CPE modifications were actually necessary.

Potential impacts of rate center consolidation that are not necessarily current limitations/constraints but that should still be considered include the following: Rate center consolidation expands further the imprecision of 9-1-1 "default routing" resulting from the emergence of CLECs. It was noted at the task force meeting in Dallas that the impact of this default routing issue might be somewhat mitigated by telephone companies in this state being more accurate in their 9-1-1 database processing to further reduce "no record found" situations that result in default routing. Due to the time constraints of preparing the task force report, affected 9-1-1 entities that might have individual opinions on the default routing issue for their particular areas were not contacted before submitting the task force's

report. Default routing issue might become more of a concern to effected 911 entities as larger geographic area are considered for rate center consolidations.

If "additional" 9-1-1 tandems are added in the future, this might further limit or undermine rate center consolidation. It was noted at the task force meeting in Dallas that GTE is currently contemplating additional 9-1-1 tandems and that GTE might have current proposals outstanding to 9-1-1 entities for this service. Further review of the impacts of adding additional 9-1-1 tandems is appropriate.

If inconsistent rate centers are permitted after consistent rate center consolidation, it could limit or constrain the deployment of fewer, new digital 9-1-1 tandems serving a greater geographic area or other 9-1-1 network modifications. It was noted at the task force meeting in Dallas that still permitting inconsistent rate centers after consistent rate center consolidation might make some future 9-1-1 network modifications more difficult because of the mix of rate center structures. For example, because the 9-1-1 tandems are limitations/constraints in certain matters, such as the scope of service provider long-term number portability, deployment of fewer, new digital tandems serving larger geographic areas or other 9-1-1 network modifications might have potential benefits that might be hampered by still permitting inconsistent rate centers after consistent rate center consolidation. Further review of the potential 9-1-1 impacts of inconsistent rate centers after any consistent rate center consolidation, is appropriate.

The potential limitations/constraints and impacts discussed above relate to the existing 9-1-1 service arrangements. Future, appropriate modifications to the existing 9-1-1 database configurations and the existing 9-1-1 selective routing networks, perhaps including modifications by switch manufacturers, might ultimately lessen or eliminate the potential rate center consolidation limitations/constraints and impacts on 9-1-1 service discussed above.

Control Point (SMS/SCP) capacity, but adds steps to the provisioning process as it requires each assigned number to be entered into the SMS before calls can be completed.

Technical Limitations:

This proposal has many elements that have never been implemented. As such, issues may develop resulting in delays to proposed number pooling implementation schedules. In addition, implementation may require unanticipated technical changes to existing switching elements and networks.

As stated earlier, use of NXX-X LRN option is limited to only those switches that have operate in an LNP environment, including a requirement that all LNP supporting processes are in place and functioning. An underlying premise of this alternative is that all LNP-capable switches participating in LNP in a specified area will be required to utilize this method. Because this solution requires LNP, this solution is not technically feasible for all segments of the industry at the present time.

In addition, it may not be either possible nor appropriate for CMRS providers to utilize numbers made available in 1000s blocks, given the high growth associated with cellular services. Nonetheless, CMRS providers, along with non-LRN capable wireline carriers can utilizing entire complete 10,000 Number NXX codes in association with the NXX-X LRN proposal. Since it is recognized that CMRS providers will not be LNP capable before June 30, 1999, they cannot realistically be expected to participate in NXX-X LRN prior to that time. As such, CMRS and other non-LNP capable providers/switches will continue to use full blocks of Central Office codes (10,000 numbers) after number pooling is implemented.

The INC local Number Portability Workshop and the NANC LNPA Working Group recommended at the 9/23/97 NANC meeting that a national, uniform Number Pooling solution be adopted (Attachment 11). In response to this recommendation, the NANC unanimously approved the following language:

“The NANC recognizes the ongoing activities and investigations by the states into number pooling. However, the states must recognize the

need to be consistent with the NANP-wide standard, when available.”

Any Number Pooling arrangement agreed to and implemented within the state of Texas will need to be mindful of this requirement

Implementation Impacts

No determination has been made with respect to the administration of the 1000s blocks; therefore, no assessment can be made regarding change to the process of : application for, and receipt of, 1000 blocks of telephone numbers.

Because of the technical limitations concerning the storage of numbers in LNP databases (SCPs), the Number Pooling Subcommittee of the Illinois Number Portability Workshop recommended that the FCC and State Commission "control implementation of NXX-X/LRN number pooling".(Attachment 12)

We do not recommend the implementation of Number Pooling accelerate the schedule set forth by the FCC in Order 96-115 for the deployment of LNP, nor that LNP deployment be advanced in any switch, including CMRS provider switches. Further, in case of an a LNP-capable switch, an NXX code will not be opened for porting merely to facilitate NXX-X LRN.

Potential NXX impact:

CMRS providers still need equal and non-discriminatory access to numbers. Since CMRS providers will not be LNP capable before June 30, 1999, they will require access to full NXX code assignment until that time. As such, the implementation of NXX-X LRN alone may not be sufficient to relieve a jeopardy NPA situation.

In addition to CMRS, paging companies are not currently required by the FCC to ever provide LNP and will not be able to utilize number pooling.

It is important to note that current assignment processes such as time frames for aging calls, number allocations for vanity numbers, and the desire on the part of businesses to reserve sequential numbers for future growth will affect the utilization of numbers.

It is also important to note that the numbers obtained for pooling must be used within the existing area for which they are currently identified from a rating and billing perspective. Depending upon the size of the rating area, this could restrict the benefit gained from pooling.

Practical Impact:**Technical Changes:**

If a decision is made to identify numbers in ranges without requiring all 1,000 number to be ported, changes in the SMS and SCP programs will be required.

Changes in the existing operational and administrative systems will be required to allow for the utilization of number portability. The NXX-X LRN proposal will impact number assignment processes necessitating the need for modifications in Operations Support Systems (OSSs), including billing systems and customer contact systems. These proposals differ by implementation so they cannot really be started until there is consensus as to the implementation.

Administrative Changes:

Proper administration of the pool of numbers is imperative if any efficiencies are to be gained from the establishment of this approach. Without control of the resource, its implementation could actually encourage number hoarding and result in a more rapid exhaust of the NPA. No currently approved National guidelines exist for administration of such a number pool.

As cited earlier, no determination has been made with respect to the administration of the 1000s blocks; therefore, no assessment can be made regarding change to the process of: application for, and receipt of, 1000 blocks of telephone numbers. No Texas policies and/or rules exist to govern this administration.

The NXX-X LRN proposal will require changes in the *Central Office Code Assignment Guidelines* and possible expansion of the responsibilities of the Central Office Code Administrator. The currently defined responsibilities of the North American Numbering Administrator selected by the FCC (Lockheed) does not include administration of numbering resources below the NXX level.

For some entities, modifications to the LERG are necessary to implement the NXX-X LRN proposal in order to support internal operational support systems as well as 1000s block administration. However, some parties contend that modifications to the LERG are not necessarily required and that a single entity can be identified with the NPA-NXX as the LERG designated carrier.

The entity responsible for a 1000 block administration will have additional workload in order to administer the NXX in a neutral manner. As pointed out above, the newly identified NANPA requirements do not envision administration below the NXX code level. To some extent the current LERG code owner is performing this function. However, the responsibility would be more extensive than is currently being performed due to the necessity to allocate and police the code utilization across ten entities as opposed to one.

We anticipate that a rulemaking will be required, at minimum, for number pooling to be implemented. After the rule is effective, implementation of the NXX-X method will take additional time for network testing and conversion. In addition, some carriers may require waivers to the technical compliance standards due to limitation in their existing switching and signaling networks.

Finally, a number pooling administrator will need to be selected at a state level if implementation takes place prior the establishment of national guidelines. In addition, operational procedures would also need to be developed and approved for those participating in the pool.

Analysis of Number Pooling for Dallas/Houston/Austin

A Data Request was issued by the TPUC staff on 10/1/97.

The aggregated results of the Data Request requiring all telecommunications providers in Texas to provide utilization numbers as well as forecasted requirements was provided to the TNC for analysis. The TNC decided to use a forecasting model developed by Lockheed Martin to analyze this data. The Lockheed Martin model was also used in Illinois in that states NP activity.

One forecast was developed using the Lockheed Martin model.

This model assumes no NXXs are returned as a result of any form of rate center consolidation.

Attachment 13 are the spreadsheets generated by the forecasting model.

Data included in the model.

- 1. Working NXXs in each NPA**
- 2. Unavailable codes in each NPA**
- 3. Spare 1000 blocks in every Rate Center in each NPA**
- 4. Forecast data for all wireless carriers thru 4Q99.**

Assumptions used with the model

- 1. Number pooling would be available 6 months after LNP is available.**
- 2. Jeopardy assignments in each NPA would be fully made each month**
- 3. Wireless providers would receive their full NXX forecasts**
- 4. Rate Center structure is as of 11/97**

Data Not Included in Model

- 1. Forecasted 1000 block forecasts for ALL wireline companies**
- 2. Wireline non-LNP forecasts for any NPA—this is most significant for 512.**

Using the assumptions listed on the preceding page, the forecast exhaust for the five NPAs under review is as follows:

Forecast Exhaust Projections

512	January, 1999
214	August, 2010
972	August, 1998
713	December, 1998
281	November, 1998

Several factors contribute to these forecast exhaust projections:

1. The quantity of spare, whole NXXs is small in four of the NPAs. Even assigning NXXs at the artificially low Jeopardy allocation totals, between now and the assumed number pooling date, significantly reduces the supply of available NXXs.
2. Number pooling cannot be made available until after the deployment of LNP.
3. Non-LNP provider forecasts thru mid 1999 further reduce the spare NXXs available for pooling. Non-LNP providers are assigned full NXXs.

The above factors make any possible effects Number Pooling can have on the exhaust of the four NPAs minimal.

It is important to note that the above forecast projections are projections based on wireless (Non-LNP capable) carriers only. Wireline requirements (LNP capable) are not included in these projections. In other words, even if number pooling was implemented that enabled LNP capable wireline carriers to use NXXs more slowly, the demand for NXXs by non LNP carriers alone will result in the exhaust of four of the NPAs under review to exhaust in late 1998 or early 1999.

In order to have any real impact on NXX conservation the Commission would have to pursue aggressive RC consolidation, which would include the possible reduction and/or elimination of multiple calling plans and consolidation of RC with less utilized codes. Even then, based on the audit information it appears the 281, 713 and 972 area codes will exhaust before the end of 1998 due to the forecasted demand of non-LNP carriers.

It is important to remember, the above forecasts do not include ANY wireline forecast information for the duration of the period under review. The data request results for the wireline providers required modification from the original format received and time did not permit the use of this data. When wireline data is included in the model, the forecasted exhaust of each NPA will shorten. This forecast information will be provided to the staff

when available.. It is also important to remember, the rate center structure presently in place was also assumed in this model. As the number of rate centers reduce, future requirements for number blocks will possibly reduce because of the smaller number of rate centers. However, unless additional, full codes are somehow retrieved and made available to the pool, the benefits of number pooling for the 512, 713,281 and 972 are minimal.

The importance of full, unassigned NXXs is critical to the efficiency of number pooling. Only unassigned NXXs can be assigned to any rate center. Codes that are made available but are contaminated will provide numbering resource to the rate center in which the contaminated code is assigned, but it cannot be used in any other rate center.

For additional details review the latest draft on the Number Pooling from the Industry Numbering Committee (INC) at <http://www.atis.com>.

C. Transparent Overlay

On November 17, 1997, a group of CMRS providers in Pennsylvania filed a petition (DA 97-2418) with the FCC requesting that the Commission issue a declaratory ruling and issue an expedited decision regarding the Pennsylvania transparent overlay plan. The petitioners, Nextel Communications, Inc., Sprint PCS, Vanguard Cellular Systems, Inc., 360 Communications Company, and Bell Atlantic Mobile, Inc. (collectively, Petitioners), requested that the FCC declare that the transparent overlay Order issued by the Pennsylvania Public Utility Commission (PaPUC) on July 15, 1997 is unlawful.

It is important to note the FCC, as of 12/1/97, has not assigned the requested NPAs requested by the Pennsylvania Commission for Transparent Overlay implementation.

The FCC issued a public notice on the petition accepted public comments through December 1, 1998 and accepted reply comments through December 8, 1998. (Attachment 14)

D. Test Codes, Special Codes and Protected Codes

The reclamation of all NXXs not available for customer use should be an ongoing activity of the Code Administrator. Care must be given that reclamation efforts does not effect the ability of the telecommunications industry to adequately test services provided to their customers. In addition, since some NXXs are reserved to minimize customer calling confusion, care should be taken when reclaiming these codes..

A report on the status of all unavailable codes in each of the five NPAs under review will be provided to the TNC by 12/15/97. A specific timeline for any/all reclamation of codes will be included in this report.

V. Recommendation

A. Rate Center Consolidation

The TNC recommends Options 1 and 3 of the Rate Center Consolidation study be ordered. This consolidation effort met the widest support from the industry in regards to practicality and timeframe in which these options could likely be implemented. As suggested in the Section 4 of this report, implementation of options 1 and 3 is estimated at 3 to 6 months after the approval of the Compliance filing.

The effect of these rate center consolidation options would be to reduce the total number of rate centers in each of the reviewed areas as follows:

<u>Metro</u>	<u>From</u>	<u>To</u>
Dallas	63	43
Houston	55	42
Austin	27	14

Implementation of these options will have the effects summarized above on future requirements of NXX codes by new entrants as compared to the existing rate center structure. For example, every facility based CLEC wishing to compete in ALL rate centers in Dallas requires 20 fewer codes. Also, although harder to quantify, facility based CLECs will be able to use their existing and growth NXXs more efficiently (i.e., over a larger geographic area), and thus their future NXX demands may be reduced. However, implementation of Options 1 and 3 is not likely to result in the return of many (if any) currently-assigned NXXs codes, unless existing customers are required to change their 7-digit telephone numbers.

The TNC recommends the Commission undertake a comprehensive investigation of Options 2, 4, 5 and 6. These options would result in greater NXX savings than can be realized under Options 1 and 3. However, because these options involve areas with EAS, EMS and ELC arrangements, consolidation will raise significant issues with regard to changes in dialing scope, customer toll charges, carrier toll revenue, and associated impacts that require further consideration by the Commission. In fact, these arrangements are by themselves a cause of inefficient NXX use in a competitive environment, because separate NXXs may be required by ILECs and CLECs, beyond those necessary to identify rate centers, to identify the calling plan subscriber for billing and call rating purposes. Thus, the Commission will need to consider all implications of special calling plans and number conservation, including a weighing of the benefits of number conservation against the difficulties of disrupting historical calling