

# **American Petroleum Institute Association of Oil Pipe Lines**

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June 30, 2004

The Honorable Michael K. Powell  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW.,  
Washington, DC 20554

RE: 47 CFR Part 54 (CC Docket No. 92-105; FCC 04-111)  
The Use of N11 Codes and Other Abbreviated Dialing Arrangements

Dear Mr. Chairman:

We are writing to thank the Commission for issuing the Notice of Proposed Rulemaking to establish and implement a nationwide toll-free three-digit number for access to our nation's 62 one-call centers, which are dedicated to the prevention of damage to underground facilities such as oil pipelines.

The Association of Oil Pipe Lines is an unincorporated trade association representing 51 interstate common carrier oil pipeline companies. AOPL members carry nearly 85% of the crude oil and refined petroleum products moved by pipeline in the United States. The American Petroleum Institute represents over 400 companies involved in all aspects of the oil and natural gas industry, including exploration, production, transportation, refining and marketing. Together, these two organizations represent the vast majority of the U.S. pipeline transporters of petroleum products.

Implementing a nationwide toll-free three-digit telephone number for one-call notification is in the best interest of our nation and is required by the Public Law 107-355, the Pipeline Safety Improvement Act of 2002. President Bush signed this Act into law on December 17, 2002.

The American Petroleum Institute and the Association of Oil Pipe Lines strongly support the North American Numbering Council recommendation to assign 811 as the nationwide, toll-free number for excavators to contact the appropriate one-call center prior to digging. However, if the FCC determines that another three-digit number, such as 344, is preferable for technical reasons, we will support such as decision.

API and AOPL also support the continued use of "#344" in the wireless community, local seven-digit numbers and toll-free ten-digit numbers currently used by one-call

centers, in addition to the three-digit number chosen by the FCC pursuant to this rulemaking. The objective is to provide several alternatives for excavators to call before work begins and have the underground facilities marked. It does not matter which number they use as long as they remember and use a number.

API and AOPL do not support the use of shared (dual use), three-digit numbers. The highly-respected national one-call center and underground damage prevention organization, the Common Ground Alliance, estimates that the 62 one-call centers currently receive approximately 15 million calls annually. CGA data also indicates that those who did not call before digging caused approximately 40% of damages that occurred. CGA believes that the incoming call volume to one-call centers over the next few years could well exceed 20 million. Adding an additional interface to callers could discourage the use of the service and reduce the effectiveness and purpose of the 62 centers.

API and AOPL do not support the use of a nationwide ten-digit number in place of the three-digit number required by law. One-call centers currently have ten-digit numbers. Converting to a new ten-digit number would add no benefit to the system and would be rejected by most, if not all of the centers. Further, these existing numbers should continue to operate at the one-call centers' direction and expense. Again, the objective is to provide options that increase the likelihood of excavators using the systems. The law requires implementation of a nationwide three-digit number for this purpose.

API and AOPL urge you to move forward expeditiously with this important rule and to select the fastest, least-cost option for implementing the nationwide toll-free three-digit number as envisioned in Public law 107-355.

Thank you for the opportunity to make our views known.

Yours truly,



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Association of Oil Pipe Lines



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cc: Honorable Katherine Q. Abernathy  
Honorable Michael J. Copps  
Honorable Kevin J. Martin  
Honorable Jonathan S. Adelstein  
Mr. William Maher, Chief, Wireline Competition Bureau

Honorable John McCain  
Honorable Ernest Hollings

Honorable Don Young  
Honorable James Oberstar  
Honorable W. J. (Billy) Tauzin  
Honorable John D. Dingell  
Honorable Joe Barton  
Honorable Chris John