



THOMAS J. VILSACK, GOVERNOR  
SALLY J. PEDERSON, LT. GOVERNOR

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CURTIS W. STAMP, BOARD MEMBER

September 13, 2006

Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: VoIP Provider Access To Numbering Resources, CC Docket No. 99-200

Dear Chairman Martin and Commissioners Copps, Adelstein, Tate, and McDowell:

It is the understanding of the Iowa Utilities Board (IUB) that the Commission is in the process of deciding whether to grant voice over Internet providers (VoIP) direct access to telephone numbers in CC Docket No. 99-200. Last Spring, in FCC 06-14, the IUB and a number of other state commissions filed comments in the rule making to consider whether to delegate authority to all states to implement mandatory thousands-block number pooling. The IUB respectfully submits that it would be critically important to dovetail the two decisions to arrive at the best result in regards to telephone numbering optimization.

Unless the two decisions are dovetailed, we see a real potential for area code exhaust if VoIP carriers are allowed direct access to numbers where number pooling is non-existent. This would be most pronounced in rural states where number pooling is often the exception. As the IUB stated in its May 15, 2006, comments in FCC 06-14, number pooling is "mandatory" in only 12 percent of Iowa's 817 rate centers. Yet number pooling is "excluded" in 45 percent of Iowa's rate centers.

If the Commission grants authority to VoIP carriers to obtain telephone numbers directly from the NANPA, without regard to number pooling capability in rural rate centers, VoIP carriers would be assigned blocks of 10,000 telephone numbers in all non-pooling rate centers. This could quickly exhaust individual area codes and threaten the long-term viability of the North American Numbering Plan.

At this time, we believe the Commission should only allow VoIP carriers direct access to numbers in the rate centers currently listed on the Pooling Administrator's website. In each of these rate centers there is at least one pooling capable carrier that may be able to donate 1,000-blocks for use by VoIP carriers. For all the rate centers not listed on the Pooling Administrator's website, VoIP carriers should not be allowed direct access

to telephone numbers until sometime after an order by the FCC delegating authority to states to expand number pooling.

The IUB suggests that small phone companies operating in “excluded” from pooling rate centers may need six months to a year become fully pooling capable. In Iowa, many of the independent telephone companies will need training and switch upgrades to become pooling capable. In addition, many of the independent phone companies may have contaminated most of the 1,000-blocks in their NXX codes. This means that even though they may have 10,000 telephone numbers available to serve only a thousand customers, they have issued telephone numbers from most or all of the individual 1,000-blocks. It will take time to “clean” the least contaminated blocks in order to make them available to the Pooling Administrator. Thus, VoIP carriers should not be allowed direct access to telephone numbers in non-pooling rate centers until sometime after an order by the FCC delegating authority to states to expand number pooling.

Sincerely,

THE IOWA UTILITIES BOARD

John Norris, Chair

Diane Munns, Board member

Curt Stamp, Board member