

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Designation of 211 and 511 as Abbreviated
Dialing Codes

CC Docket No. 92-105

VERIZON'S¹ REPLY COMMENTS

The Commission solicited comments “on the status of 211 and 511 implementation to determine whether the 211 and 511 dialing codes are being utilized in the manner for which they were assigned.”² The Commission should continue to monitor the implementation of 211 and 511 abbreviated dialing codes, but should take no action at this time.

Nearly all of the commenting parties described their successes in implementing the 211 and 511 dialing codes. For example, the American Association of State Highway and Transportation Officials (AASHTO) indicated that “511 is now available to over 110 million Americans” and that “nearly 60% of the population will have access to 511 services in their home areas by the end of 2007, with the goal of near ubiquitous implementation of 511 services by 2010 in sight.” James Wright, AASHTO Comments at

¹ The Verizon companies participating in this filing (“Verizon”) are the wholly owned subsidiaries of Verizon Communications Inc.

² Public Notice, Comments Sought on Designation of 211 and 511 Abbreviated Dialing Codes, DA 07-2017 at 1 (released May 7, 2007).

2. Likewise, the Colorado Public Utilities Commission (PUC) reports that 211 service “was available in 38 counties in the state, reaching 91 percent of the total population of Colorado” and that “the statewide call volume for 2006 was 167,580 calls.” Colorado PUC Comments at 2-3.

Only two commenters raised any concerns with the implementation of 211 and 511 abbreviated dialing. As explained below, these concerns are being addressed and there is no need for the Commission to take any action at this time.

First, Indiana 211 Partnership, Inc. (Indiana 211) says that it has encountered technical issues, such as “service is not available in areas where it should be, the routing is not completed appropriately, or some type of messaging from the local telephone provider (i.e., ‘call cannot be completed as dialed’).” Indiana 211 Comments at 3. These are exactly the sort of operational and implementation issues that should be resolved directly between the N11 service provider and the telephone service provider. There is no reason for the Commission to address these issues at this time.

Moreover, some of the so-called “technical issues” mentioned by Indiana 211 may not be issues at all, but rather a function of how the service operates. For example, Indiana 211 observes that “it is not uncommon for IN211 Centers to receive calls from other regions or out-of-state.” Indiana 211 Comments at 3. N11 calls are normally translated into an ordinary telephone number or a toll free number and then completed to the N11 center in the same manner as any other such call. Anyone that knows the telephone number of the N11 center can call that number from anywhere in the world. N11 centers can therefore receive calls from other regions or out-of-state, but the caller might not have dialed N11.

It is also possible for calls to appear to be from other regions or out-of-state even though the caller is calling from within the N11 service providers region. For example, a Michigan resident may dial 211 on his cell phone while he is roaming in Indiana. His cell phone provider will likely route that call to the Indiana 211 center serving the area where the caller is located, rather than routing it to a 211 call center in Michigan. Such a call, however, will appear to be from Michigan because the caller is using a cell phone with a Michigan telephone number. There is no reason for the Commission to address such routing of N11 calls.

Second, the National Emergency Number Administration (NENA) suggests that the Commission “[c]onsider granting 2-1-1 priority service and repair during power outages and crises.” NENA Comments at 4. There is no reason for the Commission to establish a new priority process for 211 service because there is already an established process by which any N11 service provider can obtain priority for provisioning and restoration of National Security Emergency Preparedness (NSEP) telecommunication services.

Appendix A of Part 64 of the Commission’s rules, together with “the regulations and procedures issued by the Executive Office of the President establish one uniform system of priorities for provisioning and restoration of NSEP telecommunication services both before and after invocation of the President's war emergency powers.” 47 C.F.R. § 64 Appendix A(1)(c). As the Commission explained, “[i]n order that government and industry resources may be used effectively under all conditions, *a single set of rules, regulations, and procedures* is necessary, and they must be applied on a day-to-day basis to all NSEP services so that the priorities they establish can be implemented at once when

the need arises.” *Id.* (emphasis supplied).

There is no need for the Commission to establish a separate priority process for 211 service providers. Such service providers can submit their requests for priority level assignments through the NSEP Telecommunications Service Priority System just like any other service provider. In fact, N11 service providers may already have priority level assignments that would apply to the telecommunications services they use to receive N11 calls today.

CONCLUSION

For the foregoing reasons, the Commission should continue to monitor the implementation of 211 and 511 abbreviated dialing codes, but should not take any action at this time.

Respectfully submitted,

Michael E. Glover
Of Counsel


Karen Zacharia

Amy P. Rosenthal
Verizon
1515 North Courthouse Road
Suite 500
Arlington, VA 22201-2909
(703) 351-3175

James G. Pachulski
TechNet Law Group, P.C.
1100 New York Avenue, N.W.
Suite 365
Washington, DC 20005
202-589-0120
jpach@technetlaw.com

Counsel for Verizon

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