



May 22, 2013

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Consolidation of the North American Numbering Plan Administrator and Pooling Administrator Contracts, WC Docket No. 92-237 and WC Docket No. 99-200

Dear Secretary Dortch:

Sprint Nextel Corporation, Verizon, Verizon Wireless, T-Mobile USA, Inc., AT&T Inc., and XO Communications Services, LLC, file jointly this letter in support of the consolidation of the North American Numbering Plan Administrator (“NANPA”) and Pooling Administrator (“PA”) contracts about which the Federal Communications Commission (“FCC” or “Commission”) has sought comment in the Public Notice issued on April 22, 2013.¹

The Numbering Oversight Working Group (NOWG), in its role as the oversight committee for the NANPA and the PA under the direction of the North American Numbering Council (“NANC”), conducted an evaluation of the benefits and risks of consolidating the contracts of the NANPA and PA. In a letter dated November 28, 2012, the NOWG provided the NANC a written summary of its evaluation and noted redundancies that they believe could be eliminated by combining the two contracts into one. The NOWG also noted that a unified approach could result in several operational efficiencies including a “reduction of processing days from 14 to 7 when opening new codes and modifying and disconnecting existing codes.” Finally, while the NOWG did not have access to cost data, the NOWG assumes the industry would realize a cost savings over the contract period.

¹ See, Public Notice, *Comment Sought on North American Numbering Council Recommendation That the FCC Consolidate its North American Numbering Plan Administrator and Pooling Administrator Contracts*, WC Docket Nos. 92-237 and 99-200 (April 22, 2013).

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On February 20, 2013, the NANC “unanimously concurred” with the NOWG’s report and recommended to the FCC that it should consider consolidating the NANPA and PA contracts.²

The Commission itself recognized many years ago that there may be a benefit to consolidating the NANPA and PA contracts, stating “[w]e acknowledge that it may be desirable in the future to link the thousands-block number pooling administration and central office code administration duties to take advantage of any synergies that may exist between these functions.”³

The jointly filing companies believe that time has come. We offer our full support for the evaluation conducted by the NOWG and the NANC unanimous recommendation. We, therefore, respectfully request that the Commission consolidate the North American Numbering Plan Administrator and Pooling Administrator contracts into one unified contract.

Sincerely,



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² Letter from Betty Ann Kane, Chairman of the NANC to Julie A. Veach, Chief Wireline Competition Bureau, Federal Communications Commission, February 20, 2013.

³ *In the Matter of Numbering Resource Optimization*, Report and Order and Further Notice of Proposed Rulemaking, FCC 00-104, CC Docket No. 99-200, ¶ 152 (rel. March 31, 2000).