Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
Numbering Policies for Modern Communications	)	WC Docket No. 13-97
	)	
IP Enabled Services	)	WC Docket No. 04-36
	)	
Telephone Number Requirements for IP-Enabled Service providers	)	WC Docket No. 07-243
	)	
Telephone Number Portability	)	WC Docket No. 95-116
	)	
Developing a Unified Intercarrier Compensation Regime	)	WC Docket No. 01-92
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
Numbering Resource Optimization	)	WC Docket No. 99-200
	)	
Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15 (g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources	)	
	)	
Petition of TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of the Commission's Rules	)	
	)	
Reliability and Continuity of Communications Networks, Including Broadband Technologies	)	PS Docket No. 11-60

INITIAL COMMENTS OF
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

The Pennsylvania Public Utility Commission (Pa. PUC) files these comments on the Federal Communications Commission (FCC or Commission) in the above-captioned

dockets in response to the FCC Notice of Proposed Rulemaking issued April 18, 2013, addressing access to numbers by Voice over Internet Protocol (VoIP) providers (the VoIP NPRM).[1] The VoIP NPRM seeks input on a range of issues regarding the long-term approach to VoIP providers and numbering resources under the North American Numbering Plan (NANP) implemented by the North American Numbering Council (NANC). The VoIP NPRM set July 19, 2013, and August 19, 2013, respectively, for filing Comments and Replies.

The Pa. PUC appreciates an opportunity to file Comments. As an initial matter, these Pa. PUC Comments should not be construed as binding on the Pa. PUC in any matter pending before the Pa. PUC. Moreover, these Pa. PUC Comments could change in response to later events, including Ex Parte filings or the review of other filed Initial and Reply Comments and legal or regulatory developments at the state or federal level. Finally, the Pa. PUC's participation in this proceeding is without prejudice to the ongoing appellate litigation that is pending between the Pa. PUC, other parties, and the FCC before the U.S. Court of Appeals for the 10th Circuit at Docket Nos. 10-1099, *et seq*.

[1] *In re Numbering Policies for Modern Communications, et al.*, WC Docket No. 13-97 *et al.*, (FCC, Rel. April 18, 2013), Notice of Proposed Rulemaking, Order and Notice of Inquiry, FCC 13-51.

Summary of the Pa PUC Comments

- States should be active participants in identifying and monitoring the impact of any VoIP direct access to numbering pilots conducted within their geographic area. The pilots should be conducted on a regional basis, possibly based on the current NARUC regional committee structure.

- All carriers or providers, including VoIP providers, must follow the same numbering rules, including number conservation measures implemented by a state. All carriers and providers must follow the same numbering rules, regardless of the technology being used by a carrier or provider that wants numbers.

- The final rules should not change current FCC delegated authority to the states on numbering and should allow states like Pennsylvania to apply number conservation measures to VoIP providers seeking access to numbering resources, whether at the wholesale or retail level. In addition, the final rules should not preempt states that have enacted laws, which restrict the regulation of VoIP retail services, when such states actively participate in the FCC's numbering conservation efforts.

- Accurate provider contact information is essential for the Pa. PUC to use its current delegated authority from the FCC to implement number conservation measures applicable to all carriers and providers with direct access to numbering resources. To ensure that the Pa. PUC has access to accurate provider contact information, the Pa. PUC proposes that the FCC develop and require a Recognition of Registration filed with the FCC and the agency/commission administering numbering in any state.

- The FCC must grant the states the right to steer Local Routing Number (LRN) requests toward rate centers in more populated areas, where the numbers are more likely to be utilized.

- Now is the time to rewrite the Industry Numbering Committee (INC) guidelines that dictate the rules for numbering assignment to reflect the substantial changes within the industry. To that end, the Pa. PUC advocates a move to number assignment blocks of 100. The implementation of 100-block pooling will better conserve numbers than the current 1000-block pooling. Pennsylvania's recent experience with area code exhaust and relief demonstrates that better conservation of numbers is necessary, and 100-block pooling will reduce the number of area code exhausts or relief – solutions that often cause controversy in the states where they are implemented.

- Geographic decoupling raises serious public safety concerns associated with 911 call routing and the provision of location information. The Pa. PUC is unaware of any current technological or marketplace solution that public safety and disability advocate experts have endorsed as adequately addressing these public safety concerns. The current technological and location identification problems associated with nomadic VoIP, wireless, and other technologies warrant delaying implementation of geographic decoupling until there are more effective ways of ensuring public safety.

- The final rules should also address rate center consolidation. Number conservation achieved through rate center consolidation would allow for a more efficient use of scarce numbering resources. The Pa. PUC continues to endorse rate center consolidation but only as a delegated function for the states.

- Intermediating numbering occurs when a wholesale partner marks a number as assigned even though it has not been assigned to an end-user. As a precondition to getting numbers directly, the final rules should require a VoIP retail service provider's numbering partner to transfer its entire inventory of intermediate numbering resources to the VoIP provider's identified operating company number.

- Intermediate numbers should be limited to numbers assigned to a wholesale partner for any provider that either does not have direct access to numbering resources or chooses not to have direct access to numbering resources. Intermediate numbers should not be considered assigned until actually assigned to an end user.

- VoIP and all other providers must equally share the costs for numbering rules and conservation on the same basis as the traditional common carriers.

- The FCC must create a formal process allowing states to refer their concerns about numbering practices of any carrier or provider using numbers to the FCC and the North America Numbering Plan Administrator (NANPA). Still, this type of process will not resolve every problem with numbering access for VoIP and other providers. Consequently, the final rules should require development and implementation of a review and challenge process at a state-wide level before state commissions or other bodies implementing numbering rules within a state. This should occur prior to any formal referral to the FCC.

Detailed Discussion

VoIP Direct Access to Numbering Pilots.

Any FCC trials examining VoIP provider direct access to numbering resources should be undertaken in rural, suburban, and urban exchanges. The pilots should also be conducted on a regional basis, possibly based on the current NARUC regional committee structure. Finally, the states should be active participants in identifying and monitoring the impact of any VoIP pilot conducted within their geographic area.

Uniform Standards.

As stated in our joint comments with the New York and Indiana state commissions (Joint Comments) also filed at the above-captioned dockets, the Pa. PUC supports requiring all carriers or providers obtaining numbers, including VoIP providers and yet to emerge carriers or providers, to follow the same numbering standards, criteria, and rules applicable to traditional common carriers. This includes numbering standards, criteria and rules enacted by a state commission pursuant to authority delegated to it by the FCC. For example, the Pa. PUC petitioned and was granted numbering authority by the FCC to implement mandatory thousands-block pooling in all rate centers in the Commonwealth.[2] This numbering conservation measure has greatly assisted the Pa. PUC in meeting the

[2] *Implementation of Additional Delegated Authority Granted to Pennsylvania by the Federal Communications Commission in its Order Released May 18, 2010—Mandatory Thousands-Block Number Pooling in the 215/267, 570, 610/484, 717 and 814 NPAs; M-2010-2178173 (Order entered June 3, 2010). See also* 40 *Pa.B.* 3477.

federal policy goals of ensuring efficient use of numbers and avoiding unnecessary area code relief.

The Pa. PUC believes it is important that all service providers follow consistent number conservation measures to provide a predictable uniform numbering system administration as well as efficient use of scarce numbering resources in the NANP. Ensuring that all service providers follow consistent number conservation measures also ensures accountability – a goal that would be lost if some entities do not have to comply with the uniform rules imposed on others and advances the goal of numbering resource conservation in a competitively neutral manner.

To ensure competitive and technological neutrality, the Pa. PUC believes all carriers or providers must follow the same rules regardless of technology being used by a carrier or provider when they want numbers. Section 253 of the federal Telecommunications Act of 1996 (TA-96) requires that any state requirement be competitively-neutral, including number conservation measures imposed by states. Therefore, to avoid rules and results that are not competitively neutral, the FCC must apply the number conservation measures currently in place to all service providers receiving numbering resources from NANPA. The Pa. PUC notes that an exception to the uniformity rule could be made for carriers or providers that do not need numbers in any capacity to provide their services or otherwise interconnect with the Public Switched Telecommunications Network (PSTN) or its future equivalent, the Packet Sending Transmission Network (PSTN). All other carriers or providers that want numbers must comply with the FCC's rules administered by the states, industry, and NANPA. The Pa.

PUC does not believe that Internet Protocol (IP), VoIP, or any other technological innovation is a sound basis for exempting carriers or providers from compliance with numbering conservation rules.

Current Federal Rules and States' Laws.

The FCC's final rules should not change current FCC delegated authority to the states on numbering. Specifically, this delegated authority permits states to promote efficient use of numbering resources and to implement timely area code relief. As a practical matter, Pennsylvania has implemented various numbering conservation measures for over a decade in its area codes that have applied to both regulated wireline carriers and non-Pa. PUC-regulated wireless carriers, without any regulatory conflict. The Pa. PUC believes that the same result can be achieved with VoIP providers that may have direct access to numbering resources. Therefore, the Pa. PUC proposes that any final rules on numbering allow states like Pennsylvania to apply number conservation measures to VoIP providers seeking access to numbering resources, whether at the wholesale or retail level. The final rules should also delegate to states authority to implement federal numbering conservation rules without impact to currently existing state laws.

In addition, the final rules should not preempt states that have enacted laws, which restrict the regulation of VoIP retail service providers, when such states actively participate in the FCC's numbering conservation efforts. Pennsylvania's VoIP Freedom Act, 73 Pa. C.S. § 2251.1, limits the retail regulation of VoIP services, to the following:

public safety (e.g., 911/E911), intercarrier compensation, telecommunications relay services (TRS), universal service fund (USF) mechanisms, and protected services provided under Commission-approved tariffs. The Pa. PUC believes that Pennsylvania's VoIP Freedom Act can be preserved, while the FCC delegates to the states consistent federal rules that permit Pennsylvania to continue working to ensure the efficient use of numbering resources by all carriers and providers throughout all of its area codes. Also, the Pa. PUC opposes any preemption or its constructive equivalent, including forbearance, if doing so vacates any state's determinations on VoIP regulation.

The FCC's overall approach with its numbering rules should focus on cooperative federalism to ensure that service carriers or providers use numbers efficiently. Providers using the same numbering resources while providing service through different technology should follow the same numbering rules. This provides access to scarce numbering resources on a level playing field, while promoting number conservation and technological/competitive neutrality.

Recognition of Registration (ROR).

To effectively monitor the numbering system within the Pa. PUC's geographic area, it is vital that carriers and providers, including VoIP providers, submit accurate provider contact information to the Pa. PUC. Accurate provider contact information is essential for the Pa. PUC to use its current delegated authority from the FCC to implement number conservation measures, such as safety valve requests and reclamation, on all carriers that have direct access to numbering resources.

To ensure that state commissions like the Pa. PUC have access to accurate provider contact information, the Pa. PUC proposes that the FCC develop and require a Recognition of Registration (ROR)[3] filed with the FCC and the agency/commission administering numbering in any state. Submission and acknowledgement of this ROR must be a precondition to getting numbers for any carrier or provider.

An ROR ensures that states have the necessary information from all carriers and providers to meet their obligations to implement the FCC's number conservation measures, which focus on preserving the current North America Numbering Plan (NANP). An ROR requirement is critical to Pennsylvania's ongoing efforts to monitor the numbering system within the Pa. PUC's service areas, to minimize disruptive area code exhausts, and to ensure that the Pa. PUC and industry have access to accurate information and contacts to ensure that conservation measures are implemented in compliance with the FCC's policy objectives regarding scarce numbering resources. An ROR requirement also addresses the regulatory vacuum created by prior decisions preempting state certificate requirements for some VoIP retail service providers.

The Pa. PUC supports VoIP and other providers being required to register with the FCC and the states and secure acknowledgement of their ROR *prior* to securing numbers. These ROR holders must, at the minimum, be required to register with the Pa. PUC and secure an acknowledgement from the Pa. PUC, perhaps in the form of a Secretarial Letter or ROR authorization, prior to filing a Part 1 requesting number resources within the Pa.

[3] The Pa. PUC attaches a suggested format that could form the basis for any Recognition of Registration.

PUC's jurisdiction. With this type of registration and acknowledgement, the Pa. PUC would have a more accurate assessment of number assignment and utilization to anticipate and implement timely area code relief, when necessary. Thereafter, the Pa. PUC supports requiring the holder of an ROR to update the ROR, as warranted, so that the states, the FCC and NANP can ensure that the carrier or provider getting numbers provides accurate contact information.

LRN Assignment.

LRN Assignment must be within the states' discretion but subject to FCC oversight. Consistent with the Joint Comments, the FCC must grant the states the right to steer LRN requests toward rate centers in more populated areas, where the numbers are more likely to be utilized. However, this should occur with due allowances for the fact that some carriers or providers may be seeking numbers in less-populated areas as part of their business or service plan.

Although no hard and fast rules can and should be mandated at this time, the Pa. PUC thinks the final rules should require an ROR holder to pursue numbers in more populated areas before seeking numbers from less populated areas. An ROR holder should be required to provide a reasonable business or service explanation to receive numbers in less-populated areas if numbers are available in more-populated areas. This approach eliminates the problem of stranding assigned number blocks where the majority of such blocks could not be used due to smaller populations. The use of this

rule, combined with a 100-block pooling approach, will greatly enhance the conservation of numbers and avoid area code splits or overlays.

Guideline Revisions.

The Pa. PUC believes that now is the time to rewrite the INC guidelines that dictate the rules for numbering assignment to reflect the substantial changes within the industry. For instance, the current 1000-block Pooling has worked to conserve numbers and save area codes from early exhausts. Direct access to numbers and the proliferation of new services that rely on access to numbers requires new rules that permit or require the assignment of numbers in smaller numbering blocks. The final rules should move to blocks of 100, similar to that used for 1000-block pooling. A "less than 1000" approach should also require high utilization than the current rate before triggering access to another block of numbers. This approach would allow all carriers to better synchronize the numbers they receive with the numbers they actually need. By better coordinating the available block with the actual need, we can reduce the occurrence of stranded numbers that results from the current practice of imposing a 1000-block of numbers on carriers who may need far less.

The implementation of a 100-number block pooling will conserve numbers better than the current 1000-block pooling that was previously implemented to remedy the practice of obtaining 10,000-block numbers – a practice that reflected the monopoly-era environment. The end result will reduce the number of area code exhausts or relief – solutions that often cause controversy in the states where they are implemented. This

100-block pooling solution needs to be implemented quickly, given the increased demand for numbering resources by current and future providers.

Pennsylvania's recent experience with area code exhaust and relief supports the need to move quickly to better conserve numbering resources. In the last three years, Pennsylvania has been notified by Neustar that three area codes were within three years of exhaust. This notification triggered the implementation of area code relief procedures by the telecommunications industry and NANPA.[4] Through number conservation measures, including mandatory pooling by all carriers in every rate center in the Commonwealth, the Pa. PUC was able to prevent the need for area code relief in two of the numbering areas, 814 and 717. However, Pennsylvania continues to complete implementation of an overlay in the northeast region of the Commonwealth for the 570 NPA. Because of the lack of numbering resources in the area code, the existing code, 570, has been in jeopardy since approximately 2010. The assignment of smaller blocks of telephone numbers to service providers will promote even more efficient use of numbering resources, which has a major impact on area code exhaust and the need for area code relief.

[4]*Relief Plan for the 717 NPA,* Docket No. P-2009-2136951 (Order entered December 1, 2011)*; Petition of the North American Numbering Plan Administrator on behalf of the Pennsylvania Telecommunications Industry for Approval of Numbering Plan Area Relief Planning for the 814 NPA*, Docket No. P-2009- 2112925 (Order entered April 26, 2012).

Geographic DeCoupling.

Traditional telecommunications providers were tied to their geography. Companies operated within their service territories and their physical infrastructure connected directly to their customers. Current technology allows providers to be geographically far apart from their customers.

The Pa. PUC is concerned about geographic decoupling because it raises serious public safety concerns associated with 911 call routing and the provision of location information. The Pa. PUC is unaware of any current technological or marketplace solution that public safety and disability advocate experts have endorsed as sufficient to support geographic decoupling at this time. The current technological and location identification problems associated with nomadic VoIP, wireless, and other technologies warrants delaying implementation of geographic decoupling until there are more effective ways of ensuring public safety. Thus, decoupling should occur only if the needs of public safety administrators and all citizens are met.

Accessing 911 services on an accurate and timely basis has been at the forefront of the FCC as well as other states such as Virginia and Pennsylvania. Currently, the FCC has issued a Notice of Proposed Rulemaking soliciting comments on improving the reliability and resiliency of the communications infrastructure necessary to ensure the continued availability of the nation's 911 emergency communications system,

particularly during time of major disaster.[5] The Pa. PUC strongly encourages accessibility to 911 services with accurate location information, regardless of the provider or the technology of telecommunications or other 911/E911 access services.

The Pa. PUC is concerned that if geographically based number administration is eliminated new and costly mechanisms will be required to ensure that emergency services are timely and accurately provided. Of these, the most important is clearly the ability to identify the physical location of the known end-user of a number or numbers. The Pa. PUC is concerned that the shift away from rate-center bounded numbering will negatively impact N11 generally and E911 and NG911 in particular. In addition, severing the connection between geography and number assignment will affect disabled citizens' access to the Telecommunications Relay Service (TRS) or its equivalent. Database and routing issues may arise as well if the FCC adopts decoupling.

Rate Center Consolidation.

The FCC's final rules on numbering should also address rate center consolidation. Number conservation achieved through rate center consolidation would allow for increased efficient use of scarce numbering resources permitting current area codes to

[5] *See generally* FCC Public Safety & Homeland Security Bureau, *Impact of the June 2012 Derecho on Communications Networks and Services: Report and Recommendations* (PSHSB, rel. Jan. 10, 2013); *In the Matter of Investigating 911 Emergency Call Service Outages and Problems*, Va. State Corp. Commission, Case No. PUC-2012-00042 (Order rel. Jan. 17, 2013). Also, the Pa. PUC recently addressed a consumer complaint in which a Verizon Pennsylvania, LLC customer could not access 911 service during Superstorm Sandy because of the duration of the commercial power outages experienced in her area of the Commonwealth. In that case, the Pa. PUC reasoned that it is critically important and in the public safety that all Pennsylvania citizens be provided with the ability to make a 911 call when an emergency situation arises. *Eileen Floyd v. Verizon Pennsylvania LLC*, Docket No. C-2012-2333157 (Order entered April 30, 2013).

have longer lives, thus preserving the NANP. The Pa. PUC continues to endorse rate center consolidation but as a delegated function for the states because of their unique understanding of their rate center consolidation impacts. The states are in the best position to determine the number of rate centers necessary for individual area codes located within their geographic boundaries.

Intermediate Numbers.

The Pa. PUC supports revised rules that eliminate wholesale partnering practices engaged in intermediate numbering. Intermediating numbering occurs when a wholesale partner marks a number as assigned even though it has not been assigned to an end-user. The current practice provides little or inaccurate information on how many numbers are actually assigned to end-user customers. As a precondition to obtaining numbers directly, the FCC's final rules should require a VoIP retail service provider's numbering partner to transfer its entire inventory of intermediate numbering resources to the VoIP retail service provider's identified operating company number (OCN). This provides a far more accurate view of numbering resources that are actually in use by an end-user.

Under existing practice, VoIP retail service providers typically rely on wholesale telecommunications carriers, usually an affiliate, to secure numbers. Under the new practice, any VoIP retail service provider with direct access to numbers will have to secure an ROR and have an interconnection agreement in place with the relevant carrier unless indirect interconnection or business considerations make an interconnection agreement impractical or unnecessary. However, even in those exceptional

circumstances where no interconnection agreement is in place, the VoIP or other retail service provider would still be subject to the new rules addressing the classification and utilization of intermediate numbers as assigned numbers only when in use by an end-user.

The Pa. PUC understands the current practices in which VoIP providers get their numbers from OCNs indirectly or that OCNs operating as wholesale number providers may need to exist even if VoIP providers receive numbering resources directly. In that case, the Pa. PUC suggests practices tantamount to wholesale number aggregation or retention of a small amount of numbers may be appropriate, subject to strict regulation by the FCC and subject to state oversight.

The Pa. PUC recognizes that there may be the need for a wholesale practice where a maximum amount of numbering resources may need to be held by carriers to replace an equivalent function currently performed with intermediate numbering practices. The Pa. PUC recommends that the Number Portability Administration Center (NPAC) and the states collectively develop a recommendation on what constitutes appropriate intermediate numbers within one year of issuance of final rules. The final rules should give the states, NANC, and industry carriers or providers equal access to any database necessary to promote number conservation. The states also should have a legally established right to participate in the deliberations of NANC and industry on numbering. This would allow the states to monitor databases, including the NPAC, used to ensure compliance with industry rules and guidelines. It also gives the states a structured opportunity to be heard on future rules.

These requirements are vital when it comes to calculating utilization and months to exhaust (MTE). It is also critical to qualifying for additional numbering resources and in submitting and filing correct and accurate number resource utilization and forecast (NRUF) data with NANPA.

Assigned Numbers.

Consistent with the Joint Comments, intermediate numbers should include all numbers assigned to a wholesale partner for any type of provider that either does not have direct access to numbering resources or chooses not to have direct access to numbering resources. These numbers should remain in the intermediate category until the numbers are assigned to an actual end user. This means that the "activated" or "in-use" classification should be limited to retail assignments to an end user, not simply "assignments" to a numbering client who may actually never place the numbers in service for an end-user retail customer.

There should be a separate mechanism created to track the quantity of numbers transferred via the porting process between numbering partners and their clients. This will allow states to monitor what numbers are actually utilized to prevent number exhaust. It will also prevent VoIP providers from receiving additional numbers until the numbers are assigned to an actual end user.

Enforcement Costs.

Any provider or carrier getting numbers must be required to support numbering oversight efforts. The FCC must require that VoIP providers or carriers and others share the costs of administration for the different databases.

The costs of numbering administration, number portability, and number pooling are currently shared across the industry. Much of the telecommunications infrastructure used by VoIP providers is the same infrastructure used by non-VoIP providers. However, regulated intrastate common carriers are subject to state utility commission fiscal assessments that, in part, may be currently used to support numbering administration and oversight that benefits VoIP, wireless, and other providers' access to numbering resources.

The Pa. PUC believes that VoIP and all other providers must equally share the costs for numbering rules and conservation on the same basis as the traditional common carriers.

Review and Challenge Procedures.

This rulemaking should address accountability and oversight on the current and final requirements and guidelines to address violations of the numbering requirements. The FCC must create a formal process allowing states to refer their concerns about numbering practices of any carrier or provider using numbers to the FCC and NANPA. There must be a mandatory requirement that those concerns be acted on in a documented

manner and in a timely fashion. The FCC should expand the numbering oversight process occurring between industry and NANC on the NANP to include the states.

Still, this ongoing oversight will not resolve every problem with numbering access for VoIP and other providers. Situations will arise that may not come within these rules or where application of these rules needs oversight or modification. Consequently, the final rules should require development and implementation of a review and challenge process at a state-wide level before state commissions or other bodies implementing numbering rules within a state. This should occur prior to any formal referral to the FCC. That minimizes avoidable litigation and formal referrals to the FCC.

The final rules could build on existing practice to provide a review and challenge process that gives the affected carrier or provider and the state commission an opportunity to be heard. The Pa. PUC suggests that, following any state commission decision, the carrier or provider be permitted to seek reconsideration or review before the state commission and, thereafter, a similar kind of "notice-hearing-decision" review at NANC and, thereafter only as a final resort, the FCC.

Conclusion

Identical treatment when it comes to numbering rules and compliance encourages more accurate assessments of number utilization and allows states to anticipate and limit number exhaust. Interconnected VoIP, wireless, or other carriers or providers should be required to obtain numbers first from more populated rate centers and then from less

populated rate centers, unless a state commission finds that securing direct access in less populated areas makes more sense for technical or business practice reasons.

Final rules should impose several steps to promote better number utilization. VOIP, wireless, or other carriers or providers must: (1) provide the relevant state commission with minimum information developed by the FCC, with due allowance for state supplemental requirements; (2) secure acknowledgement of a state or FCC-based Recognition of Registration (ROR) that operates on a state-wide basis; (3) consolidate and report all numbers under its own unique OCN within one year of issuance of final rules in place of current practices; (4) provide customers with the ability to access N11, E911, and NG 911 numbers with accurate location in a state; (5) complete rate center consolidation proceeding under the appropriate purview of the responsible state utility commission; and (5) maintain original rate center designations for numbers in its inventory.

The Pa. PUC thanks the FCC for providing an opportunity to file comments.

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RECOGNITION OF REGISTRATION

(A Carrier or Provider Seeking Direct Access to Numbering Resources Administered By the North American Numbering Plan Administrator Shall File this Recognition of Registration with the FCC and Any Commonwealth, District, or State Where The Carrier or Provider Seeks Numbering Resources. Formal Acknowledgement by the Commonwealth, State, or District Shall Be Obtained And Then Submitted Prior to Obtaining Numbering Resources.)

Name of Carrier or Provider:
Place of Incorporation of Carrier or Provider:
Business Address of Carrier or Provider:

Carrier or Provider Revenues in Fiscal Year _____ Derived From Access To Numbering Resources

Carrier or Provider Revenues in Fiscal Year _____ Derived From Access To Numbering Resources in Any Commonwealth, District, or State Broken Down By Commonwealth, District, or State.

Numbering Utilization Contact:
Name
Address,
Telephone Number
Fax
Email

Public Safety/Technology Contact:
Name
Address,
Telephone Number
Fax
Email

Numbering Portability/Consumer Contact:
Name
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Telephone Number
Fax
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