

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

In the Matter of	
Local Number Portability Interval and Validation Requirements;	WC Docket No. 07-244
Telephone Number Portability;	CC Docket No. 95-116
Numbering Resource Optimization	CC Docket No. 99-200

REPLY COMMENTS OF AT&T

In response to a Public Notice,¹ AT&T Services, Inc., on behalf of its affiliated companies, (AT&T) files these comments.

AT&T agrees with CenturyLink that both of the North American Numbering Council’s recommendations, Best Practices 65 and 30, “are in the public interest” and both “reduce the potential for negative customer experiences and promote greater carrier efficiency and numbering management.”²

With respect to BP 30, in particular, we note that the NANC’s recommendation reflects the industry’s general preference for area code (NPA) overlays and, as demonstrated over the last five years, it has also been preferred by almost all state commissions. In comparison with NPA splits, NPA overlays “limit[] adverse impacts to customers,”³ and, as more and more state commissions employ NPA overlays to address number exhaust, promote the spread of uniform, local ten-digit dialing nationwide. NPA overlays have immediate beneficial impacts on customers and carriers, by promoting competition, reducing costs, eliminating confusion, and facilitating education. Moreover, the widespread implementation of ten-digit dialing will facilitate the inevitable transition from TDM-based networks to all-IP networks.

¹ Public Notice, Comment Sought on North American Numbering Council Proposals Regarding Premature Activation of Ports and Area Code Relief Options, WC Docket No. 07-244, CC Docket No. 95-116, CC Docket No. 99-200, DA 13-2367 (rel. Dec. 12, 2013) (Notice).

² Comments of CenturyLink, p. 1.

³ *Id.* at 6.

AT&T also agrees with the Minnesota Department of Commerce that the adoption of a NANC best practice would not be the equivalent of a new Commission rule⁴; however, given the real benefits of NPA overlays to consumers and providers alike, we think that the case for an NPA split must meet a high burden.

We respectfully ask the Commission to consider AT&T's support of the NANC's BP 65 and BP 30.

AT&T

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⁴ Comments of the Minnesota Department of Commerce, p. 1.