

The State Scene

A Numbering Resource Publication for State Public Utility Commissions

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July

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NUMBERING ISSUES ON A STATE LEVEL

The feedback and response generated after the inaugural issue of *The State Scene* has been encouraging. The impetus behind the bi-monthly newsletter, prepared by the Communications Industry Services (CIS) group of Lockheed Martin IMS, is CIS' commitment to better serve its state commission partners and to provide information that will keep them better informed of pertinent numbering issues. To that end, this issue features two perspectives regarding thousand-block number pooling, as well as a spotlight on Vince Majkowski, one of NARUC's State Commissioner representatives to the NANC. Please continue providing suggestions and comments on topics you'd like to see addressed in future issues of *The State Scene*. **CIS**

STATES IMPLEMENTING NUMBER CONSERVATION MEASURES

Illinois

On June 30, in an interim Order in Docket 98-0847, the Illinois Commerce Commission (ICC) confirmed its May 8, 1998, vote to expand its mandatory pooling trial to four more NPAs. The pooling trial that has helped extend the life of the 847 NPA will be expanded throughout the Chicago metro area to the 312, 773, 630, and 708 NPAs.

The timeline for implementation is by July 15 for 630; August 16 for 312; October 1 for 773; and at the end of the Y2K stabilization period (February 1, 2000) for 708.

In May 1998, prior to the FCC's Pennsylvania Order, the ICC ordered pooling to be implemented in all five Chicago Metro NPAs, however, it ordered the resolution of Service Control Point (SCP) database capacity issues before expanding pooling beyond 847. In this most recent interim order, the ICC states that "issues relating to SCP capacity ...have been resolved[.]" Also in the Interim Order, the ICC granted NANPA's petition to implement all-service overlays upon the exhaust of the 312, 773, 630, and 708 NPAs.

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CO CODE RECLAMATIONS

Recovering Unused Numbering Resources

As part of the NANPA responsibilities, the CO Code Administration unit monitors the use of newly assigned NXX codes on a regular basis. The CO Code Assignment Guidelines describe the responsibilities of both the Service Provider (SP) and the CO Code Administrator, including the reclamation of unused numbering resources.

Certification of Service is Mandatory

An NXX code assigned to an SP, either directly by the Code Administrator or through transfer from another SP, should be placed in service within six months after the initial published effective date. If the assignee no longer needs the NXX code, the code should be returned to the Code Administrator and made available for reassignment. "Part 4" of the CO Code request form is the vehicle for the SP to confirm use of the assigned NXX code.

How the Process Works

If it is determined through an audit process or other means that an NXX code is not in use after six months, the Code Administrator will request the return of the code. Assignees are

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The FCC has launched a Telephone Area Code Consumer Information Campaign.

For more information, see the FCC's website at www.fcc.gov/areacode.html

or

Contact the FCC Call Center toll free at:

1-888-CALL-FCC

**TTY:
1-888-835-5322**

For questions or comments about *The State Scene* or other issues and concerns, contact the PUC Hotline 312-706-6268

CO CODE RECLAMATIONS

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notified by letter, as a reminder, that certification of service (Part 4) is due to the Code Administrator. If the Part 4 is not received within two weeks, a registered letter is sent to the SP requesting a response within 30 days to either confirm activation or return the assigned NXX code.

If the SP is unable to activate the NXX code within the specified timeframe, they can apply to the Code Administrator for an extension, which can be granted for a maximum period of up to 90 days. Prior to that date, the SP must certify use of the NXX code or return it to the Code Administrator.

Non-compliance with Guidelines

The Code Administrator will refer to the Industry Numbering Committee (INC) for resolution on those NXX codes assigned to SPs for which the Part 4 has not been returned. This includes those assignments not confirmed to be in use within six months from the originally published effective date or within the 90-day extension, if applicable.

Current Reclamation Status

For the NXX Codes assigned by NANPA, hundreds of first and second letters have been sent to SPs in the first eight regions transferred to NANPA since transition began in May 1998. The remaining eight regions have not reached the six-month deadline. NANPA has also been working with the past Code Administrators in all 16 regions to follow up on outstanding Part 4 certifications for assignments prior to NANPA transition. The SPs contacted have been responsive in returning Part 4s or returning unused NXX codes. To date, only 27 unconfirmed assignments have been submitted to INC for resolution. **GIS**

ELIMINATING PROTECTED CODES EXTENDS AREA CODE LIVES IN KS & MO

The first steps have been taken to eliminate over 600 protected central office codes in the Kansas City local calling scope—equal to “creating” almost an entirely new area code. The Kansas City-expanded local calling area—which extends into both Kansas and Missouri—has had seven-digit dialing for years, but at the cost of setting aside hundreds of unusable central office codes. Experience with implementing area code relief in recent years convinced both the Missouri Public Service Commission and the Kansas Corporation Commission to accept the industry's March proposal to implement 10-digit local dialing across the state line between Missouri's 816 and Kansas' 913 area codes.

Permissive 10-digit dialing began between the two states in June and mandatory dialing will start in early December. This change will free over 400 otherwise unusable central office codes in the Kansas 913 area code—over five years of expected growth. The Missouri 816 area code will have about 200 newly available codes—over a year and a half of expected growth.

“While the elimination of protected codes will not stop area code relief in Missouri, it certainly puts off the need to do area code relief until absolutely necessary—something Missourians certainly desire,” said Anthony Clark of the Missouri Public Service Commission.

While Kansas City represents the single largest group of such protected codes in North America, similar efforts are underway between Ohio and Kentucky and in other states to increase the efficiency of central office codes, thus extending the life of area codes by utilizing these historically unused codes. **GIS**

NUMBER POOLING PROVEN SUCCESSFUL IN THE 847 NPA

J. Seamus Glynn, Associate Director
Citizens Utility Board (CUB), an Illinois
consumer advocacy group

In June 1998, the first thousand-block number pooling “trial” started in Chicago’s 847 NPA for wireline carriers and has been successful by any measure. Not only has the 847 area code outlived several exhaust forecasts, it also experienced an increase in the utilization rate of phone numbers. This “trial” clearly indicates that thousand-block number pooling should be implemented throughout the United States and expanded to include wireless carriers.

In April 1997, number pooling was first proposed in Illinois, when the Citizens Utility Board (CUB) petitioned the Illinois Commerce Commission (ICC) to order thousand-block number pooling in five Chicago-area NPAs. In May 1998, the ICC ordered wireline carriers to implement number pooling in the 847 NPA, which had been forecasted to exhaust that Spring. However, with the implementation of number pooling, the 847 NPA has yet to exhaust.

As a telephone number conservation methodology, pooling has been an unqualified success in the 847 NPA. According to the April 1999 Report of the Illinois Number Pooling Subcommittee (available at www.numberpool.com), pooling had saved an additional 137 NXXs in the 847 area code. Before pooling started, there were about 150 NXX available for assignment. That’s a savings rate close to 100 percent.

From the 847 trial, pooling has also proven to be a method to ensure that carriers have access to numbering resources on a non-discriminatory basis. Under FCC area code relief guidelines, carriers that are not in a market at least 90 days before exhaust cannot obtain numbers from the exhausting area

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NUMBER POOLING WILL CONSERVE NUMBERS, BUT LIMITS NEEDED

Norman Epstein, Manager
Industry Standards
GTE Service Corporation

Thousand-block number pooling is a number optimization technique that can be beneficial under specific circumstances and should be developed and implemented as a means of improving the efficient assignment of numbers among local number portability (LNP) carriers. The introduction of number pooling should be justified rather than ordered on a blanket basis.

The justification to implement number pooling should be contingent on the results of a study that proves that number pooling will extend the life of an NPA a minimum of five additional years (compared to no pooling being introduced). Given the additional cost and administrative complexity of pooling, there needs to be a valid cost benefit to the introduction of pooling.

The implementation of thousand-block number pooling will be most beneficial when initiated concurrently with the introduction of a new NPA, as it will increase the life span of the new NPA by more efficiently distributing numbers to all service providers.

However, any order to implement pooling must be consistent with the FCC Pennsylvania Order which states that: only LNP-capable carriers can participate in number pooling; pooling must be done on a voluntary basis; states are encouraged to conform their trials to the national guidelines; and carriers can’t be required by the states to return central offices codes (NXXs) or 1000-number blocks. The Pennsylvania Order also requires that mechanisms be in place to ensure that carriers that do not participate in pooling have access to adequate numbering resources outside of the pooling process.

GTE recognizes the need for numbering conservation at a national level, and therefore it

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NARUC SUMMARY

NARUC held its Summer meetings in San Francisco from July 16 -21. The NARUC Subcommittee on Telecommunications dedicated their first half-day of meetings exclusively to numbering issues. One of the speakers was NANPA's Area Code Administrator Rose Breidenbaugh, as well as staff members from the Texas, New York, and Maine Commissions, who shared their numbering stories and discussed what they have done to attempt to alleviate the numbering crisis in their states. A representative from the FCC also spoke to share their numbering vision. For more information on the NARUC final resolutions, check on the NARUC website at www.naruc.org.

SPOTLIGHT ON:



Vince Majkowski

VINCE MAJKOWSKI

Colorado PUC and NARUC Representative to the North American Numbering Council (NANC)

Within the FCC's North American Numbering Council (NANC), sit three representatives to the National Association of Regulatory Utility Commissioners (NARUC), a group engaged in the regulation of utilities and carriers. The three members are Joanne Sanford (North Carolina UC), David Rolka (Pennsylvania PUC), and NARUC's senior representative, Vince Majkowski, a commissioner with the Colorado PUC since 1993.

Majkowski, a member of NARUC's Committee on Telecommunications, has represented NARUC on the NANC since 1996. His first responsibility, he said, is representing the states' rights issues and supporting the states on various issues within the telecommunications industry. Some of the issues that have been addressed in the past are technology-specific overlays and, currently, the efficient utilization of numbering resources.

"You have to look at issues on a national level," Majkowski said. "You see a state doing something that meets proper specifications, but I might not personally feel it's the right way to go, I still have to represent the states. If it deals with states rights or states prerogatives, then I'll always support the states."

State commissions, in turn, need to be more educated to the process and the different conservation measures such as number resource utilization, Majkowski said, in order to understand how they will be impacted.

As an example, Majkowski noted that before the Telecom Act of 1996, the industry looked to the incumbent code administrator for area code relief plans, and then went to the state commissions, which approved the plan. In today's competitive environment, NANPA forwards the relief plan on behalf of the industry to the state commissions, in most states. But occasionally, the industry doesn't reach consensus, so there's an education process for the commissions and it often becomes a political issue, Majkowski noted.

"Nobody worries about [area code relief planning] until they have an exhaust crisis, especially state commissions. If there's an area with a low population, the commissions don't think they need to be educated until it hits them," he noted. "State commissions have to work the issues that are nipping at them."

And one of those issues facing the states is number conservation and how to use the number resources more efficiently. Majkowski said that whether the method is 1,000-block pooling or rate center consolidation, all number conservation measures have to be used and prioritized to determine the implications on other parties and areas. "You have to involve all the players affected," he added.

In addition to the states issues, Majkowski, vice chairman of the NANC steering committee, said he also works to ensure that the neutrality and non-discriminatory function of the NANPA is maintained and is not being pressured by a particular segment to violate that neutrality. **CS**

"If it deals with states rights or states prerogatives, then I'll always support the states."

STATES IMPLEMENTING NUMBER CONSERVATION MEASURES

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New York

The New York Commission voted to expand its pooling trial from the 212 and 718 NPAs to the 516 NPA as well. In Opinion No. 99-6, Case 98-C-0689, the Commission states “to further 1000-block number pooling, one-third of the newly available NXX codes in the new area code, as well as the newly available NXX codes in the 516 area code, should be reserved for 1000-block number pooling.”

New York began the nation’s only voluntary, port-on-demand pooling trial in July of 1998. The difference between port-on-demand and the pre-port methodology being used in Illinois is how numbers are ported. With both methods, carriers are assigned blocks of 1,000 numbers. With pre-port all 1,000 numbers are ported from carrier to carrier immediately. With port-on-demand, it is the choice of the carrier being assigned the block of 1,000 numbers to port all or only a portion of those numbers at any one time as it requires them for assignment to its customers. Interim New York guidelines designates port-on-demand for the 212 and 718 trials. The national guidelines call for the pre-port methodology.

Texas

On July 1, the Public Utility Commission of Texas (PUCT) approved a petition, for Delegation of Authority to implement number conservation measures to be filed with the FCC. In its petition, the PUCT cites the recent area code proliferation throughout the state.

“Between 1947 and 1990, a span of over 40 years, Texas added only 3 area codes. Since 1990, Texas has added 11 new area codes. There are seven (7) designated metropolitan areas in Texas, and all but one will have undergone relief one or more times within the past 10 years”, the PUCT stated.

In also citing the “expensive and troubling” nature of NPA relief, the PUCT requests permission to implement Thousand Block Number Pooling, Unassigned Number Porting, Reclamation of Unused NXX codes, and Utilization and Forecast Information collection. Comments are due Aug. 16 and replies are due August 30. **CIS**

A Word From Our Managing Director



There are some exciting changes going on at Communications Industry Services (CIS), and I want to make sure you’re kept abreast of them.

In December 1998, Lockheed Martin announced that CIS would be divested and established as a free standing, independent company. With this divestiture, CIS would continue its mission of providing NANPA and LNP services on a competitively neutral, third-party basis to the communications industry. We’re in the process of that divestiture and the restructuring of CIS.

This proposed restructuring will be seamless to all of CIS’ customers – the new CIS will provide the same services to the same customers at the same prices. All of the Lockheed Martin CIS employees and systems will transfer to the new company. Operationally, there will be no change in CIS.

Financing for the new company will be provided by Warburg Pincus, a large, U.S.-based private equity investor. Warburg is committed to providing financial strength and supporting CIS’ efforts to provide the neutral services needed by the communications industry.

The focal point of the restructuring is ensuring the integrity of CIS’ neutrality, to which both companies are firmly committed. We have committed to observing all of the existing rules on neutrality and to a strict Code of Conduct that ensures continued neutrality.

CIS’ restructuring has been thoroughly reviewed and approved by the North American Numbering Council (NANC) and the regional LNP LLCs. The last level of approval is the FCC, which is very concerned—as am I—that CIS’ neutrality not be jeopardized by a divestiture.

In response to the FCC’s concerns, CIS is working with Lockheed Martin and Warburg to alter the proposed structure to ensure neutrality. We will do everything possible to meet the FCC’s concerns, as we have with the NANC and the LLCs. We are currently in discussions with the FCC to get this accomplished, and expect to reach final agreement among the FCC, the NANC, and LLCs on our new structure in the near future. In the meantime, CIS continues as an operating unit of Lockheed Martin.

The challenges in numbering services and resources are great and complex. The current and new CIS is focused on providing the highest level of quality, reliable, and neutral services that the telecommunications industry – and all the players it encompasses – needs. Regardless of structure, our commitment remains the same.

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code. Pooling allows existing carriers and future entrants to obtain blocks of numbers from the original area code, rather than automatically being assigned numbers from the new NPA.

The 847 NPA experience demonstrates that number pooling is more fair and equitable for carriers than adding a new area code, and is an efficient and effective number conservation technology. With the results of the 847 trial, we believe number pooling should be expanded throughout the U.S. and to all carriers, in order to have the greatest impact possible. The alternative is the continuing premature exhaust of NPAs nationwide and the consequent collapse of the North American Numbering Plan. **CIS**

REGIONAL CONFERENCE CALLS

The first round of CIS' regional conference calls with the state commissions is complete, with more than half of the commissions participating. This is an excellent turnout for a first-time event. The range of issues discussed was quite varied from "What is NANPA doing on CO Code reclamation?" to "Who is your media contact person?" Two of the major action items for CIS, generated from the calls, were: 1) the drafting of a Numbering 101 packet; and 2) implementing a more frequent e-mail update to *The State Scene* bi-monthly newsletter.

The Numbering 101 packet will include information on local number portability (LNP), number pooling and other conservation measures, and area code relief planning. Its purpose is to educate Commission Staff new to various aspects of numbering and will be posted to www.numberpool.com and www.nanpa.com by mid-August. The e-mail supplement to *The State Scene* newsletter will also begin in August, and is designed to disseminate information quickly on issues that come up between newsletter release dates. **CIS**

CIS NEWS

Linda Hymans

A former senior utility analyst for the Public Utility Commission of Texas (PUCT) recently joined CIS' North American Numbering Plan Administration (NANPA) organization as a NPA Relief Planner for the Central Region. Linda is based in Cedar Park, Texas.

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is fundamentally important that numbering conservation policies be consistent across states. Companies, like GTE, that provide telecommunications service in multiple states could face considerable technical difficulties and expense in attempting to implement inconsistent pooling methods and approaches in different states in which they have a presence.

Further, GTE actively supports the industry rules and procedures for numbering conservation at a national level, recognizing that numbering resources are limited and must be managed appropriately by all carriers. To this end, GTE has implemented internal methods and procedures that allow numbers to be assigned in blocks of 1,000. When that block reaches an approximate 80% level of utilization, GTE then opens up another 1,000 block for assignment. **CIS**

During the first round of calls it was agreed that future calls would be held bi-monthly, instead of monthly. Following is the schedule for the next round of regional conference calls.

Central Region (North) - MN, WI, IL, IA, IN, MI, MO **Thurs., August 12,**
10 a.m. (CST)

Eastern Region (North) - ME, VT, NY, NH, PA, CT, MA, OH, RI, NJ, DE, MD, DC **Fri., August 13,**
11 a.m. (EST)

Western Region - AZ, CA, CO, WA, OR, ID, MT, ND, SD, WY, NE, KS, OK, NM, NV, UT, HI, AK, CNMI, Guam **Thurs., August 19,**
11 a.m. (PST)

Eastern Region (South) - WV, VA, NC, SC, GA, FL, PR, USVI **Thurs., August 19,**
11 a.m. (EST)

Central Region (South) - AR, MS, AL, LA, TX, TN, KY **Fri., August 20,**
10 a.m. (CST)

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