

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

_____)	
North American Numbering Plan Administrator)	
Petition for Relief of the 603 Numbering Plan)	DT 10-211
Area)	
_____)	

COMMENTS OF TELECOMMUNICATIONS CARRIERS

AT&T Corporation, Cellco Partnership d/b/a Verizon Wireless (“Verizon Wireless”), MCImetro Access Transmission Services LLC, d/b/a Verizon Access Transmission Services (“Verizon Access”), Sprint Nextel Corporation, and T-Mobile Northeast LLC, d/b/a T-Mobile (“T-Mobile”) (collectively, “Telecommunications Carriers”) jointly and respectfully submit these comments for consideration in response to a question from Commissioner Below raised during the DT 10-211 Prehearing Conference & Tech Session held on October 27, 2010. Commission Below asked whether there were any additional steps that can be taken to extend the life of the 603 area code (aka, Numbering Plan Area or “NPA”). Area code relief implementation is a lengthy process, requiring many months for network preparation and customer education. In this case, the Telecommunications Carriers strongly support the industry-recommended seventeen-month implementation schedule for an all-services overlay. Because of this lead time, the Telecommunications Carriers urge the Commission to act expeditiously to issue an Order for an all-services overlay as the method of relief for the 603 NPA. To ensure that the all-services overlay is not implemented sooner than necessary, however, the Commission should also set a trigger, based on the number of

remaining available NXX codes, for the industry to convene to set the appropriate dates for a seventeen-month implementation schedule for the overlay.

A. A Commission Petition to the FCC for Delegated Authority to Implement Mandatory Thousands-Block Number Pooling in the 603 NPA Is Unlikely to Materially Extend the Life of the 603 NPA.

In consideration of determining whether there are any additional steps that can be taken to extend the life of the 603 NPA, the Telecommunications Carriers investigated the potential impact of thousands-block pooling in all rate centers in the 603 NPA. In its Numbering Resource Optimization (“NRO”) First Report and Order, the FCC determined that thousands-block pooling is essential to extending the life of the North American Numbering Plan (“NANP”),¹ and stated that it would continue to consider state petitions for delegated authority to implement thousands-block pooling outside the top 100 Metropolitan Statistical Areas (MSAs) on a case-by-case basis. The FCC delegated authority to the Common Carrier Bureau (now the Wireline Competition Bureau) to rule on state petitions for delegated authority to implement number conservation measures, including pooling, where no new issues were raised.²

In the 603 NPA, 25 of the 149 rate centers are designated as Optional pooling, and the remaining 124 rate centers are designated as Mandatory pooling. The

¹ *Numbering Resource Optimization*, CC Docket No. 99-200, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574, 7625, para. 122 (2000) (*NRO First Report and Order*). The NANP was established over 50 years ago by AT&T to facilitate the expansion of long distance calling. The NANP, the basic numbering scheme for the United States, Canada, and most Caribbean countries, is based on a 10-digit dialing pattern, NPA-NXX-XXXX, where N represents any digit from 2 through 9 and X represents any digit from 0 through 9. Thousands-block number pooling is a numbering resource optimization measure in which 10,000 numbers in an NXX are divided into ten sequential blocks of 1,000 numbers and allocated to different service providers (or different switches) within a rate center. See *Numbering Resource Optimization*, CC Docket Nos. 99-200, 95-116, Fourth Report and Order, 18 FCC Rcd 12472, 12474, para. 5 (2003) (*NRO Fourth Report and Order*).

Commission could petition the FCC for delegated authority to implement mandatory thousands-block pooling in the 25 Optional rate centers if doing so might materially extend the life of the 603 NPA. While the Telecommunications Carriers recognize that additional delegated authority for mandatory pooling has proven beneficial in extending the life of several NPAs across the NANP, the Telecommunications Carriers determined that it is unlikely the 603 NPA would realize any measurable additional life if the 25 Optional rate centers became Mandatory rate centers.

In the 25 Optional rate centers, there is no forecasted CO code demand on file with the Pooling Administrator for the next 6 months.³ In implementing thousands-block pooling, the FCC indicated that state petitions for delegated authority must demonstrate that: (1) an NPA in the state is in jeopardy; (2) the NPA in question has a remaining life span of at least one year; and (3) the NPA is in one of the largest 100 MSAs or, alternatively, the majority of wireline carriers in the NPA are local number portability (LNP)-capable. The FCC recognized that there may be “special circumstances” where pooling would be of benefit in NPAs that do not meet all three criteria and said that pooling may be authorized in such an NPA upon a satisfactory showing by the state commission of such special circumstances.⁴ Because the 25 Optional rate centers do not appear to be the source of current NXX code demand driving the exhaust of the 603 NPA, it may prove difficult for the Commission to justify the request to the FCC for additional authority.

Further, if the Commission petitioned the FCC for delegated authority, the recent

² See *NRO First Report and Order*, 15 FCC Rcd at 7651-52, para. 170.

³ See the 603 NPA Pool Tracking Report at www.nationalpooling.com.

⁴ See *NRO First Report and Order*, 15 FCC Rcd at 7651-52, para. 170.

experience of other states with similar petitions indicates that it is unlikely the FCC would respond to the petition in advance of the date that carriers would need to begin an overlay implementation. Timely relief implementation is essential to ensure an adequate supply of telephone numbers are available to carriers so that New Hampshire consumers can continue to be able to choose products and services from the carrier of their choice. As such, although the Telecommunications Carriers investigated the possibility, they cannot recommend that the Commission petition the FCC for additional delegated authority to implement thousands-block pooling in the 25 Optional rate centers. The possibility is only documented as a potential option that was considered to extend the life of the 603 NPA, but rejected.

B. The Commission Should Order an All-Services Overlay Now But Delay The Onset Of Relief Implementation Using A Predetermined Trigger.

According to the October 2010 NPA Exhaust Analysis prepared by the North American Numbering Plan Administrator (“NANPA”), exhaust of the 603 NPA is currently projected to occur in the second quarter of 2013.⁵ In general, the planning horizon for an all-services overlay is shorter than that for a geographic split. In this case, the industry is recommending seventeen months before exhaust to implement an overlay because area code relief in states where relief is required for the first time can be a more challenging transition, for carriers and consumers alike. The seventeen-month implementation interval is comprised of an eight-month period for network preparation and customer education materials preparation, an eight-month permissive 7-digit or 10-

⁵ See http://www.nanpa.com/pdf/NRUF/2010_NPA_Exhaust_Projections.pdf.

digit dialing period and customer education period, and a 1-month period before activation of first code in the new NPA. It is important to allot sufficient time for the industry to do a thorough job of public education. Therefore, the Telecommunications Carriers request that the Commission act as quickly as possible.

As an additional step that can be taken to extend the life of the 603 NPA and ensure relief implementation does not occur prematurely, the Commission can establish a predetermined trigger requiring the industry to set relief implementation dates if and when the number of available NXX codes falls to thirty.

To determine an appropriate trigger based on the number of remaining available NXX codes, the Telecommunications Carriers reviewed a number of factors, including the historical NXX code assignment for the last three years, the quantity of remaining available NXX codes, the current projected exhaust date, the forecasted demand for NXX codes from the Pooling Administrator in the next six months, the quantity of thousands-blocks currently available in the rate center pools, and the quantity of rate centers within the 603 NPA. Currently, there are fifty NXX codes remaining in the 603 NPA. Through analysis of these factors, the Telecommunications Carriers determined that a threshold of thirty remaining available NXX codes is reasonable to trigger implementation dates for an all-services overlay for the 603 NPA. Such a trigger will provide enough time to accommodate the industry's recommended seventeen-month implementation without implementing relief sooner than necessary.

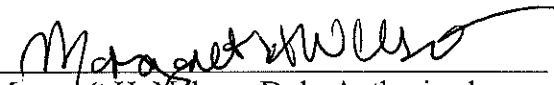
CONCLUSION

For the foregoing reasons, the Telecommunications Carriers respectfully request that the Commission order an all-services overlay as the method of relief for the 603 NPA, with a seventeen-month implementation schedule and a trigger of thirty remaining available NXX codes for the industry to convene to set the appropriate dates for the seventeen-month implementation interval.

Respectfully submitted

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