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PUBLIC SERVICE COMMISSION

February 13, 2001

VIA ELECTRONIC FILING

Ms. Magalie Roman Salas
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445 Twelfth Street, SW - TW-A325
Washington, DC 20554

Re: **Florida Public Service Commission Comments in the Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200; and Petition for Clarification of Second Report and Order in CC Docket No. 99-200**

Dear Ms. Salas:

Forwarded herewith are the Florida Public Service Commission Comments in the Second Further Notice of Proposed Rulemaking and Petition for Clarification of the Second Report and Order in CC Docket. No. 99-200.

These comments were drafted by the Competitive Safeguards Bureau.

Sincerely,

/s/

Cynthia B. Miller, Esquire
Bureau of Intergovernmental Liaison

CBM:tf

Attachment

cc: Brad Ramsay, National Association of Regulatory Utility Commissioners

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Petition for Declaratory Ruling and Request For)	
Expedited Action on the July 15, 1997 Order of)	CC Docket No. 96-98
the Pennsylvania Public Utility Commission)	
Regarding Area Codes 412, 610, 215, and 717)	
)	

**FLORIDA PUBLIC SERVICE COMMISSION
COMMENTS IN THE SECOND FURTHER NOTICE OF PROPOSED RULEMAKING
IN CC DOCKET NO. 99-200**

Introduction and Executive Summary

The Florida Public Service Commission (FPSC) submits these comments and reconsideration in response to the Second Report and Order on Reconsideration (Order), and Second Further Notice of Proposed Rulemaking (Rulemaking) on Numbering Resource Optimization (NRO) measures which the Federal Communications Commission (FCC) released on December 29, 2000.

The FPSC considers the NRO Order to be a milestone in the regulation of public telephone numbering resources. The Order adopts and implements various number conservation measures or methodologies to ensure that the numbering resources in the North American Numbering Plan (NANP) are used efficiently. The FPSC generally supports the FCC's Order addressing the numbering crisis, and would like to submit the following comments:

1. The FCC should permit state commissions to implement service-specific or technology-specific overlays, but not require that they be on a "phased in," or transitional basis.
2. The FPSC believes that state commissions should have access to mandatory reporting data on NeuStar's web site through a password-protected access in addition to receiving the semi-annual utilization data now provided.

3. The FPSC suggests that an FCC-sponsored workshop be conducted to determine a middle ground in pursuing rate center consolidation and revenue neutrality.
4. The FCC should acknowledge state commissions' independent authority to conduct "for cause" and "random" audits in lieu of a national audit program conducted by auditors of the Common Carrier Bureau.
5. The FCC should allow state commissions the option to defer state-mandated thousands-block pooling costs until national thousands-block number pooling is implemented and a federal cost recovery mechanism is in place, at which time the costs of the state-mandated thousands-block number pooling could be rolled into one recovery mechanism.
6. The FCC should give state commissions authority to decide on requests for waiver of the utilization threshold requirement in certain narrowly defined instances such as a rate center with multiple switches.

Background

On April 2, 1999, the FPSC filed a petition before the FCC requesting that the FCC delegate to the FPSC authority to implement various number conservation measures. On June 2, 1999, the FCC issued a Notice of Proposed Rule Making (NPRM) on Numbering Resource Optimization. In the NPRM, the FCC clearly acknowledged the existence of serious problems with the utilization of numbering resources, addressed the underlying causes of area code exhaustion, and expressed concern that consumers should be spared the enormous costs and inconveniences associated with the introduction of new area codes. The FCC recognized that implementing new area codes is not a solution that can continue indefinitely, considering the finite number of area codes.

On September 15, 1999, the FCC granted five state commissions (including Florida) additional interim number conservation authority. Later in the year, the FCC delegated similar

authority to many other state commissions. To exercise this interim authority, on February 29, 2000, the FPSC issued a Proposed Agency Action (PAA) which would have required various number conservation measures including number pooling in three area codes. Florida's number pooling trials for the Ft. Lauderdale MSA (954 area code) and the Palm Beach MSA (561 area code) began on January 22, 2001, and February 5, 2001, respectively. The third number pooling trial is scheduled to begin on April 2, 2001 for the Jacksonville MSA (904 area code).

On March 31, 2000, the FCC issued its Report and Order and Further Notice of Proposed Rulemaking. The FPSC agreed with the majority of the FCC's administrative and technical measures to monitor the way numbering resources are used within the NANP.

On December 29, 2000, the FCC issued its Second Report and Order and Second Further Notice of Proposed Rulemaking. Florida and other states are thankful to the FCC for realizing the importance of this matter and delegating authority for various interim number conservation measures. The FPSC would like to address certain issues within the FCC's Second Further Notice of Proposed Rulemaking.

Specific Comments in Response to the Second Further Notice of Proposed Rule Making

(1) SERVICE-SPECIFIC AND TECHNOLOGY-SPECIFIC OVERLAYS

In the Local Competition Second Report and Order, the FCC adopted a rule prohibiting service-specific and technology-specific overlays (§ 124). The Connecticut, Massachusetts, and California Commissions filed petitions to amend or waive the FCC's rules; and the Ohio and Pennsylvania Commissions filed petitions for additional delegated authority to implement service-specific and technology-specific area code overlays (§ 125). In this Rulemaking, the FCC seeks comments on the advantages and disadvantages of service-specific and technology-specific area

code overlays from a competitive, consumer, number resource optimization, technical and transitional feasibility perspective (§ 129-143).

The FPSC, along with other state public utility commissions, faces an enormous burden in determining when, and in what form, to implement area code relief. The FPSC has utilized its resources to convene public service hearings and workshops and to plan for different area code relief strategies depending upon the geographic structure of the region being considered. The FPSC works closely with NANPA and the industry to choose an effective area code relief plan which will address the needs of the customers and the community of interest. Having service-specific or technology-specific overlays as an option when determining the best type of area code relief can be very beneficial. However, the FCC should not require that service-specific or technology-specific overlays be made on a “phased in” or transitional basis. The FPSC believes that the “phased in” or transitional approaches should be available as options to the state commissions.

Service-specific or technology-specific overlays would yield potential new benefits, which in return would promote numbering resource optimization objectives. We disagree with Ameritech’s concerns that service-specific or technology-specific overlays would cause any competitive harm. The FPSC believes that the FCC should permit states to implement service-specific or technology-specific overlays, but not require that they be on a “phased in,” or transitional basis. Indeed, the FPSC urges the FCC to support state discretion to use many tools, including technology-specific and service-specific overlays, with phased-in overlay being an option.

(2) STATE COMMISSIONS’ ACCESS TO MANDATORY REPORTING DATA

In this Rulemaking, the FCC states that some state commissions assert that they require full access to NANPA’s database where forecast and utilization data is stored (§ 151). The FCC also states that NeuStar has proposed to the FCC that state commissions could have password-protected

access to the data from NeuStar's web site. The FCC seeks comments on whether NeuStar's proposal is necessary, sufficient, or whether the access previously granted to state commissions (i.e., States currently have access to semi-annually reported data) is sufficient (§ 151). The FPSC agrees with NeuStar's proposal, and strongly recommends that state commissions should have access to NeuStar's web site through a password-protected access in addition to receiving the semi-annual utilization data now provided. However, the FPSC is concerned that the information provided at this web site could contain custom-produced spreadsheets for a specific purpose, which indeed may not be suitable for every state commission. The FPSC believes that it is necessary for state commissions to have access to the numbering resources databases. Therefore, the FPSC recommends that state commissions should have access to NeuStar's "raw database" from which each state commission could customize its own reporting for different purposes. The FPSC believes that this method would be sufficient. In addition, the FPSC believes that after accessing NeuStar's web site via password-protection, states should have the "raw database" with no-password protection. For example, some people would like to protect their spreadsheets or files so that no one should have access to various company-based formulations or change the layout of the output. If there is a password protection to each computer file, the FPSC believes that it will not be a good use of resources. The FPSC recommends that the password-protection should only be applicable to access the web site, not individual files. The FPSC also recommends that state commissions be able to access the "raw database" so that state commissions' staff could customize its need.

In response to NeuStar's proposal, the FPSC believes that as long as there is direct access to "raw database", and the semi-annual utilization data continues to be provided to states as it is now, this proposal is sufficient to accommodate the states' needs.

(3) THE RATE CENTER PROBLEM

The FCC seeks comment on ways of severing the connection between number assignment and call rating and routing (§ 148). The FPSC agrees with the FCC and other state commissions that rate center consolidation (RCC) can be an important long-term measure to optimize the utilization of numbering resources. However, the problem of severing the connection between rate centers and rating and routing is a major obstacle. Carriers are willing to initiate rate center consolidation provided it is on a revenue neutral basis. The FPSC suggests that an FCC-sponsored workshop be conducted to determine a middle ground in pursuing rate center consolidation and revenue neutrality.

(4) STATE COMMISSION'S AUTHORITY TO CONDUCT "FOR CAUSE" AND "RANDOM" AUDITS

In this Order, the FCC believes that numbering audits are the only comprehensive method to verify the validity and accuracy of number utilization data submitted by carriers (§ 81). The FCC also believes that a comprehensive auditing program could be very useful for multiple purposes (§ 83). Therefore, the FCC approved two types of audits: "for cause" audits and "random" audits (§ 85). The FCC states that "for cause" audits are necessary when there is a belief that a carrier is providing inaccurate or misleading information or has violated the rules, orders, or guidelines. The FCC also states that "random" audits will "[s]erve as a strong deterrent to any carrier who might misuse numbering resources" (§ 88).

Although regularly scheduled audits were considered, the FCC determined that they would be "exorbitantly expensive" to the industry (§ 85). The FCC also decided that auditors from the Common Carrier Bureau or other designated agents under section 251(e)(1), would conduct the audits, but would permit state commissions' staff to participate on the FCC audit teams provided that the state commissions have resources to do so, and if they wish to do so (§ 90-92).

The FCC seeks comment on whether state commissions should be given independent authority to conduct “for cause” and “random” audits in lieu of a national audit program conducted by auditors of the Common Carrier Bureau (§ 155). The FPSC believes that the FCC should acknowledge state commissions’ independent authority to conduct “for cause” and “random” audits in lieu of a national audit program conducted by auditors of the Common Carrier Bureau. Many states have both the staff and expertise to conduct these audits. The FPSC believes that national uniform auditing standards should be established for numbering audits. The FCC Errata issued January 24, 2001 replaces the third sentence in paragraph 14 of FCC 00-429 to read “Moreover, we delegate authority to the Chief of the Bureau to provide a comprehensive audit plan, including detailed audit procedures for both “for cause” and “random” audits.” The FPSC believes these detailed audit procedures would provide consistency whether state commissions or auditors from the Common Carrier Bureau perform a numbering audit. It would also allow the FCC and state commissions to achieve their common goals to conserve telephone numbers and have the ability to penalize carriers which hoard numbers or use them inefficiently.

For state commissions which elect not to conduct “for cause” or “random” audits, an auditor from the Common Carrier Bureau or other designated agent could be assigned. In summary, the FCC should acknowledge state commissions’ independent authority to conduct “for cause” and “random” audits in lieu of a national audit program conducted by auditors of the Common Carrier Bureau.

(5) **RECOVERY OF POOLING SHARED INDUSTRY AND DIRECT CARRIER-SPECIFIC COSTS**

The FCC adopted three cost categories for thousands-block number pooling – shared industry costs (cost incurred by the industry as a whole such as NANP administration costs), carrier-

specific costs directly related to thousands-block number pooling (such as enhancements to carriers' Service Control Point (SCP), Local Service Management System (LSMS), Service Order Activation (SOA), and Operation Support Systems (OSS), and carrier-specific costs not directly related to thousands-block number pooling.

The FCC further concluded that incremental shared industry costs become carrier-specific costs once they are allocated among carriers, and it adopted the NANPA fund formula for allocating shared industry costs for thousands-block number pooling.

FCC Order 00-104 stated that "Costs incurred by carriers to implement state-mandated thousands-block number pooling are intrastate costs and should be attributed solely to the state jurisdiction." (§ 170) Also, per Order 00-104, in order for an area to qualify for number pooling it must be one of the largest 100 Metropolitan Statistical Areas (MSA's) or, alternatively, the majority of wireline carriers in the NPA must be LNP-capable (§ 170).

The FCC seeks further comment and cost studies that quantify shared industry and direct carrier-specific costs of thousands-block number pooling (§ 182). The FPSC believes that since state pooling trials must meet the same criteria of being in one of the largest 100 MSA's or have the majority of wireline carriers in the NPA LNP-capable, the state pooling trials basically have become an extension of the national number pooling rollout with the only difference being a matter of timing.

The FPSC believes the FCC should allow state commissions the option to defer state-mandated thousands-block number pooling costs until national thousands-block number pooling is implemented and a federal cost recovery mechanism is in place, at which time the costs of the state-mandated thousands-block number pooling could be rolled into one recovery mechanism. This

would result in having only one number pooling charge on a customer's bill, and cause less confusion for the customers.

(6) WAIVER OF GROWTH NUMBERING RESOURCE REQUIREMENTS

The FCC seeks comment on the need to establish a "safety valve" apart from the general waiver process to allow carriers that do not meet the utilization threshold in a given rate center to obtain additional numbering resources (§§ 186-189). On December 19, 2000, BellSouth Telecommunications, Inc. (BellSouth) made a presentation to the FPSC regarding its inability to obtain new growth codes, because it had to prove that it met certain criteria at the rate center level instead of the switch level. BellSouth stated that it receives codes at the switch level. The FPSC believes that a "safety valve" should be established at the state commission level for situations such as multiple switch rate centers. Some switches use more NXX central office codes than others, and although one switch in a rate center of multiple switches may be near exhaust, the average utilization may not exceed the standard utilization rates at the rate center level, preventing a carrier from obtaining a new code. The FPSC believes the FCC should give state commissions authority to decide on requests for waiver of either the utilization threshold or months to exhaust requirements in certain narrowly defined instances such as a rate center with multiple switches.

In conclusion, we thank the FCC for its efforts to enable state commissions to help solve the numbering crisis puzzle.

Respectfully submitted,

/s/

CYNTHIA B. MILLER, Esquire
Bureau of Intergovernmental Liaison

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Florida Public Service Commission
February 13, 2001
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DATED: February 13, 2001

**BEFORE THE
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WASHINGTON, D.C. 20554**

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the Pennsylvania Public Utility Commission)	
Regarding Area Codes 412, 610, 215, and 717)	

**FLORIDA PUBLIC SERVICE COMMISSION
PETITION FOR CLARIFICATION OF SECOND REPORT AND ORDER
IN CC DOCKET NO. 99-200**

The Florida Public Service Commission (FPSC) submits this petition for clarification of Second Report and Order (00-429) in CC Docket No. 99-200 on Numbering Resource Optimization (NRO) measures which the Federal Communications Commission (FCC) released on December 29, 2000.

The FPSC is concerned with the FCC’s statement in paragraph 44 of FCC 00-429. The FCC states that “States using a utilization threshold that exceeds the currently established initial threshold of 60% in an active pooling trial need not decrease their threshold in that area, but may continue to use their threshold up to a maximum of 75%.” The FPSC requests a clarification from the FCC regarding the meaning of “active pooling trial.” The FPSC generally believes that the active pooling trial date should be the date at which state commissions issue an order regarding a number pooling trial.

In conclusion, we ask the FCC to clarify the meaning of “active pooling trial.”

Florida Public Service Commission
February 13, 2001
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Respectfully submitted,

/s/

CYNTHIA B. MILLER, Esquire
Bureau of Intergovernmental Liaison

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DATED: February 13, 2001

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Comments of the Florida Public Service Commission will be furnished to the parties on the attached list.

/s/

CYNTHIA B. MILLER, Esquire
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DATED: February 13, 2001

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