

Alliance for Telecommunications Industry Solutions

Problem Solvers to the Telecommunications Industry

1200 G Street, N.W.  
Suite 500  
Washington, D.C. 20005

202-628-6380  
Fax: 202-393-5453  
www.atis.org

Chairman  
Martin McCue  
Global Crossing

First Vice Chairman  
Fred Fromm  
Siemens Information and Communication Networks

Second Vice Chairman  
Ross K. Ireland  
SBC Communications

Treasurer  
David R. Maccarelli  
CFW Communications

President & Chief Executive Officer  
Susan M. Miller  
ATIS

Vice President of Finance & Operations  
William J. Klein  
ATIS

General Counsel  
Megan L. Campbell  
ATIS



Standards Committee 11  
Telecommunications



Carrier Liaison Committee



Telecommunications Industry Forum



Protection Engineers Group



Standards Committee 05



Network Reliability Steering Committee



Network and Services Integration Forum



Internetwork Interoperability Test Coordination Committee



Data-Aware Transport Activity

May 5, 2000

RECEIVED

MAY 05 2000

FCC MAIL ROOM

Mr. L. Charles Keller, Chief  
Network Services Division  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

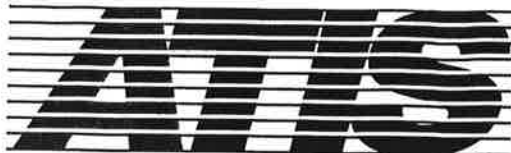
**Re: Clarification Questions to the Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 99-200 (FCC 00-104)**

Dear Mr. Keller:

The Alliance for Telecommunications Industry Solutions (ATIS) sponsored Industry Numbering Committee (INC) began the work of revising its Thousands-Block (NXX-X) Pooling Administration and CO Code Assignment Guidelines in accordance with the FCC Order 00-104 at the Committee's April 10-14, 2000 meeting. In order to meet the June 20, 2000 deadline imposed by the NANC for all updates to the above Guidelines, the INC agreed to an expedited process and the CO/NXX and LNPA Workshops are meeting on a very aggressive schedule.

As this work has developed, the participants have composed a list of several clarification questions with respect to the Order. Answers to these questions are required for the INC to proceed with their work and to meet the June 20<sup>th</sup> deadline. I have provided the list of clarification questions as an attachment to this letter. ATIS and the INC are hopeful that the FCC could address the questions and respond prior to the next scheduled meeting of the CO/NXX and LNPA Workshops on May 30-June 2, 2000. Responses prior to the meeting date would allow the INC to proceed with the work and address any follow-up concerns or necessary clarifications resulting from that meeting in advance of the deadline.

Megan



Alliance for Telecommunications Industry Solutions

Problem Solvers to the Telecommunications Industry

1200 G Street, N.W.  
Suite 500  
Washington, D.C. 20005

202-628-6380  
Fax: 202-393-5453  
www.atis.org

Chairman  
Martin McCue  
Global Crossing

First Vice Chairman  
Fred Fromm  
Siemens Information and  
Communication Networks

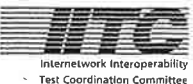
Second Vice Chairman  
Ross K. Ireland  
SBC Communications

Treasurer  
David R. Maccarelli  
CFW Communications

President & Chief Executive Officer  
Susan M. Miller  
ATIS

Vice President of Finance & Operations  
William J. Klein  
ATIS

General Counsel  
Megan L. Campbell  
ATIS



May 5, 2000

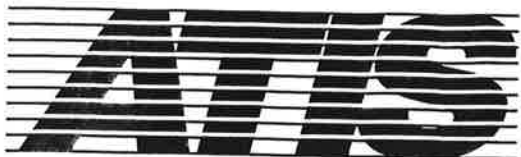
Mr. L. Charles Keller, Chief  
Network Services Division  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**Re: Clarification Questions to the Report and Order and  
Further Notice of Proposed Rulemaking in CC Docket  
No. 99-200 (FCC 00-104)**

Dear Mr. Keller:

The Alliance for Telecommunications Industry Solutions (ATIS) sponsored Industry Numbering Committee (INC) began the work of revising its Thousands-Block (NXX-X) Pooling Administration and CO Code Assignment Guidelines in accordance with the FCC Order 00-104 at the Committee's April 10-14, 2000 meeting. In order to meet the June 20, 2000 deadline imposed by the NANC for all updates to the above Guidelines, the INC agreed to an expedited process and the CO/NXX and LNPA Workshops are meeting on a very aggressive schedule.

As this work has developed, the participants have composed a list of several clarification questions with respect to the Order. Answers to these questions are required for the INC to proceed with their work and to meet the June 20<sup>th</sup> deadline. I have provided the list of clarification questions as an attachment to this letter. ATIS and the INC are hopeful that the FCC could address the questions and respond prior to the next scheduled meeting of the CO/NXX and LNPA Workshops on May 30-June 2, 2000. Responses prior to the meeting date would allow the INC to proceed with the work and address any follow-up concerns or necessary clarifications resulting from that meeting in advance of the deadline.



Mr. Keller  
May 5, 2000  
Page 2

Questions 1 through 9 in the attachment, with the exception of question 4A, were previously presented to the NANC at the April 26th NANC meeting by the INC Moderator, Shawn Murphy, as part of the INC Moderator's Report to the NANC. The remaining questions were developed during the CO/NXX and LNPA Workshop meetings held this week at ATIS.

Should you have any questions, please do not hesitate to contact me at 202-434-8847. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Megair L. Campbell".

Megair L. Campbell  
General Counsel

cc: Yog Varma, Deputy Bureau Chief, Common Carrier Bureau  
Diane Harmon, Operations Deputy Chief, Network Services Division  
Les Selzer, FCC Economist, Network Services Division  
Shawn Murphy, INC Moderator  
Norman Epstein, INC Assistant Moderator

**INC CLARIFICATION QUESTIONS REGARDING  
FCC ORDER 00-104**

**LNPA Workshop Questions to the April NANC:**

- **Question 1: Concerning contamination, does the FCC mean up to and including 10% or up to 10% (The intent of the INC was up to and including 10%).**
- **Question 2: The INC Thousand Block (NXX-X) Pooling Administration Guidelines currently do not address transitioning from the state pooling trials to the National Thousand Block Pooling Framework. Does the FCC believe that transition plans from state pooling trials need to be documented (e.g., Requirement Document)?**
- **Question 3: When referring to "days" is the FCC referring to "calendar" or "business" days? For example, the 45 days noted for reserved numbers. (Paragraph 23).**

**CO/NXX Workshop Questions to the April NANC:**

- **Question 4: What is the FCC definition of "assignees' applicable activation deadline?" Does this term refer to the day the code is opened in the PSTN, or the day customers are using the numbers?**
  - **Question 4 A: The INC would like the FCC to comment on whether "activation date," and "activation deadline," refer to the same timeframe. INC believes that these are two distinct terms. (LNPA Workshop May 2, 2000)**
- **Question 5: Can a service provider submit an application for an initial code and indicate an effective date of up to six months from the date of application? (Paragraph 96).**

**COCUS II Questions to the April NANC:**

**Question 6: Do carriers have to have a separate COCUS report for each OCN?**

**Question 7: If two OCNs belong to the same company and only one OCN completed its COCUS, can the non-reporting OCN delay resources for the reporting OCN?**

**INC CLARIFICATION QUESTIONS REGARDING  
FCC ORDER 00-104**

**Question 8: For SPs that fail to provide a COCUS, should the NANPA deny a request on a rate center, NPA or state basis? (To be developed by the NANPA).**

**Question 9: Does the calculation in paragraph 35 for available numbers preclude the PA from reporting on available numbers?**

**Additional Questions for the FCC from LNPA Interim Workshop, May 2, 2000:**

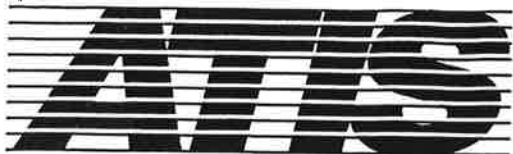
- **Question A: INC knows that the LERG uses the term rate center; however, there are smaller geographical rating areas in existence, e.g, rate district, rate zones. Therefore, INC has chosen to use the word "rate area" to account for this. Should INC continue to refer to these rating areas as "rate areas," or should they, per the FCC order, call them rate centers? INC believes that "rate area," in the context of the guidelines, is the appropriate term. INC further believes that "rate area" is the appropriate term because pooling is structured around rate areas according to the guidelines. INC is concerned with the situation where a rate center is split by an NPA boundary and the affect using "rate center" will have in these situations.**
- **Question B: The FCC has introduced a term "Parent Company OCN(s)." INC needs clarification on a definition for this term. INC believes that if company "b" is owned by company "a" or is a subsidiary of company "a," then we interpret "Parent Company OCN" to be the overall OCN of company "a."**
- **Question C: The order speaks to utilization requirements in general for carriers, whether or not they are in a pooling or non-pooling area. The INC believes, based on sections in the FCC order pertinent to thousands-block numbering pooling, that pooling participants are not required to report utilization as part of their forecasts.**
- **Question D: INC would like the FCC to define the "non-carrier" as used in the FCC Order.**

**INC CLARIFICATION QUESTIONS REGARDING  
FCC ORDER 00-104**

- **Question E:** *Forecasts are to be submitted semi-annually for a one-year period. As per that requirement, it will be very difficult to establish a six-month inventory based on yearly forecast information. The pooling guidelines, as written, had requested quarterly forecasts information that INC believed was appropriate to establish a six-month inventory. Did the FCC take this into account when they structured the new forecast reporting requirement?*

**New Questions from the CO/NXX Workshop, May 4, 2000:**

- **Question F:** *When multiple switches exist in a rate center or a new switch is added to a rate center that has an existing switch, shouldn't the months to exhaust utilization calculation be based on a per switch basis? (FCC 00-104 ¶100 52.15 (g) (3) (i)).*
- **Question G:** *Does the present order eliminate the possibility for carriers to request additional CO/NXX codes for distinct routing, rating, or billing purposes without justifying the request with an MTE? INC believes that there are circumstances where distinct routing, rating and billing functions require distinct codes. (See Sections 4.2.3 and 4.2.4 of the COCAG and FCC 00-104 ¶100 52.15 (g) (3) (i)).*
- **Question H:** *Does the NANPA still have the option of granting extensions when codes have not been put into service after the assignee's applicable activation deadline? INC is assuming that NANPA still has the prerogative to give a 90-day extension. (See Sections 8.2.3 and 8.2.4 of the COCAG and FCC 00-104 ¶ 237-241, 52.15 (i)).*
- **Question I:** *Under the FCC Order, is NANPA to refer instances of un-activated codes to state commissions after the expiration of the applicable activation deadline, or initiate reclamation directly? (See Sections 8.2.3 and 8.2.4 of the COCAG and FCC 00-104 ¶ 237-241, 52.15 (i)).*



Alliance for Telecommunications  
Industry Solutions

*Problem Solvers to the  
Telecommunications Industry*

1200 G Street, N.W.  
Suite 500  
Washington, D.C. 20005

202-628-6380  
Fax: 202-393-5453  
www.atis.org

Chairman  
Martin McCue  
Global Crossing

First Vice Chairman  
Fred Fromm  
Siemens Information and  
Communication Networks

Second Vice Chairman  
Ross K. Ireland  
SBC Communications

Treasurer  
David R. Maccarelli  
CFW Communications

President & Chief Executive Officer  
Susan M. Miller  
ATIS

Vice President of Finance & Operations  
William J. Klein  
ATIS

General Counsel  
Megan L. Campbell  
ATIS



Standards Committee T1  
Telecommunications



Carrier Liaison Committee



Telecommunications  
Industry Forum



Protection Engineers Group



Standards Committee 05



Network Reliability  
Steering Committee



Network and Services  
Integration Forum



Internetwork Interoperability  
Test Coordination Committee



Data-Aware  
Transport Activity

May 5, 2000

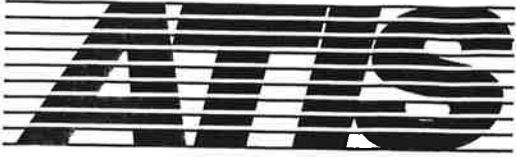
Mr. L. Charles Keller, Chief  
Network Services Division  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**Re: Clarification Questions to the Report and Order and  
Further Notice of Proposed Rulemaking in CC Docket  
No. 99-200 (FCC 00-104)**

Dear Mr. Keller:

The Alliance for Telecommunications Industry Solutions (ATIS) sponsored Industry Numbering Committee (INC) began the work of revising its Thousands-Block (NXX-X) Pooling Administration and CO Code Assignment Guidelines in accordance with the FCC Order 00-104 at the Committee's April 10-14, 2000 meeting. In order to meet the June 20, 2000 deadline imposed by the NANC for all updates to the above Guidelines, the INC agreed to an expedited process and the CO/NXX and LNPA Workshops are meeting on a very aggressive schedule.

As this work has developed, the participants have composed a list of several clarification questions with respect to the Order. Answers to these questions are required for the INC to proceed with their work and to meet the June 20<sup>th</sup> deadline. I have provided the list of clarification questions as an attachment to this letter. ATIS and the INC are hopeful that the FCC could address the questions and respond prior to the next scheduled meeting of the CO/NXX and LNPA Workshops on May 30-June 2, 2000. Responses prior to the meeting date would allow the INC to proceed with the work and address any follow-up concerns or necessary clarifications resulting from that meeting in advance of the deadline.



Mr. Keller  
May 5, 2000  
Page 2

Questions 1 through 9 in the attachment, with the exception of question 4A, were previously presented to the NANC at the April 26th NANC meeting by the INC Moderator, Shawn Murphy, as part of the INC Moderator's Report to the NANC. The remaining questions were developed during the CO/NXX and LNPA Workshop meetings held this week at ATIS.

Should you have any questions, please do not hesitate to contact me at 202-434-8847. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Megan L. Campbell".

Megan L. Campbell  
General Counsel

cc: Yog Varma, Deputy Bureau Chief, Common Carrier Bureau  
Diane Harmon, Operations Deputy Chief, Network Services Division  
Les Selzer, FCC Economist, Network Services Division  
Shawn Murphy, INC Moderator  
Norman Epstein, INC Assistant Moderator



**INC CLARIFICATION QUESTIONS REGARDING  
FCC ORDER 00-104**

**LNPA Workshop Questions to the April NANC:**

- **Question 1: Concerning contamination, does the FCC mean up to and including 10% or up to 10% (The intent of the INC was up to and including 10%).**
- **Question 2: The INC Thousand Block (NXX-X) Pooling Administration Guidelines currently do not address transitioning from the state pooling trials to the National Thousand Block Pooling Framework. Does the FCC believe that transition plans from state pooling trials need to be documented (e.g., Requirement Document)?**
- **Question 3: When referring to “days” is the FCC referring to “calendar” or “business” days? For example, the 45 days noted for reserved numbers. (Paragraph 23).**

**CO/NXX Workshop Questions to the April NANC:**

- **Question 4: What is the FCC definition of “assignees’ applicable activation deadline?” Does this term refer to the day the code is opened in the PSTN, or the day customers are using the numbers?**
  - **Question 4 A: The INC would like the FCC to comment on whether “activation date,” and “activation deadline,” refer to the same timeframe. INC believes that these are two distinct terms. (LNPA Workshop May 2, 2000)**
- **Question 5: Can a service provider submit an application for an initial code and indicate an effective date of up to six months from the date of application? (Paragraph 96).**

**COCUS II Questions to the April NANC:**

**Question 6: Do carriers have to have a separate COCUS report for each OCN?**

**Question 7: If two OCNs belong to the same company and only one OCN completed its COCUS, can the non-reporting OCN delay resources for the reporting OCN?**

**INC CLARIFICATION QUESTIONS REGARDING  
FCC ORDER 00-104**

**Question 8:** *For SPs that fail to provide a COCUS, should the NANPA deny a request on a rate center, NPA or state basis? (To be developed by the NANPA).*

**Question 9:** *Does the calculation in paragraph 35 for available numbers preclude the PA from reporting on available numbers?*

**Additional Questions for the FCC from LNPA Interim Workshop, May 2, 2000:**

- **Question A:** *INC knows that the LERG uses the term rate center; however, there are smaller geographical rating areas in existence, e.g, rate district, rate zones. Therefore, INC has chosen to use the word "rate area" to account for this. Should INC continue to refer to these rating areas as "rate areas," or should they, per the FCC order, call them rate centers? INC believes that "rate area," in the context of the guidelines, is the appropriate term. INC further believes that "rate area" is the appropriate term because pooling is structured around rate areas according to the guidelines. INC is concerned with the situation where a rate center is split by an NPA boundary and the affect using "rate center" will have in these situations.*
- **Question B:** *The FCC has introduced a term "Parent Company OCN(s)." INC needs clarification on a definition for this term. INC believes that if company "b" is owned by company "a" or is a subsidiary of company "a," then we interpret "Parent Company OCN" to be the overall OCN of company "a."*
- **Question C:** *The order speaks to utilization requirements in general for carriers, whether or not they are in a pooling or non-pooling area. The INC believes, based on sections in the FCC order pertinent to thousands-block numbering pooling, that pooling participants are not required to report utilization as part of their forecasts.*
- **Question D:** *INC would like the FCC to define the "non-carrier" as used in the FCC Order.*

**INC CLARIFICATION QUESTIONS REGARDING  
FCC ORDER 00-104**

- *Question E: Forecasts are to be submitted semi-annually for a one-year period. As per that requirement, it will be very difficult to establish a six-month inventory based on yearly forecast information. The pooling guidelines, as written, had requested quarterly forecasts information that INC believed was appropriate to establish a six-month inventory. Did the FCC take this into account when they structured the new forecast reporting requirement?*

*New Questions from the CO/NXX Workshop, May 4, 2000:*

- *Question F: When multiple switches exist in a rate center or a new switch is added to a rate center that has an existing switch, shouldn't the months to exhaust utilization calculation be based on a per switch basis? (FCC 00-104 ¶100 52.15 (g) (3) (i)).*
- *Question G: Does the present order eliminate the possibility for carriers to request additional CO/NXX codes for distinct routing, rating, or billing purposes without justifying the request with an MTE? INC believes that there are circumstances where distinct routing, rating and billing functions require distinct codes. (See Sections 4.2.3 and 4.2.4 of the COCAG and FCC 00-104 ¶100 52.15 (g) (3) (i)).*
- *Question H: Does the NANPA still have the option of granting extensions when codes have not been put into service after the assignee's applicable activation deadline? INC is assuming that NANPA still has the prerogative to give a 90-day extension. (See Sections 8.2.3 and 8.2.4 of the COCAG and FCC 00-104 ¶ 237-241, 52.15 (i)).*
- *Question I: Under the FCC Order, is NANPA to refer instances of un-activated codes to state commissions after the expiration of the applicable activation deadline, or initiate reclamation directly? (See Sections 8.2.3 and 8.2.4 of the COCAG and FCC 00-104 ¶ 237-241, 52.15 (i)).*