

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

UT-991627

Possible Surcharge for State)
Interim Number Pooling)

COMMENTS OF SPRINT

1. Do you intend to ask for a surcharge to cover state interim pooling costs?

RESPONSE: Yes, Sprint intends to file for a surcharge to recover interim number pooling costs.

2. How should the costs of interim pooling in area code 509 be recovered?

RESPONSE: Cost recovery should be handled through an end user surcharge, preferably by combining the charge with the local number portability charge on customer's bills.

3. What FCC requirements do you believe apply regarding the type of allowable costs to be recovered for interim pooling?

RESPONSE: The FCC concluded that section 251(e)(2)'s competitively neutral requirement applies only to the allocation and recovery of shared industry costs and carrier-specific costs directly related to the implementation of thousands-block number pooling, not to carrier-specific costs. See FCC 00-104, released March 31, 2000, paragraph 201.

4. Should carriers who participate in interim pooling within the 509 area code recover costs at this time or wait until such time as the Federal Communications Commission (FCC) addresses cost recovery for pooling on a national level?

RESPONSE: Sprint would like to begin recovery with implementation.

5. What portion of these costs should be recovered at the time of the national pooling roll out vs. upon implementation of interim state pooling?

RESPONSE: The number pooling functions appear to be equivalent at both the federal and state level. There is no need to apportion cost between the state and the national number pooling rollouts. If the FCC provides a mechanism for cost recovery via an interstate end user surcharge and the cost is identical, then the state surcharge could be discontinued. If there are material pooling administration costs attributable to the state, then the state surcharge could be reduced to recover such pooling administration costs,

with the remaining cost recovered through the interstate surcharge.

6. Should the interim pooling charge continue once national pooling is implemented and cost recovery is addressed by the FCC?

RESPONSE: In the FCC's DA 00-1616 released July 20, 2000, paragraph 21 states that "because the FCC's national cost recovery plan will not be in effect until national thousands-block number pooling implementation occurs, states conducting their own pooling trials must develop their own cost recovery mechanisms for the joint and carrier specific costs of implementing and administering pooling within their states. The individual state cost-recovery schemes, however, must transition to the national cost-recovery plan when the latter becomes effective. The national cost recovery plan will become effective after national thousands-block number pooling is implemented."

7. What are the specific incremental costs related to interim number pooling?

RESPONSE: FCC 00-104, paragraph 201 identifies three types of incremental costs for number pooling, the first two of which are recoverable. (1) Shared industry costs, costs incurred by the industry as a whole (including NANP administrator costs, and enhancements to the national number portability database); (2) carrier-specific costs directly related to thousands-block number pooling implementation (such as enhancements to carriers' SCP, LSMS, SOA, and OSS systems); and (3) carrier-specific costs not directly related to thousands-block number pooling. Sprint believes that state-specific administration costs fall into the first category and should be recovered. Additionally, network systems cost rightfully belong in the second category and should be recovered.

8. How is the allocation factor determined for the software upgrade that enables number pooling?

RESPONSE: The number pooling software (shared industry costs) used at the Number Portability Administration Centers (NPACs) is designed specifically for number pooling and does not require any allocation factor. The number pooling software (directly related carrier specific costs) used in Sprint's systems and network is designed specifically for number pooling and does not require an allocation factor.

9. Is the software used for number pooling capable of providing other service offerings?

RESPONSE: No.

10. If a percentage of the software is recovered through a number pooling surcharge, how will you assure that this cost is not collected again through regulated rates (i.e. as a result of being included in rate base)?

RESPONSE: The cost of number pooling will be separately tracked so that it can be

removed for rate making.

11. Should cost be recovered from a company's own customers or pooled and recovered from all customers in the 509 area code?

RESPONSE: All customers, nationwide, benefit from number pooling and should pay for number pooling. Cost recovery should be carrier specific and applied to all Sprint customers in the State of Washington who have LNP capable lines. Sprint does not see any need to establish a cost recovery pool. The administrative costs associated with cost pooling would needlessly increase number pooling costs for consumers.

12. How should the costs of the interim pooling administrator be recovered?

RESPONSE: The interim pooling administrator cost should be allocated, based on end user revenues, across all carriers that operate in the state. These costs then become a part of the carrier specific direct costs for number pooling.

13. Should the current number portability charge be modified to include cost recovery for interim pooling, should the number portability charge be extended for a longer period of time or should a separate interim pooling charge apply?

RESPONSE: Sprint would prefer to add the number pooling cost to the number portability charge and begin recovery with implementation. At the point that the cost of number portability recovery is complete, Jan. 31, 2004, customers would see a rate reduction of \$.48/mo. At that point, the surcharge would represent the interim pooling cost recovery.

14. What is the name of each central office and/or rate center owned by your company located in the 509 NPA that has local number portability capability?

RESPONSE: All of Sprint's Washington offices have local number portability capability. See Attachment A.

15. If local number portability is not currently provided, is the call processing equipment capable of being upgraded to provide LNP?

RESPONSE: All of Sprint's call processing equipment is LNP capable.

16. What is the name of each exchange and/or rate center in the 509 NPA in which your company has received requests for number portability and when will LNP be available?

RESPONSE: All Sprint exchanges in Washington are LNP capable with the last exchanges being made available in April 1999. See Attachment A.

17. Please provide detail of your company's costs associated with providing local

number portability.

RESPONSE: Sprint's costs for LNP was provided in the LNP cost recovery studies filed with the FCC.

18. Does your company currently charge a set up and query charge for local number portability?

RESPONSE: Sprint charges a tariffed default query charge for LNP services.

19. If you charge for local number portability, what is the rate and how long will it be in effect?

RESPONSE: Sprint's tariffed default query rate is \$.004227 per query. Sprint will continue to charge this rate for default queries indefinitely. Sprint's tariffed LNP end user charge is \$.48 per month per access line as approved by the FCC. The LNP end user charge will be applied until January 31, 2004.

Respectfully submitted this 28th day of February, 2001, by

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