

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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| In re Numbering Resource Optimization |) | CC Docket No. 99-200 |
| |) | |
| Washington Utilities and Transportation |) | DA 06-1 |
| Commission, Petition for Mandatory |) | |
| Number Pooling |) | |

SPRINT NEXTEL CORPORATION COMMENTS

Sprint Nextel Corporation (“Sprint”) submits these comments in support of the Washington Utilities and Transportation Commission (“WUTC”) petition seeking authority to implement mandatory number pooling in rate centers outside the top 100 Metropolitan Statistical Areas (MSAs).¹ Sprint urges the Commission to act expeditiously on this petition because prompt action could ensure that Washington residents will be spared the costs and burdens of undergoing area code relief while ensuring that carriers will have continuing access to the telephone numbers they need when they need them.

I. NUMBER POOLING HAS PROVEN TO BE A HIGHLY-EFFECTIVE NUMBERING RESOURCE OPTIMIZATION TOOL

Thousands-block number pooling has been extraordinarily effective in improving number utilization and extending the life of the North American Numbering Plan (“NANP”). Number pooling in the 100 most populous MSAs was implemented over a 20-month period between March 15, 2002 and December 31, 2003. According to the most recent data publicly available (year end 2004), pooling has already saved over 153

¹ Public Notice, *Petition for Mandatory Number Pooling Filed by the Washington Utilities and Transportation Commission*, CC Docket No. 99-200, DA 06-1 (Jan. 3, 2006)(“WUTC Petition”).

million telephone numbers.² Largely as a result of number pooling, the NANP administrator has estimated that the life of the NANP has been extended by at least 23 years, from 2012 to beyond 2035³ – action that has saved American consumers an estimated \$50 billion.⁴

To date, the primary focus of number pooling implementation has been on metropolitan areas, which is understandable considering this is where most customers are located, and, as a result, where most telephone numbers have been allocated. The introduction of number pooling has, however, contributed to wide disparities in telephone number utilization rates between carriers serving metropolitan areas and carriers serving rural areas:

PERCENT OF TELEPHONE NUMBERS ASSIGNED TO CUSTOMERS⁵

| | Metropolitan Areas (<u>Pooling Utilized</u>) | Rural Areas (<u>Pooling Generally Not Used</u>) |
|------------------------|---|--|
| ILEC | 58.8% | 15.5% |
| Cellular/PCS | 55.5% | 23.9% |
| CLEC | 16.6% | 16.8% |
| All Reporting Carriers | 44.0% | 15.8% |

Mandatory number would greatly improve number utilization in rural areas outside the Top 100 MSAs where, as demonstrated in the *WUTC Petition*, competition is impacting numbering resources.

² See Industry Analysis and Technology Division, *Numbering Resource Utilization in the United States as of December 31, 2004*, Table 9 (August 2005) (“2004 Numbering Utilization Report”).

³ See NANP 2004 Annual Report at 54-55.
http://www.nanpa.com/reports/NANP_AR_2004.pdf#search='nanpa%202004%20annual%20report'

⁴ See First NRO Report, 15 FCC Rcd 7574, 7580 n. 9 and n. 12 (2000).

⁵ See *2004 Numbering Utilization Report*, Tables 2 and 3.

II. MANDATORY NUMBER POOLING IS NECESSARY IN WASHINGTON

The *WUTC Petition* documents that competition is moving to rural areas and that, unless pooling is implemented in rural areas, the problem of area code exhaust will soon accelerate.⁶ The WUTC reports:

In Washington, competition is expected in all areas of the State with increased offering of Voice Over Internet Protocol (VOIP), wireless, and other service. Cable television companies are offering telephone service in rural areas as well as urban areas. As these competitive companies seek telephone numbers, the present exhaust dates will accelerate. Mandatory number pooling before these competitors request and receive numbers will conserve numbers, delaying number exhaust and the need for are code changes.⁷

According to the NANPA 2004 Annual Report, the 360 NPA is currently estimated for exhaust in the third quarter of 2007; and, the 509 NPA is estimated for exhaust in the first quarter of 2011.⁸ However, the *WUTC Petition* provides ample evidence that mandatory number pooling has a proven track record of extending the lives of NPAs in Washington. For example, where mandatory pooling has been implemented throughout entire NPAs, the lives of the 253 NPA and the 425 NPA have been extended 15 and 26 years, respectively.⁹ Mandatory number pooling is a highly effective number conservation tool, and the WUTC should be permitted to use this tool in advance of dire numbering circumstances expected in the areas where mandatory number pooling has not been implemented.

Data demonstrates that utilization rates for some carriers in Washington are below national averages. Utilization data is particularly relevant in the rural portions of NPA

⁶ *WUTC Petition* at 4.

⁷ *Id.* at 3.

⁸ See NANP 2004 Annual Report at 40-46.

⁹ *WUTC Petition* at 6.

360 and NPA 509 because: i) these NPAs are expected to exhaust soon; and, ii) mandatory pooling does not exist in portions of these NPAs. For example, the utilization of Inland Telephone Company - WA is 7.23 percent, and it has over 37,000 numbers that cannot be used by other carriers so long as Inland does not participate in thousands-block pooling. Pend Oreille Telephone Company has 30,000 numbers to serve fewer than 2,200 customers- a utilization rate of 7.13 percent. And, Whidbey Tel. Co.'s utilization rate is 12.14 percent; it has been assigned over 96,000 telephone numbers that it is not using.¹⁰ None of these carriers participate in pooling and all serve customers in either the 360 or the 509 NPAs – the two NPAs where pooling is most critically needed. Implementation of mandatory number pooling in all rate centers throughout these NPAs will lead to greater utilization of existing numbering resources and quell the need for area code relief.

III. THE PUBLIC INTEREST WOULD BE SERVED BY EXPEDITIOUS GRANT OF THE *WUTC PETITION*

Sprint agrees with the WUTC that the public should be protected from the costs and confusion related to area code relief when numbering resources and mechanisms exists to prevent such relief – that is, if all carriers engage in number pooling. Sprint also agrees that carriers, including rural LECs, should not face substantial burdens implementing mandatory pooling because “all carriers in the state are LNP-capable, or

¹⁰ Utilization rates for the Inland Telephone Company – WA, Pend Oreille Telephone Company Inc., CenturyTel of Cowiche, Inc., and Whidbey Tel. Co. determined by dividing the number of access lines served by the carrier by the total number of telephone numbers assigned to the carrier. Universal Service Administration Company (USAC) 1sat Quarter 2006 HC05 Report used to determine number of lines served; LERG data as of 1/1/2006 used to determine the quantity of numbers assigned.

are expected to be by the time this petition is decided.”¹¹ Sprint therefore urges the Commission to grant expeditiously the pooling relief sought by the WUTC.

IV. CONCLUSION

For the foregoing reasons, Sprint Nextel Corporation urges the Commission to grant expeditiously the petition and allow the WUTC the authority to order mandatory number pooling in rate centers outside the top 100 MSAs.

Respectfully submitted,

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¹¹ *Id.* at 5.