

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of) CC Docket 96-98
)
Washington Utilities and Transportation)
Commission's Petition for Additional)
Delegated Authority to Implement) File No. NSD-L-99-102
Number Conservation Measures)
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_____)

WASHINGTON UTILITY AND TRANSPORTATION COMMISSION'S
REPLY COMMENTS IN SUPPORT OF
PETITION FOR ADDITIONAL DELEGATED AUTHORITY
TO IMPLEMENT NUMBER CONSERVATION MEASURES

The Washington Utilities and Transportation Commission (WUTC) submits these Reply Comments in support of its Petition for Delegation of Authority to Implement Number Conservation Measures filed December 10, 1999.

The industry commenters to this petition have essentially stated that the Commission should reject the Washington Utilities and Transportation Commission's request and allow the current wasteful practice of assigning numbers to continue. They make the arguments that the new area codes are "needed" by carriers, regardless of the impact on the public, until a viable solution is reached at a national level. Although the WUTC agrees that national solutions are needed, agreement on a national level is not proceeding fast enough to provide critically needed solutions on a local level. The parties to this practice are perpetuating a system in which valuable numbering resources are not efficiently used by the industry, which has contributed to accelerated exhaust of numbers.

I. Industry Needs to Be Encouraged to Conserve Prefixes

In its Comments, AT&T reiterates comments made in other states in the U S WEST region that U S WEST's policy of requiring each CLEC to use a different local routing number (LRN) in each rate center is an inefficient and misguided use of prefixes. This practice is especially burdensome in Washington State's 360 Area Code where there are more than 130 rate centers. The WUTC supports AT&T in its efforts to require U S WEST to abandon its policy of requiring carriers to have a separate LRN for each rate center. It is the WUTC's understanding that U S WEST is no longer following this practice. Therefore, it is the WUTC's position that industry, including AT&T, should be encouraged to return LRN prefixes that are no longer required to the code administrator.

II. FCC Should Revisit the Use of Unassigned Number Porting

The FCC recognized the importance of Local Number Portability (LNP) in assuring the nondiscriminatory provision of competitive services by issuing several orders to guarantee the timely introduction of this technology. The WUTC recognizes that LNP not only preserves fair competition, it also provides an opportunity to foster number conservation. The use of interim unassigned number porting (IUNP) will allow CLECs and other carriers with LNP technology to port unassigned numbers between themselves in congested area codes. The WUTC is interested in achieving significant rate center consolidation in Washington. However, the time frames

needed to bring about consolidation may require the use of some interim measures, such as IUNP, in order to guarantee that all carriers are able to provide service and have access to numbers within existing area codes.

Similarly, the WUTC foresees a potential need for the use of the existing thousand number block pooling (TNP) software. There is no guarantee that the next version of the TNP software will be available in a timely manner for use in relieving Washington's area codes. Although, industry is asking everyone to wait

for the version 3.0 of TNP software, prefixes continue to be ordered at an alarming

rate. Therefore, the WUTC requests that the FCC grant it authority to implement

the existing version of the TNP software, if needed, as has been delegated to other

states, such as Maine.

III. The WUTC Agrees That National Standards Are Needed

In its Comments, GTE opposed the WUTC Petition. However in each of its comments GTE reiterated the need for "national number assignment standards." The WUTC agrees with GTE that there should be national standards, provided those standards are strong enough to protect customers from the adverse impacts of current industry practices. Unfortunately, customers in the state of Washington are suffering from the lack of national standards and the lack of uniform cooperation between the industry and standards implementation groups. The WUTC believes that states need to be granted statutory approval to move

ahead on number conservation measures until satisfactory and sufficient national standards

are in place and working properly.

IV. The WUTC Should Be Granted the Authority it Seeks

Illinois and other states that have been granted authority to use code conservation and number pooling have been successful in extending the lives of their area codes. The WUTC believes that the current area code situation in Washington has reached crisis proportions with the numbering plan administrator now showing all five existing area codes (206, 425, 253, 360, and 509) exhausting within the next three years. While it is desirable to have national

guidelines and standards in place to help alleviate situations similar to the exhaust

situation now occurring, the WUTC feels that it needs statutory authority to implement extraordinary measures on an interim basis. Therefore the WUTC continues to request that the FCC grant the WUTC authority to implement the following five measures.

- (1) enforce number assignment standards, including auditing the use of numbering resources, and reclaiming unused and reserved area codes;
- (2) implement mandatory thousand number block pooling (TNP) trials using existing TNP software until the later editions are available;
- (3) adopt interim number assignment standards;
- (4) implement interim unassigned number porting (INUP); and
- (5) revise rationing procedures if necessary.

The WUTC will use this additional authority to delay new area codes in the 206, 425, 253, 360 and 509 area codes and prolong the lives of new NPAs, such the 564 area code.

Respectfully submitted,
WASHINGTON UTILITIES AND

TRANSPORTATION COMMISSION

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March 13, 2000