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BEFORE THE ARIZONA CORPORATION COMMISSION

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CARL J. KUNASEK
Chairman
JIM IRVIN
Commissioner
WILLIAM A. MUNDELL
Commissioner

IN THE MATTER OF U S WEST)
COMMUNICATIONS, INC.'S)
COMPLIANCE WITH § 271 OF THE)
TELECOMMUNICATIONS ACT)
OF 1996)

Docket No. T-00000B-97-0238

**US WEST'S SUPPLEMENTAL
FILING Re LOCATION ROUTING
NUMBER (LRN) ISSUES**

In the January 11, 2000, workshop concerning Checklist Item Nos. 8, 9 & 12, the Commission Staff and DCI asked U S WEST to provide additional information concerning its change in policy concerning the assignment of Location Routing Numbers (LRNs). Previously, U S WEST required one LRN "per rate center." In a January, 7, 2000 letter to AT&T, U S WEST agreed to modify this policy to allow one "LRN per LATA or other level" As a result of this policy shift, the Commission Staff and DCI asked U S WEST to formally answer four questions; specifically:

1. Describe U S WEST's plan for implementing its new LRN policy;
2. Describe how quickly U S WEST will implement its new LRN policy;
3. Describe U S WEST's efforts to recover unused NXXs from CLECs; and
4. Describe what U S WEST meant by "or other level" in the January 7, 2000 letter.

Through this pleading, U S WEST hereby responds to each of the above questions.

I. Introduction

Checklist Item No 9, Number Administration, requires U S WEST to comply with "numbering administration . . . guidelines, plans or rules." In its comments on this Checklist Item,

AT&T asserted that U S WEST's policy of requiring one LRN per rate center, as opposed to one LRN per LATA, ran contrary to Checklist Item No. 9.

In a January 7, 2000 letter, U S WEST informed AT&T that it had modified its LRN policy to allow one LRN "per LATA or other level" as requested by AT&T. The letter reads:

In those instances where a service provider has already established an LRN for a particular Rate Center, the service provider should continue to use that established LRN. However, if a service provider has no need for NPA-NXX codes that have been assigned at a Rate Center level and decides to return those codes to the number administrator, the service provider will notify U S WEST of their desire to change from the LRN(s) assigned at a per Rate Center level to LRN(s) assigned at a per LATA or other level, and U S WEST will make appropriate network rearrangements to accommodate such change(s)."

In those instances where the service provider has not established and has no need for an NPA-NXX for a particular Rate Center, the service provider will notify U S WEST of their desire to establish an LRN per LATA, or other level. U S WEST will make appropriate rearrangements to accommodate the new LRN(s).

Given this change in policy, and given the importance of number conservation, the Commission Staff and DCI asked U S WEST to respond to the aforementioned four questions. U S WEST hereby responds.

II. Details Concerning U S WEST's New LRN Policy

U S WEST's Plan for Implementing its New LRN Policy

U S WEST's plan for implementing its new LRN policy is set forth in *Exhibit 1*. U S WEST distributed this material to all CLECs operating in its 14-state region on January 14, 2000. This material is also available on U S WEST's website (WWW.USWest.com/carrier).

Timing for Implementing U S WEST's New LRN Policy

U S WEST's new LRN policy is effective immediately upon the CLECs' receipt of *Exhibit 1*. Thus, U S WEST will immediately begin accepting requests from CLECs under its new policy. However, U S WEST needs sufficient time to rearrange its network so that calls originated under the new policy will complete properly. Therefore, as explained in *Exhibit 1*:

The timeframe for U S WEST's completion of network rearrangements will be within 60 calendar days after Co-Carrier confirmation. Depending upon the complexity of the rearrangements or vendor dependencies, certain locations may require more time for implementation.

U S WEST's Efforts to Help Recover Unused NXXs from CLECs

As U S WEST explained during the January 11, 2000, workshop, it does not have the ability to require CLECs to return unused NXXs to the North American Numbering Plan Administrator. Nonetheless, we have sent a letter to all of the facilities based CLECs operating in Arizona with at least two NXXs. A copy of the letter is attached as *Exhibit 2*. Thus, U S WEST has sent this letter to 16 CLECs.

U S WEST's Definition of "or other level" from the January 7, 2000 letter

During the workshop, U S WEST explained that its new policy allowed "one LRN per "LATA or other level." The Staff asked what U S WEST meant by "or other level." As Margaret Bumgarner explained during the January 11, 2000 workshop, "or other level" generally means that CLECs with multiple switches in a given LATA need one LRN per switch. There are, however, two other scenarios that may require more than one LRN per LATA:

For network efficiency reasons, a CLEC may want to utilize more than one LRN per LATA due to our large geographic territory.

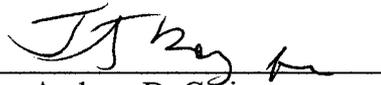
In some circumstances, CLECs may have already assigned multiple NPA-NXXs. In this circumstance, the CLECs may desire (and U S WEST would encourage) to keep multiple LRNs per LATA so as to keep the number of administrative changes to a minimum.

Thus, "or other level" refers to at least these three scenarios.

Dated this 18th day of January, 2000.

Respectfully submitted,

U S WEST COMMUNICATIONS, INC.

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**ORIGINAL and 10 copies of the foregoing filed
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**COPY of the foregoing hand-delivered
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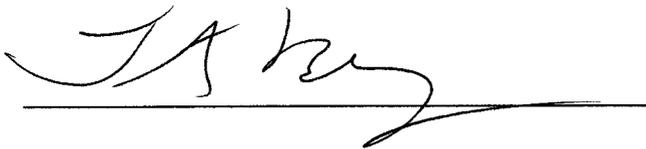
A handwritten signature in black ink, appearing to read 'C. Kallenbach', is written above a solid horizontal line.

EXHIBIT 1

January 14, 2000

Memorandum To: (all CLECs & their Account Managers)

Subject: LNP - Location Routing Number (LRN)

Local Number Portability (LNP) deployment was underway prior to the establishment of industry guidelines for Location Routing Number (LRN) assignment. By March 1999, problems began to surface in certain areas within the 14 states that U S WEST serves when service providers did not assign an LRN for each Rate Center they intended to serve. Certain calls to ported customers did not complete, and customers would get confusing /incorrect intercept messages or local calls would get routed over toll trunk groups.

In the April 1999 Western Region Operations meeting, and in subsequent LNP workshops, U S WEST recommended that service providers assign an LRN for each Rate Center they intend to serve, in order to overcome call completion problems. The LRN is based on the NXX code that the service provider would typically obtain to serve a particular Rate Center.

U S WEST's network architecture separates toll and local traffic onto separate trunk groups, and we have been pursuing technical solutions that would allow us to accommodate LRN assignment at the LATA level, or other level, to ensure that service providers would not be required to obtain an NPA-NXX code for the sole purpose of assigning an LRN.

We are now prepared to offer alternatives, on a location-specific basis, to ensure conservation of numbering resources. While we still recommend one LRN per Rate Center where feasible from a numbering perspective, the attached document provides a process for notifying U S WEST when assignment of an LRN at a Rate Center level is not feasible.

We are pleased to offer reasonable solutions in an effort to conserve valuable numbering resources, and look forward to working with you to accommodate your specific needs regarding LRN assignment.

The attached information is being updated in the Interconnect & Resale Resource Guide that is available on the web at: .

If you have any questions, please contact your Account Manager.

Number Portability Product Management

Attachment

LRN Assignment

Background

Location Routing Number (LRN) is a ten digit number that looks like a TN and is used to identify the switch that serves a ported number. The first six digits of the LRN contain an NPA-NXX assigned to the switch.

In an LNP environment, it can no longer be assumed that the NPA-NXX code holder actually serves the customer. During call setup, an LNP database in the SS7 network is queried to determine which switch actually serves the dialed number. If the number is ported, the Called Party Number (CdPN) field is moved into the Generic Address Parameter (GAP) field, and the LRN information is overlaid in the Called Party Number (CdPN) field so that the call can be routed to the proper terminating switch. The terminating switch then completes the call to the end customer based upon the data contained in the GAP.

U S WEST's network architecture separates local and toll traffic on to separate trunk groups. In order to accommodate ubiquitous LRN assignment at a level that is broader than per Rate Center (i.e. per local calling area or per LATA), U S WEST would need to make fundamental and expansive changes to its network architecture and longstanding business policy. Therefore, U S WEST has recommended that an LRN be assigned for each Rate Center that a CLEC intends to serve.

In order to assign an LRN, the Co-Carrier must obtain an NPA-NXX from the North American Numbering Plan Administrator (NANPA) for each LNP capable switch. Most Co-Carriers request NPA-NXXs for each Rate Center based upon their market plans. However, all carriers, including U S WEST have concerns regarding number conservation and in some cases assignment of new NPA-NXXs at a Rate Center level may not be necessary.

Industry Standards

U S WEST acknowledges the existence of the industry Location Routing Number (LRN) Assignment Practices that were developed by the Industry Numbering Committee (INC) and issued by the Alliance for Telecommunications Industry Solutions (ATIS) on July 13, 1998, and Technical Requirements No. 2 prepared April, 1999 by the TIS1.6 Working Group on Number Portability and issued by ATIS.

Specifically, the INC practice states that "An NXX will not be assigned to a service provider for the sole purpose of establishing an LRN unless that service provider's switch or POI does not yet have an LRN for the LATA where they intend to provide service" and the TIS1.6 technical requirements state that "only one NPA-NXX is needed for the first 6-digits of an LRN per Local Access Transport Area (LATA) to identify the switch".

The above-mentioned practices and technical requirements were developed after LNP deployment was underway.

Solution

U S WEST recommends one LRN per Rate Center, but also offers location-specific alternatives to ensure conservation of numbering resources. These alternatives allow those Co-Carriers interconnecting with U S WEST in Rate Center areas served by means of a switching entity located in a different Rate Center the ability to use one LRN to serve multiple Rate Center locations. The existing contract requirements for establishment of a point of interconnection (POI) and direct trunking to end offices at certain thresholds remain in effect.

In those instances where the Co-Carrier has not requested and has no need for an NPA-

NXX for a particular Rate Center, the Co-Carrier may notify U S WEST of their desire to establish an LRN per LATA, or for some lesser geographic area. This notification must occur as soon as reasonably possible, but no later than at the time they first arrange for their POI, LIS trunking, etc.

In those instances where a Co-Carrier has already established an LRN for a particular Rate Center, the Co-Carrier should continue to use that established LRN. However, if a Co-Carrier has no need for NPA-NXX codes that have been assigned at a Rate Center Level and decides to return those codes to the number administrator, the Co-Carrier will notify U S WEST of their desire to change from the LRN(s) assigned at a per Rate Center level to LRN(s) assigned at a per LATA or for some lesser geographic area, and U S WEST will make appropriate network rearrangements to accommodate such change(s).

Notification to U S WEST

The attached "LRN Notification" form is to be completed by the Co-Carrier and submitted to:

***Inez Lucero
U S WEST LNP Product Manager
1801 California St., Room 2340
Denver, CO 80202
303-896-7043***

FAX: 303-896-9022

A copy of the LRN Notification should also be sent to the U S WEST Account Manager.

Notification Review Process and Timeline

U S WEST will conduct a location-specific analysis based upon the notification and information provided by the Co-Carrier in the Location Routing Number (LRN) Notification form attached below. U S WEST will determine the appropriate network rearrangements to accommodate such change(s). A written response to all notifications will be provided within fifteen (15) business days of receipt, or sooner when possible. Any rearrangement to U S WEST's network for the purpose of accommodating LRN assignment to a per LATA level will be based upon the most efficient network and technically feasible solution for the switch type(s) and the unique requirement of the particular location.

Co-Carrier Responsibilities

U S WEST anticipates that the Co-Carrier will work cooperatively with us to make any necessary changes to their network to accommodate the recommended solution. The Co-Carrier will ensure that modifications are made to the Local Exchange Routing Guide (LERG) and will send the appropriate LRN assignment updates to the Number Portability Administration Center/Service Management System (NPAC/SMS). Information required for an LRN per LATA solution is in addition to other U S WEST requirements and does not eliminate the Co-Carrier's responsibility for involvement in these other processes.

Implementation of network rearrangements will begin when the Co-Carrier confirms receipt and acceptance of the location-specific solution. This confirmation should be provided in writing to the U S WEST contact listed above, and a copy should be provided to the Account Manager.

In the event that Co-Carrier does not accept the recommended solution for a specific location, U S WEST and the Co-Carrier will work cooperatively to develop an alternative solution.

Implementation Timeline

The timeframe for U S WEST's completion of network rearrangements will be within 60 calendar days after Co-Carrier confirmation. Depending upon the complexity of the rearrangements or vendor dependencies, certain locations may require more time for implementation. Timeline requirements will be communicated in the initial U S WEST response, and any completion date changes will be communicated to the Co-Carrier as soon as they are known.

Location Routing Number (LRN) Notification Form

Date _____

Co-Carrier Name _____

Contact Name and Telephone Number _____

State and Rate Center(s)involved _____

Current LRN(s), if any _____

New LRN to be assigned _____

Reason new LRN is to be assigned _____

Co-Carrier's switch CLLI code and address associated with the new LRN _____

**Details/Pertinent Information regarding the POI and LIS Trunks serving the Rate Center(s),
Local Calling Areas**

**Provide Local, Intra-LATA and InterLATA Toll traffic volumes for the Rate Center location
where LRN is currently assigned, if applicable. (Provide actual volumes associated with the
most recent six (6) months) OR forecasted traffic volumes for the newly-assigned LRN at a**

LATA-level.

(Please attach additional pages if necessary to provide further details)

EXHIBIT 2

Date: January 18, 2000

To: (All CLECs in Arizona with more than one NXX assigned, and their Account Managers)

Re: Implementation of U S WEST's New LRN Policy

As we informed you through a memo dated January 14, 2000, U S WEST has modified its policy with respect to the assignment of Location Routing Numbers (LRNs). Previously, U S WEST required one LRN "per rate center." Specifically, the January 14, 2000 update states that:

In those instances where the Co-Carrier has not requested and has no need for an NPA-NXX for a particular Rate Center, the Co-Carrier may notify U S WEST of their desire to establish an LRN per LATA, or for some lesser geographic area. This notification must occur as soon as reasonably possible, but no later than at the time they first arrange for their POI, LIS trunking, etc.

In those instances where a Co-Carrier has already established an LRN for a particular Rate Center, the Co-Carrier should continue to use that established LRN. However, if a Co-Carrier has no need for NPA-NXX codes that have been assigned at a Rate Center Level and decides to return those codes to the number administrator, the Co-Carrier will notify U S WEST of their desire to change from the LRN(s) assigned at a per Rate Center level to LRN(s) assigned at a per LATA or for some lesser geographic area, and U S WEST will make appropriate network rearrangements to accommodate such change(s).

U S WEST informed the Arizona Corporation Commission of this policy shift in a workshop conducted in its pending Section 271 docket (Docket No. T-00000B-97-0238), during a discussion surrounding Checklist Item No. 9, Number Administration. Once advised of this issue, the Arizona Commission staff encouraged U S WEST to send a letter to all CLECs who may be willing to return unused NXXs to the North American Numbering Plan Administrator (NANPA). As a result, please be advised that the Arizona Commission staff encourages your company to evaluate the current number of NXXs in its possession and assess whether or not some of them can be returned to the NANPA. U S WEST did inform the Commission staff that it had no ability to require CLECs to return unused NXXs; nonetheless, given the importance of number conservation in Arizona, U S WEST agreed to send this letter on behalf of Commission Staff informing you of this laudable objective.

As you know, your company currently has more than one NXX code assigned to it in Arizona. Therefore, U S WEST is sending this letter to you. As stated in our January 14 memo, we are pleased to offer reasonable solutions in an effort to conserve valuable numbering resources, and look forward to working with you to accommodate your specific needs regarding LRN assignment.

Respectfully,

Number Portability Product Management

CC: David Motycka – Arizona Corporation Commission Staff

Respectfully,