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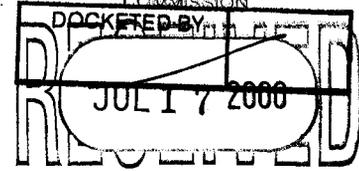
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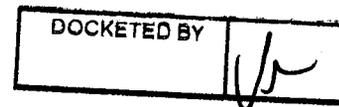
ARIZONA CORPORATION
COMMISSION



Director of Utilities

Arizona Corporation Commission
DOCKETED

JUL 24 2000



July 13, 2000

Deborah R. Scott
Director Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Dear Ms. Scott:

Re: Commission Staff request for comments on Industry Petition for Approval on an NPA Relief Plan for the 520 NPA - Docket No. T-00000F-99-0641

Citizens Mohave Cellular welcomes this opportunity to provide comments to the Arizona Commission regarding the Industry proposed overlay relief plan for the 520 NPA. In addition to commenting on the Industry relief plan as recommended, Citizens Mohave Cellular includes comments on whether adoption of number pooling, as defined in the FCC's Order on Number Resource Optimization (CC Docket No. 99-200), should be incorporated into the Industry recommended relief plan.

Industry Recommendation for all-services Overlay for 520 NPA

Citizens Mohave Cellular supports implementation of an all-services overlay for the entire geographic area that is presently served by the 520 NPA. As a result of the area code change in Citizens Mohave Cellular's serving area in recent years, Citizens Mohave Cellular has developed preferences for specific relief methods in given situations. Our focus is on the actual customer impacts of past relief activities rather than preconceived notions held by service providers and regulatory bodies early in the state planning process. In the case of the 520 NPA, Citizens Mohave Cellular believes an all-services overlay is the best relief solution, and we continue to support the Industry recommended plan filed with Arizona Commission on May 30, 2000.

Citizens Mohave Cellular believes the all-services overlay for the entire geographic area currently served by the 520 NPA is the most customer focused solution for the number dissipation. With this solution, customers keep their existing 10 digit telephone numbers, and are not inconvenienced with the many problems associated with traditional area code splits. With the all-services overlay, Cellular customers will not be required to have handsets reprogrammed, nor will their service providers be required to duplicate NXX

codes in the new NPA. This results in the least inconvenience for the customer, in addition to conserving limited number resources by not duplicating NXX codes.

Customers in 520 area code were required to undergo an area code change just five years ago. Citizens Mohave Cellular feels that to require many of these same customers to be subjected to a second change in such a short time period would be an unnecessary burden, especially since it could be avoided with implementation of an all-services overlay.

The overlay of the 520 area code is a permanent solution for customers, as no subsequent change is required for those customers. While the overlay will require dialing the area code on all calls, no subscriber's telephone number will change and future area codes can be added without customers having to make additional changes. Once implemented for a specific area, the overlay plan is expandable and provides a long-term solution for relief. John R. Hoffman, Chairman of the North American Numbering Council (NANC), recently, interviewed in "Telecommunications Report", June 12, 2000 issue, is quoted as saying he would "like to see it (10 digit local dialing) as the means of first resort" for combating number exhaustion. Logically, the use of overlays for area code relief is becoming more common place.

For these reasons, (1) Customer convenience, (2) Number conservation, and (3) providing a long-term solution, Citizens Mohave Cellular supports the Industry recommended all-services overlay plan for the 520 NPA.

Incorporation of Number Pooling in the Industry Recommended Relief Plan

Citizens Mohave Cellular does not support incorporation of number pooling into the Industry recommended relief plan for the 520 NPA. Number pooling is not a method of providing NPA relief. The incorporation of this technique on a trial basis would not substitute for the area code relief required in this situation. Citizens Mohave Cellular believes number pooling achieves the most benefit in newly introduced NPAs not at risk for short-term dissipation.

There are numerous issues involved with early deployment of thousands block number pooling, as well as associated risks with these issues. First, the national Number Portability Administration Center (NAPC) software upgrade (Release 3.0) is currently scheduled for the Western Region mid-February 2001. Early deployment using Release 1.4 will require additional manual work and unnecessarily high service change order processing load. Another priority is the additional cost for the subsequent conversion to NAPC release 3.0 at a later date.

Early deployment for number pooling results in higher implementation costs for the industry, and consequently means there are more costs to recover. Cost drivers include such items as payment of premiums to vendors, manual work-arounds prior to systems being already, and deployment of switch upgrades on an expedited schedule.

State deployment of number pooling prior to a national rollout, will result in the need for a state cost recovery mechanism. The March 31, 2001 FCC order, paragraph 171 states, "In addition, because our national cost recovery plan cannot become effective until national pooling implementation occurs, states conducting pooling trials must develop their own cost recovery scheme for the joint and carrier-specific costs of implementing and administering pooling in the NPA in question." Implementation of number pooling commensurate with the national rollout will not only result in lower implementation costs, but also avoid the need for a state cost recovery mechanism.

Compounding these issues is the selection of a national Number Pooling administrator. This process is associated with the entire national pooling rollout schedule specified in the FCC's order. If the state chooses to deploy in advance of the national roll-out, the State must go through the process of selecting its own Pooling Administrator, which may be superseded once a national Pooling Administrator is selected.

Conclusion

Citizens Mohave Cellular supports number pooling, as defined in the FCC's Order on the Number Resource Optimization (CC Docket No. 99-200) for national rollout. This national plan provides for continuity and a permanent solution. National number pooling will begin implementation late in 2001. Early deployment would be costly to the individual state, cause manual work-arounds and may impact processes which ensure quality of service, it would not relieve current dissipation of the 520 NPA. Citizens Mohave Cellular believes number pooling is best accomplished in a standard national roll-out.

Thank you for the opportunity to provide comments with respect to the relief of the 520 NPA. Should you have any questions on these issues, please feel free to contact Thomas Carter at (520) 681-0375 or by fax at (520) 681-0330.

Sincerely,



W. T. Carter

CC: Charlene Barbknecht