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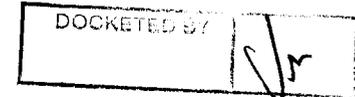
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Arizona Corporation Commission

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JUN 30 2000

June 30, 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

U S WEST wishes to take this opportunity to provide comments to the Arizona Commission on the Industry proposed overlay relief plan for the 520 NPA. In addition to commenting on the Industry relief plan as recommended, U S WEST provides 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

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

U S WEST believes the all-services overlay for the entire geographic area currently served by the 520 NPA is the most customer friendly solution for number exhaust. With this solution, customers keep their existing 10 digit telephone numbers, and consequently

are not inconvenienced with the many problems associated with traditional area code splits. With the all-services overlay, wireless customers are not required to have handsets reprogrammed, nor are their service providers required to duplicate NXX codes in the new NPA. This results in the least inconvenience for the customer, in addition to conserving limited numbering resources by not duplicating NXX codes.

Customers in the 520 area code were required to undergo an area code change just five years ago. U S WEST feels that to require many of these same customers to be subjected to a second change in such a short time period would not be in their best interests, especially since it could be avoided with the 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 any more changes. In other words, once implemented for a specific area, the overlay plan is expandable and thus 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 exhaust. As such, 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, U S WEST supports the Industry recommended all-services overlay plan for the 520 NPA.

Incorporation of Number Pooling in the Industry Recommended Relief Plan

U S WEST does not support the incorporation of number pooling into the Industry recommended relief plan for the 520 NPA, as number pooling is not a method of providing NPA relief. Notwithstanding the benefits of national number pooling as a form of number conservation, the incorporation of this conservation technique on a trial basis would not substitute for the area code relief required in this situation. U S WEST believes number pooling achieves the most benefit in newly introduced NPAs, or in those NPAs not at risk for short-term exhaust.

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 (NPAC) software upgrade (Release 3.0) is currently scheduled for the Western Region sometime mid February 2001. Early deployment using Release 1.4 will require additional manual work and service order processing. Another factor is the cost for the subsequent conversion to NPAC 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 ready, 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 recover plan cannot become effective until national pooling implementation occurs, states conducting their own 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 will 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 laid out in the FCC's order. If the state chooses to deploy in advance of the national rollout, the State must go through the process of selecting its own Pooling Administrator, which may be superceded once the national Pooling Administrator is selected.

In Conclusion

U S WEST supports number pooling, as defined in the FCC's Order on Number Resource Optimization (CC Docket No. 99-200) for national rollout. This national plan provides for continuity and a permanent solution, as opposed to temporary/trial applications. National number pooling will begin implementation late in 2001. While early deployment is an option, it would be costly to the individual state, cause manual work-arounds and processes impacting quality of service, and would not relieve current exhaust for the 520 NPA. U S WEST believes numbering pooling is best accomplished in a standard national roll-out, and that it would be prudent to wait for the national roll-out.

Thank you for the opportunity for U S WEST 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 John Duffy on 602-630-1183 or Charlene Barbknecht on 303-707-7008.

Sincerely,

Charlene Barbknecht 

CC: All parties of record