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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
Chairman
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner

DEC 23 1999
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IN THE MATTER OF THE GENERIC
INVESTIGATION INTO NUMBER RESOURCE
OPTIMIZATION AND IMPLEMENTATION
OF NUMBER POOLING IN ARIZONA

DOCKET No. T-00000A-01-0076

STAFF'S REQUEST FOR A
PROCEDURAL ORDER

The Arizona Commission ("Commission" or "ACC") Staff requests that the Commission issue a Procedural Order commencing a Generic Investigation for the purpose of obtaining comments from interested parties and members of the Industry concerning the implementation of number pooling and other number conservation methods in the State of Arizona.

I. BACKGROUND.

On December 23, 1999, the ACC petitioned the Federal Communication Commission ("FCC") for Expedited Delegation of Authority to Implement Number Conservation Measures. In its Petition, the Commission requested additional authority to:

1. Implement mandatory thousands-block number pooling.
2. Ensure efficient number use practices such as fill rates or sequential number assignment.
3. Establish interim mandatory number utilization data reporting and forecasting requirements.
4. Establish auditing procedures and implement random audits.
5. Require the return of unused NXX codes by carriers to the code administrator.
6. Require the return of unused or under-utilized portions of NXX codes to the Pooling Administrator when one is selected.

On July 20, 2000, the FCC granted, in part, the Petitions of Arizona and several other States. See, In the Matter of Numbering Resource Optimization, et. al., Docket No. 99-200 et. al.,

1 Order, (Rel. July 20, 2000) ("FCC Numbering Optimization Order"). In the FCC Numbering
2 Optimization Order, Arizona was delegated the authority to institute thousands-block number
3 pooling in the 480, 520, 602 and 623 NPA's and the authority to conduct audits of a carrier's use of
4 numbering resources, consistent with national numbering guidelines. Additional numbering resource
5 optimization administrative and technical measures were set forth by the FCC in its Report and
6 Order and Further Notice of Proposed Rulemaking, In the Matter of Numbering Resource
7 Optimization, CC Docket 99-200 (Rel. March 31, 2000). On December 28, 2000, the Commission
8 solicited competitive proposals and bids for the selection of an Interim thousands-block Arizona
9 Pooling Administrator. Such proposals and bids are to be submitted no later than 4:00 p.m. Arizona
10 time on January 30, 2001.

11 **II. DISCUSSION.**

12 The Commission, pursuant to its delegated authority, may in the near future order a
13 pooling trial to begin in one of the Metropolitan Statistical Areas ("MSA") in Arizona. To assist in
14 its implementation of number pooling, Staff believes information from Industry and interested
15 parties regarding the following issues would be helpful to the Commission. Therefore, in its
16 Procedural Order commencing this Investigation, Staff recommends that the Commission request
17 comments on the following issues.

- 18 1. Which MSA should be selected for the first pooling trial?
- 19 2. If the MSA contains multiple NPA's which NPA should be first?
- 20 3. What is an appropriated interval for implementing number pooling between
21 NPAs where more than one exist in a NPA?
- 22 4. If the geographic area of a NPA is greater than the MSA, should number
23 pooling be implemented in the entire NPA?
- 24 5. How soon in 2001 might a number pooling trial begin?
- 25 6. How should number pooling costs be allocated (all carriers, pooling carriers
26 only, only carriers within the MSA, etc.)?
- 27 7. How should number pooling costs be recovered?

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- 8. Are there unique aspects of your network in Arizona as compared to those found in states where number pooling has already been implemented? Describe any network modifications, due to such uniqueness, that would be required to support number pooling and provide the associated cost of these modifications.
- 9. Are there rate centers within the state that can be consolidated? If so which ones and how soon could it be accomplished?
- 10. What degree of contamination (i.e. 5%, 10% etc.) should be allowed in thousands-blocks donated to the numbering pool?
- 11. What other issues should be addressed as part of a pooling trial?
- 12. What additional number conservation methods may be implemented to maximize the life of the NPA's within Arizona.

III. CONCLUSION.

Wherefore, Staff respectfully requests that the Commission issue a Procedural Order commencing a Generic Investigation into the implementation of number pooling and other number conservation methods in the State of Arizona.

RESPECTFULLY SUBMITTED this 23rd day of January, 2001.

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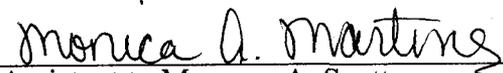
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