

Exhibit No.: _____
Issue: NANP Petition
and Related Issues
Witness: John C. Rollins
Type of Exhibit: Direct Testimony
Sponsoring Party: GTE Midwest Incorporated
Case No.: TO-2000-374
Date Testimony Prepared: May 10, 2000

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

IN RE:

THE MATTER OF AN)
INVESTIGATION INTO THE)
EXHAUSTION OF CENTRAL OFFICE) CASE NO. TO-2000-374
CODES IN THE 314 AND 816)
NUMBERING PLAN AREA)

DIRECT TESTIMONY
OF
JOHN C. ROLLINS
SENIOR PLANNING MANAGER
NETWORK PLANNING
ON BEHALF OF
GTE MIDWEST INCORPORATED

FILED
MAY 10 2000
Missouri Public
Service Commission

MAY 10, 2000

1 Over the past few years, I have participated in several national industry
2 numbering forums dealing with number exhaust and number conservation
3 methods including those held in the states of Florida, North Carolina,
4 Pennsylvania, Texas, Missouri, Minnesota, Washington, Oregon and California. I
5 have also served on teams representing many of the GTE telephone operating
6 companies regarding Local Number Portability (LNP) requirements in the
7 Southwest, Western, West Coast and Southeast Regions. Previously, I was Co-
8 Chairperson of the Southwest Region LNP Requirements Subcommittee and
9 past Chairman of the Bellcore Advanced Voice Services User Group. I was also
10 the GTE telephone operating companies' representative to the North American
11 Numbering Council ("NANC") Central Office Code Transition Team. This team
12 has developed guidelines for the transition of the code administration from the
13 GTE telephone operating companies and the Regional Bell Operating
14 Companies ("RBOCs") to NeuStar (formerly a subsidiary of Lockheed/Martin).

15
16 Currently, I am the Vice Chair of the United States Telephone Association's
17 Network Planning Subcommittee. I also represent the GTE telephone operating
18 companies on the Alliance for Telecommunications Industry Solutions ("ATIS")
19 T1S1.6 Standards Committee and am the GTE telephone operating companies'
20 alternate to ATIS committee T1S1. The T1S1.6 Standards Committee is
21 responsible for developing generic requirements for Local Number Portability and
22 Thousand Block Number Pooling.

1 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE MISSOURI PUBLIC**
2 **SERVICE COMMISSION ("MO PSC")?**

3 A. Yes, in TO-99-14, the implementation of number conservation methods in the St.
4 Louis area. I have also appeared as an expert witness on behalf of GTE
5 telephone operating companies in Texas, New Mexico, Oklahoma, Arkansas,
6 Indiana, North Carolina, Florida and Pennsylvania. My most recent involvement
7 in state proceedings has been in the areas of LNP and number conservation.

8
9 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

10 A. The purpose of my testimony is fourfold:

- 11 1. I will discuss the recent NANPA petition for overlays in the 314 and 816
12 NPAs;
- 13 2. I will provide GTE's position on number conservation;
- 14 3. I will summarize the FCC's March 31, 2000 order in CC Docket No. 99-200
15 on Number Optimization as it relates to actions in the state of Missouri and
16 cost recovery for pooling trials implemented prior to the rollout of national
17 pooling; and
- 18 4. I will discuss GTE's recommendation regarding the process the MO PSC
19 should undertake to conduct a pooling trial in Missouri, assuming the MO
20 PSC receives delegated authority from the FCC to implement thousand block
21 number pooling.

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II.

GTE'S POSITION ON THE NANPA PETITION

Q. HAVE YOU REVIEWED THE NANPA PETITION CONCERNING THE 314 AND 816 NPAS IN MISSOURI?

A. Yes, I have. The NANPA proposes to apply a retroactive overlay to the 314 NPA and the area currently encompassed by the 636 NPA and to implement an "all services" overlay in the 816 NPA. Subsequent relief will be provided by additional NPA overlay codes.

Q. DOES GTE SUPPORT THE NANPA'S PROPOSALS AND IF SO WHY?

A. GTE supports the NANPA's proposals because they provide the most benefit to customers and will extend the availability of numbers without requiring immediate relief.

Q. WHAT DOES AN "ALL SERVICES" OVERLAY MEAN?

A. In an "all services" overlay, NXXs are equally available to all carriers regardless of the service they provide or industry segment they belong to. All services overlays provide the greatest flexibility and efficiency of assignment.

Q. PLEASE EXPLAIN THE DIFFERENCE BETWEEN AREA CODE SPLITS AND OVERLAYS.

A. In a geographic split, the existing NPA is split into two or more geographic areas. The existing NPA serves one of the areas, which is much smaller than the original area. A new code is assigned to any additional areas created by the

1 split. This method usually divides the area along jurisdictional, natural or
2 physical boundaries. An NPA overlay occurs when more than one NPA code
3 serves the same geographic area. In an NPA overlay, code relief is provided by
4 opening up a new NPA code within the same geographic area as the NPA(s)
5 requiring relief. NXXs served from the overlay NPA will be available for
6 assignment equally to all carriers on a first-come first-serve basis (per FCC 96-
7 333, released August 8, 1996). The overlay was originally introduced in 1997 for
8 both area codes in Maryland. Additional overlays have been implemented by
9 state commissions in Colorado, Georgia, Texas, Florida, Pennsylvania, and New
10 York and have been ordered to be implemented in North Carolina, and
11 Washington. Other states are considering overlay proposals.

12
13 **Q. PLEASE DESCRIBE THE BENEFITS OF AN OVERLAY VERSUS AN AREA**
14 **CODE SPLIT.**

15 A. The implementation of an overlay would result in significant benefits to
16 consumers, carriers, and the Commission. Overlays provide consistent
17 treatment for future relief plans, and make more efficient use of the numbering
18 resources. They require less dependence on forecasting, and eliminate the need
19 for customers to change their telephone number when relief occurs. Overlays
20 also reduce the need for lengthy and contentious arguments on where to draw
21 specific boundary lines, which occurs in the case of area code splits. Overlays
22 are a more competitively neutral approach to area code relief than is afforded by
23 utilizing area code splits. In addition, the use of an overlay simplifies the

1 inevitable transition to ten-digit dialing and reduces the time frame to implement
2 future area code relief.

3
4 **Q. ARE THERE ANY SIGNIFICANT DRAWBACKS TO OVERLAYS?**

5 A. No. GTE believes that there are no significant drawbacks to such a policy.
6 Although some parties may argue that mandatory ten digit dialing is a deficiency
7 of this approach, in reality, ten digit dialing is already being implemented for an
8 increasing number of customers as the geographic area covered by area code
9 splits becomes increasingly smaller. Since overlays have already been
10 implemented in a number of states, the operational issues are understood and
11 are no more cumbersome than those encountered with area codes splits. GTE
12 has already implemented mandatory ten digit dialing and overlays in Houston
13 and Dallas, Texas and in Pennsylvania with minimal customer impact and
14 operational disruption.

15
16 **Q. PLEASE EXPLAIN THE TERM "RETROACTIVE OVERLAY"?**

17 A. The term "retroactive overlay" describes providing area code relief by erasing the
18 boundary between two NPAs normally created by a previously ordered area code
19 split. This creates a new area code with the combined boundary of the two or
20 more previous area codes.

21
22 **Q. WHAT IS THE ADVANTAGE OF IMPLEMENTING SUCH AN OVERLAY?**

23 A. In addition to the obvious benefits of utilizing an overlay, applying retroactive
24 overlays extends the life of the NPA by delaying the need for introducing a third
25 area code. This results in more efficient use of numbers.

1 **Q. HAS THIS APPROACH BEEN USED BEFORE?**

2 A. Yes. GTE implemented retroactive overlays in Dallas and Houston, Texas. In
3 Dallas, the 214 area code had been split creating a donut shaped geographic
4 split with the 972 area code surrounding Dallas and the main city of Dallas
5 keeping the 214 area code. In less than two years Dallas experienced a situation
6 where the 214 area code had approximately 300 NXX codes available for
7 assignment but the 972 area code only had 50. If relief were to be accomplished
8 via a split, the 972 geographic area would have had to been subdivided almost
9 immediately by introducing a third area code. Instead, the Commission and the
10 industry agreed on a plan that would erase the existing area code boundaries
11 between 214 and 972 thus freeing up 350 codes for assignment and extending
12 the life of both area codes. In addition, the Commission ordered that a third code
13 be implemented as an overlay to the same expanded geographic area when
14 additional relief was needed. This resulted in a relief plan that required minimal
15 industry or Commission action for a number of years. Since this approach did
16 not require any customers to change their existing numbers, the implementation
17 of the third area code was essentially a non-event and went smoothly.

18
19 **III.**

20 **GTE'S POSITION ON NUMBER CONSERVATION ISSUES**

21
22 **Q. PLEASE DESCRIBE THE ACTIONS GTE HAS TAKEN TO ASSIST IN THE**
23 **EFFICIENT UTILIZATION OF NUMBERING RESOURCES.**

24 A. GTE has been an active supporter of numbering relief efforts, not only in Missouri
25 and in the other states in which GTE operates, but also at the national level.

1 GTE is a participant in industry standards bodies including T1S1, the NANC, the
2 Industry Numbering Committee ("INC"), the Ordering and Billing Forum ("OBF"),
3 the Network Interconnection / Interoperability Forum ("NIIF") and numerous state
4 numbering conservation task forces. GTE has been active in the following NANC
5 committees: the North American Numbering Plan Administration ("NANPA")
6 Oversight Committee, the Central Office Code Transition Task Force, the Local
7 Number Portability Administration ("LNPA") Working Group, and the Number
8 Resource Optimization ("NRO") Work Group. In addition, GTE has filed
9 comments and held exparte meetings with the FCC concerning the FCCs
10 recently released Numbering Resource Optimization Order.

11
12 **Q. HAS GTE UNDERTAKEN ANY INTERNAL SYSTEMS MODIFICATIONS TO**
13 **FACILITATE NUMBER CONSERVATION?**

14 A. Yes. GTE enacted rate center consolidation efforts in a number of states. GTE
15 has also modified previous assignment processes to maximize the number of
16 thousand blocks ("blocks")¹ that would be available should number pooling be
17 ordered. GTE is in the process of developing operational enhancements to
18 utilize the planned Number Portability Administration Center ("NPAC") pooling
19 software developed as release 3.0.

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¹ Uncontaminated blocks of 1,000 numbers and blocks of 1,000 numbers with less than
10% of its numbers assigned.

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IV.

FCC ORDER ON NUMBERING RESOURCE OPTIMIZATION

Q. WHAT ACTIONS HAS GTE TAKEN WITH REGARD TO THE FCC OPEN DOCKET ON NUMBER CONSERVATION?

A. On June 2, 1999, the FCC released its Notice of Proposed Rulemaking in the Numbering Resource Optimization Docket 99-200. GTE filed comments on July 30, 1999 and reply comments on August 30, 1999. The FCC docket addressed many of the concerns expressed in Missouri and other states across the nation concerning area code exhaust. GTE also met with the FCC Staff and submitted *ex parte* documents concerning the disposition of the docket.

Q. ARE YOU FAMILIAR WITH THE RECENTLY RELEASED FCC ORDER ON NUMBERING RESOURCE OPTIMIZATION?

A. Yes. On March 31, 2000 the FCC released its Report and Order and Further Notice of Proposed Rule Making in CC Docket 99-200 concerning the matter of Number Resource Optimization ("NRO Order"). I have generally reviewed this order and provide an overview of its implications below. I am not an attorney and do not purport to articulate GTE's legal position regarding this order. Additionally, the order is still open to petitions for reconsideration. GTE or other parties may file such petitions and the FCC may issue a revised order. After such an order is issued, GTE's position regarding the order may change.

1 **Q. PLEASE SUMMARIZE THE NRO ORDER.**

2 A. The NRO Order can be summarized into six sections:

- 3 1. The impact on existing number pooling trials permitted by virtue of the interim
4 authority the FCC granted to ten states;
5
6 2. The impact to additional states if/when the FCC awards interim relief to them;
7
8 3. Timing of the national rollout of thousand block pooling;
9
10 4. Requirements for the implementation of conservation activity including
11 thousand block number pooling;
12
13 5. Items not addressed in the order; and
14
15 6. Requests for additional comments.

16 **Q. WHAT IMPACT DOES THE NRO ORDER HAVE ON THE EXISTING POOLING
17 TRIALS ALREADY IN PLACE TODAY?**

18 A. The NRO Order mandates that existing pooling trials be modified to conform to
19 national standards by September 1, 2000. In addition, the FCC stated that

20 "No carrier should be denied numbering resources simply because
21 needed area code relief has not been implemented."²

22 **Q. WHAT ARE THE NATIONAL STANDARDS TO WHICH THE FCC REFERS?**

23 A. The Alliance for Telecom Industry Solutions (ATIS) committee T1S1.6 has
24 established standards for developing switching and database technical pooling
25 requirements; the Industry Numbering Committee (INC) has developed thousand
26 block pooling administrative guidelines; and the North American Numbering
27 Council has developed requirements related to the requirements for a pooling
28 administrator.

² NRO Order at ¶ 171.

1 **Q. WHAT DOES THE FCC PROPOSE REGARDING COST RECOVERY?**

2 A. Costs incurred by carriers to implement state-mandated thousands-block number
3 pooling trials are intrastate costs and should be attributed solely to the state
4 jurisdiction.

5
6 **Q. WHAT IS GTE'S PROPOSAL FOR COST RECOVERY ASSOCIATED WITH A
7 POOLING TRIAL IN MISSOURI?**

8 A. Should the Commission receive FCC permission to implement a pooling trial
9 outside of a national roll-out, GTE recommends that state specific costs be
10 recovered in a manner similar to that used on a national basis for LNP, that is,
11 through an end user surcharge levied on a state basis. Similarly, if a trial is
12 initially implemented in conjunction with the FCC ordered national rollout, GTE
13 has recommended to the FCC that the cost be recovered through a nationally
14 mandated end user surcharge.

15
16 **Q. WHAT IMPACT DOES THE NRO ORDER HAVE ON STATES' APPLICATIONS
17 FOR PERMISSION TO IMPLEMENT POOLING TRIALS THAT HAVE NOT YET
18 RECEIVED FCC AUTHORITY?**

19 A. The FCC stated that it
20 "will continue to grant states authority to implement thousands-block
21 number pooling on an individual basis....[s]tate commissions receiving
22 new delegations of pooling authority from the FCC must conform to this
23 national framework."³
24
25

³ NRO Order at ¶ 169.

1 **Q. BESIDE MISSOURI, DO YOU KNOW WHAT OTHER STATES ARE WAITING**
2 **FOR FCC APPROVAL TO IMPLEMENT POOLING TRIALS?**

3 A. In addition to the ten states which have already received permission to
4 implement pooling trials (California, Connecticut, Florida, Illinois, Maine, New
5 Hampshire, New York, Ohio, Texas, and Wisconsin), the following states have
6 requests pending before the FCC:

STATE	PETITION DATE
Nebraska	9/14/99
Indiana	10/21/99
Utah	10/25/99
Missouri	11/1/99
Iowa	11/10/99
Tennessee	11/17/99
Georgia	11/19/99
North Carolina	11/29/99
Virginia	11/29/99
Colorado	12/16/99
Pennsylvania	12/27/99
Washington	12/8/99
Arizona	12/23/99
Kentucky	1/19/00

7

8 **Q. DOES THE NRO ORDER ADDRESS THE TIMING AND IMPLEMENTATION**
9 **OF THE NATIONAL ROLLOUT OF THOUSAND BLOCK NUMBER POOLING?**

10 A. Yes. In addition to the trials currently being deployed, the FCC order states that:

- 11 1. Mandatory National Thousand Block Pooling will be phased in by all LNP
12 capable carriers in the top 100 MSAs at a rate of three NPAs per region per
13 month;
- 14 2. The start of national pooling will begin nine months after the selection of a
15 pooling administrator;
- 16 3. The pooling administrator will be selected using a competitive bid process;

- 1 4. NPAs exhausting in less than a year will not be identified as high priority
2 NPAs for pooling in the national rollout because of the limited value of such a
3 conversion; and
4 5. In cases where there are NPAs within the largest 100 MSAs that receive an
5 overlay NPA, both the original and overlaid NPAs shall be subject to pooling.
6

7 **Q. ARE THERE OTHER REQUIREMENTS FOR IMPLEMENTING**
8 **CONSERVATION ACTIVITIES INCLUDING THOUSAND BLOCK NUMBER**
9 **POOLING?**

10 A. Yes. Other requirements include:

- 11 1. Companies requesting numbering resources should be authorized to provide
12 service in the area for which they are requesting numbers.
13 2. A "Months to Exhaust" report should be used to document a need for new
14 thousand blocks.
15 3. The use of fill rates to determine justification for additional codes was
16 determined not to be necessary for those carriers participating in pooling.
17

18 **Q. DOES GTE HAVE A POSITION ON ANY OF THESE ISSUES?**

19 A. Yes. With regard to the first item, it is GTE's position that authorization of
20 wireless carriers may take the form of FCC licenses. Historically, GTE has
21 supported all three of these conservation activities.
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1 **Q. ARE THERE ANY OTHER ISSUES THE NRO ORDER ADDRESSES?**

2 A. Yes. The FCC also made certain determinations regarding the timing of certain
3 events. They include:

- 4 1. Reservation intervals are to be reduced from 18 months to 45 days with no
5 allowance for extension;
- 6 2. Carrier inventory levels will be restricted to six months;
- 7 3. Utilization reports will be limited to twice per year (state commissions can
8 reduce the frequency of reporting), and the FCC has defined the major terms
9 to be used in this report. Company data is to be made available to state
10 commissions on a disaggregated basis. However, the state commissions
11 must protect the confidential nature of the data. Sub-category definitions are
12 to be developed by the industry and state regulatory Commissions and
13 provided to the FCC for approval within 120 days. In addition, all carriers
14 must file these reports.
- 15 4. The FCC ruled that aging intervals should be limited to a maximum of 360
16 days for business and 90 days for residential customers. The interval of time
17 before a number is available for reassignment after it has been disconnected
18 is called "aging." In order to reduce the possibility of telephone numbers
19 being dialed in error, this time frame should be long enough to ensure
20 customers are not still trying to use the number to reach the party to which it
21 was previously assigned; and
- 22 5. Carriers requesting numbers must be able to provide service within 60 days
23 of the activation date for the numbers.

24

1 **Q. IS UNASSIGNED NUMBER PORTING (UNP) AND INDIVIDUAL TELEPHONE**
2 **NUMBER POOLING (ITN) DISCUSSED IN THE FCC ORDER?**

3 A. Yes, the FCC stated that:

4 "We reiterate our finding that UNP and ITN are not yet sufficiently
5 developed for adoption as nationwide numbering resource optimization
6 measures and conclude that ITN and UNP should not be mandated at this
7 time. We also remain concerned with the impact of UNP on carriers ability
8 to control their own number inventories and forecast future numbering
9 needs."⁴

10
11

12 **Q. DOES THE FCC PROVIDE SOME FLEXIBILITY TO OPEN NEW BLOCKS OF**
13 **NUMBERS?**

14 A. Yes. While the FCC does require the assignment of all numbers within an open
15 thousands block before moving to the next block, they do allow carriers flexibility
16 to open additional blocks if the existing block is "not sufficient to meet a customer
17 request." The FCC further states that if a carrier opens a clean block,

18 "prior to utilizing in its entirety a previously-opened thousands-block
19 should be prepared to demonstrate to the state commission: (1) a
20 genuine request from a customer detaining the specific need for telephone
21 numbers; (2) the inability on the part of the carrier to meet the specific
22 customer request for telephone numbers from the surplus of numbers
23 within the carrier's currently activated thousands-block."⁵

24

25 **Q. WERE THERE ANY ISSUES RAISED IN THE INITIAL NOTICE THAT THE**
26 **FCC DID NOT ADDRESS IN ITS NRO ORDER?**

27 A. Yes. The FCC chose not to address audits, rate center consolidation, ten-digit
28 dialing, or the use of technology-specific overlays but stated that it does intend to
29 address these issues in subsequent orders.

⁴ NRO Order at ¶ 230.

⁵ NRO Order at ¶ 245.

1 **Q. WHAT IS GTE'S POSITION REGARDING THESE ISSUES?**

2 A. GTE has provided the FCC with documentation on these issues in past FCC
3 filings. Specifically, GTE advances the following positions:

- 4 1. Audits - GTE does not believe that regularly scheduled audits need to be
5 conducted. Rather, for-cause and random audits should meet the needs for
6 ensuring compliance with the applicable numbering policies.
- 7 2. Rate Center Consolidation - GTE has participated in rate center consolidation
8 and supports it where it can be implemented in a revenue neutral manner.
- 9 3. Ten-digit dialing - GTE advocates nation-wide ten-digit dialing as documented
10 in the Industry Numbering Committee's Uniform Dialing Plan,
- 11 4. Technology Specific Overlays (TSO) - Because technology specific overlays
12 do not result in efficient number utilization and cannot be implemented in a
13 competitively neutral manner, GTE is opposed to TSOs. GTE assumes that
14 TSO is the same as a service specific overlay.

15

16 **Q. PLEASE IDENTIFY THE AREAS OF NUMBER CONSERVATION FOR WHICH**
17 **THE FCC REQUESTS ADDITIONAL COMMENTS.⁶**

18 A. The FCC requests additional comments be filed on the following:

- 19 1. The level of utilization threshold that should be used for carriers not
20 participating in number pooling;
- 21 2. Whether CMRS carriers should be required to participate in pooling
22 immediately upon the expiration of the LNP forbearance period on November
23 24, 2002;

⁶ Comments are now due May 19, 2000 and reply comments are due June 9, 2000.

- 1 3. Whether carriers should be charged for the numbering resource; and
2 4. Additional cost information on number pooling prior to making a decision on
3 cost recovery.
4

5 **Q. DOES GTE HAVE A POSITION ON THESE FOUR ISSUES?**

6 A. Yes. The FCC extended the comment date on these items until May 19, 2000.
7 GTE is currently preparing a response and will make it available to the MO PSC
8 as soon as it is filed. However, at a summary level GTE supports the following:

9 1. Utilization Threshold - GTE supports a uniform, nationwide utilization
10 threshold for all non-LNP carriers subject to certain conditions:

11 a. Looking solely at utilization thresholds might understate a carrier's need
12 for growth codes. Therefore, some flexibility needs to be built into the
13 process to allow carriers to obtain numbering resources even if they do
14 not exceed the threshold upon a showing of need.

15 b. All numbers are not equally usable. Therefore, some thousands blocks
16 may naturally have a lower utilization rate subject to customers' ability to
17 utilize certain numbers.

18 c. GTE recommends the MO PSC establish a 50% utilization level with
19 annual 5% increases to a maximum of 65% per the lowest code
20 assignment point (LCAP)⁷.

⁷ The lowest code assignment point (LCAP) refers to the lowest point at which a carrier assigns numbering resources in a given area. For example, in a geographic area in which a carrier has more than one switch serving the same rate center, the LCAP would be at the switch level. In other rate centers that have only one switch serving the center, the LCAP would be at the rate center level.

- 1 2. Timing of pooling for CMRS Carriers - GTE recommends that the number
2 pooling deployment for CMRS carriers begin no less than 12 months following
3 completion of LNP deployment for CMRS carriers to allow time for wireless
4 carrier system modifications.
- 5 3. Charges for numbering resources - GTE is opposed to a system which results
6 in charging for numbers. Implementation of a charge for numbers raises a
7 myriad of questions concerning carrier inventory asset value, the pooling
8 administrator's asset value and transfer of this value to the end user customer
9 as telephone numbers are assigned. It is hard to imagine a system by which
10 numbers have an associated charge when passing between carriers and the
11 administrator without the numbers acquiring an inherent value. In this
12 environment, the industry would certainly be faced with significant
13 administrative cost increases associated with tracking the numbers for billing
14 and accounting purposes.
- 15 4. Cost information and cost recovery - GTE estimates that the shared
16 cumulative industry cost for number pooling in the 2000 to 2003 time frame
17 will be in the range of \$40 to \$80 million. Although the analysis is not yet
18 complete, GTE estimates that while the internal cost is not insignificant for
19 pooling it will be much less than the cost for LNP
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V.

**GTE'S RECOMMENDATIONS FOR THE IMPLEMENTATION
OF NUMBER POOLING IN MISSOURI**

**Q. WHAT IS GTE'S POSITION CONCERNING THE DEPLOYMENT OF NUMBER
POOLING?**

A. GTE supports number pooling where it can be shown that it provides a benefit. GTE does not support the implementation of pooling in area codes that are already in jeopardy. The FCC also recognized this issue in its NRO Order and stated that NPAs with less than a year before exhaust would not be given a high priority with regard to the implementation of pooling. Experience has shown that little extension in the life of an area code can be accomplished where most of the NXXs have already been assigned. As an alternative, GTE recommends that the MO PSC concur in the implementation of a retroactive overlay in current geographic area served by the 314/636 NPAs to provide the necessary immediate code relief. Pooling could then be implemented at the same time the third area code is implemented. With regard to the 816 NPA, GTE recommends that an overlay be implemented to provide relief and that pooling be implemented in the future if it can be shown to extend the life of the two area codes.

**Q. ASSUMING THE MO PSC RECEIVES DELEGATED AUTHORITY FROM THE
FCC TO IMPLEMENT THOUSAND BLOCK NUMBER POOLING, WHAT
STEPS DOES GTE RECOMMEND THAT THE MO PSC TAKE?**

A. Based on past experience GTE recommends that a schedule be developed similar to that identified in JCR-1. This timeline was utilized in the deployment of pooling in the 310 area code in California. The attachment identifies the steps

1 necessary to implement pooling over a period of approximately seven months. It
2 is important to note that the selection of the pooling administrator, while not
3 specifically identified in this timeline, can delay the overall schedule if one is not
4 chosen by the third month of the schedule.

5
6 **Q. HASTHE FCC NAMED A POOLING ADMINISTRATOR?**

7 A. At this time NeuStar has been selected as the pooling administrator in all current
8 trials. However, the recent FCC order mandates that a competitive bidding
9 process be used for the selection of the national pooling administrator. This
10 decision may impact the ability of state commissions or regional LNP LLCs to
11 negotiate a long-term pooling agreement with NeuStar.

12
13 **Q. DOES EACH STATE HAVE TO SELECT A POOLING ADMINISTRATOR?**

14 A. Yes. If the process used to select a pooling administrator in Missouri takes
15 longer than three months it could impact the overall implementation schedule.

16
17 **Q. WHAT OTHER RECOMMENDATIONS CAN GTE MAKE?**

18 A. GTE recommends that the carriers that implement pooling utilize Number
19 Portability Administration Center (NPAC) software release 3.0 and be required to
20 utilize the Efficient Data Representation ("EDR") functionality that allows blocks
21 to be stored and transmitted using a single entry as opposed to 1,000 individual
22 numbers. This release should be tested and available in Missouri by the first
23 quarter of 2001.

1 **Q. WHAT WOULD HAPPEN IF AN OLDER RELEASE WERE USED?**

2 A. If the older release is utilized, carriers and customers could experience problems
3 that impact service.
4

5 **Q. PLEASE EXPLAIN THE RELATIONSHIP BETWEEN LNP AND NUMBER
6 POOLING. IS LNP AVAILABLE IN ALL GTE EXCHANGES IN MISSOURI?**

7 A. Since number pooling utilizes the LNP platform to allow calls to be routed at a
8 thousand block level, LNP is a requirement for pooling. The FCC order
9 recognizes this fact and also establishes different requirements for non-LNP
10 capable carriers. LNP was required to be implemented in areas where
11 competitive carriers provided bona fide requests. As such, GTE still has a few
12 sites throughout Missouri that are not LNP capable. Within the areas
13 encompassed by a retroactive overlay of 314/636 and the current 816 area code,
14 GTE only has two base units with associated remotes that will not be LNP
15 capable in 2000 (Warrenton and Savannah⁸). The fact that these sites have not
16 received bona fide requests would indicate that there is little competition and
17 therefore pooling would be of little benefit for these sites.
18

19 **Q DOES THIS CONCLUDE YOUR TESTIMONY?**

20 A. Yes, it does. I will supplement my testimony, as needed, to reflect further
21 developments at the federal level.

⁸ Savannah is scheduled to be sold to Spectra Communications Group in 2000.

California Number Pooling Trial - 310

The following timelines combine the dates determined in the 1st Implementation Meeting with those identified in the OPWest Testing Subcommittee Meeting.

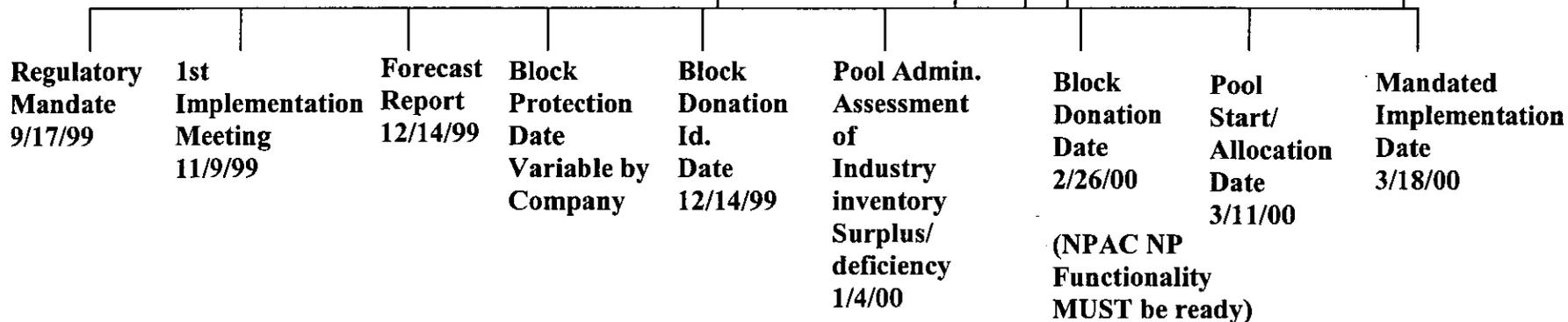
Begin Round
Robin
Testing²
2/21/00

Begin Intra
Service
Provider
Porting
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Begin
Testing
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NPAC¹
1/24/00

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End Testing
with NPAC
3/17/00



Note 1: Testing with SPs and HUB Providers that have not previously tested in the Midwest Region.

Note 2: Testing with SPs and HUB Providers that have previously tested in the Midwest Region.

The Application, Allocation, Effective, and TN Activation dates were determined using the INC Guidelines (99-0127-023).

