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July 30, 1999

Lawrence E. Strickling
Chief, Common Carrier Bureau
Federal Communications Commission
The Portals
445 Twelfth Street, SW
Washington, D.C. 20554

Dear Mr. Strickling:

In Paragraph 184 of CC Docket No. 99-200, *In the Matter of Numbering Resource Optimization*, comment is sought on “whether the NANPA should serve as thousands-block Pooling Administrator or whether the Commission should seek competitive bids ... “. In the same paragraph, the Commission tentatively concluded that it “should ask the NANC for a recommendation regarding what entity should serve as the Pooling Administrator”.

The North American Numbering Council (NANC) has been carefully reviewing these questions for several months. An Issue Management Group (IMG) has brought to the NANC Steering Group and to the NANC a recommendation based on an intense effort reviewing the requirements of thousand-block administration and negotiating these requirements and pricing with the present North American Numbering Plan Administrator (NANPA) to achieve an acceptable result. The NANC concluded (with NARUC abstaining) that thousand-block administration should be awarded to the present NANPA for a period coincident with its present term (which expires at the end of February 2003). (This recommendation presumes that certain details, terms and conditions of the relationship can be carefully concluded). We believe that the transition to thousand-block pooling can most effectively be concluded in a timely fashion in this way.

The NANC believes that it is important that there be competition for both the NANPA and Administrator roles. Accordingly, we further recommend that NANC be directed to begin the process of preparing for competitive bidding of both the NANPA and thousand-block pooling administration functions to be awarded at the end of the present NANPA's term.

Sincerely,

Alan C. Hasselwander
Chairman, North American Numbering Council

cc: Yog R. Varma, Anna Gomez, Diane Harmon, Jared Carlson, Jeannie Grimes