

August 26, 1999

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

Dear Mr. Strickling:

At its meeting on July 21, 1999 and again at its meeting on August 24 and 25, the North American Numbering Council (NANC) considered the effect of geographic area code splits that follow other than existing rate center lines. The issue was brought to NANC because of a number of situations in which this practice was followed in Arizona, Minnesota and New York.

In these situations, in order for customers to maintain their existing 7-digit telephone numbers, existing carriers must duplicate central office codes in each Numbering Plan Area (NPA) for each split rate center. New carriers that enter split rate centers may very likely require two or more codes rather than one to establish service. The duplication of codes is an inefficient use of numbers that can lead to a premature exhaust of the affected NPA. The North American Numbering Plan Administrator (NANPA) estimates that in one case at least 104 additional codes would be used at the time of the split by wireline carriers.

The practice of splitting rate centers also appears to affect local number portability (LNP) by constraining the geographic area in which numbers can be ported.

As a result of the situations described above, the Industry Numbering Committee (INC) has modified the *NPA Code Relief Planning and Notification Guidelines* to require that NPA boundaries follow rate center boundaries. This action was taken by unanimous consent of the INC members who participated in the consideration of this issue.

The NANC feels obliged to bring this issue to the attention of the Federal Communications Commission (FCC) because of its implications with respect to numbering resource optimization and as a potential factor in the premature exhaust of the North American Numbering Plan. It is NANC's position that in the future the North America Numbering Plan Administrator (NANPA) should withhold the assignment of NPA codes in situations in which states intend to establish NPA boundaries that result in splitting rate centers.

The NANC views this issue prospectively and does not believe that action should be taken with respect to split rate centers already in effect in some states.

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NANC members with the exception of the NARUC representatives agree with this recommendation. While the NARUC representatives to the NANC support without reservation the overarching goals of the NANC to further efficient utilization of numbering resources, the NARUC representatives voiced concern regarding state commissions' need for flexibility when addressing area code relief within their borders. Regarding the specific issue addressed in this letter, the NARUC representatives do not support the recommendations that could reduce state commissions' options when addressing area code relief.

Sincerely,

Alan C. Hasselwander
Chairman, North American Numbering Council

cc: Yog R. Varma, Anna Gomez, Diane Harmon, Jared Carlson, Jeannie Grimes, Arizona Corporation Commission, Minnesota Public Utilities Commission, State of New York Department of Public Service