

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington D.C. 20554

In the Matter of )  
 ) CC Docket No. **99-200**  
Numbering Resource Optimization )

**PETITION OF THE  
MICHIGAN PUBLIC SERVICE COMMISSION  
FOR ADDITIONAL DELEGATED AUTHORITY OVER  
NUMBERING RESOURCE CONSERVATION MEASURES**

In an effort to conserve numbering resources in Michigan, the Michigan Public Service Commission (“MPSC”) submits this petition to the Federal Communications Commission (“FCC”) for delegated authority to implement mandatory Thousands-Block Number Pooling (“number pooling”) in the 989 NPA.

**I. INTRODUCTION.**

Delegated authority to the states, over specific telephone numbering issues, has had a positive effect on the North American Numbering Plan (“NANP”) with overall exhaust moving from 2007 to 2035.<sup>1</sup> State commissions are familiar with their state’s telecommunications landscape and have provided state specific information to both the North American Numbering Plan Administrator (“NANPA”) and the Pooling Administrator (“PA”) to assist in numbering resources allocation and conservation.

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<sup>1</sup>October 2004 NANP Exhaust Analysis, NANPA website, <http://www.nanpa.com/pdf/NRUF/October2004NANPEXhaustAnalysis.pdf>.

State commissions balance their delegated authority over numbering resource conservation with the needs of local exchange providers, wireless services, and emerging technologies to serve customers. The MPSC has made swift decisions regarding local number portability, safety valve requests from carriers, and area code relief. Additional delegated authority over numbering resource conservation will allow the MPSC to protect citizens from untimely area code relief, while providing carriers ample numbering resources to serve their customers.

The 989 NPA meets the requirements set forth by the FCC<sup>2</sup> and, therefore, The MPSC should be granted delegated authority to require optional number pooling rate centers to be mandatory pooling rate centers where there are multiple carriers or upon the entrance of a second carrier.

## **II. DISCUSSION.**

The 989 NPA was created in 2001, a result of area code relief for the 517 NPA. The 989 NPA consists of 134 rate centers with only nine rural rate centers<sup>3</sup> located within two Metropolitan Statistical Areas (“MSA”).<sup>4</sup>

Although requests for CO Codes has lessened in the 989 NPA, due to voluntary number pooling by dominant local exchange carriers (“LEC”), 43

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<sup>2</sup> *Report and Order and Further Notice of Proposed Rule Making*, CC Docket No. 99-200 (FCC 00-104) ¶ 164.

<sup>3</sup> Hubbardston, Palo, Muir, Westphalia, Fostoria, Clifford, Fowler/Pewamo, Marlette, and Mayville.

<sup>4</sup> Metropolitan statistical areas as defined by the U.S. Census.

CO Codes were allocated in 2003 and 41 CO Codes were allocated in 2004. The current exhaust, for the 989 NPA, as determined by the North American Numbering Plan Administrator (“NANPA”) is the 2<sup>nd</sup> Quarter of 2008, with relief planning expected to begin in the spring of 2005.<sup>5</sup>

Rural NPAs, such as 989, have experienced significant competition with both mid-sized cities and villages within their boundaries. Wireless services and advanced technologies are not constrained by MSA boundaries, moving swiftly into rural rate centers. Two large incumbent LECs have instituted optional number pooling in 101 of the rate centers outside of the MSAs in the 989 NPA; however, within optional number pooling rate centers,<sup>6</sup> carriers are not required to be local number portability (“LNP”) capable and, therefore, many request numbering resources as CO Codes. The concern of the MPSC is the unnecessary stranding of thousands of telephone numbers within optional number pooling rate centers while residential and business customers undergo area code relief.

The majority of rate centers within the 989 NPA are currently in mandatory or optional number pooling, and the MPSC is not requesting that rate centers outside of the top 100 MSAs become LNP-capable to number

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<sup>5</sup> 2004 NRUF and NPA Exhaust Analysis, October 31, 2004, <http://www.nanpa.com/pdf/NRUF/October2004NPAExhaustProjectionsFinal.pdf>.

<sup>6</sup> Optional pooling rate centers occur in geographic areas that are not mandatory pool areas, but where the ILEC has implemented the technology to pool telephone numbers.

pool. This petition relates only to those rate centers where the incumbent LEC is number pooling and competition for customers has been established.

The area code relief process in the 989 NPA will not be delayed by the MPSC due to this petition. The MPSC will participate and provide assistance during the area code process as deemed necessary by the NANPA.<sup>7</sup>

### III. CONCLUSION.

The Michigan Public Service Commission requests delegated authority to implement mandatory Thousands Block Number Pooling in the 989 NPA rate centers currently considered optional by the Pooling Administrator. The 989 NPA meets all requirements set forth by the FCC and delegated authority would not affect the area code relief process currently under consideration by the North American Numbering Plan Administrator.

Respectfully submitted,

**MICHIGAN PUBLIC SERVICE COMMISSION**

By its attorneys:

Michael A. Cox  
Attorney General

David A. Voges  
Steven D. Hughey  
Michael A. Nickerson

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<sup>7</sup> *Report and Order and Further Notice of Proposed Rule Making*, CC Docket No. 99-200 (FCC 00-104) ¶ 120.

Assistant Attorneys General  
Public Service Division  
6545 Mercantile Way, Suite 15  
Lansing, MI 48911  
Telephone: (517) 241-6680

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