

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON D.C. 20554**

In the matter of:

National Thousands-Block Number	)	CC Docket No. 99-200
Pooling Rollout Schedule	)	

**COMMENTS OF THE MICHIGAN PUBLIC SERVICE  
COMMISSION ON THE NATIONAL THOUSANDS-BLOCK  
NUMBER POOLING ROLLOUT SCHEDULE**

The Michigan Public Service Commission (MPSC) files these comments on the proposed national Thousands-Block Number Pooling rollout schedule (rollout schedule), as requested in Public Notice DA 01-2419 released October 17, 2001. The MPSC, in the interest of clarity, includes several adjustments and clarifications that will assist in finalizing the rollout schedule.

**I. INTRODUCTION**

Michigan has 3 of the top 100 Metropolitan Statistical Areas (MSAs) in the United States.<sup>1</sup> Included in those MSAs are the 313, 810, 586, 248, 734, and 616 NPAs (numbering plan areas). Since July 2000, the MPSC has aggressively provided area code relief plans for these six NPAs to address the need for adequate numbering resources for carriers and customers.<sup>2</sup> Our comments, therefore, reflect the impact and inherent limitations associated with the implementation of area code relief on the proposed number pooling rollout schedule.

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<sup>1</sup> The 3 Michigan NPAs are Detroit, Ann Arbor, and Grand Rapids.

## II. DISCUSSION

The MPSC believes that certain changes to the preliminary rollout schedule are necessary. Listed below is a comparison between the current rollout schedule and one that incorporates MPSC recommendations:

	<b><u>PROPOSED ROLLOUT SCHEDULE</u></b>	<b><u>MPSC RECOMMENDATIONS</u></b>
<b>1st Quarter</b>	248/947	734
<b>2nd Quarter</b>	734, 616/269, 810	248/947, 616/269, 810
<b>3rd Quarter</b>	517, 586	517, 586
<b>4th Quarter</b>	989	989
<b>5th Quarter</b>	231	231
<b>6th Quarter</b>	313, 989, 906	906
<b>7th Quarter</b>	No Michigan NPAs Listed	
<b>8th Quarter</b>	No Michigan NPAs Listed	

The MPSC recommendations involve only three changes be made to the rollout schedule. First, the 313 NPA should be removed from the rollout schedule in the 6<sup>th</sup> Quarter. On August 24, 2001, the FCC granted the MPSC delegated authority to begin state pooling trials with the stipulation that the trials begin prior to the March 2001

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<sup>2</sup> MPSC Orders include: U-12552 (517/989), U-12588 (810/586), U-12721 (248/947), U-12850 (616/269), U-12880 (313/679) and U-12743 (734/679)

national rollout schedule<sup>3</sup> and, on October 11, 2001, the MPSC ordered an interim number pooling trial in the 313 NPA to begin no later than February 24, 2002.<sup>4</sup> The first implementation meeting is scheduled for November 8, 2001. This interim pooling trial will be transitioned to the national program as soon as practical, even if the February 24, 2002 target date is delayed due to unforeseen technical considerations.

Additionally, the MPSC requests that the 734 NPA and the 248/947 NPAs positions on the rollout schedule be reversed. The 734 NPA and the 313 NPA will share an area code relief plan in the form of a multi-NPA all-services overlay.<sup>5</sup> The 734 NPA meets the FCC's 3 pooling criteria: the NPA is in jeopardy, it has more than a year until exhaust, and it lies in 2 MSAs.<sup>6</sup> Although implementation dates have not been finalized for this relief plan, the MPSC requests that the 734 NPA number pooling effort be coordinated as close as possible with the 313 NPA, which will begin prior to February 24, 2002, to ensure timely area code relief.

Finally, the 248 NPA area code relief plan will be fully implemented on June 8, 2002, with the introduction of the 947 NPA as an all-services overlay and mandatory 10 digit dialing.<sup>7</sup> In discussions between NeuStar, Inc., Michigan's Interim Pooling Administrator, and MPSC Staff, it was determined that number pooling during the permissive dialing period of area code relief is not optimal. Currently, there is a time

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<sup>3</sup> In the Matter of Numbering Resource Optimization, CC Docket 99-200, NSD-L-01-34, August 24, 2001.

<sup>4</sup> *In the matter, on the Commission's, own motion, to consider the implementation of limited number pooling trials*, Case No.U-13086, Michigan Public Service Commission, 2001 Mich. PSC LEXIS 412 (October 11, 2001).

<sup>5</sup> *In the matter, on the Commission's own motion, to consider implementation of a 734 area code relief plan*, Case No. U-12743, Michigan Public Service Commission, 2001 Mich. PSC LEXIS 333 (September 7, 2001).

<sup>6</sup> In the Matter of Numbering Resource Optimization, CC Docket 99-200, NSD-L-01-34, ¶24. (Note: the 734 NPA was placed in jeopardy by NANPA on July 27, 2001.)

delay between carriers being allocated CO (central office) codes in the new NPA and those CO codes being available for activation. It is the MPSC's understanding that the recapturing of those allocated, but not yet activated, CO codes for donation into number pools is time consuming and labor intensive. Therefore, the MPSC requests that the 248/947 NPAs be moved to the 2<sup>nd</sup> Quarter of the rollout to allow for the area code relief to be completed prior to number pooling.

### III. CONCLUSION

In summary, the MPSC requests three changes to the rollout schedule:

1. Move the 734 NPA to the 1<sup>st</sup> Quarter.
2. Move the 248/947 NPAs to the 2<sup>nd</sup> Quarter.
3. Remove the 313 NPA from the 6<sup>th</sup> Quarter, since it will be transitioned to the national pooling program as soon as feasible after February 24, 2001.

While the MPSC recognizes that this is a comprehensive, aggressive rollout schedule, it should be noted that most of the top 100 MSAs have highly wireless concentrations.<sup>8</sup>

Therefore, granting the wireless telecommunications industry's request for forbearance will considerably diminish the benefits of number pooling.<sup>9</sup>

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<sup>7</sup> *In the matter, on the Commission's own motion, to considered implementation of a 248 area code relief plan*, Case No. 12721, Michigan Public Service Commission, 2001 Mich. PSC LEXIS 196 (April 17, 2001).

<sup>8</sup> In Michigan, the Grand Rapids rate center is 47% wireless, the Pontiac rate center is 47% wireless, and Detroit Zone 5 is 73% wireless.

<sup>9</sup> Verizon Wireless, Forbearance Petition, FCC WT Docket 01-184, July 26, 2001.

Respectfully submitted,

**MICHIGAN PUBLIC SERVICE  
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