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September 27, 2013

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: Technology Transitions Policy Task Force Seeks Comment on Potential Trials, GN Docket. No. 13-5, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket. No. 12-353
Written Ex Parte Communication**

Dear Ms. Dortch:

John Staurulakis, Inc., (“JSI”) hereby submits this attached written *ex parte* letter in response to AT&T’s recommendation to change the number assignment procedures to a Just-In-Time (“JIT”) process that would assign a carrier a telephone number (“TN”) one customer at a time.¹ AT&T filed comments on July 8, 2013 in response to a May 10, 2013 Public Notice² released by the Federal Communications Commission (“FCC” or “Commission”) in which AT&T proposed a numbering trial that “should build on the existing numbering databases, administrators, and processes to determine what new protocols and/or procedures would be necessary to assign telephone numbers TNs on a less-than-one-thousands-block basis (and ideally on an as needed/just-in-time basis).”³

As explained in the attached written *ex parte* notice, JSI does not agree with the AT&T “just-in-time basis” for TN assignment but rather believes a migration from Thousands Block Number Pooling to Hundreds Block Numbering Pooling is a better option for the industry.

Respectfully submitted,

John Kuykendall
Vice President

Enclosure

¹ Comments of AT&T, GN Docket No. 13-5 (fil. Jul. 8, 2013) (“AT&T Comments”).

² *Technology Transitions Task Force Seeks Comment on Potential Trials*, Public Notice DA 13-1016, GN Docket No. 13-5 (rel. May 10, 2013) (“Task Force Public Notice”).

³ AT&T Comments at 38.

I. Introduction

JSI is a telecommunications consulting firm offering a full spectrum of regulatory, financial and operational services for clients primarily in the rural independent telecommunications industry. Among its operational consulting services, JSI provides Service Order Administration (“SOA”) Management services, Number Assignment Management, and Administrative Operating Company Number (“AOCN”) services. Through the SOA service, JSI obtains access to Neustar’s Number Portability Administration Center (“NPAC”) database for the purpose of identifying ported telephone number information on behalf of clients. Currently, JSI provides SOA Management services for local exchange carriers. JSI’s Number Assignment Management services include requesting NXXs or 1K blocks on behalf of clients from the North American Numbering Plan Administrator (“NANPA”) and/or the Pooling Administrator (“PA”). Under its AOCN service, JSI manages the entry of new NXXs and 1K blocks in the Business Integrated Routing and Rating Database System (“BIRRRDS”) which contains the routing instructions for all assigned numbering to be published in iconectiv’s LERG product. JSI provides Number Assignment Management services and AOCN services. Additionally, JSI provides other intra-and inter-modal number portability-related services including assistance in implementation and regulatory compliance.

II. AT&T’s JIT Proposal

Today, numbering assignments are requested for a full NXX or a single thousands block to create an internal numbering inventory for a service provider in the rate centers being served. This inventory provides companies the ability to efficiently and immediately assign TNs to new customers. Once the inventory becomes low, the carrier requests additional NXXs or thousands blocks. In this process, NANPA or the PA has time to verify the qualifications of the requesting carrier and validate the utilization of the existing numbers assigned to the carrier. The AT&T proposal would dramatically change how numbering assignments are obtained from Neustar’s NANPA or PA.

AT&T’s proposal states:

Under the proposed trial, the PA would create a JIT Administrator function for numbering resources. The JIT Administrator would have its own Service Provider ID (“SPID”) or would use the PA’s SPID to obtain numbering blocks that could then be distributed on an individual, just-in-time, basis to carriers and VoIP providers (either directly, to the extent they have obtained a waiver to obtain direct

access to numbers, or through their numbering partners) using the number porting process.⁴

AT&T's proposed system is called "Just in Time" and suggests that service providers may no longer maintain an internal numbering inventory. Rather, the JIT proposal recommends that all service providers be required to order TNs one at a time from the JIT Administrator. The carrier may only submit a request when that service provider has a signed contract or service request from a customer. This would require a service provider to submit an application to the JIT administrator every time a new TN is required for a customer. The timing of the request is such that the customer will be waiting for the JIT Administrator to assign a TN in real time.

III. JSI's Response to AT&T's JIT Proposal and JSI Client Poll

JSI believes that a change in the numbering assignment process will be required if interconnected VoIP providers obtain the right to directly access numbering resources and porting. However, AT&T's JIT proposal is too extreme for the industry. The JIT process will likely have an adverse impact on customers due to the additional time it will take to receive a TN assignment from the JIT Administrator.

Processing TN applications one customer at a time instead of one NXX or thousands block at a time would increase the volume of applications to the JIT Administrator, which in turn would seem to require a significant staff increase even if the process is tested in a limited trial setting. The timeframes for the JIT administrator to complete TN assignments must be addressed. Currently, the PA has seven calendar days to assign a thousands block of numbers and works a Monday-to-Friday schedule. Service Providers ("SP") have the ability to assign a TN to a customer 7 days a week, 24 hours a day. If an SP was required to wait for a TN assignment from the JIT, any request for a telephone number on a Saturday would at best be made two days later on the following Monday. This would likely mean that a customer may not have the ability to request a new TN and service activation on a weekend.

JSI has concerns about the impact of these delays, so we conducted a client poll. 280 clients were asked their opinion on AT&T's JIT system. 104 responses were received and all except one opposed the JIT process due to the lack of a numbering inventory which they deemed essential to timely number assignment.⁵ For most JSI clients, the telephone number is assigned out of the existing, internal number inventory and serves as the customer account number. Without a telephone number to post in the record, the ordering

⁴ AT&T Comments at 39.

⁵ One respondent remained neutral and did not want to take a position at this time.

system cannot generate a new customer in the provisioning and billing systems. If a service provider has to submit a request for one telephone number at a time and wait for assignment and activation, this can result in delayed service to customers.

Additionally, client responses indicated concern over the potential costs associated with the JIT system. Current costs for number assignment could increase due to additional SP staffing requirements to manage the increased volume of number assignment applications to the JIT Administrator. Additional concerns include costs to the industry for maintaining JIT administrators due to volume of requests, potentially extended coverage hours, and the cost of a new mechanized system.

IV. JSI's Hundreds Block Pooling Proposal

JSI proposes a transition from thousands block pooling to hundreds block pooling as opposed to AT&T's JIT recommendation. The Thousands Blocks Pooling system currently allocates ten individual 1K block assignments from a single NPA-NXX code. The Hundreds Block Pooling Administration would work identical to the current Thousands Block Pooling Administration process but allow for 100 individual hundred block assignments from each and every pooled NPA-NXX code. This would significantly conserve numbering resources by increasing ten-fold the total number of blocks available in a rate center. In addition, the pooling applications and processes are already in place, thus eliminating the need for a separate JIT function. And, since a Hundreds Block Pooling environment would allow SPs to maintain some level of numbering inventory, hundreds block requests could be processed in the same timeframes as thousands block applications are today, which in turn should not require any significant increase or burden to Pooling Administration staffing.

When determining the best numbering assignment process to conserve numbers and accommodate new entrants, the FCC and the industry as a whole should consider the following:

- New JIT industry numbering guidelines and practices will have to be created whereas 1K block guidelines are already in place and will require minimal modification to accommodate hundreds block pooling.
- Current 1K block guidelines allow the PA seven calendar days to review applications along with the required supporting documents (certification and switch readiness) for new block assignments. The JIT Administrator must have the same obligations to receive and review the application and required support documents.

The JIT Administrator could not complete this process and assign a telephone within one business day.

- The current NXX/1K block assignment process encompasses the interconnection requirements an SP must meet to receive numbers. The requirements would remain “as is” if the 1K block guidelines were modified to apply to hundreds block pooling.
- With JIT, the interconnection requirements associated with the assignment of JIT numbers have not been resolved.
- With JIT, the requirements and qualifying factors to obtain an individual telephone number have not been determined.
- JIT will require costly and time consuming translation modifications for telephone numbers at the individual level as opposed to the block level.
- JIT will not allow SPs to maintain an inventory of TNs for assignment to new customers. SPs will be required to request telephone numbers one at a time. This will severely delay the new customer number assignment.
- Current NXX and 1K block assignments are published in the LERG to provide notification to SPs of new entrants into their rate centers. JIT will not allow for this notification as TNs assigned by the JIT will not be published in the LERG.
- Transitioning to one hundred block assignments from the current thousands block assignments will provide substantial support to numbering conservation efforts.
- The NRUF should remain at the SP level. The JIT function provides for the NRUF submission only at the JIT level. Since SP audits may be evaluated based upon information obtained from an SP’s NRUF, only the SP can provide actual TN assignment records to ensure TNs are utilized in compliance with assignment guidelines.

JSI believes that migrating to a Hundreds Block Pooling system from today’s Thousands Block Pooling system would be a much more cost effective and time-saving process for both service providers and the industry as a whole. The hundreds block level assignment will allow service providers to maintain a numbering inventory, which is essential for customer service while effectively addressing number conservation issues.