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February 20, 2014

Via ECFS

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

> **Re: GN Docket No. 13-5, GN Docket No. 12-353, WC Docket No. 10-90, CG
> Docket No. 10-51, CG Docket No. 03-123, WC Docket No. 13-97
> Numbering Testbed Proposals
> Written Notice of *Ex Parte***

Dear Ms. Dortch:

John Staurulakis, Inc., ("JSI") hereby submits the attached proposal for the Federal Communications Commission's ("FCC") "development of a telephony numbering testbed for collaborative, multi-stakeholder research and exploration of technical options and opportunities for telephone numbering in an all-IP network."[1]

As explained in the attached proposal, JSI believes a migration from thousands-block number pooling to hundreds-block number pooling is the preferred testbed option for number allocation in an all IP-network.

Respectfully submitted,

John Kuykendall
Vice President

Enclosure

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[1] *See Technology Transitions et al.,* GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 at para. 152 (rel. Jan. 31, 2014) ("Technology Transitions Order").

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Telecommunications Advisors Since 1962

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 its local exchange carrier clients. JSI's Number Assignment Management services include requesting NPA-NXXs or Thousands-Block (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 NPA-NXXs and 1K blocks in the Business Integrated Routing and Rating Database System (BIRRDS) which contains the routing instructions for all assigned numbering to be published in iconectiv's LERG product.

JSI Proposes Hundreds-Block Pooling (HBP) for the FCC's Numbering Testbed

In its September 27, 2013 written *ex parte* notice, JSI proposed a transition from thousands-block pooling to hundreds-block pooling.[2] JSI again presents the proposal to the FCC as the preferred testbed option for number allocation in an all IP network.

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 similar to the current thousands-block pooling administration process but allow for 100 individual hundred block assignments from each and every pooled NPA-NXX code. The pooling applications and processes are already in place, thus eliminating the need for a separate assignment function. Such a process will allow the testbed to focus on routing and the assignment of credentials for telephone numbers in an all IP network. In addition, hundreds-block pooling would allow service providers to maintain some level of numbering inventory, which would address concerns by many service providers of immediate access to telephone numbers.

JSI received feedback from 104 rural ILEC clients in favor of hundreds-block pooling in lieu of number assignment under AT&T's just-in-time proposal. JSI believes hundreds-block pooling will promote the IP transition in a less obtrusive way. The primary reason cited was the need to maintain an inventory for prompt customer service. If a service provider had to submit a request for one telephone number at a time and wait

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[2] Letter from John Kuykendall to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 13-5 and 12-353 (filed September 27, 2013, in response to AT&T comments on its proposed numbering trial).

for assignment and activation, this could result in delayed service to customers. JSI believes rural companies will be disproportionately impacted by an individual telephone number assignment system due to limited internal resources.

Should the industry convert to a single database administrator option, one that incorporates both numbering assignment and routing functions, hundreds-block pooling would be a flexible option. As a subset of today's thousands-block pooling, hundreds-block pooling could easily exist in today's numbering assignment practice. Or, should the industry progress to a single numbering/routing database function, hundreds-block pooling could be modified to work in a new database model.

When determining the best numbering assignment process to accommodate new entrants as well as accommodating the conversion to an all IP network, the FCC and the industry as a whole should consider hundreds-block pooling ("HBP") in the testbed for the following:

- HBP will allow service providers to maintain an inventory of telephone numbers for assignment so as to not delay activation of new customers to their network.

- HBP can be flexible enough to work in the current multi-database environment or in a "new IP world" single database.

- 1K block guidelines will require minimal modification to accommodate hundreds-block pooling.

- The current NXX/1K block assignment process encompasses the interconnection requirements a service provider must currently meet to receive numbers.

- HBP modifies certain characteristics of the current numbering structure, while allowing service providers more focus on the routing and security of telephone numbers in an all IP network, resulting in a more efficient placement of a company's resources.

- HBP is a natural progression in number allocation and will better support SPs internal requirements in the numbering administration process.

- As the industry progresses to a non - geographic numbering system, HBP can easily evolve.

JSI believes that testing and possibly transitioning to the hundreds block pooling system would be a much more cost effective and time-saving number allocation 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. Hundreds-block pooling will also provide service providers with a minimal impacting option to the current numbering process, which will allow for more focus and resources on the IP transition. For these reasons, JSI is advocating that hundreds-block pooling be part of the numbering testbed.