Resolution Requesting the Federal Communications Commission
to Initiate an Inquiry into the Administration of the
North American Numbering Plan

WHEREAS, The Bell Communications Research Corporation
(Bellcore) was created in 1983 as a result of the Modified Final
Judgement (MFJ) between AT&T and the United States Department of
Justice; and

WHEREAS, The Plan of Reorganization stipulated that Bellcore
should be in charge of administration of the North American
Numbering Plan (NANP) for the telephone industry; and

WHEREAS, Bellcore (NANP group and other groups) administers
the assignment of various numbering codes that are of critical
importance to the telecommunications industry in North America. In
some cases, administrative guidelines are provided by industry
groups such as the Industry Carrier Compatibility Forum (ICCF).
These numbering codes include:

1) Numbering Plan Area (NPA) codes dialed by ratepayers;

2) Automatic Number Identification Information (ANI) digits
used in the processing of telephone calls;

3) Carrier Identification Codes (CIC) dialed by ratepayers
to reach specific purchasers of access services;

4) Telecommunications Credit Card Issuers Identification
codes (CIID) used in the routing of credit card calls;

5) Interexchange Carrier Operator access codes;

6) Service Access Code 800 central office codes;

7) Service Access Code 900 central office codes;

8) Signaling point codes used as addresses in Signaling
System 7 (SS7) signaling messages; and

WHEREAS, Bellcore (or some other organization) will be
responsible for administering the assignment of new codes required
by the telecommunications industry in North America, including:

1) Intermediate Signaling Network Identifier (ISNI) codes
used to identify the SS7 signaling network required to
carry some SS7 messages;

2) Number assignments for the Public Switched Digital
Service (PSDS) offerings;

3) Number assignments for developing personal
communications services (PCS) so that telephone numbers
will be assigned to individuals rather than locations;
4) Number assignments and administration of the 800 Database pending approval by the Federal Communications Commission (FCC) and the MFJ court; and

WHEREAS, The pending exhaust of a number of the codes, including the NPA codes, the CIC codes, and the II codes, is causing the telecommunications industry to spend untold millions of dollars to devise and eventually implement the chosen solutions; and

WHEREAS, The financial burden of administering the NANP and making hardware and software changes throughout the industry to accommodate changes in the NANP ultimately flows to the ratepayers; and

WHEREAS, Both business and residence ratepayers face confusion and disruption in adapting to changes in the NANP caused by the exhaust of various numbering codes; and

WHEREAS, There are critical considerations and issues surrounding the exhaustion of the present NANP codes that necessitate regulators' interest and attention such as:

1) The costs to the telephone companies and the ratepayers of creating and deploying a system of interchangeable NPA codes or any alternative plan to address the NPA code exhaust;

2) The costs that may be appropriately allocated to a telecommunications service that consumes a limited resource, such as a telephone number or CIC code, that will eventually cost many millions of dollars to replenish;

3) The effects a new numbering scheme may have upon the differing types of existing customer premises equipment and the dialing patterns familiar to ratepayers;

4) The potential strategies for the deployment of telephone numbers and other NANP codes required to implement new services including PCSs;

5) The possible competitive advantage to the Regional Bell Operating Companies of having Bellcore as the NANP Administrator;

6) The examination of equitable plans for assigning NANP codes among the competing interests such as the Bell Operating Companies, the Independent Operating Companies, the Interexchange Carriers, the Enhanced Service Providers, Cellular Mobile Carriers, and emerging PSC providers;

7) The examination of methods that may be used to reduce the demand for scarce NANP codes, or to augment the existing
supply of telephone numbers, such as central office 
code-sharing and reclaiming unused telephone numbers, or 
some combination of the above;

8) The establishment of additional monitoring reports that 
could be used by regulators to exercise oversight, decide 
public policy, and inform the public;

9) The examination of technically feasible alternatives, 
available today or in the future to the plan developed in 
the 1960's for the exhaust of the current NPA coding 
scheme;

WHEREAS, The FCC entertains complaints and concerns regarding 
industry decisions which have been made and are being made with 
respect to the national numbering plan; now, therefore, be it

RESOLVED, That the Executive Committee of the National 
Association of Regulatory Commissioners (NARUC), convened at its 
Summer Meeting in San Francisco, California, requests that the FCC 
issue a Notice of Inquiry, seeking information and comment regarding 
the many considerations and issues surrounding the NANP expressed 
herein; and be it further

RESOLVED, That the Notice of Inquiry also invite comment on any 
additional concerns and questions that may be relevant to the 
administration of the NANP.

Sponsored by the Committee on Communications
Adopted July 24, 1991