

**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 (II) 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