

the Long Term Evolution (LTE) and LTE-Advanced wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

ATIS' Industry Numbering Committee (INC) addresses and resolves industry-wide issues associated with planning, administration, allocation, assignment, and use of the North American Numbering Plan (NANP) numbering resources within the NANP area. INC guidelines and recommendations are used by the North American Numbering Plan Administration (NANPA), the national Pooling Administrator (PA), and the Canadian Radio Television and Telecommunications Commission (CRTC) in the management of numbering resources.

II. COMMENTS

In its *Petition*, the NHPUC seeks authority to: (1) implement individual telephone number (ITN) pooling; (2) establish the Pooling Administrator (PA) as the holder of blocks for assignment of ITNs when fewer than 100 numbers are requested by a carrier; and (3) implement single number pooling trials using existing software and methods.¹ While ATIS INC supports the goal of ensuring the efficient utilization of numbering resources, it believes that there are practical and technical issues associated with the NHPUC request, and that important numbering policy issues continue to weigh against it.

One practical challenge relates to the impact that the request will have on the Request for Proposals (RFP) the Commission is expected to issue for a new contract that will combine the NANPA and PA roles. The *Petition* proposes to establish new responsibilities for the PA and suggests that "the timing may be right to include individual telephone number portability administration in the RFP for the new pooling administrator."² ATIS INC strongly opposes the

¹ *Petition* at p.2.

² *Petition* at p. 2, fn.1.

addition of new requirements for the PA to serve as an individual number pooling (ITN) administrator to the already complex, combined NANPA/PA RFP. Given the important roles played by the PA and NANPA, ATIS INC believes that it is important that this RFP be issued in a timely manner. Adding an additional new role at this late stage, particularly given that no Technical Requirements Document has been developed to outline any administrator and system responsibilities for an ITN administrator, will delay this important RFP.

Another practical consideration relates to who will pay for the proposed ITN trial. The NANPA and PA functions are supported by all service providers' NANP Fund contributions.³ An equitable cost allocation methodology would need to be developed to ensure that the costs are appropriately allocated amongst the relevant stakeholders.

The *Petition* also raises questions/concerns regarding technical and operational issues. The NHPUC proposes that ITN pooling can be implemented on a trial basis, suggesting that the Commission could use New Hampshire as a testbed or proof of concept for potential broader application throughout the NANP.⁴ However, the *Petition* lacks significant operational details about the proposed ITN trial, such as which service providers would participate in the trial, whether participation would be voluntary or mandatory, and what happens to the TNs contributed to the ITN inventory when the trial has concluded. There are no guidelines or technical requirements readily available for an ITN pooling trial, and the PA's Pooling Administration System (PAS) is not designed to assign TNs individually. Further, some service providers across the country, including those operating in New Hampshire, have invested significantly in their operational support systems to automate the thousands-block pooling processes and manage those thousands-blocks appropriately. Those service providers would have

³ More information on funding can be found at: <http://nanpfund.com/>.

⁴ *Petition* at p. 7.

to develop separate processes for New Hampshire numbering inventories, creating unnecessary difficulty and added expense.

The NHPUC in its *Petition* suggests that concerns over geographically-relevant telephone numbers have diminished such that ITN pooling will be readily built on what is in place now that the industry has “the advantage of proving that pooling can be implemented effectively.”⁵ ATIS INC disagrees that ITN pooling can be “readily built” on existing systems. As previously noted, no standards or guidelines have been developed for ITN pooling, and the PAS is not designed to allocate TNs individually. The ITN trial would potentially require all New Hampshire TNs to be added to the NPAC and would require changes to the NANC LNP (Local Number Portability) process flows. Further, ITN could put a significant strain on service providers’ Local Service Management Systems (LSMSs) and number portability databases, particularly those that rely on Efficient Data Representation (EDR) implementation, and would require investment to add capacity that is otherwise unnecessary.

Finally, NHPUC notes that the process for ITN pooling was outlined in ATIS INC’s *Initial Report to the NANC on Number Pooling* (ATIS-0300063).⁶ This report, developed by the industry in 1997, explained that while ITN pooling could offer improvement in number utilization, its implementation requires significant changes to existing systems as well the development of new systems.⁷ Indeed, the Commission recognized these impacts when it declined multiple state requests for delegated authority to implement ITN and Unassigned Number Porting (UNP).⁸ In the Commission’s first Numbering Resource Optimization Order,

⁵ *Petition* at p. 4.

⁶ This document is available from the ATIS document repository at <https://www.techstreet.com/atis/standards/atis-0300063-1997-12?product_id=1627396>.

⁷ *Initial Report to the NANC on Number Pooling*, Section 16.0.

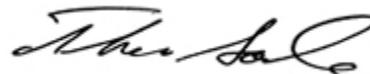
⁸ *Report and Order and Further Notice Of Proposed Rule Making*, CC docket 99-200 (released March 31, 2000) (First Numbering Resource Optimization Order).

the Commission correctly recognized the lack of standards for ITN and the potential disruptions to carrier switches, operational support systems, and LNP mapping logic if those methodologies led to significant porting.⁹ There are still no standards for ITN, and those same concerns are still relevant today. Furthermore, as discussed above, thousands-block pooling has and is working effectively to extend the life of the NANP, including for the 603 numbering plan area (NPA) covering New Hampshire. The *Petition* provides no compelling reason to depart from the Commission's current numbering resource optimization measures, and area code relief rules and policies.

III. CONCLUSION

ATIS appreciates the opportunity to provide its input to the *Public Notice* and urges the Commission to deny the NHPUC's *Petition*.

Respectfully submitted,



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⁹ *Id.* at ¶¶ 228-231.