

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

Numbering Resource Optimization

CC Docket No. 99-200

BELLSOUTH TELECOMMUNICATIONS, INC.

EMERGENCY PETITION FOR PARTIAL WAIVER AND EXTENSION OF TIME

BellSouth Telecommunications, Inc. ("BellSouth"),<sup>1</sup> by counsel and pursuant to Sections 1.3<sup>2</sup> and 1.46<sup>3</sup> of the Commission's rules, respectfully requests that the Commission waive certain mandatory reporting requirements adopted in the *Numbering Resource Optimization Report and Order* ("NRO Order")<sup>4</sup> in the above-captioned proceeding. Specifically, BellSouth requests that the Commission: (1) waive Section 52.15(f)(5)(i), which requires carriers to submit

<sup>1</sup> This petition is filed on behalf of BellSouth Telecommunications, Inc., an affiliated company of BellSouth Corporation, that provides wireline local telephone service. BellSouth Cellular Corp., a separate affiliate of BellSouth Corporation, will submit forecast and utilization data in accordance with the Commission's rules by the August 1, 2000 deadline.

<sup>2</sup> 47 C.F.R. § 1.3 ("Any provision of the rules may be waived by the Commission on its motion or on petition if good cause therefor is shown.).

<sup>3</sup> 47 C.F.R. § 1.46.

<sup>4</sup> *Numbering Resource Optimization*, CC Docket No. 99-200, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 00-104 (rel. Mar. 31, 2000) ("NRO Order" and "ENPRM").

utilization reports based on five number use categories;<sup>5</sup> and (2) waive or extend the August 1, 2000 filing deadline<sup>6</sup> for 90 days until November 1, 2000.

As described more fully below, special and compelling circumstances warrant grant of the requested relief. BellSouth will not be able to comply fully with the Commission's reporting requirements by the August 1 deadline, because it will not have the internal mechanization in place that will enable it to report data as prescribed in the *NRO Order*. BellSouth, however, expects to be able to provide Central Office Code (NXX) forecast data at the NPA level in compliance with Section 52.15(f)(4)<sup>7</sup> by August 1. BellSouth also expects to be able provide modified utilization data as soon after August 1 as possible and, in any event, no later than November 1, 2000. Specifically, BellSouth plans to submit utilization data divided into three categories: (1) "assigned" (which will include administrative and some intermediate numbers); (2) reserved (which will include the remainder of intermediate numbers); and (3) aging.

#### I. A PARTIAL WAIVER IS WARRANTED.

BellSouth satisfies the "good cause" standard for grant of a waiver.<sup>8</sup> Courts have held that "a waiver is appropriate only if special circumstances warrant a deviation from the general rule and such deviation will serve the public interest."<sup>9</sup> The Commission "may exercise its

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<sup>5</sup> 47 C.F.R. § 52.15(f)(5)(i).

<sup>6</sup> *NRO Order*, ¶ 67; 47 C.F.R. § 52.15(f)(6)(i).

<sup>7</sup> 47 C.F.R. § 52.15(f)(4).

<sup>8</sup> See 47 C.F.R. §1.3; *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("The FCC has authority to waive its rules if there is 'good cause' to do so.").

<sup>9</sup> *Northeast Cellular Telephone Co.*, 897 F.2d at 1166; see also *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

discretion to waive a rule where particular facts would make strict compliance inconsistent with the public interest.”<sup>10</sup>

A waiver is justified under the standard articulated above. First, unique circumstances exist that would make strict application of the reporting rules inconsistent with the public interest. BellSouth’s existing legacy systems are not designed to accommodate the kind of data collection and reporting contemplated by the Commission in the *NRO Order*. For example, our systems cannot separately identify assigned, intermediate, and reserved numbers as required by the new rules. In order to meet these new specifications, BellSouth will have to develop, test, and install new software and replace the existing COSMOS<sup>11</sup> and ATLAS<sup>12</sup> network operations support systems. These changes are substantial and will require time to implement. Currently, BellSouth is scheduling upgrades that will accommodate the changes necessary to collect data as required by the Commission. BellSouth has already begun replacing the COSMOS legacy system with the new SWITCH system;<sup>13</sup> and replacement of the ATLAS legacy system with the new CNUM<sup>14</sup> system (which includes the companion Telephone Number Tracking System)<sup>15</sup> will begin in 2001.

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<sup>10</sup> *Northeast Cellular Telephone Co.*, 897 F.2d at 1166 (citing *WAIT Radio*, 418 F.2d at 1159).

<sup>11</sup> COSMOS is an operations support system that inventories telephone numbers.

<sup>12</sup> ATLAS is an operations support system that assigns telephone numbers to business units.

<sup>13</sup> SWITCH is an operations support system that inventories telephone numbers.

<sup>14</sup> CNUM is an operations support system that inventories, selects, and administers telephone numbers. CNUM will ultimately replace COSMOS, SWITCH, and ATLAS.

<sup>15</sup> Telephone Number Tracking System (TN Tracker) is a companion system to CNUM that provides reports, utilization and forecasts for telephone numbers.

In the interim, however, the only way that BellSouth could extract quantities of intermediate and administrative numbers from other assigned numbers would be through manual processes that are impractical in view of the volume of data being requested. Even with a manual effort, we will not be able to provide utilization data based on all five number use categories. At this time, our systems can extract utilization data based on only three categories: (1) "assigned" (which includes administrative and some intermediate numbers); (2) reserved (which includes the remainder of intermediate numbers); and (3) aging. In light of the foregoing, BellSouth requests that the Commission grant a partial waiver of its mandatory reporting requirements.

## **II. AN EXTENSION OF THE FILING DEADLINE WILL SERVE THE PUBLIC INTEREST.**

BellSouth is also seeking a 90-day extension in order to file its modified utilization data. An extension is warranted because of the intensive manual effort required to collect and compile such a large volume of data from multiple legacy systems. With 7,800 NXXs in over 1,500 rate centers, BellSouth must report a total of approximately 400,000 data elements and 80,000 lines of data. Once the raw data is gathered, we will have to resolve discrepancies between the multiple systems and then summarize the data in an appropriate manner in order to populate FCC Form 502 (the Numbering Resource Utilization/Forecast Report). Completing an effort of this magnitude before August 1 is simply not possible. Thus, BellSouth respectfully requests that the Commission allow it to submit its modified utilization data as soon after August 1 as possible, yet no later than November 1, 2000. As indicated above, BellSouth intends to file its Central

Office Code (NXX) forecast data at the NPA level by the August 1 deadline to assist NANPA in revising its NPA exhaust projections using the most current data.

An extension of time to submit utilization data will not disrupt the reporting process. To the contrary, grant of the extension will allow the NANPA additional time to: (1) develop an appropriate system to collect, aggregate, and analyze carrier reports; (2) make any necessary changes to FCC Form 502; and (3) clarify any ambiguities regarding the reporting requirements or format. The end result will be more accurate and complete data provided in a more useful form.

These additional steps are important because the underlying purpose behind the mandatory reporting requirements is “to increase carrier accountability and incentives to use numbers efficiently.”<sup>16</sup> BellSouth is firmly committed to the goal of more efficient number usage and has been working diligently to implement the Commission’s new rules. Nonetheless, as the record clearly demonstrates, compliance with the August 1, 2000 reporting deadline is in jeopardy for BellSouth as it is for much of the industry.<sup>17</sup> Despite the efforts of all parties

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<sup>16</sup> *NRO Order*, ¶ 5.

<sup>17</sup> A number of parties have submitted requests for an extension of the August 1, 2000 reporting deadline. *See, e.g.*, Qwest Corporation Request for Expedited Deferral of Effective Date or, Alternatively, a Waiver or Stay of Portions of Soon-To-Be Effective Rule 47 C.F.R. Section 52.15(f), CC Docket No. 99-200, at 6 (filed July 10, 2000) (extension until February 1, 2001 or “until a certain amount of time after the NANPA situation is worked through.”); Motion for Extension of Time, filed on behalf of the Association for Local Telecommunications Services, the Competitive Telecommunications Association, and the Personal Communications Industry Association, CC Docket No. 99-200 (filed July 14, 2000) (90-day extension); Motion for Extension of Time, filed on behalf of Winstar Communications, Inc., CC Docket No. 99-200 (filed July 17, 2000) (120-day extension); Petition for Waiver and Extension of Time, filed on behalf of Cincinnati Bell Telephone Company, CC Docket No. 99-200 (filed July 20, 2000) (90-day extension); Petition for Temporary Waiver of 47 C.F.R. §§52.15(f)(6)(i) and 52.15(j), filed on behalf of VoiceStream Wireless Corporation, CC Docket No. 99-200 (filed July 20, 2000) (90-day extension).

involved – the Commission, the NANPA, and carriers – compressed time frames have made full compliance with the initial filing deadline problematic.

Even if carriers provide data to the NANPA to meet the August 1 deadline, such data is likely to come in different formats and categories than those prescribed by the Commission. The process for developing the new reporting form, making it available to the industry, and allowing carriers time to understand the complexities of the form has been hurried. As a result, carriers will inevitably use different assumptions to satisfy the requirements as best they can. The absence of uniform reporting – one of the express goals of the Commission – will seriously undermine the validity of these initial reports.

Moreover, NANPA will not have the capability to meaningfully analyze the initial submissions. At a meeting of the North American Numbering Council (“NANC”) on June 20, 2000, a NANPA representative indicated that the NANPA would not complete the development of internal systems that would allow it to organize and analyze the utilization reports until some time after August 1, 2000. In the absence of this capability by the NANPA, BellSouth sees little, if any, value in retaining the August 1 deadline. An extension will not harm any interested party and, in fact, will serve the public interest by allowing carriers time to provide more accurate and complete data and by reducing the administrative burdens imposed upon the NANPA and the carriers.

## **CONCLUSION**

In light of the foregoing, BellSouth respectfully requests that the Commission grant a partial waiver of its reporting requirements and extend the filing deadline to allow BellSouth

to submit modified utilization data as soon after August 1 as possible and, in any event, no later than November 1, 2000.

Respectfully submitted,

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July 24, 2000

**CERTIFICATE OF SERVICE**

I do hereby certify that I have this 24th day of July, 2000, served the following parties to this action with a copy of the foregoing **BELLSOUTH TELECOMMUNICATIONS, INC. EMERGENCY PETITION FOR PARTIAL WAIVER AND EXTENSION OF TIME**, reference CC Docket No. 99-200, by hand delivery, Federal Express, or by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties as set forth on the attached service list.

  
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