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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the matter of)
)
Application by SBC Communications Inc.,)
The Ohio Bell Telephone Company d/b/a) CC Docket No. _____
Ameritech Ohio and Southwestern Bell)
Communications Services, Inc. d/b/a)
Ameritech Long Distance for Provision of)
In-Region InterLATA Services in Ohio)

**AFFIDAVIT OF JEFFREY A. MONDON
ON BEHALF OF AMERITECH**

STATE OF CALIFORNIA)
)
COUNTY OF CONTRA COSTA)

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NUMBER ADMINISTRATION AFFIDAVIT**

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I, JEFFREY A. MONDON, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

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1. My name is Jeffrey A. Mondon. My business address is 2600 Camino Ramon, Room 2S650BB, San Ramon, California, 94583. I support SBC Operations, Inc. (“SBC”) and serve as Area Manager - Network Regulatory - Numbering. The responsibilities of this position include area code relief planning and implementation and policy development for numbering issues. I formerly acted as the industry area code relief planner for California and Nevada. My affidavit demonstrates that Ameritech is in full compliance with Checklist item (ix)¹ regarding nondiscriminatory access to telephone numbers for assignment.

PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND

2. I received my Bachelor of Science in Business Administration from San Francisco State University in 1984. From 1988 until 1997 I held numerous management positions within Customer Service, Claims, and Administrative Service departments for Crum and Forester, Vision Service Plan and Plymouth Rock Assurance Corporation. In 1997, I was hired by Pacific Bell Telephone Company (“Pacific”) as an Area Code Relief Planner, with the responsibility of coordinating the telecommunications industry's area code relief planning efforts in California and Nevada. Additionally, my work group served as Central Office Code Administrator (“Code Administrator”). This work group provided non-discriminatory access to telephone numbers, both before and after the adoption of numbering guidelines. In 1999, I was appointed to the position of Area Manager-NPA Relief Planning & Implementation, with the responsibility of overseeing all NPA relief planning and implementation efforts for Pacific and Nevada Bell Telephone Company (“Nevada Bell”).

¹ Section 271(c)(2)(B)(ix) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996.

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Since that time, I have assumed responsibilities of policy development for long-term Number Portability (LNP) and other numbering issues for SBC on a 13 state basis, including Ohio.

EXECUTIVE SUMMARY

3. My affidavit describes actions taken by Ameritech to comply with the requirements of Checklist Item (ix): Number Administration and relevant FCC orders. Specifically, I describe the steps taken to ensure all telecommunications carriers were provided non-discriminatory access to telephone numbers while The Ohio Bell Telephone Company d/b/a Ameritech Ohio or Ameritech (“Ameritech”)² was the Central Office Code Administrator (“Code Administrator”). Ameritech is no longer the Center Office Code Administrator as NeuStar (formerly Lockheed Martin) took over the Code Administrator responsibilities on March 29, 1999. Since that time, Ameritech has adhered to applicable industry number administration guidelines and Federal Communications Commission (“FCC”) rules.

ACT AND FCC REQUIREMENTS

4. Checklist Item (ix) requires that Ameritech provide, “[u]ntil the date by which telecommunications numbering administration guidelines, plans, or rules are established, nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers.”³ The checklist mandates compliance with “such

² The Ohio Bell Telephone Company, an Ohio corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Ameritech Corporation is a wholly owned subsidiary of SBC Communications Inc. Ohio Bell offers telecommunications services and operates under the names “Ameritech” and “Ameritech Ohio” pursuant to trade name registrations with the state of Ohio.

³ 47 U.S.C. § 271(c)(2)(B)(ix)

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guidelines, plans or rules” after they have been established.⁴ The FCC's rules, in turn, require that a Local Exchange Carrier (“LEC”) permit competing providers to have access to telephone numbers that is identical to the access the LEC provides itself.⁵ My affidavit demonstrates that Ameritech is in full compliance with this Checklist item.

BACKGROUND AND OVERVIEW

5. As used in this affidavit, “number administration” refers to the administration and assignment of central office codes to requesting facilities-based telecommunications providers.
6. A telephone number is made up of three components, totaling 10 digits. The first three digits represent the “numbering plan area” or “NPA.” The NPA is commonly referred to as the “area code.”
7. The second three digits constitute the central office – or “NXX” – code. The final four digits of the telephone number represent the specific line address within the NXX. The format of a telephone number is therefore: NPA-NXX-XXXX.
8. In the NXX, any number from 2 to 9 may represent “N” and any number from 0 to 9 may represent “X.” There are 792 available NXX codes within each NPA (200 through 999, less all “N11” codes such as 911, 411, etc., which are reserved for emergency and other public access purposes), and 10,000 telephone numbers (NXX-0000 through NXX-9999) within each NXX.
9. In order to provide facilities-based local exchange telephone service within the public switched telephone network, carriers must have an NXX code(s) assigned to their switching

⁴ Id.

⁵ 47 CFR § 51.217(c)(i)

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location for the provision of telephone numbers to their subscribers. The regional Central Office Code Administrator assigns these central office codes.

10. Until March 29, 1999, Ameritech acted as Central Office Code Administrator in Ohio. In this capacity, Ameritech provided non-discriminatory access to telephone numbers for all carriers in accordance with the *Central Office Code Assignment Guidelines* (Assignment Guidelines) and the *NPA Code Relief Planning Guidelines* (NPA Relief Guidelines) and subject to the oversight and complaint jurisdiction of the FCC.
11. The process for obtaining a central office code “NXX” block of 10,000 numbers is set out in the Assignment Guidelines. It is identical for all requesting carriers, including Ameritech and is relatively simple. First, the applicant makes a request to the Code Administrator using the Central Office Code Assignment Request and Confirmation Form. The Code Administrator date-stamps the request and then determines if the request is in compliance with the national code assignment guidelines. If the application is in compliance, the Code Administrator selects an unassigned code for assignment. The Code Administrator honors requests for specific NXX codes if available. The Code Administrator will respond to the Applicant with an NXX assignment within 10 working days from receipt of the application. Any denial of an application which may be necessary is based upon nondiscriminatory criteria as authorized in the guidelines and orders of the FCC and, where a request is denied, the administrator will provide specific reasons for the denial and information on where to appeal the decision.
12. Until March 29, 1999, when it ceased to be the Code Administrator in Ohio, Ameritech assigned a total of 335 NXX central office codes to 15 different local service competitors in the state of Ohio, representing 3,350,000 telephone numbers throughout the state. Once

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assigned a central office code, the applicant assumes control over the assignment and administration of all 10,000 numbers within the assigned code. The Code Administrator is not involved in the individual telephone number assignment, NXX-XXXX, which is performed by the code holder. While Code Administrator, Ameritech did not deny any valid requests by certified competitors for NXX codes in Ohio.

13. In July of 1995, the FCC issued an important rulemaking in the area of number administration: CC Docket No. 92-237, In the Matter of Administration of the North American Numbering Plan, Report and Order. In the NANP Order, the FCC required the transfer and centralization of number administration responsibilities to a neutral third party. The order also created the North American Numbering Council (“NANC”) to oversee this transfer and set numbering policies for the North American Numbering Plan.
14. Ameritech, as a subsidiary of SBC, is an active participant in the NANC. SBC fully supports the efforts of the NANC and went on record as supporting the quick and responsible transfer of number administration functions to a neutral third party.
15. In its Second Report and Order and Memorandum Opinion and Order, FCC 96-333, In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996 (“Second Report and Order”), the FCC held that “the action taken in the NANP Order satisfies the Section 251(e)(1) requirement that the Commission create or designate an impartial third party number administrator.” (Second Report and Order, par. 262). The FCC went on to “...authorize Bellcore and incumbent LECs to continue performing the number administration functions they performed prior to the enactment of the 1996 Act.” (Id., par. 326.) The FCC concluded, “incumbent LECs should apply identical standards and procedures for processing all numbering requests, regardless of the identity of the party

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making the request.” (Id., par. 334.) Ameritech complied with this FCC directive as the Code Administrator and applied identical standards and procedures when processing central office code requests from any industry member.

16. The transfer of the number administration functions formerly performed by Ameritech were designated by the FCC to go to a new administrator, Lockheed Martin. The number administration function was fully transferred from Ameritech to Lockheed Martin as of March 29, 1999. On November 17, 1999, the FCC released an Order in CC Docket 92-231, NSD File No. 98-151 which transferred the number administration function performed by Lockheed Martin to another entity, NeuStar Inc. Since March 29, 1999, Ameritech has not performed any function with regard to number administration or assignment. However, Ameritech, as a service provider adheres to number administration rules, and regulations established by the various regulatory agencies.

CONCLUSION

17. As demonstrated above, Ameritech is in full compliance with 271 Checklist item (ix) regarding nondiscriminatory access to telephone numbers for assignment.
18. This concludes my affidavit.

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on _____, 2001.

Jeffrey A. Mondon
Area Manager - Network Regulatory - Numbering

STATE OF CALIFORNIA
COUNTY OF CONTRA COSTA

Subscribed and sworn to before me
this _____ day of _____, 2001.

Notary Public