Summary of Small LEC DR Responses – TX-2007-0086					
November 2006					
DR Question	YES	NO	OTHER		
1. Does your company have a switch with the <u>technical capability (i.e. hardware)</u> to provide local number portability (even if it is not already providing LNP)?	32	5			
2. If your answer to # 1 is in the affirmative, does your company have the software necessary for your switch to provide local number portability?	23	9			
3. In areas other than those associated with the MCA, does your company have any rate center(s) in which it has been distributed, assigned or allocated more than one 10,000 block or central office code? If yes, please identify the rate center and the central office codes.	2	33			
4. Within each central office code, please identify each "block" of 1000 numbers for which no telephone numbers are currently in use (i.e., an "uncontaminated" block of 1000 numbers).			417 – 127 blocks 573 – 102 blocks 636 – 9 blocks 660 – 592 blocks 816 – 25 blocks		
5. Within each central office code, please identify each block of 1000 numbers for which 100 or less numbers are currently in use (i.e., a 10% or less "contaminated" block of 1000 numbers).			417 – 67 blocks 573 – 103 blocks 636 – 9 blocks 660 – 464 blocks 816 – 24 blocks		
6. Please identify any technical difficulties your company would encounter if required <u>not</u> to issue telephone numbers in uncontaminated blocks of 1000 numbers.	0	37			

DR Question	YES	NO	OTHER
7. Please identify any technical difficulties your company would encounter if required <u>not</u> to issue telephone numbers in 10% or less contaminated blocks of 1000 numbers.	2	35	A couple carriers indicated a concern with being able to keep track of what numbers would be allowable and what numbers would not be allowable.
8. Please identify any technical difficulties your company would encounter if required to donate uncontaminated blocks of 1000 numbers to another carrier within the same rate center.	3	34	A few carriers indicated a problem with not having anyone in-house that could complete the necessary translations. These carriers would have to pay the switch manufacturer to complete the translations. There was also a concern that such a requirement would result in additional translations and routing tables being required.
9. Will database dips need to be performed if uncontaminated blocks of 1000 numbers are donated to the thousands-block number pool prior to another carrier placing those donated numbers into use (in other words, the numbers are just "sitting" there without being used)?	3	34	
10. Please estimate the initial and on-going costs associated with donating uncontaminated blocks of 1000 numbers to the thousands-block number pool. What is the basis or support for this estimate?	32	4	Carriers indicating a cost state there will be one-time implementation costs ranging from \$500 to \$5000, with most carriers indicating less than \$1000. Little, if any, ongoing costs were identified. Several carriers were not able to provide an estimate of the cost at this time.
11. Please identify any technical difficulties you see for other carriers not exempt from number pooling requirements from being required to participate in 1000 block number pooling in a rate center where the ILEC is exempt from number pooling requirements.		5	Several carriers indicated they were not able to speak on behalf of other carriers (i.e. competitors). When clarification was sought as to any technical difficulties the ILECs might encounter, a concern was expressed over rating and routing of the calls if the competitor does not have local interconnection. Who will pay to route the calls if there is no local interconnection.

DR Question	YES	NO	OTHER
12. Does your company object to or have concerns with participating in the number conservation efforts of proposed Chapter 37 even if it is exempt from the number pooling requirements? ("number conservation efforts" includes requiring carriers to assign available numbers within an opened thousand block before prematurely opening a new thousand block, to submit proof of justification before opening a new thousand block, and carriers requesting growth numbering resources to provide justification therefore. The specifics of the proof or justification are set forth in the proposed rule.)	3	33	Most carriers indicated they did not object to complying with number conservation measures, but expressed concerns about not being able to meet customer needs in future. For instance, many carriers expressed concerns about not being able to give a customer any number requested. There were also concerns about not being able to assign payphone lines and company official lines with uniformity. The carriers that objected or had concerns expressed concerns about the appropriateness or fairness of the rules since wireless carriers would not be required to follow Ch 37. Concerns were also expressed as to the need of number conservation efforts in areas where competitors have not entered.