

**CONCURRING STATEMENT OF  
COMMISSIONER JONATHAN S. ADELSTEIN**

*Re: Administration of the North American Numbering Plan, Order, CC Docket No. 99-200, FCC 05-20*

I support this decision to permit SBC to pursue innovative network interconnection arrangements through a limited and conditional waiver that grants SBC access to numbering resources for their IP-enabled services. In granting this relief, I note SBC's commitment to comply with Federal and State numbering utilization and optimization requirements. I am also pleased that this Order includes a referral to the North American Numbering Council for recommendations on whether and how the Commission should revise its rules more comprehensively in this area. While I support this conditional waiver, these issues would be more appropriately addressed in the context of the Commission's IP-Enabled Services rulemaking. Addressing this petition through the IP-Enabled Services rulemaking would allow the Commission to consider more comprehensively the number conservation, intercarrier compensation, universal service, and other issues raised by commenters in this waiver proceeding. It would also help address commenters' concerns that we are setting IP policy on a business plan-by-business plan basis rather than in a more holistic fashion.