

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

<i>In the Matter of</i>)	
)	
Nationwide Number Portability)	WC Docket No. 17-244
)	
Numbering Policies for Modern Communications)	WC Docket No. 13-97
)	

REPLY COMMENTS OF GENERAL COMMUNICATION, INC.

On behalf of itself and its affiliates, General Communication, Inc. (“GCI”) submits this reply in response to the Commission’s Notice of Proposed Rulemaking and Notice of Inquiry regarding Nationwide Number Portability.¹ GCI shares in the support expressed by many commenters for moving toward nationwide number portability (“NNP”).² There are many issues that must be resolved before NNP can be implemented, not the least of which is to select an NNP model and ensure that consumer protection and call completion are maintained during the transition.³ The Commission should draw on the expertise of the NANC and its working groups, as well as ATIS, as it contemplates the best way to move toward NNP. The Commission should not, however, take away the ability of Alaskan consumers to continue to use their chosen provider of interexchange services in the name of facilitating NNP.

¹ *Nationwide Number Portability, Numbering Policies for Modern Communications*, Notice of Proposed Rulemaking and Notice of Inquiry, 32 FCC Rcd. 8034 (2017) (“*NNP NPRM*”).

² *See, e.g.*, Comments of Comcast Corporation, WC Docket Nos. 17-244 & 13-97, at 1 (filed Dec. 27, 2017); Comments of Competitive Carriers Association, WC Docket Nos. 17-244 & 13-97 (filed Dec. 27, 2017), at 1.

³ *See, e.g.*, Comments of Telcordia Technologies, Inc., d/b/a iconectiv, WC Docket Nos. 17-244 & 13-97, at 4 (filed Dec. 27, 2017) (“At a minimum, implementation of NNP will impact many industry processes including call detail record (CDR) processing, subscriber billing, intercarrier compensation, and caller ID issues”).

Commenters generally agree that rule changes, to the extent they are needed, can wait until there is a clear plan for NNP implementation.⁴ One of the legacy rules raised in the *NNP NPRM* is the requirement that incumbent local exchange carriers (“ILECs”) continue to support dialing parity for their customers who subscribe to toll services from a stand-alone interexchange carrier (“IXC”). While the Commission forbore from most dialing parity requirements for ILECs in 2015, it declined to forbear from the requirements as they apply to the ILECs’ customers that subscribed to a stand-alone IXC at the time of the forbearance decision.⁵ The Commission should not brush aside the benefits that stand-alone IXCs provide to these “grandfathered” customers. As GCI explained in its comments, stand-alone IXCs provide essential services in remote Alaska, where local calling areas tend to be limited to a single village. In contrast to the national trend, many consumers continue to subscribe to stand-alone IXCs either because it is their best option or because they have no other option.⁶

As GCI explained, stand-alone IXCs do not in and of themselves pose any obstacle to NNP.⁷ NNP will force changes in the way that carriers route calls, particularly wireline calls, in

⁴ See, e.g., Comments of the Alliance for Telecommunications Industry Solutions, WC Docket Nos. 17-244 & 13-97, at 4 (filed Dec. 27, 2017) (noting that “the implementation of the rule changes to the N-1 query rules is best done when an industry agreed to NNP solution is implemented”); Comments of Verizon, WC Docket Nos. 17-244 & 13-97, at 3 (filed Dec. 27, 2017) (encouraging the Commission to “account for implementation of new industry standards and practices and coordination” as it considers the timing of any rule changes); Comments of WTA-Advocates for Rural Broadband, WC Docket Nos. 17-244 & 13-97, at 5-7 (filed Dec. 27, 2017) (“WTA Comments”) (opposing elimination of the N-1 query requirement as “premature”).

⁵ See *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) from Enforcement of Obsolete ILEC Legacy Regulations That Inhibit Deployment of Next-Generation Networks et al.*, Memorandum Opinion and Order, 31 FCC Rcd. 6157, 6188 ¶ 54 (2015), *pet. for recon. denied*, 32 FCC Rcd. 3885 (Wireline Comp. Bur. 2017).

⁶ See Comments of General Communication, Inc., WC Docket Nos. 17-244 & 13-97, at 2-5 (filed Dec. 27, 2017) (“GCI Comments”).

⁷ See *id.* at 10-11.

that carriers will not be able to determine whether a call is local or should be routed to an IXC simply by examining the NPA-NXX. This is not a scenario unique to calls involving stand-alone IXCs; rather, it relates to the disassociation of NPA-NXX's with geographic location. Inefficient routing could occur in the relatively small number of cases where an originating carrier declines to do a lookup before routing a historically non-local number to an IXC when the number in fact is local, but that possibility exists regardless whether the IXC is affiliated with the local carrier, and in any event could be resolved with a database query. NNP will also force an examination of rating and billing practices: to the extent that NPA-NXX's are used to determine whether a call should be treated as local or billed as a toll call today, NNP will cause them to be unreliable indicators of whether a call is local or non-local. That issue, too, is not unique to stand-alone IXCs but could arise for any provider or plan that distinguishes between local and non-local calls.

In all events, there is no pressing need to extend forbearance and remove these customers from grandfathered status. NNP implementation is likely years away, assuming that the Commission ultimately decides to move forward. In the meantime, there is no need to disrupt the current arrangements of Alaska consumers.

While some commenters encourage the Commission to remove the grandfathering condition, they repeat the general argument that “most consumers” subscribe to an all-distance plan, and that stand-alone long distance is a “declining segment of the voice industry.”⁸

⁸ WTA Comments at 7; *see* Comments of ITTA-The Voice of America's Broadband Providers, WC Docket Nos. 17-244 & 13-97, at 10 (filed Dec. 22, 2017) (supporting forbearance from dialing parity requirements for currently-grandfathered); Comments of Neustar, Inc., WC Docket Nos. 17-244 & 13-97, at 13 (filed Dec. 27, 2017) (“[M]ost consumers utilize the same carrier to handle their local and long-distance calls”); WTA Comments at 5, 7 (supporting elimination of grandfathered status “as long as ILECs have a

Grandfathered customers still exist and there is no need for them to have to change their service arrangements.⁹ No Alaska ILEC has sought relief from the grandfathering requirement or even participated in this proceeding. The benefits, if any, to eliminating this requirement are unclear at best and are outweighed by the harm to consumers in the form of disruption, reduced choice, and reduced competition for interexchange services.

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GCI encourages the Commission to work with the NANC, ATIS, and the industry generally to develop a plan for nationwide number portability. At the same time, the Commission should respect the needs and choices of Alaska's consumers and leave the grandfathering condition in place to preserve choice and availability of interexchange services. The Commission is always free to re-examine that grandfathering when full implementation of NNP is imminent.

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January 26, 2018

Respectfully submitted,



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full set of options, including one to leave existing stand-alone toll service arrangements undisturbed”).

⁹ “[T]here are still many subscribers to traditional POTS plans that distinguish between ‘local’ and ‘toll’ destinations.” Comments of Interisle Consulting Group, WC Docket Nos. 17-244 & 13-97, CC Docket No. 01-92, at 2 (filed Dec. 27, 2017).