

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

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)
)
Telephone Number Portability) CC Docket No. 95-116
) RM 8535

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**REQUEST OF GTE FOR EXTENSION OF TIME
IN WHICH TO FILE OPENING COMMENTS**

GTE Service Corporation ("GTE"), on behalf of its affiliated domestic telephone and wireless operating companies, requests a 30-day extension of the existing September 12, 1995 deadline for the filing of opening comments in this docket. As more specifically discussed below, the extension is needed in order to allow GTE to complete and present the results of a customer survey regarding local number portability ("LNP").

**I. ADDITIONAL TIME IS NEEDED FOR GTE TO COMPLETE AND
PRESENT THE RESULTS OF A CUSTOMER SURVEY REGARDING
LNP.**

GTE is currently in the process of completing a survey of randomly selected residential and business customers of both GTE and four Regional Bell Operating Companies ("RBOCs"). The GTE customers are drawn from GTE's entire continental United States franchise area. The RBOC customers are drawn equally from Dallas, Los Angeles, Seattle and Manassas, Virginia.

The survey is designed to elicit information regarding potential customer demand for LNP given certain variables such as cost and service provider. The survey also explores customer reaction to LNP from the *calling* party's point of

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view. This aspect of the survey focuses on customer reaction to possible effects of LNP such as the inability of the caller to determine the location of the person or entity being called, the time of day at that location, or whether the call will generate a toll charge.

This effort combines traditional, survey-based market research with a well-established, advanced multivariate statistical technique known as conjoint analysis. Conjoint analysis specifically determines how consumers trade off key variables in a purchase decision-making process.

In order to complete the survey, evaluate the data and prepare it for presentation to the Commission, GTE requests a 30-day extension to October 12, 1995 in which to file opening comments. Delaying the presentation of the survey results until the reply comments round will foreclose most parties from presenting their views on the survey's results.¹

II. THE RESULTS OF GTE'S SURVEY WILL PROVIDE IMPORTANT EMPIRICAL DATA REGARDING THE DEMAND FOR LNP.

Although the LNP debate has been ongoing for quite a while, there is very little empirical data regarding the potential demand for LNP by end user customers. Because LNP costs and cost recovery are central issues, data regarding the potential demand for LNP is absolutely crucial. At this stage,

¹ GTE assumes that if its results were presented in reply comments, some parties would seek leave to file surreply comments. The extension will avoid the need for such efforts while ensuring as complete a record as possible.

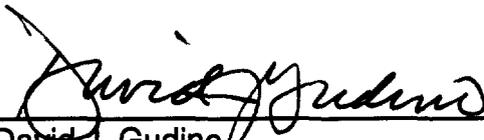
additional data can only assist the Commission in making the important determinations it is called upon to make in this proceeding.

III. CONCLUSION

For all of the foregoing reasons, GTE respectfully requests the Commission to extend the date for filing opening comments until October 12, 1995.

Respectfully submitted,
GTE SERVICE CORPORATION,
on behalf of its affiliated domestic
telephone and wireless operating
companies

By



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