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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
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Telephone Number Portability)
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RM 8535

FEDERAL COMMUNICATIONS COMMISSION
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COMMENTS OF
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Summary

The public interest, the industry's experience with 800 service, and available survey information all support the implementation of a system of service provider portability for geographic numbers. The Commission should take an active role in mandating the implementation of such a system by a date certain. Whatever permanent portability solution is adopted must satisfy several criteria:

- it must be consistent nationwide;
- it must be implemented within a reasonable timeframe;
- it must be flexible enough to accommodate future portability requirements without extensive and costly replacement of the network used to provide service provider portability;
- it must use scarce numbering resources efficiently;
- it must allow carriers to provide unique competitive services independent of other industry players;
- it must allow carriers to control the network routing for their customers;
- it must provide for seamless service between carriers and not degrade service to end users;
- it must not favor any industry segment or enable any industry segment to gain monopoly control over any of the portability system elements.

Sprint believes that an AIN-based topology which satisfies each of these guiding principles can be deployed on a timely basis, and remains willing to work with other interested parties

to achieve implementation of such a system. Until such a solution is put in place, Sprint supports use of remote call forwarding, under certain specified circumstances, as an interim measure.

making telephone numbers portable either between service providers, services, or locations" (§7). Among other things, it has sought information on the following issues:

- the relative importance of service provider number portability to decisions by end users as to whether to take service from competing providers (§23);
- whether there is a demand for service or location portability (§§25-26);
- what role the Commission should play in developing and implementing a national number portability policy (§§33-34);
- what network architecture should be deployed to support number portability (§35), how much it would cost to deploy the chosen network architecture (§53), and how those costs should be recovered (§54);
- whether an interim portability solution should be adopted (§62), and, if so, what is necessary to transition from this interim solution to a permanent number portability solution (§64);
- whether non-geographic telephone numbers in the 900 and 500 SAC should be portable (§69).

As a general principle, Sprint agrees that number portability stimulates competition and increases consumer choice, and fully supports the Commission's efforts to help devise and implement a balanced, uniform, nationwide system of telephone number portability. However, Sprint believes that the focus here should be on making geographic telephone numbers portable among service providers. The benefits of service provider portability are readily discernible, and, as discussed in Section II below, data already exist which indicate market demand for this type of portability.

As noted in the NPRM, several alternative portability solutions have been proposed. Sprint believes that whatever permanent geographic number portability solution is adopted must satisfy several criteria:

- the solution must be consistent nationwide;
- it must be deployed within a reasonable timeframe;
- it must be flexible enough to accommodate future portability requirements;
- it must use scarce numbering resources efficiently;
- it must allow carriers to provide unique competitive services independent of other industry players;
- it must allow carriers to control the network routing for their customers;
- it must provide for seamless service between carriers and should not result in degradation of service to end users;
- it must not favor any industry segment or enable any industry segment to gain monopoly control over any of the portability system elements.

Sprint believes that a network topology which satisfies all of these criteria can be deployed in a timely basis. Sprint also describes below the role it believes the Commission must play to ensure the smooth deployment of a pro-competitive system of geographic number portability.

II. THE IMPORTANCE OF NUMBER PORTABILITY.

As noted above, the Commission has tentatively concluded that number portability is an important factor in a customer's decision to select new and different services or to switch to a competing service provider (NPRM, ¶2). This conclusion is con-

sistent with both the industry's experience with 800 number portability, and survey information regarding local number portability provided by MCI, MFS, and Pacific Bell.

Growth in the 800 services market has been explosive since 800 numbers became portable in May 1993. For example, between 1993 and 1994, Sprint estimates that 800 service minutes of use increased by over 10%; the number of interstate 800 database queries handled by the RBOCs grew from 16.0 billion to 20.96 billion, an increase of 30.7%; and the quantity of 800 numbers in working status increased by 56.8%.¹ This growth reflects demand from new customers and service applications, as well as from existing customers who increased their usage with either their old 800 service provider or with a new 800 service provider. Competitive activity has increased markedly since 800 numbers became portable, with IXCs such as Sprint Communications Co. offering new 800 service products, features and functions, with numerous promotions to further stimulate demand. There is every reason to expect that implementation of service provider portability for local telephone numbers would similarly spur significant competitive activity.

Every survey on this topic of which Sprint is aware supports the conclusion that service provider portability for geographic telephone numbers is an important influence on customers' will-

¹ 800 database query data are from the BOCs' 1994 and 1995 annual access filings, Tariff Review Plans, Form RTE-1; working 800 number data are for December 1993 and December 1994, *Long Distance Carrier Code Assignments*, Industry Analysis Division, August 1995, Table 10.

ingness to use a competitive local service provider. As summarized in the NPRM (§22 and n. 26), surveys by both MCI and MFS found that a very large portion of customers would be unlikely to switch to a new local service provider if they also had to change their telephone numbers. MCI, for example, found that 90% of businesses would be very or somewhat unlikely to switch to another local service provider if they had to change their telephone numbers; even with a 20% discount, this figure was 75%.² Residential customers are also reluctant to switch to another local service provider if they had to change their numbers; 80% are very or somewhat unlikely to switch if no discount is offered, although this figure drops to 42% at a 20% discount (*id.*, Figure 9). MFS similarly found that 81% of its (business) customers surveyed would be "not very likely" or "not at all likely" to switch to a competitive local service provider, for comparable or better service and cost, if they also had to change their telephone number.³

In contrast, Pacific Bell claims that its survey indicates that number portability is a relatively unimportant factor in a customer's decision about whether or not to switch to another

² "Local Number Portability National Study," Executive Summary, MCI, Figure 3.

³ "The Importance to Customers of Retaining Current Telephone Number When Switching Telecommunications Companies," MFS contribution to Industry Numbering Committee, dated April 6, 1995.

local telephone service provider.⁴ Pacific's study concludes (p. 17) that "in any given situation (i.e., combination of discounting, brand and service bundling), the addition of number portability only captures approximately 10% more of the business market." It also concludes that "in general businesses will consider pricing discounts more heavily than the ability to keep their telephone number.... To capture businesses not likely to switch because of a number change, only a 12% discount is required" (*id.*).

Pacific's characterization of the relative unimportance of number portability does not withstand scrutiny.⁵ First, Pacific's own data show that there are situations in which number portability is the most important factor in a customer's decision as to whether to switch to an alternative local service provider, and that number portability is a critical factor in almost all of the scenarios considered in the Pacific survey. Second, Pacific's attempts to downplay the shift in market share due to number portability ("only" 10%), and the discount needed to get businesses to even consider switching to an alternative local service provider ("only" 12%), are disingenuous. Both the 10% market share shift and the 12% discount are very significant and simply highlight the crucial role of number portability. Third,

⁴ "Analysis of Potential Local Access Competition and Interconnection Issues, Business Market," Final Report, prepared for Pacific Bell, May 1995 ("Pacific Survey").

⁵ Each of the following points is discussed in greater detail in Appendix 1.

Pacific's use of "conversion factors," the phrasing of its survey questions, its inclusion of apparently anomalous survey results, and the lack of clarity associated with certain technical aspects of its survey, all tend to minimize the estimated impact of number portability. In short, far from demonstrating the relative unimportance of number portability, Pacific's survey actually confirms the survey results obtained by MCI and MFS.

* * * * *

Implementation of number portability clearly had a significant positive impact on the development of competition and on the range of customer options in the 800 services market. All of the surveys discussed above -- including Pacific Bell's -- support the conclusion that implementation of service provider portability for geographic numbers will similarly foster competition and customer choice. Therefore, the Commission should act promptly to achieve a system of service provider portability for geographic numbers. Sprint discusses in Section III following the appropriate role for the Commission in this process.

III. THE COMMISSION SHOULD ADOPT SPECIFIC STANDARDS AND DEADLINES IN THE DEVELOPMENT AND IMPLEMENTATION OF A NATIONAL NUMBER PORTABILITY POLICY.

In the NPRM, the Commission has sought comment on "whether there should be a regulatory mandate requiring the availability of number portability measures for geographic telephone numbers" (§28) and what specific actions the Commission can or should take to ensure implementation of a system of number portability (§33). Sprint believes that proactive and aggressive Commission involve-

ment in directing the implementation of local number portability is crucial if a nationwide, uniform, and equitable system is to be implemented in a reasonable timeframe.

As a general matter, Commission guidance on policy matters is required to ensure that whatever portability solution is adopted is pro-competitive and nondiscriminatory. Numbering resources are a finite asset and administration of these resources must be neutral so as not to impede the development of competition.⁶ Because access to numbering resources "is essential to entities desiring to participate in the telecommunications industry," the Commission "must assume a more active role in numbering policy development and issue resolution than it has in the past" (*Numbering Plan Order*, ¶43).

Sprint believes that the Commission needs to be involved in many of the specific issues relating to implementation of a system of geographic number portability. The Commission's role in mandating 800 number portability should serve as an example of the degree of Commission involvement required here. In the 800

⁶ While RBOC administration of numbering resources might have been acceptable in the past, the introduction of competition into monopoly local service markets makes the RBOCs' continuing role as number administrators untenable. The Commission has recently emphasized the need for truly neutral administration of numbering resources, establishing the North American Numbering Council and rejecting a proposal by Ameritech to implement an overlay plan to address NPA code exhaust in the Chicago area on the grounds that such proposal was unreasonably discriminatory and harmful to non-wireline carriers. See *Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech - Illinois*, 10 FCC Rcd 4596 (1995); *Administration of the North American Numbering Plan*, CC Docket No. 92-237, Report and Order released July 13, 1995, FCC 95-283 ("*Numbering Plan Order*").

database proceeding, the Commission mandated specific outcomes with specific service standards as of specific dates; made clear to which LECs such requirements applied; and resolved certain pricing and costing issues relating to 800 database access.⁷ In the two years prior to 800 database availability, the Commission clarified several additional elements of its 800 database access policy and addressed specific implementation issues raised by interested parties.⁸

Until the Commission adopted the specific standards in its 1991 *Reconsideration Order*, implementation of a system of 800

⁷ In 1991, the Commission adopted access time standards for database access (97% of originating 800 database access must have an access time of five seconds or less); required the BOCs and GTE to meet that standard within 18 months; adopted improved access time standards for future database access (within two years after initial database access, none of the BOCs'/GTE's 800 traffic would have an access time of greater than five seconds, with all 800 traffic experiencing a mean access time of 2.5 seconds or less); affirmed which 800 database-related costs would be allowed exogenous cost treatment and which would be considered general network upgrades; and required LECs to create separate Part 69 access elements for database access, with separate subelements for each vertical feature. See *Provision of Access for 800 Service, Memorandum Opinion and Order on Reconsideration and Second Supplemental Notice of Proposed Rulemaking ("Reconsideration Order")*, 6 FCC Rcd 5421 (1991). In a subsequent order, the Commission required other independent telephone companies to provide 800 database access within the same 18 month window, but exempted these LECs from the access time standards applicable to the BOCs and GTE (see *Provision of Access for 800 Service, Memorandum Opinion and Order on Further Reconsideration*, 8 FCC Rcd 1038 (1993)).

⁸ See, e.g., *Provision of Access for 800 Service, Order*, 7 FCC Rcd 8161 (1992); *Second Report and Order*, 8 FCC Rcd 907 (1993); *Order*, 8 FCC Rcd 1423 (1993); *Order*, 8 FCC Rcd 1844 (1993); *BOCs' Tariff for the 800 Service Management System, Tariff FCC No. 1*, 8 FCC Rcd 5132 (1993); *800 Presubscription Rules for 800 Providers and Responsible Organizations*, 8 FCC Rcd 7315 (1993).

number portability (which had relatively few competitive ramifications for the RBOCs) had been dragged out for more than five years, with the estimated date by which the database would be available deferred time and time again.⁹ Sprint believes that deployment of a system of local number portability, where the competitive stakes for the LECs are so much higher, will suffer from even longer implementation delays unless the Commission acts decisively and prescribes uniform nationwide network interfaces, specific performance criteria, and a date certain by which the LECs must implement a system of geographic number portability which satisfies these standards. The Commission can assign development of technical specifications to industry fora under the auspices of the newly formed North American Numbering Council, which in turn would be subject to oversight by the Commission. Each of these recommendations is discussed briefly below.

1. **Nationwide system.** The Commission should direct the LECs to deploy a nationwide uniform system for geographic number port-

⁹ For example, in the *Notice of Proposed Rulemaking* in CC Docket No. 86-10, the Commission noted that the BOCs had estimated that their 800 database system would be available "in late 1987 or even late 1988"; in February 1988, some BOCs estimated that 800 database access could be provided at approximately the same set-up times as were experienced under the NXX system by 1990. In April 1989, the BOCs estimated that they would be able to offer SS7 interconnection at all of their access tandems by the end of 1991. This date was subsequently revised to the end of 1993 or later, assuming reversal of a decision by the US District Court involving establishment of signalling points of interconnection. The Commission's *Reconsideration Order* specified a March 1993 availability date, which was subsequently deferred to May 1993.

ability.¹⁰ As the Commission correctly noted (NPRM, ¶30), "[a] uniform, national method for providing number portability is likely to be less costly and more efficient for interstate [indeed, all] carriers." For example, uniform interfaces are essential to efficient call processing; otherwise, carriers (especially interstate carriers) will incur huge costs to try to interact with the end office and access tandem switches of the 1400 individual LECs and alternative local service providers.¹¹ And, obviously, there must be consistency in call processing. On every call, there should be no confusion as to which carrier is responsible for performing the database dip to determine the identity of the preferred terminating service provider.

Consistency should also extend to the greatest possible degree to administrative systems and processes, for example, to ensure the automated exchange of information. Interoperability between back office systems must keep pace with interoperability between networks if service to the end user is to be seamless.

2. **Timing.** Sprint believes that the Commission should adopt a phased approach to implementation of a permanent number portability solution. The Commission should require local service providers to deploy the permanent portability solution in response

¹⁰ In mandating a nationwide system of geographic number portability, the Commission must also define the circumstances under which an end user may request that his number be ported to another service provider, e.g., if the end user remains in his existing home, if he moves to a new home within the same rate center or same LATA, etc.

¹¹ Uniform interfaces do not imply (and should not be viewed as support for) a single vendor for switches or databases.

to a *bona fide* request from a certified carrier (competitive access providers, IXCs, etc.) based on the size of the market: in the top 100 MSAs^{1,2} within 2 years from release of the order adopting the solution; in the next 135 MSAs in years 3-4; and in any remaining areas in years 5 and beyond. Implementation should be within 2 years of the *bona fide* request.

The phased approach reasonably balances the need for rapid deployment of a portability system with the capital constraints facing individual carriers. It seems logical to assume that demand for portable geographic numbers will be greatest in the largest markets, and that in certain markets (most probably the smallest, rural areas) such demand will be minimal or nonexistent. Given the cost and the technical resources needed to deploy a system of true geographic number portability, it is difficult to justify nationwide deployment on a flash-cut basis, particularly in areas where the likelihood of cost recovery (including a reasonable return on investment) is slim because of low demand.

Sprint suggests that each service provider be responsible for recovery of its own costs of implementing a system of geographic number portability (*i.e.*, that there not be any pooling of costs). One possible cost recovery mechanism might be a surcharge assessed on end user customers in the markets in which the permanent solution is available. To minimize any burden, the implementation costs could be amortized over a several year

^{1,2} MSA as used herein refers to a city, urban area, or combined city/urban area within a county with a population of 100,000 or more.

period, as was done for equal access conversion costs. The Commission would, of course, have to determine which costs may be recovered in this surcharge, which costs should be allocated to other services which use the same network architecture, which costs are general network upgrades, etc.

3. **Performance criteria.** Sprint suggests that whatever permanent number portability solution is adopted must comply with the following performance criteria:

- it allows the service provider to control the routing of calls for its customers, including those roaming into the carrier's service territory;
- it allows for the provision of seamless service to the end user, *i.e.*, there should be no confusion as to how to reach an end user served by an alternative local service provider, or to obtain Caller ID, 911, or operator-assisted services;
- it should not result in a degradation in service to end users served by an alternative local service provider, *e.g.*, set-up times should be equivalent to those experienced by the incumbent LEC and should satisfy Commission-prescribed parameters, and callers should not have to dial extra digits to reach customers of an alternative local service provider;
- it should handle both incoming and outgoing traffic.

4. **Oversight of industry fora.** The Commission should direct the appropriate industry fora (the Industry Numbering Commit-

tee¹³ and the Committee T1) to develop the technical standards associated with uniform interfaces and to develop the requisite interoperability test plans. Industry fora have long been the venue for resolving technical issues such as these, and the forum process draws in the combined technical expertise of many interested parties.

Sprint suggests that the newly formed North American Numbering Council (NANC) coordinate the portability standards work performed by the various industry fora.¹⁴ In addition to the administrative tasks associated with coordinating the work of the individual fora, the NANC should file an implementation plan with the Commission within 6 months from the date the Commission adopts a permanent service provider portability solution for geographic numbers.

The Commission should formally adopt the recommended standards developed by the industry (assuming that it finds such standards to be reasonable and feasible) so that the standards are mandatory rather than voluntary for all service providers involved. While most entities abide by voluntary industry guide-

¹³ INC has been working on the issue of local number portability for over a year now, and expects to issue a white paper report by the end of 1995.

¹⁴ While Sprint recognizes that the NANC already has been tasked with choosing a neutral entity or entities to administer the North American Numbering Plan and central office codes, it is to be hoped that much of the work associated with these two major jobs will have been completed by the time the Commission issues an order in the instant proceeding mandating a permanent geographic number portability solution.

lines, the lack of enforcement capability is a problem in those cases in which violations are suspected or discovered.

IV. THE GEOGRAPHIC NUMBER PORTABILITY SOLUTION.

A. A Permanent Solution Must Satisfy Several Criteria.

Several service provider geographic number portability "solutions" have been offered by different industry participants. In evaluating these alternatives, the Commission should apply the following criteria:

- the system must satisfy the criteria discussed above (at pp. 10-13), i.e., it must be uniform nationwide, it must be deployed within a specified timeframe, and it must meet certain performance criteria;
- the system should be flexible enough to accommodate all forms of portability, including service provider, location, and service (e.g., POTS to ISDN or wireline to PCS) portability for geographic numbers as well as portability for nongeographic numbers (assuming there is demand for such capabilities) without extensive and costly replacement of the network used to provide service provider portability;
- the system must allow carriers to provide unique competitive services independent of other industry players;
- the system must use numbers efficiently;
- the system must not give bottleneck control of calls to any service provider or industry segment. For example, the national database portion of the system must be administered by a neutral entity. The database should provide administrative

functions only, and not control call processing, which should remain under the purview of the service provider. This would help to ensure that this crucial facility is not controlled by a party with a competitive interest at stake, and that access to the national database is available on a nondiscriminatory basis.

Sprint has been involved in the development of a network topology for a system of number portability in Illinois. Both the technical and cooperative efforts exhibited in this process are good examples of how the industry can work towards the creation of a network topology that meets the needs of all industry segments as well as the guidelines and performance criteria described above. The Commission should therefore rely at least in the first instance upon a similar industry effort to accomplish nationwide number portability as described in Section III above.

B. The Commission Should Allow Use of An Interim RCF Solution Only Under Certain Circumstances.

There appear to be two primary means of offering a type of number portability available today -- remote call forwarding (RCF) and flexible direct inward dialing (DID). Under RCF, if a customer transfers his number from Carrier A to Carrier B, Carrier A's switch routes the call to Carrier B by translating the dialed number into a number with an NXX corresponding to a switch operated by Carrier B. Under DID, Carrier A routes the customer's calls over a dedicated facility to Carrier B's switch.

Both RCF and DID are inferior to a system of true service provider portability for geographic numbers. First, RCF and DID allow the incumbent LEC to retain bottleneck control over the call, providing the incumbent LEC with the switched access charge revenues associated with terminating interstate calls (including calls which ultimately terminate over the competitive local service provider's network) as well as marketing information regarding which customers have subscribed to competitive local service providers. Second, RCF and DID use scarce numbering resources inefficiently, since they require two 10-digit telephone numbers, thereby contributing to code exhaust. Third, RCF and DID are technically inferior to a true system of geographic number portability. For example, RCF and DID do not forward carrier identification code (CIC) information and therefore the competitive local service provider cannot bill IXCs directly; and there are implications for 911 and certain CLASS services (caller ID and automatic call back) since it is the forwarded rather than dialed number which will appear. Fourth, because there are two separate calls involved in RCF and DID, forwarded calls have higher set-up time.

Nonetheless, true number portability cannot be implemented overnight, and Sprint is unaware of any portability solution which is likely to be implemented prior to the beginning of 1997. Even under an ambitious deployment schedule, there will still be at least a two year period before a satisfactory AIN-based network topology, and any associated back office systems (billing, order entry, etc.), are in place to provide geographic number

portability even in the largest markets. Therefore, Sprint supports the use of RCF¹⁵ as an interim solution, under the circumstances specified below.

First, the Commission should allow use of RCF only as an interim solution. Once a permanent solution is in place (according to a timeline specified by the Commission), use of RCF to simulate number portability should be discontinued. Use of an "interim" solution should not be used as an excuse to delay unreasonably the implementation of a permanent solution; nor should the RCF interim solution be replaced by another interim solution such as MCI's "Carrier Portability Code" proposal. At this point, it is not known whether MCI's proposal will actually work or how much it will cost to implement. In the face of such uncertainty, the more proven technology -- RCF -- should be adopted as the interim portability solution, despite its flaws.

Second, the incumbent carrier offering RCF or DID should charge the competitive local service provider long run incremental cost for these services.¹⁶ Forcing competitors to pay

¹⁵ RCF is preferable to DID because it ubiquitously supports more CLASS functionality than does DID, which requires ISDN/PRI technology to provide CLASS functionality. In addition, RCF requires an isolated switching function, as opposed to a dedicated trunk group as is required with DID, and is therefore somewhat easier and cheaper for both the incumbent and the competitive local service provider to install.

¹⁶ RCF when used as an interim portability solution differs from RCF as used by end users. The end user RCF allows customers to program, from their own phones, the telephone number to which their calls should be forwarded (e.g., to the end user's home or to a friend's house instead of to the end user's office). End user access is not allowed for number portability RCF, which involves programming the incumbent LEC's switch to forward the call to a fixed destination (another central office). Therefore,

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the incumbent anything higher than the LRIC would have a chilling effect on competition -- it would discourage end users from switching to the competitive local service provider because the competitive carrier's rates would have to be high enough to recover all of its costs, including those associated with RCF. Obviously, the customers of the incumbent LEC would not be assessed any fee to recover the costs of number portability RCF, since such feature is not necessary to complete calls on the incumbent's own network.

Third, implementation of an interim number portability solution should not be the basis on which RBOC requests to enter the interLATA market are granted. The Commission should require implementation of a permanent, AIN-based network topology as the basis for a system of true number portability as a prerequisite to RBOC entry into the interexchange market.

V. THERE IS INSUFFICIENT INFORMATION TO JUSTIFY MANDATING PORTABILITY FOR NONGEOGRAPHIC NUMBERS AT THIS POINT.

At the present time there is insufficient information to determine whether market demand exists for service or location portability for geographic numbers. This is even more the case for nongeographic numbers such as 500 and 900 SACs. Until information is available as to whether demand exists for these services, it makes no sense to mandate nongeographic number portability. As the Commission has noted in the instant proceeding, surveys are a good means of gathering information on potential mar-

it is not appropriate for the incumbent LEC to charge the competitive local service provider the retail rate charged to end users for RCF.

ket demand. Therefore, Sprint recommends that surveys (or, perhaps a comprehensive, industry-sponsored survey) be conducted to determine whether demand exists for portable nongeographic numbers.

Because it is possible that the Commission might, at some future date, require implementation of other types of number portability, the portability solution adopted in the instant proceeding should, as noted above, be flexible enough to accommodate all types of portability without requiring massive upgrades.

VI. CONCLUSION.

The public interest, the industry's experience with 800 service, and available survey information all support the implementation of a system of geographic number portability. The Commission should take an active role in mandating the implementation of such a system by a date certain. Whatever permanent portability solution is adopted must satisfy several criteria:

- it must be consistent nationwide;
- it must be implemented within a reasonable timeframe;
- it must be flexible enough to accommodate future portability requirements;
- it must allow carriers to provide unique competitive services independent of other industry players;
- it must use scarce numbering resources efficiently;
- it must allow carriers to control the network routing for their customers;

- it must provide for seamless service between carriers and not degrade service to end users;
- it must not favor any industry segment or enable any industry segment to gain monopoly control over any of the portability system elements.

Sprint believes that an AIN-based topology which satisfies each of these guiding principles can be deployed on a timely basis, and remains willing to work with other interested parties to achieve implementation of such a system. Until such a solution is put in place, Sprint supports use of remote call forwarding, under the circumstances specified in Section IV above, as an interim measure.

Respectfully submitted,

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