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

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

COMMENTS OF MFS COMMUNICATIONS COMPANY, INC.

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Dated: September 12, 1995

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Summary

MFS applauds and strongly supports the Commission's decision to assume a leadership role in promoting local number portability. Both surveys and market experience have convincingly demonstrated that telephone customers are generally disinclined to consider the service offerings of new local telephone companies if they have to change their telephone number in order to use these services. Therefore, service provider portability in particular is a fundamental necessity before effective local competition can develop.

The Commission should continue to monitor and support the technology trials now being conducted under the auspices of state regulators. Although it clearly is important that all number portability technologies be technically compatible with the nationwide network of networks, it is not essential that the same database architecture be used nationwide or that number portability technology be deployed in all markets simultaneously. For these reasons, state-sponsored trials can continue without interfering with the Commission's development of a national policy.

MFS believes that it would be premature for the Commission to attempt to select a single "perfect" database technology at this time. Several "real-world" trials are scheduled for 1996 which should produce useful empirical evidence that can be used to evaluate both advantages and disadvantages of each proposed architecture. Results of these trials should be available by the third quarter of 1996. This information will enable the industry to implement operational database number portability systems during 1997, and the Commission should accordingly adopt a mandatory implementation schedule for the 100 largest metropolitan areas. Implementation in smaller markets can await the development of actual local exchange competition.

All database systems should be administered by a neutral third party, and not by any carrier that could gain a competitive advantage from exercising control over (or having preferential access to) the database. The administrator should be responsible for all aspects of database operation, including both hardware and software procurement, operation, and maintenance.

In general, each carrier should bear its own costs to make its network operations compatible with the number portability database system However, costs incurred in the actual deployment and operation of the system by the neutral, third-party administrator should be recovered from the customers of all local exchange service providers, since all customers will derive economic benefits from the greater competition that will be enabled by this technology.

Until database deployment can be completed, interim number portability solutions such as Remote Call Forwarding can and should be used to permit customers to subscribe to competitive local services without having to change their telephone numbers. As discussed in the body of these comments, however, these interim solutions have significant drawbacks which make them unsuitable for long-term use. Considerations of efficient network operation and efficient use of numbering resources both require that interim solutions be phased out as soon as a database system can be put into operation.

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MFS Communications Company, Inc. ("MFS"), by its undersigned counsel, hereby submits its comments concerning the Notice of Proposed Rulemaking issued in this docket, FCC 95-284 (released July 13, 1995) (the "*NPRM*"). MFS strongly supports the Commission's initiative to promote the availability of telephone number portability, which is one of several essential "foundation" arrangements that must exist before effective local telephone competition can develop.[1] Prompt Commission action both to adopt rules as proposed in the *NPRM*, and to oversee implementation of those rules after adoption, is necessary to effectuate the emerging national policy of promoting local exchange competition.[2]

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[1] Other arrangements that must exist to permit local competition to occur include reciprocal arrangements for network interconnection and the exchange of local traffic; access to database systems, emergency response systems, telephone directories, and other essential service platforms; and access to unbundled local loop facilities, which is addressed in MFS' pending Petition for Rulemaking, *Unbundling of Local Exchange Carrier Common Line Facilities*, RM-8614 (filed March 7, 1995).

[2] As of the date of these comments, both the House of Representatives and the Senate have passed bills that would establish a Federal policy of eliminating barriers to entry in all telecommunications markets, specifically including local exchange service. The rules proposed in this docket would, of course, be entirely consistent with and promote the purposes of such legislation if finally enacted. Nonetheless, the Commission has ample interest in and authority over numbering issues to proceed with this docket under current law, as noted in paragraphs 29-31 of the *NPRM*.

In the remainder of these comments, MFS will address the issues raised in Section III.A of the *NPRM*, concerning portability for geographic telephone numbers.

I. IMPORTANCE OF NUMBER PORTABILITY

MFS agrees fully with the Commission's tentative conclusion in paragraph 19 of the *NPRM* that "the portability of geographic telephone numbers benefits consumers by providing them greater personal mobility and flexibility in the use of telecommunications services and by contributing to the development of competition among alternative providers of local telephone and other telecommunications services." Among the several types of number portability discussed in the *NPRM*, service provider portability clearly is the most important both in fostering competition and in addressing customer needs. Both MFS' customer surveys and its actual experience in New York conclusively demonstrate that customers are extremely reluctant to change telephone carriers if it means they will also be required to change telephone numbers. MFS has conducted a nationwide survey of potential customers that provides overwhelming evidence of the significance of number portability to customers considering switching to a competitive provider.[3] In the 1994 Survey, 92% of customers surveyed said they would not consider MFS Intelenet services without number portability. Also, 98% of customers said number portability was "very important" to them. (The other 2% said number portability was at least "somewhat important.") A total of 81% said that it was either "not very likely" or "not

[3] A survey conducted in November 1994 (the "1994 Survey") was described in MFS' contribution to the INC Number Portability Workshop, cited in footnote 26 of the *NPRM*. A copy of this contribution is attached to these comments as Exhibit A.

at all likely" that they would change their telephone number in order to receive "comparable or better service and cost" offered by a competitive telephone company. MFS has not seen in any jurisdiction any market survey or other evidence suggesting that number portability is not critically important to customers. In particular, a recent Pacific Telesis survey filed as an *ex parte* submission in this docket confirms that number portability is important to all customer categories, and any requirement to change telephone numbers would significantly reduce the likelihood that customers would switch carriers.

Telephone subscribers act as if they own their telephone numbers and are extremely reluctant to change numbers unless absolutely necessary This is particularly true for businesses whose economic well-being is tied to having a recognizable, consistent phone number where they can be reached by their customers on an ongoing basis. Many businesses invest heavily in a phone number in the form of advertising, stationery and business cards showing the telephone number. Changing phone numbers therefore imposes not only substantial inconvenience, but also the expense of reprinting these written materials, as well as sending mailings to customers and vendors notifying them of the new number and the possibility of lost calls. This entails direct expenses for printing and mailing, and also diverts employee time from more productive activities.

In addition, long term investment in advertising a phone number that must later be changed can never be recovered. Even a business that might consider changing phone numbers once would be even more reluctant to change numbers again. Competition cannot thrive in an environment characterized by this level of customer inertia, and even the LECs will benefit in

the long run from a system that would permit a customer to not only switch providers freely, but to switch back as well.

This issue is particularly sensitive for the generally underserved market of small business customers, typically those having 5 to 35 lines. These customers make up the economic backbone of Florida, yet have generally received the worst service and paid the highest prices of any class of telephone users. They are also the customers to whom, as a general matter, the ability to retain existing telephone numbers is of the most critical importance. These customers do not have sufficient traffic volume to justify splitting their business between two carriers, and they have often invested substantial amounts of money in advertising and publicizing their telephone numbers. In some lines of business, incoming telephone calls are virtually the only source of sales. The lack of a cost-effective method to allow customers to retain their telephone numbers would harm small businesses more than any other class of customer. Because number portability has been identified by customers as a critical customer need, the Commission must accommodate this need on both an interim and long-term basis if it expects to establish a competitive market.

Every state that is implementing local exchange competition is considering some form of interim number portability. The New York Public Service Commission recently issued an Order concluding that "[n]umber portability will be essential to the transition to a competitive local exchange market."[4] The Commission ordered NYNEX and Rochester Telephone

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[4] *Proceeding on Motion of the Commission to Examine Issues Related to the Continued Provision of Universal Service and to Develop a Framework for the Transition to Competition in the Local Exchange Market*, Case 94-C-0095, Order Requiring Interim Number Portability, Directing a Study of the Feasibility of a Trial of True Number Portability, and Directing Further Collaboration (issued March 8, 1995) (a copy of this Order is attached as Exhibit B).

Corporation to provide interim number portability, including a broadbased sharing of costs. The New York Commission only required that this one option be made available, but also encouraged carriers to explore alternative solutions. All certificated local exchange companies, including competitive providers, were required to provide interim number portability.

The Illinois Commerce Commission ("ICC") has required that a variety of interim number portability services be tariffed.[5] Specifically, the ICC required that Remote Call Forwarding, Enhanced Remote Call Forwarding DID Trunks, and FX Service be made available to competitors "at cost-based rates with only a reasonable level of contribution." *Id.* at 110. (The Commission added that "we intend to scrutinize the tariffs to ensure this." *Id.*) Similarly, the Connecticut Department of Public Utilities has tentatively approved a stipulation between Southern New England Telephone Company and a number of new entrants under which Remote Call Forwarding will be provided as an interim number portability solution, and the carriers will work cooperatively towards long-term solutions.[6] Other states, including Florida, Iowa, Maryland, and Texas, have recognized the necessity of number portability either by regulatory decision or by statute.

MFS is not aware at this time of any strong expression of consumer interest in service or location portability like that for service provider portability. It is possible, however, that this relative disinterest is simply due to lack of knowledge among consumers that these functionalities are feasible. Certainly, those consumers who move to a new location served by the same central

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[5] *Illinois Bell Telephone Company, Proposed introduction of a trial of Ameritech's Customers First Plan in Illinois*, Docket Nos. 94-0096 et al., Order (Ill. Comm. Comm'n, April 7, 1995).

[6] *Investigation into the Unbundling of the Southern New England Telephone Company's Local Telecommunications Network*, Docket No. 94-10-02, Draft Decision, Attachment A at 12 (Sept. 1, 1995).

office and therefore are *able* to keep their existing telephone number actually *do* keep that number, suggesting that location portability at least may attract consumer interest. In any event, MFS believes that a robust database system supporting service provider portability should also be capable of supporting service portability and (within some defined geographic area) location portability, at little or no extra cost, so that it will be reasonable to make all three capabilities available upon deployment of a database system.

II. THE COMMISSION'S ROLE

As noted in the introduction, MFS applauds the Commission's decision to adopt a leadership role in the implementation of number portability, and agrees completely with the tentative conclusions in paragraphs 29-31 of the *NPRM* regarding the federal interest in number portability. In particular, MFS agrees that the ultimate database architectures deployed, and the standards for signalling the database and routing calls between carriers, should be technically compatible nationwide in order to minimize the costs imposed on carriers. Inconsistent signalling or routing standards in different sections of the country could result in imposing excessive costs and operational inefficiencies on those carriers operating nationwide networks. However, as discussed further in subsequent sections, it is not necessary either that there be a single nationwide database or that number portability be implemented simultaneously on a nationwide basis, as long as implementation is compatible with nationwide and industry-wide standards. Furthermore, a robust database solution should be capable of evolving as standards are updated; this would allow an initial solution to be implemented in the relatively near future, using embedded switch hardware and software with the ability to upgrade to a more

sophisticated architecture as carriers deploy more advanced capabilities within their own networks.

MFS also concurs with the Commission's finding that state-sponsored trials of local number portability technologies should be encouraged "because they will provide empirical evidence and other relevant information." *NPRM*, para. 32. In particular, the two trials scheduled to begin in New York State on February 1, 1996, should provide critical information for the Commission and for the industry. In these trials, two different architectures will be tested (the MCIMetro proposal in Manhattan, and the Stratus/US Intelco proposal in Rochester). The results of the test should help clarify the relative strengths and weaknesses of each approach, including, among other things, the following:

- how each solution works with switches from different manufacturers (AT&T, Northern Telecom, Ericsson, Siemens, etc.);
- what effect each solution has on the operation of switch features (call waiting, call forwarding, automatic callback, call trace, calling party number delivery, etc.);
- impacts on operation and billing procedures, and identification of the information needed to enable existing systems to continue to process orders and bills; and
- real-life experience in a real-time, multi-carrier environment, which will help to ensure that all companies will have the necessary support systems to operate within the database system architecture.

If additional database solutions become available within a reasonable time that are not compatible with the two approaches being tested in New York, it may be desirable to conduct a limited number of additional trials in other markets in order to gain more information.

However, the Commission should not delay implementing number portability indefinitely in hopes of achieving a "perfect" solution through an extended series of tests. Trials involve costs and delays which must be balanced against the value of the information to be obtained from them. The New York number portability task force (of which MFS is a co-chair) evaluated a half dozen responses to its Request for Proposals before selecting the MCI and Stratus proposals as the most suitable for trial. Other solutions should be trialed *only* if they appear to offer material advantages over the MCI and Stratus approaches.

Paragraphs 33 and 34 of the *NPRM* raise the crucial issue of what specific actions the Commission should take to expedite implementation of number portability and development of technical standards. MFS encourages the Commission to establish a date certain for the initial implementation of number portability in a limited number of geographic markets. Each of the major LECs (the RBOCs and GTE), as well as competitive local carriers operating in the areas served by these LECs, should be directed to implement number portability in at least one metropolitan area (SMSA) by the initial implementation date. Once the initial implementations have been completed, and any problems identified and corrected, there should be a fixed schedule for expanding implementation to the 100 largest SMSAs.

Results of scheduled state number portability trials should be available to the industry and to the Commission by the third quarter of 1996. Barring any unforeseen problems in the trials, the industry should be able to develop and carry out implementation plans based on the trial results within six months. Therefore, the initial cut-over date for number portability should be not later than Sunday, March 31, 1997. The deadlines for implementing number portability in the remainder of the top 100 SMSAs should allow for deployment over the next seven months,

concluding in October 1997 (so as to avoid the holiday season)—portability should be implemented in at least 35 markets by the end of June; in at least 65 markets by the end of August; and in all 100 markets by the end of October. Installation of number portability systems in markets beyond the top 100 should be required only if and when *bona fide* local competition exists in those markets.[7]

The Commission should not attempt to specify detailed technical standards for the operation of number portability systems. In order to assure competitive neutrality, however, the Commission should require that any system be capable of supporting all switch types that currently exist in the local exchange network. Any protocols or technical standards (for signalling or other switch functions) required to support number portability must be made available to all switch vendors at the same time on a non-discriminatory basis.

The Commission should direct the industry to develop technical standards through cooperative processes. However, implementation of number portability should not be conditioned upon the development of new technical standards, as this would only give those carriers who currently control the lion's share of numbers a strong incentive to delay the process. Rather, as noted above, the industry should implement a database system that is capable of operating *within* existing technical standards. There will always be an opportunity to upgrade the system at a later date, provided that the initial design takes into account the ability to upgrade in the future.

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[7] To the best of MFS' knowledge, the smallest markets in which local exchange competition is being contemplated at present are Grand Rapids, Michigan; and Cedar Rapids, Iowa.

III. LONGER-TERM NUMBER PORTABILITY SOLUTIONS

Paragraphs 35-54 of the *NPRM* request a variety of fairly specific technical information about, and evaluations of, four alternative designs for long-term number portability systems. At present, MFS is not in a position to provide any definitive evaluation of most of these designs, pending the completion of the New York State trials which are intended to produce much of the information sought by the Commission.

It is immediately clear, however, that one of the four proposals discussed in the *NPRM* does not merit any further consideration. The GTE proposal described in paragraph 39 simply does not meet customers' expressed desire to retain their *existing* telephone number when changing carriers. Instead, GTE's proposal would require customers to change to a new, non-geographic telephone number in order to benefit from service provider portability. Since customers in survey after survey have said that they would be disinclined to switch to a new carrier's services if they had to change to a new geographic number in the process, there is no reason to suspect they would be any more willing to change to a new non-geographic number.

The remaining proposals discussed in the *NPRM* each are worthy of further consideration. Each proposal has a different set of advantages as well as some potential disadvantages. MFS therefore prefers not to comment on the merits of these proposals until it has obtained more concrete information about them as the result of trials in progress.

MFS supports the Commission's tentative conclusions that number portability systems should support operator services and enhanced 911 service, as well as use telephone numbers efficiently. *NPRM*, paras. 41-42. MFS suggests that some additional criteria that should be applied include the following:

- All switch vendors must be able to support the selected architecture before it is deployed in the market place. Any hardware or software vendor that develops a number portability technique must be required to share system specifications with other vendors.

- The selected architecture should not require replacement of existing ordering, billing, and operations support systems.

- The architecture should be based upon SS7 signalling and support Intelligent Network features and functions.

- End users should receive seamless service between carriers and should not experience any noticeable delays in call set-up, or in service activation when changing local service providers, and should not lose service features or functionalities as a result of number portability.

- The number portability system should interface with Line Information Data Bases (LIDBs) so that collect and third-party calls charged to "ported" numbers can be billed correctly and other LIDB functions can be performed.

A. Call Processing Scenarios

The Commission should direct that the "N-1" call processing model be adopted. This solution is clearly more efficient than the alternatives The OSP scenario would, as noted in paragraph 45 of the *NPRM*, require that every local service provider nationwide have the ability to query every number portability database on every call it originates (either from the end office or the tandem). Adoption of this scenario likely would delay implementation of number portability, since no system could be operational until all of the independent LECs nationwide

had installed the necessary query capability, even in areas where no local exchange competition is expected to exist in the foreseeable future.

The TAP scenario has almost all the negative features of the interim number portability solutions discussed in Section IV, below. Under this scenario, all calls would have to be routed according to the LERG as far as the end office to which the telephone number was originally assigned. Only at this point would a database query be launched, and the call then forwarded to the new destination. This scenario could require that a call be routed through as many as five terminating access switches (the incumbent LEC tandem, the incumbent LEC end office, back to the incumbent LEC tandem, the competitive provider's tandem, and the competitive provider's end office), while the "N-1" approach assures that the call will not be switched by more than one tandem and one end office. Both New York trials will use the "N-1" procedure.

B. Administration of the Database

The Commission should require that any "master" database used in a number portability system be operated and administered by a neutral third party. The existing 800 Service Management System ("SMS/800") is not a good model to emulate in this case. The SMS/800 is owned by Bellcore, a subsidiary of the RBOCs, and is operated using Bellcore software on Southwestern Bell computer systems. Although access to the SMS/800 is mediated by a neutral third party "Number Administration and Service Center" ("NASC"), the NASC does not actually have any control over the database or even any greater access to it than other users of the system. In the case of a local number portability database, it is important that the database

operator not be a party that could gain a competitive advantage through manipulation of the data or by controlling access to the database.

C. Cost Recovery Issues

MFS believes that the costs incurred by a third-party administrator to install and operate a number portability database system should be borne by all customers within the geographic area served by that system. All customers benefit from the availability of number portability because it enhances their competitive choice, and therefore increases the incentive for their current local service provider to improve its efficiency and service quality. Just as all consumers benefitted from interLATA equal access and the resulting competition in the interexchange industry, even though the majority did not avail themselves of the opportunity to change carriers, so all consumers will benefit from the increased local competition that will result from local number portability.

A reasonable method for distributing the cost of number portability systems would be a surcharge per local access line, assessed on a monthly or annual basis on all local service providers operating within the geographic area served by the system. Alternatively, the surcharge could be assessed per active telephone number; this option would provide somewhat better incentives for efficiency in the use of numbering resources, but also would be somewhat more complex and burdensome to administer.

In addition to costs incurred by the administrator, all carriers offering local telephone service in the area served by a database system, as well as all interexchange carriers desiring to terminate calls in that area, will incur some internal costs in order to adapt existing systems

to work with the database. These costs should be viewed as costs of doing business to be recovered by each carrier from its own customer base, as are the costs of other network upgrades designed to provide end users with improved services and new features. No special cost-recovery mechanism for these expenditures would be either necessary or reasonable.

IV. INTERIM NUMBER PORTABILITY MEASURES

The interim number portability measures discussed in paragraphs 55-63 have been used in several jurisdictions as stop-gap measures to permit customers to retain existing telephone numbers in the absence of true number portability. The only real benefit of these measures is that they do permit customers to change service providers without changing their telephone number; they are therefore better than the alternative of requiring every customer to change telephone numbers when subscribing to the services of a new carrier. These measures do have very substantial disadvantages, however, and therefore are not acceptable other than as very short-term substitutes for true number portability.

Of the various interim measures discussed in the *NPRM*, MFS has concluded that Remote Call Forwarding (RCF) has the fewest disadvantages. Under the RCF approach as it is presently used in New York, MFS assigns a new telephone number in its own NXX code corresponding to each NYNEX telephone number that it will retain. NYNEX then forwards calls from the old telephone number to the new number over the same trunks used for co-carrier traffic exchange. The advantage of RCF relative to other interim measures is that inefficient trunk groups between the new entrant's switch and the incumbent's end offices can be eliminated. Forwarded calls can be routed through the tandem switch over common trunk groups. Signalling can be either

in-band or out-of-band SS7. The Automatic Number Identification ("ANI") that is out-pulsed when the customer places a call is the new number which is transparent to the customer.

Unfortunately, both RCF and other interim number portability solutions require that all calls be routed to the incumbent LEC's switch before they can be forwarded to MFS, a process that results in additional transmission and switching expense and call set-up time. It also appears that busy line interrupt/verification and some CLASS features are not available on incoming calls when utilizing RCF, because the "calling party number" that is forwarded to the new entrant's switch is the telephone number associated with the LEC switch that performs the forwarding, not the number where the call actually originated. However, Bell Atlantic recently has stated in testimony filed before the Maryland Public Service Commission that it has completed successfully tests in which it was able to forward the original caller's telephone number with RCF calls.[8] An additional problem with RCF is that the number transmitted on outgoing calls is the new telephone number assigned by the new entrant, not the retained telephone number known to the customer. This can pose problems with some CLASS features and with E-911 systems, although MFS has worked closely with public safety agencies to minimize the latter problem.

Although RCF is not technically optimal, as cited above, several state commissions, several LECs, and MFS have agreed that RCF is the best interim solution available. RCF provides the critical function of permitting end users to change local service providers while retaining their existing telephone number, with virtually no impact to the incumbent LEC's

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[8] Md. PSC Case No. 8584, Phase II, Rebuttal Testimony of Charles H. Eppert, III at page 4 (June 30, 1995).

customer base and network. Like any interim system, RCF is not perfect, it is in MFS' view the best currently available interim solution. RCF is not acceptable as a long-term solution, however. Besides the shortcomings discussed above, RCF requires the use of two telephone numbers for each line; the originally assigned number and an "invisible" number (*i.e.*, one that is never used by the customer) identifying the customer's termination on the new entrant's switch. This number duplication is acceptable for a short term, but if it continued over a number of years it could place unacceptable strain on some existing area codes. With the transition to a database solution, it should be possible to eliminate this duplication of telephone numbers and re-use the "invisible" numbers for other customers.

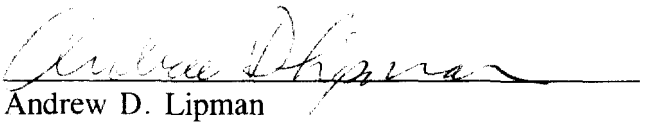
In principle, MFS believes that any incremental costs resulting from interim number portability measures should be recovered from all carriers, on the same basis as discussed above for long-term number portability costs. However, MFS has been willing to accept arrangements in various states in which it pays a nominal charge based on LEC incremental costs for retained numbers, as a means of expediting competitive entry and avoiding the administrative costs associated with a more precise allocation of costs among carriers.

V. CONCLUSION

MFS commends the Commission for its leadership in addressing the key competitive issue of local number portability. A national policy on this issue is needed to give guidance and support to the States as they deal with issues of local competition, interconnection, and unbundling. The Commission's guidance is also needed to assure that database architectures are technically compatible among all regions of the Nation and among all carriers' networks.

As explained above, customers have strongly indicated that they will be much less willing to consider competitive local services if they cannot retain their existing telephone numbers. The Commission should mandate expeditious implementation of a database system that will permit customers full service provider portability at their existing locations, with the ability to add service portability and location portability functions as demand warrants. Subject to the results of the New York trials scheduled to begin in 1996, MFS believes that it is feasible for the Commission to mandate that database systems be deployed in the major metropolitan areas by the first quarter of 1997.

Respectfully submitted,



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Dated: September 12, 1995

145164.1

EXHIBIT A

INDUSTRY NUMBERING COMMITTEE CONTRIBUTION

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ISSUE: Number Portability Workshop

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TITLE: The Importance to Customers of Retaining Current Telephone Number When Switching Telecommunications Companies

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SOURCE: MFS Intelenet, Inc.

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DATE: April 6, 1995

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ABSTRACT: This contribution offers the results from a market research study conducted in November, 1994 by MFS Intelenet, Inc. Two questions pertaining to number portability were asked and the results are provided for industry discussion. The first question asks customers about the importance of retaining current business telephone number when switching telecommunications companies, and the second question asks about the likelihood of changing business telephone number for comparable/better service and cost by a competitor.

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MFS INTELENET RESEARCH

LOCAL NUMBER PORTABILITY

MFS Intelenet Research Methodology

A total of 1,332 MFS Intelenet customers were interviewed via telephone by AHF Marketing Research, Inc. located at 100 Avenue of the Americas, New York, New York. The customers were selected from a list provided by MFS Intelenet. Interviewing took place from October 11 to November 18, 1994.

The decision maker identified on the customer list was interviewed unless he or she no longer worked at that company, in which case, an alternative respondent (who confirmed responsibility for telecommunications service decisions) was accepted.

Quotas were set by market in order to provide the greatest sampling efficiency. The goal was 75 interviews per market. The markets are geographically dispersed.

MFS INTELENET RESEARCH

LOCAL NUMBER PORTABILITY

The Questionnaire

Actual Questions Asked:

When you switch telecommunication companies, how important is it for you to retain your current business telephone number? Would you say it is? (Read List)

Very Important
Somewhat Important
Not Very Important
Not At All Important
(Do not read)
Don't Know

If you were offered comparable or better service and cost by a competitor and you had to change your business telephone number, how likely would you be to change you number? Would you be? (Read List)

Very Likely
Somewhat Likely
Not Very Likely
Not At All Likely
(Do not read)
Don't Know

IMPORTANCE OF RETAINING CURRENT BUSINESS TELEPHONE NUMBER WHEN SWITCHING TELECOMMUNICATION COMPANIES

	TOTAL
Unweighted Base	(1332)
Weighted Total	(1332)
Not Reported	(20)
Base: Weighted Answering	(1312)
	%
VERY/SOMEWHAT IMPORTANT	100
VERY IMPORTANT	98
SOMEWHAT IMPORTANT	2
NOT VERY/NOT AT ALL IMPORTANT	*
NOT VERY IMPORTANT	*
NOT AT ALL IMPORTANT	*

* LESS THAN 0.5%