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

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

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COMMENTS OF THE ASSOCIATION FOR
LOCAL TELECOMMUNICATIONS SERVICES

Richard J. Metzger
General Counsel
**Association for Local
Telecommunications Services**
1200 19th Street, N.W., Suite 560
Washington, D.C. 20036
(202) 466-3046

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SUMMARY

ALTS applauds the Commission's decision to assume a leadership role in the national implementation of full number portability. Both the House of Representatives and the United States Senate have recently acknowledged the importance of fostering effective local exchange competition in H.R. 1555 and S.652, and each bill recognizes that full number portability is essential to the development of robust local exchange competition. Similar conclusions about the importance of number portability have been reached by New York, Maryland, California, Oregon, Illinois and California.

The issue at hand for the Commission thus is not the importance of full number portability, but rather the manner of its implementation. The Commission should be careful not to doom number portability to "industry decision-making by consensus," or risk the perils of premature technology picking. Instead, the Commission need only adopt a few simple principles:

- Full number portability should be defined by its features and functions, and not by the particular technology used for its implementation.
- Tier 1 LECs should be required to provide full number portability in major markets or upon bona fide request in the near future.
- Until such time as full number portability is available to local exchange competitors, LECs should provide interconnection to their local competitors at a 50% discount.

- Local jurisdictions should remain free to pursue full, intermediate, or interim number portability solutions, provided such solutions create no appreciable impediments to the features and schedules of the Commission's national number portability approach.
- The industry should meet, along with Commission Staff, in the INC number portability forum to adopt within sixty days new working procedures and tentative benchmarks for implementing the above principles. In the absence of substantial agreement, the competing procedural and substantive views should be presented to the Commission, which would then select the single proposal most likely to vindicate its number portability principles, giving weight both to the number and nature of the industry groups supporting each proposal.

These principles will fully protect the public interest in number portability, acknowledge and support a continued role for the states, and provide economic incentives for all industry sectors to cooperate in formulating a quick and effective implementation approach. In the event that basic industry consensus fails to emerge within sixty days of its Order, the Commission would then pick the best proposed implementation procedure without change, giving weight to the number and nature of the various supporting parties in order to encourage the creation of broad cross-sector coalitions.

The other important task for the Commission at the present time is to insure that the incremental costs of number portability are recovered according to sound economic principles, which require that the beneficiaries of number portability also bear its costs. As the Number Portability Coalition points out

in their comments, the introduction of robust competition in local exchange prices, services, and features will obviously benefit all the local exchange customers who are able to switch service providers, including those who never happen to make any changes. Consequently, all local exchange customers who gain the ability to port their numbers should contribute to the recovery of its incremental costs. The Commission should insure economically rational cost recovery for this service by stating in its Order it will consider preempting any attempt to allocate incremental number portability costs to any other group of customers, or solely to the competitors of existing monopoly providers.

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**COMMENTS OF THE ASSOCIATION FOR
LOCAL TELECOMMUNICATIONS SERVICES**

Pursuant to the Notice of Public Rulemaking ("NPRM") released July 13, 1995, in the above proceeding, the Association for Local Telecommunications Services ("ALTS") hereby comments upon and enthusiastically supports the Commission's proposal that it play a leadership role "in developing a national number portability policy" (NPRM at ¶7).

I. ALTS' INTEREST IN NUMBER PORTABILITY

ALTS is the non-profit national trade organization representing competitive providers of local telecommunications services. ALTS' membership includes over thirty non-dominant providers of competitive access and local exchange services which deploy innovative technologies in many metropolitan and suburban areas across the country. ALTS, as well as several of its individual members, participated actively in the Commission proceedings which gave rise to expanded interconnection (Expanded Interconnection with Local Telephone Company Facilities, CC Docket No. 91-141).

ALTS also has actively participated in the Commission's docket dealing with national numbering policy and central office code administration, Administration of the North American Numbering Plan, CC Docket No. 92-237, report and order issued July 13, 1995, and has recently nominated its President for membership on the North American Numbering Council ("NANC"). ALTS' members are seriously handicapped by the absence of number portability in seeking to compete with entrenched local exchange providers. The Commission's proposal to advance number portability nationally will prove to be an important element in promoting effective local exchange competition.

II. IT IS MANIFEST THAT PROMPT IMPLEMENTATION OF FULL NUMBER PORTABILITY IS IN THE PUBLIC INTEREST.

The NPRM is clearly correct in concluding that the prompt implementation of full number portability is in the public interest. Every public body and technical forum which has considered the issue has concluded that full number portability is essential to the implementation of robust local exchange competition.

A. Both Houses of Congress Have Now Concluded That Number Portability Is in the Public Interest.

For the first time in over sixty years, both the House of Representatives and the Senate have each considered and adopted far-reaching telecommunications reform legislation. While the Conference version of this legislation may not emerge until late fall, both the House and Senate agree about the importance of

introducing full competition into local telecommunications, and the important role that full number portability should play in implementing that competition. The Report of the Senate Committee on Commerce on S.652 concluded that (S. Rpt. 104-23 at p. 5):

"The legislation reforms the regulatory process to allow competition for local telephone service by cable, wireless, long distance, and satellite companies, and electric utilities, as well as other entities."

"The bill preempts almost all State and local barriers to competing with the telephone companies upon enactment of the bill."

Prominent among S. 652's implementing provisions is its requirement that number portability be among the minimum requirements in the creation of effective local exchange competition (id. at 20):

"Number portability and local dialing parity are included in the minimum standards of subsection 251(b). If requested, a local exchange carrier must take any action under its control to provide interim or final number portability as soon as it is technically feasible. Section 307 of the bill adds new section 261 of the Act which establishes a neutral telecommunications numbering administration and defines interim and final number portability. The FCC will determine when final number portability is technically feasible." (Emphasis supplied.)

H.R. 1555 incorporates a similar mandate (H.R. 104-204 at 72):

"Section 242(a)(4) sets out the duty to provide number portability, to the extent technically feasible. Number portability is the means by which customers may stop receiving service from their local telephone service provider and `take' their telephone number with them to a new provider. The ability to change service providers is only meaningful if a customer can retain his or her local telephone number. The `technically feasible' requirement in this provision is important, because the software necessary for `true' number portability, as opposed to `interim' number portability (which is an advanced call forwarding

feature), is not presently available for local telephone service, although testing is presently under way. The Committee recognizes that the local exchange industry is dependent on the software manufacturers for development of `true' number portability, and expects that technology to be deployed when it is technically feasible." (Emphasis supplied.)

The central role of number portability in both the Senate and House legislation in fostering robust local exchange competition amply demonstrates the Commission is correct in concluding that (NPRM at ¶2): "The inability of end users to retain their telephone numbers under these circumstances -- that is, a lack of number `portability' -- appears to deter customers who wish to select new and different services or who wish to choose among competing service providers."

**B. States Considering Number Portability Have
Each Concluded It Advances the Public Interest.**

Every state that has taken up the issue has concluded that number portability is in the public interest. For example, the Staff of the New York Public Service Commission concluded in Cases 94-C-0095, Telephone Competition II, The Level Playing Field: An Interim Report, that number portability is essential to effective local competition (at 9-11):

"While no telephone subscriber can claim `ownership' of his or her telephone number, the fact is that subscribers everywhere behave as if they `own' their numbers. Many residence customers retain the same telephone number for years; it is distributed to most entities with which they interact, such as banks, insurance and credit card companies, merchants and neighbors, friends and associates. For business people, the welfare and economic viability of their company is often irrevocably intertwined with their telephone numbers; it is printed on their stationary and in

their ads, and it is the easiest and quickest way of reaching them. A change in telephone number can be a very real hardship for any business person -- if you don't know how to reach them, you can't do business with them "

"This issue is, in fact, analogous to the situation of several years ago, when interexchange carriers demanded the ability to compete with AT&T on an equal access basis. The parties agree that number portability between service providers is essential to local loop competition."
(Emphasis supplied.)

The central role of number portability in creating robust local exchange competition was also recently underscored in the Department of Justice's motion for a modification of the MFJ that would permit an interexchange experiment for Ameritech in the Chicago and Grand Rapids LATAs. Among the requirements that Ameritech would be required to fulfil prior to commencement of any long distance experiment is implementation of full number portability (Memorandum of DOJ at 11; see also DOJ's Reply Memorandum filed June 30, 1995, at 14: " The order requires true number portability from the outset unless Ameritech shows that it cannot meet this condition, and the Department will carefully scrutinize Ameritech's showing and determine whether it justifies going forward with a trial at all, let alone a deferral of as much or as little as one year.").

Recent experience from US Signal, a competitor of Ameritech in Michigan, suggests the importance of number portability in that 748 of US Signal's first 1008 local exchange customers requested that their existing numbers be ported. And recent news stories indicate that the industry number portability task force in Illinois has adopted AT&T's "location routing number"

architecture as a permanent database solution by consensus (Telecommunications Reports, September 11, 1995, at 39). The public record in the States is thus unmistakably on the side of full number portability.

C. Market Studies and Economic Analyses Demonstrate That Number Portability Is Essential to the Emergence of Robust Local Exchange Competition.

Economic analyses of the value of full number portability to customers of local exchange carriers have revealed the substantial value of this functionality. In The Transition to Local Exchange Competition, an MCI-sponsored Gallup survey showed that 40%-50% of residential customers, and 70%-80% of business customers who would otherwise change local telephone customers would not do so if they were unable to port their numbers (Tab 3 at 2). MFS reported to the INC Number Portability Workshop earlier this year that telephone interviews with 1332 business customers indicate that 33%-48% found it not very likely, and not at all likely, respectively, that they would change numbers for comparable or better prices.

Even studies sponsored by entrenched providers show this clear outcome. Pacific Bell recently presented INC with a market study claiming that business and residential customers would require 11% discounts from their total phone bills in order to offset a lack of full number portability (Pacific Bell ex parte in CC Docket No. 95-116, filed August 30, 1995, at 23). It has not been possible to analyze Pacific Bell's study for accuracy in

the short time since it was filed with the Commission, and it poses a serious methodological problem in that many local customers are ignorant about actual amount of their local and toll bills, largely because they currently lack any opportunity to change service providers.¹

However, even if Pacific's study were correct, it only serves to show that number portability is indeed central to fully effective local competition. Many local competitors will be providing toll service and local loops via resale rather than building their own facilities. Assuming Pacific Bell's study is correct, the need to discount prices -- including resold loops and toll services -- by 11% in addition to the discount needed by any new market entrant to gain operations of adequate scale in a former monopoly market is a huge impediment to the development of meaningful local competition.

The significance of number portability is also reflected in independent economic analyses of the likely development of local exchange competition. In Ensuring Competition in the Local

¹ Even if its survey technique were correct, Pacific Bell's results require close examination. For example, Pacific claims that a 12% price discount could offset a lack of number portability (p. 21), but its own study shows that competitive penetration would be almost 50% greater with such a discount and full number portability (id.). Also important are the "conversion factors" used by Pacific Bell to ostensibly adjust its study -- i.e., reduce the importance of number portability -- by eliminating the responses of some participants who stated they would change providers, but, according to Pacific Bell, do not really mean what they say (id. at 14).

Exchange, Chimerine, Olbeter and Cohen, Economic Strategy Institute (1995), the authors state that Michigan, New York, Maryland, Oregon and Washington "are firmly on record as supporting a database solution to portability" (at p. 6). They conclude that (at 7):

"In general, it is a widely-shared consensus that true local number portability will be required before a level playing field is possible in the local exchange."

III. THE COMMISSION SHOULD ADOPT GUIDING PRINCIPLES AND A SCHEDULE FOR IMPLEMENTING NUMBER PORTABILITY.

Given the clear need for prompt implementation of full number portability in order to advance substantial competition in local exchange markets, the critical issue for the Commission at the present time is how it can best assist this process.

A. The Commission Should Promulgate Principles and Schedules Rather than Appoint a Federal Advisory Committee or Attempt to Choose a Particular Technology.

The Commission's decision to become the national regulatory sponsor of number portability is entirely commendable, and supported by hard economic evidence. Unfortunately, the technical issues of implementation lie far outside the Commission's common expertise, and the many parties that would benefit from delay are all too likely to raise ostensibly "technical" problems.

The inevitability of technical disputes creates at least two tempting -- but equally undesirable -- choices for the Commission. Pick one fully-articulated technology and order its

implementation, or appoint a committee of all interested parties and direct it to choose a technology.

Either of these choices would be disastrous. None of the three existing tests of full number portability has been completed, and all the tests will require post-trial review and Beta testing. Trying to pick a particular implementation technology now would be completely speculative, creating the specter of an "Edsel" number portability system.

On the other hand, appointing an advisory body under the Federal Advisory Committee Act ("FACA"), P.L. 92-463, would certainly insulate the Commission from any criticism of the Committee's decisions. But, unfortunately, the Committee would probably not reach any decisions until well into the next century. The present proceeding is very different that Administration of the North American Numbering Plan, CC Docket No. 92-237, report and order issued July 13, 1995, in which the Commission recently concluded it should appoint a Federal Advisory Committee (the "NAPC") to advise concerning future policy decisions for the North American Numbering Plan ("NANP"), and to recommend a new administrator of the Plan to assume responsibility for administration of central office codes.

Because the NANP has multi-national implications stretching well into the next century, the Commission's decision to appoint a Federal Advisory Committee using consensus decision-making is understandable, and ALTS has nominated its president for

membership on the NAPC. But the long term focus and multi-national aspect of the NAPC which both require and enable it to function by consensus are entirely absent in the case of number portability. Long term numbering policy basically focuses on resource availability and customer needs, although competitive disputes do arise in certain situations, such as central office code allocations and NPA overlay disputes.

Implementation of full number portability, on the other hand, is on a near-term schedule (the comment of the Ad Hoc Number Portability Coalition indicating that full number portability can be implemented in major markets and upon bona fide request within twenty-four months is a reasonable estimate). Even more critical is the fact implementation of full number portability will have immense financial implications for entrenched providers. This means that consensus decision making, whether via a Federal Advisory Committee or the existing procedures of the Industry Numbering Council ("INC") taskforce on numbering portability, simply will not work.

But the Commission need not attempt to construct an optimal procedural framework for INC or ATTIS, anymore than it needs to guess at the best number portability technology. Rather, the Commission need only adopt principles and schedules that create incentives for all parties to work together in formulating prompt and effective solutions, and then order the industry to comply with that mandate. This is how the the Commission

handled the implementation of equal access, 800 data base access, cellular interconnection, 500 number allocation, and 800 number exhaust. The lesson from these experiences is just as applicable here. Once the Commission announces a schedule along with principles that protect the public interest and create incentives for all parties to participate in formulating effective solutions, the industry will be able to take meaningful action with minimal Commission involvement.

B. The Commission Should Adopt Explicit Principles and Schedules for the Implementation of Full Number Portability.

The Commission can best achieve its goal of fostering full number portability by adopting a few simple principles:

- Principle #1:** Full number portability should be defined by its features and functions rather than the technology used for its implementation.
- Principle #2:** Tier 1 LECs should be required to provide full number portability in major markets or upon bona fide request in the near future.
- Principle #3:** Until such time as full number portability is available to local exchange competitors, LECs should provide interconnection at a 50% discount.
- Principle #4:** Local jurisdictions should remain free to pursue full, intermediate, or interim portability solutions, provided such solutions create no appreciable impediments to the features and schedules of the Commission's national number portability approach.
- Principle #5:** The industry should meet, along with Commission Staff, in the INC number portability forum to adopt within sixty days new working procedures and tentative benchmarks for implementing the above principles. In the absence of substantial agreement, the competing procedural and substantive views will be presented to the

Commission, which will then select the single proposal most likely to vindicate its number portability principles, giving weight both to the number and nature of the industry groups supporting each proposal.

These principles are entirely consistent with similar proposals being made in this proceeding by the Number Portability Coalition, which also merit the Commission's close attention, and are clearly well-founded for the reasons discussed below.

Principle #1 - Define Full Number Portability By Features and Functions Rather Than Technology.

However tempting it might seem for the Commission to delve into the niceties of technical implementation for number portability -- and the capacity problems of Remote Call Forwarding ("RCF") and the resource waste entailed in Pacific Bell's speculative "release to pivot" network topology touted in its August 30th ex parte certainly do invite comment -- it is manifest the Commission should only sketch out the minimal features and functions of full number portability.

True, there have certainly been examples of technology conflict in telecommunications markets. Incompatible packet switches and the ongoing ISDN terminal equipment debacle have plainly wasted resources and consumer goodwill. But there is nothing about either of these examples to indicate that Commission intervention could have prevented the problem, or that number portability should now be the exception to the fundamental maxim that the Commission should stay out of technology picking

(see the Commission's recent decision not to choose the particular technology for implementing PCS wireless services despite claims of potential waste and inefficiency; Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies, RM-7981, First Report and Order and Third Notice of Proposed Rulemaking, released October 16, 1992; ¶39). Wrong turns are simply part of the costs entailed by any technological advance, and the best way to minimize such risk is for the Commission to foster an environment in which the industry makes such choices, not the government.

Indeed, the Commission probably need go no farther than to insist that full number portability include, at a minimum, service provider portability, and require that it not create undue post-dial delay or other palpable network harms. The Commission need not address the issue of location portability at this time. If location portability proves to be a logical feature of the particular implementation technology chosen by the industry, the issues of billing, toll signaling, etc., posed by location portability can be addressed at that time. Even if location portability is not implemented as part of the Commission's national approach, there may well be locations where market needs, local network topology, and local regulation combine to make it an appropriate adjunct to provider portability. In any event, there is no need for the Commission now to exclude it as a possible functionality.

Principle #2 - Tier 1 LECs Should Be Required to Provide Full Number Portability in Major Markets or Upon Bona Fide Request in the Near Future.

Perhaps the most important thing the Commission can do to implement full number portability is also the simplest: Order Tier 1 LECs to quickly implement full number portability in specified geographic areas. The particular schedule and market specification are not critical in themselves. The proposal by the Ad Hoc Number Portability Coalition, for example, is quite reasonable, and other reasonable requirements can easily be formulated. What is essential is that the Commission start setting dates and places where number portability will be made available in order to make it happen.

Whether the problem is the financial interest of the LECs, or the simple inertia inherent in institutions, the plain fact is that quick change does not occur in interstate telecommunications until the Commission orders it to occur. This lesson is reflected in the creation of equal access, data base 800 access, cellular interconnection, customer premises equipment, etc. If a current practice is both profitable and familiar to entrenched providers, it will not stop until the Commission orders its demise.

Principle #3 - Until Such time as Full Number Portability Is Available to Local Exchange Competitors, LECs Should Provide Interconnection Services at a 50% Discount.

Although ordering the LECs to provide full number portability in specified areas within a certain time frame is an

important element in advancing number portability, such a mandate must be accompanied by a meaningful institutional incentive in order to be effective. The Commission's ability to levy fines and penalties is just too slow and unintimidating to truly motivate the parties which enjoy massive financial benefits from delaying full number portability.

The appropriate solution is for the Commission to recognize the fact that the lack of full number portability imposes an appreciable financial penalty on potential competitors, one that may preclude robust local exchange competition entirely until it becomes available. The Commission confronted the same problem in calculating the costs of non-premium access for AT&T's competitors. Given the delay and expenses involved in being able to give long distance competitors "equal access" to local facilities, the Commission granted substantial discounts for Feature Groups A and B, compared with AT&T's better quality Feature Group C. As equal access -- Feature Group D -- became available, the discount disappeared.²

² The negotiations which led to what are now called the ENFIA agreements had their origin in AT&T's original access tariffs, which a later Chief of the Common Carrier Bureau said "provided for drastically higher rates for local exchange lines," Gerald W. Brock, "The Telecommunications Industry: The Dynamics of Market Structure," at 227-28 (Harvard 1981). Upon objection by AT&T's long distance competitors, the Commission convened a series of intense negotiations lasting three months, and culminating in discounts of as much as 55% which the Commission largely accepted and subsequently incorporated into its access charge system. See id. and Exchange Network Facilities, 71 FCC 2d 440 at ¶18 (1979).

The present situation is completely parallel. Just as the network required redesigning to accommodate multiple local distance providers, the network now needs redesigning to permit local exchange competition. And just as the non-premium nature of the original line-side and trunk-side access that evolved into Feature Groups A and B merited a substantial discount prior to the availability of equal access, all local exchange interconnection arrangements and services should be discounted until full number portability is available.

A Federally-mandated discount of 50% in no way interferes with the right of local jurisdictions to set prices initially, or to accept negotiated agreements. It simply creates a short-term incentive for local providers to cooperate in implementing number portability promptly. Furthermore, the 50% discount is entirely modest given Pacific Bell's own estimate in its August 30th ex parte submission that competitors would need to discount total local and toll bills by 11% in order to offset the absence of number portability, even before making the further discounts that would be required to gain market share in the first place. While the ratio of expenses to revenues will likely differ among various local exchange competitors, a 50% discount of interconnection costs should help narrow the cost burden imposed by the lack of number portability. In any situation where a full 50% discount proves unnecessary, the local LEC could petition to have a smaller discount applied.

In any event, the financial effect of the 50% discount would be minimal since competitive local exchange traffic volumes will build slowly, and full number portability -- given the present proposal -- would become widespread in major markets in the near term.

Principle #4 - Local Jurisdictions Should Remain Free to Pursue Full, Intermediate, or Interim Portability Solutions Provided Such Solutions Create No Appreciable Impediments to the Features and Schedules Mandated for Full Portability.

The Commission should expressly recognize there is nothing to fear from allowing local jurisdictions to conduct their own investigations and issue their own orders concerning full, intermediate, or interim number portability while the Commission's national approach is underway. If a national solution appears more cost-effective than a local approach, or if the national solution undercuts the technological assumptions which support a more regional version, the involved parties will immediately bring that fact to the attention of the local jurisdiction. Against the backdrop of a robust national portability implementation plan, local agencies can then weigh the costs and benefits of deferring or continuing with their particular initiatives.

Given the importance many States attribute to jump-starting local competition, they may well decide to continue or even accelerate their existing plans. So long as any such decisions recognize the effects of the national plan, such a choice is plainly within the discretion of a State.

Principle #5 - The Industry Should Meet, Along With Commission Staff, in the INC Number Portability Forum to Adopt New Working Procedures and Tentative Benchmarks Within Sixty Days for Implementing the Above Principles, and Report those Procedures and Benchmarks to the Commission.

As explained above, the first four principles are intended to define number portability, recognize its importance to the emergence of vigorous local exchange competition, and create incentives for all sectors of the telecommunications industry to participate in its prompt implementation. The last principle provides a starting point for that implementation, as well as a "checkpoint" for the Commission in case industry-wide agreement fails to emerge quickly.

While ALTS agrees with most other commentators that the current INC Number Portability Forum is not ideally formulated to serve as the vehicle for an industry-wide implementation of number portability, ALTS does believe it would serve as the best starting point, provided that Commission staff also participate. INC should reconvene immediately following the Commission's order in this docket, and adopt procedures and schedules within sixty days for implementing the Commission's decision.

If INC is not able to reformulate itself into an effective implementation body by substantial mutual consent within that time, then the differing views should be presented to the Commission along with clear evidence as to what sectors of the industry support which positions. The Commission should then measure each proposal against its first four principles, taking

into consideration the breath and cross-industry sector support for each, and choose one particular proposal in its entirety.

It is important that the Commission make it clear it will pick only one specific proposal (though such an approach might well address only procedural issues rather than technical matters), factoring in its merit and breadth of support, rather than pick and choose among different plans. A "best plan wins, provided it meets the principles" approach will encourage the development of broad coalitions, thereby simplifying the Commission's choice and possibly avoiding any dispute in the first place.

IV. THE COMMISSION SHOULD ADOPT GUIDELINES FOR THE RECOVERY OF NUMBER PORTABILITY COSTS.

While the importance of number portability and the means by which it needs to be implemented parallel the implementation of equal access, these events do differ in that the initial implementation of number portability will likely start at a local level before migrating to a national approach. Thus, number portability, at least from a cost recovery perspective, will first involve the States, while equal access ratemaking was first addressed by the Commission.

There is no need for the Commission to try to anticipate all the cost discovery disputes that will incur in the States. Indeed, it remains to be seen precisely what costs of number portability are actually incremental to the LECs' current plans

for SS-7 and the various forms of the Intelligent Network.

The one ratemaking point which the Commission should address -- one that is clearly within its preemption powers since it drives the very implementation of full number portability -- is the point that any costs of number portability should be borne by those customers which economically benefit from its implementation (see also the Comments of the Number Portability Coalition on this point).

While this point is self-evident, the Commission needs to assure itself that no jurisdiction deals a deathblow to number portability by insisting, contrary to sound economics, that any costs be borne solely by customers of competitive providers. The increased competition in prices, services, and features generated by full number portability obviously benefits all local exchange customers once they are able to change service providers, including those who never switch from their existing provider. The Commission should make this point clear in its decision, and indicate it will consider preempting any jurisdiction that attempts to allocate the incremental costs of number portability in a fashion which fails to track its economic benefit.