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September 12, 1995

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William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

Re: *CC Docket No. 95-116, RM-8535 - Telephone Number Portability*

On behalf of Pacific Companies, please find enclosed an original and six copies of their *"Notice of Proposed Rulemaking Comments"* in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Alan F. Ciamporcero

Enclosure

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| Telephone Number Portability | ) | CC Docket No. 95-116 |
| | ) | RM 8535 |
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**NOTICE OF PROPOSED RULEMAKING**
**COMMENTS OF THE PACIFIC COMPANIES**

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## SUMMARY

Pacific Bell commends the FCC for beginning to look at the issues associated with long term number portability. We believe that the Commission's focus should be on service provider number portability. Service portability and location portability should either be developed through market forces or approached after service provider number portability issues are resolved.

Service provider number portability should be the Commission's area of concentration because it will help facilitate telecommunications competition. While we differ from others in the industry on the level of demand or necessity for immediate long term number portability solutions, we are committed to working with other industry players on a national level, and at a state level, to develop technically and economically feasible solutions for service provider number portability.

The Commission should take into consideration the work being done at the state level from both the test and trial perspective, as well as state commission policy decisions, in the number portability area. The FCC need not mandate number portability solutions but it should develop national guidelines that will enable industry players to deploy compatible number portability solutions. Until long term number portability solutions are fully developed, interim number portability solutions are reasonable and viable alternatives. We will be offering interim number portability, based on remote call forwarding technology, beginning in January 1996, as required by the California Public Utilities Commission.

The Notice of Proposed Rulemaking requests information on several proposals for long term number portability and we have addressed them in our comments. We also describe

another solution that we believe is the best solution, especially as an entrance design for number portability, from the perspectives of technical feasibility, number conservation and economics. This "Release To Pivot" (RTP) proposal should be seriously considered along with the other proposals that have been suggested.

Cost recovery for the development of number portability offerings should be designed based on the architecture of the solution(s) adopted. However, we believe that the Commission's goal for cost recovery should be a framework that is competitively neutral such that all providers, who will all benefit from number portability, support its development.

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**NOTICE OF PROPOSED RULEMAKING**
**COMMENTS OF THE PACIFIC COMPANIES**

Pursuant to Sections 1.415 and 1.419 of the Commission's Rules, Pacific Bell ("Pacific") hereby files its opening comments in response to the Commission's Notice of Proposed Rulemaking (NPRM) concerning portability of telephone numbers.

## I. INTRODUCTION

The California Public Utilities Commission (CPUC) is currently reviewing all issues associated with opening the local exchange to competition. Numbering issues, including both interim number portability and long-term number portability are being addressed. We are actively participating in these proceedings. A Number Portability Task Force, which we co-lead, has been established in California to analyze, develop and implement an economically and technically feasible number portability solution. Monthly meetings are underway and all parties are cooperating and sharing information to assess the various options being considered in the industry for service provider number portability.

These efforts should, and will, continue. Investigation of number portability issues and development of national guidelines by this Commission can only facilitate such state-sponsored activities. The FCC should focus its resources on developing national policies for

number portability issues related to number conservation, interconnectivity and cost recovery principles. The FCC should encourage the industry to review demands number portability will place on network capacity and strive to minimize them. These areas match the types of analyses the California Number Portability Task Force is planning to undertake.

## II. THE FCC SHOULD FOCUS ON SERVICE PROVIDER NUMBER PORTABILITY

Long term number portability, that will allow virtually every business and residence phone number to be retained when selecting a competing service provider, is an enormous undertaking no matter what solution is employed. Whether to perform screening functions on each and every one of the billions of calls handled each year must be considered with extreme care and with an understanding of the effect on consumers, networks, and competition. We are committed to applying resources to the development of a long term service provider number portability solution which is economically and technically feasible.

We are willing to devote resources to this project because we agree with this Commission that service provider number portability will benefit consumers by providing greater personal mobility and flexibility in the use of telecommunications systems, and it will contribute to the development of competition among alternate providers of local telephone and other telecommunications services. However, we disagree that all forms of number portability (service provider, location and service portability) are in the public interest and therefore should be mandated. The North American Numbering Plan (NANP) was designed to use geographic telephone numbers as a specific network routing and addressing system. The challenge is to find the best mechanism that allows a customer to change service providers, while staying at the same location, and continue to use historic (NANP) telephone numbers as the network address to

terminate and originate telephone calls. Solving this challenge should be the first priority with an eye to transitioning to geographic, or location portability (i.e., allowing end users to take geographic telephone addresses from one location to another) or to service portability (i.e., porting a number from one service to another). The market should drive the development of service and location portability, if in fact there is appropriate value in doing so.

### A. Market Research Indicates That Number Retention Is Just One Item Considered In The Decision To Change Carriers

While we agree that service provider number portability will have competitive value, we firmly believe, as supported by detailed qualitative and quantitative market research attached hereto as Attachment A and described herein, that the competitive necessity of number portability has been vastly overstated. Results of our research, performed by ConStat, conclusively demonstrate that lack of service provider number portability is not a barrier to competition as argued by others. Our research concluded that competitive local exchange carriers ("CLECs") can capture between one tenth to one third of the business telecommunications market without any number portability, depending on the discount offered, brand, and degree of packaging. In the residence market, our research shows that CLECs will be able to capture as much as 20-50% of the residence market without number portability. In both the business and residence markets, service provider number portability only adds approximately 10% more customers in any given situation.

Our research indicates that new entrants to the local exchange market will be able to overcome a lack of number portability by simply continuing discounting practices currently in effect in the intraLATA toll market. For example, AT&T is currently offering 10% to 20% discounts below Rochester Telephone's rates. MCI, in its "Friends and Family" promotion offers

25% discounts if calls are outside of the circle and 50% discounts if the call is within the circle. MFS advertises that "[o]ur calls are on average 19% cheaper than the existing NYNEX local usage".

In a Wall Street Journal article however,[1] competitors overstated the need for number portability. Royce Holland, MFS President, was quoted as stating that "[s]eventy-five percent of the customers generally are not going to change their phone number unless there's a big economic benefit".[2] Our research establishes that even with number portability and no other economic incentive, over 75% of business customers are not inclined to switch service providers.

MCI's Michael D. Pelcovits, was quoted in that same article as saying "...nearly half of potential customers surveyed said they wouldn't switch to a new MCI local service if they couldn't keep their numbers." The ConStat study found that even with number portability, and a 25% discount below Pacific's prices, less than 50% of business customers are inclined to switch.[3]

Finally, Scott Rafferty, a Washington Telecommunications Consultant said, "[i]t is an enormous barrier to entry to make someone change their telephone number." ConStat's survey objectively determined that it is a combination of factors that determine whether customers will switch service providers.

The research we sponsored is superior to that offered by MCI and MFS for several reasons. MCI's research, conducted by The Gallup Organization, was a simple telephone survey, in which respondents were contacted on a cold call basis without having an opportunity to

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[1] "Telephone Numbers Hang Up Local Bell Rivals". Wall St. J., Jan. 13, 1995.
[2] Ibid..
[3] The ConStat survey also concluded that customers have other motivations when deciding to switch to other providers. One question asked: *"Assuming you were planning to switch your local and toll service and all companies were making basically the same offer, which company would you choose?"* The responses of businesses approximated existing long distance market shares.

consider all aspects of the choices offered or prioritize their relative importance. The MCI/Gallup survey also failed to reflect the tendencies frequently found in market research studies that lead to an inflated estimate of demand. For example, the ease of saying "yes" as opposed to writing a check, the desire to give good news to an interviewer or the desire to end an interview as quickly as possible by giving rapid, often unreflected answers, all have been found to result in inflation. Estimates of intention, as collected in the relatively quick telephone interview such as that used by Gallup, are often much higher than subsequent market performance of the actual product or service.

Of critical significance is the fact that the MCI/Gallup research did not consider all the factors involved in a customer's decision to switch service providers. In a vacuum, one would expect that keeping a number is important or even preferred to having to change a telephone number. However, this is not realistic because other variables - including price, brand awareness and perceptions, service bundling and quality of service - will be simultaneously considered when the decision to switch service providers is made.

The MFS Intelenet Research, performed by AHF Marketing Research, is similarly flawed. The research was done by a simple telephone survey like the MCI/Gallup study, in which respondents received a cold call without having the opportunity to reflect upon their decision or consider all aspects of the choices and their relative impact to their business. The study did not name the alternative carrier that would offer local access (i.e., the alternative carrier was merely described as a "telecommunications company" or "a competitor"). AHF apparently did not discount the raw responses of respondents to take into account normal market survey inflation. Neither the AHF research nor the MCI study informed customers that they could have their historic telephone number referred to an announcement informing callers of the new

telephone number assigned by the new carrier (e.g., Number Referral Service is a tariffed service that is normally available to all customers). The objectivity of the respondents is debatable as well because those surveyed were selected from a list provided by MFS Intelenet, rather than from random samples.

The Commission's statement that "[a] lack of number portability likely would deter entry by competitive providers of local services" is incorrect. It is not supported by MCI or MFS research and, in fact, our in-depth research proves a lack of number portability can easily be overcome.

The purpose of our research, which was conducted during the fourth quarter of 1994 and first quarter of 1995 was to identify "...the relative importance of service provider number portability to the decisions of end users when considering whether to take service from competing providers." The qualitative and quantitative research dealt with five major areas:

- What factors are important in deciding to change local service providers?
- What is the value placed on the incumbent telephone number?
- What incentives are important for customers to switch numbers and carriers?
- Can other technical solutions mitigate a lack of number portability?
- What are trade-offs and inter-relationships of the various elements?

Potential respondents were first recruited by telephone and then mailed a questionnaire. All participants were randomly recruited from third party samples and the survey was conducted without knowledge of the company sponsoring the survey. Each respondent was mailed a copy of the "Telecommunications 1995 and Beyond" survey package and a "Dictionary of Terms." Within this package was information on what the telecommunications environment

would be like in a more competitive market place, as well as full explanations of all of the elements used in the conjoint scenarios. All completed questionnaires were returned to ConStat and were edited for internal consistency and logic and entered into ConStat's data processing system for analysis and cross-tabulation. The results were also discounted to more closely estimate actual customer switching behavior.

In our research we also explored various technological solutions to determine the mitigating effect on a number change. The solutions included the standard recorded announcement that informs callers of a telephone number change as well as automatic call completion in association with the announcement. We learned that these factors have relatively little effect on the likelihood to switch local telephone providers. Regardless of the technological solution type or its duration, more than one-third (36%) of residence customers would consider switching even if a number change occurred. In the business market, when an incumbent long distance telephone company bundles long distance, local and toll services at a 15% discount but requires a number change, approximately one quarter of the businesses would switch their main lines. When offered number portability under the same scenario, only 10% more of the businesses (36% total) would switch their main lines.

Other factors, such as reimbursement for re-printing business cards and stationery or company relocation will have only a minor effect on a business' willingness to switch telephone providers.

In our research, a 10% discount on long distance service, free basic cable service for 3 months, a $35 check or free call waiting for 1 year were also suggested. These incentives were attractive to about one-fifth of all customers.

ConStat also asked "[a]ssuming you had to change your number to switch local access providers, how much would you be willing to pay to keep your number?" We found that the majority of residence customers (68%) would rather change their number than pay to keep it. Almost one quarter (24%) of the respondents were willing to pay to retain their number and these customers are willing to pay about $5.00 per month to retain their number.

### B. Expectations Regarding Service Provider Number Portability Are Likely To Be Different Among Wireless Providers And Wireless Customers

The NPRM asks parties to comment on the competitive significance of service provider number portability in creating competition between wireless and wireline providers. (NPRM at para. 24.) To the extent that wireless service providers offer the same type of basic, local exchange service as wireline carriers, we expect that the demand for service provider number portability will be similar. These customers are likely to want the same features and functions from their local exchange carrier regardless of the technology employed.

Wireless carriers have traditionally requested and received hundreds of dedicated NPA-NXX codes (i.e., 10,000 number blocks) for assignment to their customers. Wireless providers may be reluctant to make these numbers portable to other wireless carriers for economic and strategic reasons.[4] Wireless end user customers may also be less concerned than wireline customers about number portability because of the nature of wireless calling. Since most wireless customers are charged by their service provider for calls originated as well as received, they may not publicize their wireless number.

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[4] In the Commercial Mobile Radio Services (CMRS) Interconnection proceeding, the Commission sought comment on the issue of number transferability. Number transferability is not synonymous with number portability. Number transferability involves the transfer of numbers to a wireless reseller. See, Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Services, Notice of Proposed Rulemaking and Notice of Inquiry, CC Docket No. 94-54, 9 FCC Rcd 5408 at para. 94, n.31 (1994).

The NPRM requests comment on whether LECs have an increased burden over other carriers with regard to transferring wireless telephone numbers between different service providers. For some services today, we route traffic destined for other service providers based on the NPA (including 500 and 900) and NXX called. These codes, both geographic and non-geographic, are dedicated to a particular carrier which makes it easy to direct calls by using the six digit NPA - NXX. To route calls based on all ten digits, which number portability would require, places the same technical burden on all carriers, regardless of the technology deployed by the other service provider. Whatever technical method is chosen to accommodate this type of portability, it can apply to both wireless and wireline customers.

## III. THE COMMISSION'S ROLE SHOULD BE TO DEVELOP NATIONAL POLICIES AND GUIDELINES

The NPRM postulates that the FCC should assume a leadership role in developing a national number portability policy because of its importance on interstate communications. (NPRM at paras. 7 and 19.) We agree. The FCC should develop general number portability policy principles that will guide the industry as it seeks to develop a long term number portability solution or solutions. The FCC can monitor the industry's efforts and, through the insights gained by trials and technical development can create policy and guidelines on standards and possible architectures.

The FCC should focus on several policy areas. We recommend adoption of policies that include:

- Full participation in service provider number portability by all users of numbering resources.

- Full participation in the funding of long term number portability by all users of numbering resources.
- Competitively neutral cost recovery for all funding parties of long term number portability solutions.

Such national policies will assist industry endeavors to solve number portability. The Industry Numbering Committee (INC) has agreed to the principles listed below. The FCC should also consider them as it develops national policies.

- NANP Number Principle - Where number portability is required, it applies to geographic ten-digit NANP numbers, except in situations where industry approved service definitions limit or preclude such portability (e.g., 555).
- Customer Transparency Principle - The mechanism by which portability is provided should, as an objective, be transparent to the customer.
- Service Impact Principle - Regardless of the selection of the network provider, care should be taken to avoid any adverse impacts to customers who do not desire number portability.
- Participation Principle - All service providers (e.g., CMRS, IECs, CAPs, LECs, CLECs) participating in number portability should also participate in number portability development, deployment and associated administrative functions.
- Reciprocal Interconnection Principle - All service providers (e.g., CMRS, IECs, CAPs, LECs, CLECs) offering portability within the same specific geographic area should interconnect and allow for call completion. The method of interconnection (direct,

tandem, hub, etc.) is a business decision for the service provider requesting interconnection.

- Service Provider Principle - Customers should have the option of retaining their geographic telephone number as they change between service providers (e.g., CMRS, IECs, CAPs, LECs) serving the same specific geographic area. The obligation to provide number portability should be borne by all service providers as required by appropriate regulatory bodies with jurisdiction over a common geographic boundary area.
- Architectural Flexibility Principle - To the extent possible, architectures proposed for the support of number portability should allow network providers reasonable flexibility in the manner in which the architecture is implemented. Specifically, architectures which require external database(s) solution should not preclude any carrier from incorporating the database(s) in their own internal network.

### A. The FCC Should First Concentrate On Service Provider Number Portability Principles

We also recommend that the FCC concentrate on developing principles associated with service provider number portability. Service portability and location portability present additional challenges, as we discuss further below. Service provider number portability -- or local number portability (LNP) -- is the area of number portability our California Commission is focused on because of the imminent introduction of local competition. Such an approach is consistent with activities at INC which has decided to initially limit its consideration to service provider number portability.

INC made its decision to narrow the technical issues to service provider portability because of local competition. Service provider number portability is primarily a local

competition issue. Interstate calls should complete in a transparent manner whether number portability is implemented or not. Service provider number portability is expected to work within the current NANP structure and, as such, will not directly affect interstate routing and call handling. Interstate calls will only be affected to the extent a service provider number portability solution requires the called number to be screened on the originating or terminating end (depending on the portability solution design used). Further, full ten digit, nationwide location portability of current geographically-based line numbers would require a huge investment of capital expense and resources far outweighing, at least for the foreseeable future, any consumer benefit.

B. The FCC's Efforts Should Facilitate Industry-Sponsored Endeavors

The Commission is correct in concluding that it has jurisdiction to ensure that number portability is handled fairly and efficiently. (NPRM at paras 29 and 31.) The main industry numbering forum, INC, is also actively working on this goal. INC has issued many numbering assignment guidelines used today in the industry. We also encourage the Commission to have the North American Numbering Council (NANC) address the efficient use of numbers as part of the future number administration's responsibilities.

It is not necessary to have just one, uniform technical solution nationwide so long as various solutions are interoperable. The FCC can help tremendously in this respect by establishing a set of guidelines that layout the common features and functions necessary for portability.

Similarly, the FCC should not impose deadlines at this time because there is insufficient information available upon which a date certain for national implementation could be set. It would be acceptable for the FCC to request informal monitoring reports from the INC on

its progress in developing portability solutions. INC is analyzing portability options being proposed. The INC Number Portability Workshop is reviewing, at each meeting, the results of ongoing technical trials. They are in the best position to develop a technically and economically feasible long term solution.[5] Technical and performance standards should also be developed through other industry committees, such as Committee T1.

## IV. COSTS AND THE EFFECT ON THE NETWORK WILL BE DETERMINED BY THE COMPLEXITY OF THE SOLUTIONS ADOPTED

Jumping to a full-scale, unlimited across-the-board number portability solution that permits full mobility among services, locations and providers is appealing. How to develop such a solution that is timely, cost effective, technically feasible and consumer friendly is obviously much more difficult. Whatever solution(s) is adopted cannot be too expensive, waste too many numbers, favor one segment of the industry over another, take too long to implement, degrade existing services, create unacceptable call handling delays or network problems.

The fundamental feasibility of any number portability solution must be evaluated in terms of the solution's effect on the existing public telecommunications network and the associated technical and economic infrastructure of access, interconnection, service, engineering, management, and billing systems. To aid in these endeavors, the FCC should encourage the industry to issue technical compatibility guidelines that establish the following goals for service provider number portability architectures:

1. Unambiguous routing information and addressing
2. Common query platform

[5] The Commission has recognized the value that the INC and NANC provide in developing number assignment guidelines and resolving complex technical and operational numbering issues. See Administration of the North American Numbering Plan, CC Docket 92-237, Report and Order, released July 13, 1995, paras. 13 and 43.

3. Internetwork signaling and transmission compatibility

4. Common interfaces for ordering, billing and other administrative functions

National agreement in these areas will reduce the necessity to deploy a single, nationwide solution. Each state could develop its own favored solution so long as it complies with national interoperability standards.

A. Cost Recovery Should be Competitively Neutral

Cost recovery issues are being addressed by the states. California's Commission will be holding workshops next year to discuss long term number portability cost recovery as well as other issues. The FCC should issue a national policy establishing that LNP cost recovery should be competitively neutral with costs spread across all service providers.

To that end, LNP should not be considered a new service provided by the incumbent LECs. Although the IECs and new competing LECs may advocate that the incumbent LECs should foot the bill for LNP, we believe that all service providers will need to provide funding if LNP is to be successful.

The specific cost recovery mechanism will be dependent on the type of architecture design deployed. For example, if a national database is created, run by an independent agency, then perhaps all providers should pay part of the development costs in addition to query fees for use of the database. Such determinations are premature, however, and are dependent of the architecture adopted.

B. Timelines For Each Proposed Solution Depends On Significant Deployment Of Network Hardware, Software And Other Resources

As part of our involvement on the California Number Portability Task Force, we have analyzed the proposed LNP architectures in light of the architecture goals we listed above as well as the consequences from a customer and a number conservation perspective.

From these criteria we have found that one architecture appears to be superior to others proposed. The "Release To Pivot" (RTP) option is, in our opinion, the best match to the principles listed and we endorse it as an entrance architecture. We believe that the RTP design is best suited to allow integration of number portability capabilities into current network designs. It has the added benefits of not requiring investment into alternative databases or major infrastructure changes.

Our preliminary review of the proposals indicates that most of them will require another year of design work, and then between one to two years to implement. We will discuss the technical feasibility of the various options in more detail below. All options will take at least three years. Timelines for deployment, however, tentatively break out as follows:

- Release to Pivot

  This proposal requires the deployment of the following resources:

  (1) New software and tables in switches with ported customers to provide RTP

  (2) Design and test interval is approximately 12-18 months

  (3) Order, install and deploy time frame is 18-24 months

  (4) The ability to do 10 digit Global Title Translations (GTTs)

- NORTEL Look Ahead Proposal

  This proposal requires the deployment of the following resources:

  (1) Triggers in all switches

(2) Increased SS7 infrastructure (STPs, links, ports, GTT tables)

(3) Database deployment for correlating Customer Name (CNA) and Customer Address (NNA)

(4) Database provisioning and administration system

(5) Design and test time is approximately 24-30 months

(6) Order, install and deploy time frame is 2 years

(7) The ability to do 10 digit GTTs

- MCI metro Proposal:

This proposal requires the deployment of the following resources:

(1) New software in all switches to support Carrier Portability Code (CPC)

(2) Increased SS7 infrastructure (STPs, links, ports, GTT tables)

(3) CPC Database deployment

(4) Database provisioning and administration system

(5) Additional design and test time for this option is approximately 3 years

(6) Order, install and deploy time frame is 24-30 months

(7) The ability to do 10 digit GTTs

- AT&T Proposal

This proposal requires the deployment of the following resources:

(1) Triggers in all switches

(2) Increased SS7 infrastructure (STPs, links, ports, GTT tables)

(3) Database deployment

(4) Database provisioning and administration system

(5) Additional design and test time is approximately 24-30 months

(6) New software to support LRN

(7) Order, install and deploy time frame is 2 years

(8) The ability to do 10 digit GTTs

- ELI Proposal

This proposal requires the deployment of the following resources:

(1) Triggers in all switches

(2) Increased SS7 infrastructure (STPs, links, ports, GTT tables)

(3) Geographic mapping database

(4) Database provisioning and administration system

(5) Additional design and test time is approximately 3 years

(6) Order, install and deploy time frame is 24-30 months

(7) The ability to do 10 digit GTTs

(8) New software to support CNA/NNA

- GTE One-time Number Change Proposal

This proposal requires the deployment of the following resources:

(1) Non-geographic number database deployment

(2) Design interval is 12-18 months

(3) Order, install and design time is 18-24 months

(4) The time required to address the Industry Number Administration Process is 1 year.

C. Billing And Routing Of Calls Will Also Be Directly Affected By Number Portability

To be able to bill a customer accurately, AMA records from the switches should reflect appropriate information to correctly calculate mileage based on V&H (vertical and horizontal) coordinates. If a call terminates to a ported number, the ported number information should be accompanied by a NPA (at a minimum) that is resident on the terminating switch. This NPA-NNX can then be used to identify the true V&H coordinates of the ported number for mileage calculation purposes.

For Alternate Billing Services (ABS) traffic (e.g., calling card, collect, or third number billing), any call billing to a ported number should contain appropriate billing information, so that billing records can be sent to the appropriate billing entity. This information also needs to be stored in the Line Information Data Base (LIDB).

The bill format may eventually require changes to add more information for the customer to track calls terminating to ported numbers. This will also help customer service groups to resolve billing issues related to ported numbers. Account maintenance may also require changes if billing numbers, other than traditional POTS numbers are used (e.g., non-geographic numbers). This will affect other billing functions, (e.g., local tax calculation which is based on a geographic area).

## V. THE SOLUTIONS PROPOSED CONTAIN DIFFERENT ADVANTAGES AND DISADVANTAGES

All of the solutions proposed so far, with the exception of Release to Pivot (RTP), rely on external database queries to get carrier and routing information. Whatever database method is employed should limit the number of database queries to a minimum - preferably only on calls to ported numbers. In any case, only one database query should be performed on calls to ported numbers.

A. The Release To Pivot Proposal Is The Best Alternative

Release To Pivot (RTP) is a network routing capability that allows an initial destination switch (release switch) to release an existing call to the previous switch (pivot switch) in the call path with information needed to complete the call to another destination. The pivot switch records and routes the call based on information it has received from the releasing switch. The RTP switch may simultaneously process calls using its pivoting functions and its releasing functions. A copy of our RTP proposal is attached as Attachment B.

The RTP proposal has the benefits of retaining the user's network address and utilizing information already resident in the network to route ported calls. Another positive attribute is that it only applies to numbers that have been ported. No pseudo numbers are assigned for routing which minimizes number exhaust. RTP is designed for any carrier's switch, LEC, CLEC or IEC which leads to more efficient routing.

RTP requires the introduction of optional parameters within standard SS7 ISUP messages to accomplish network routing. The increase in information processed and complexity is minimal. This network innovation is useful in networks with a relatively low proportion of ported calls and achieves high efficiency in routing situations where a new destination for a call, not involving the original terminating switch, is determined. In the RTP proposal, no external query is required. Because this solution is based on standard network interconnections, it is also compatible with other query/trigger strategies, and will be consistent with the routing and addressing algorithms of other service providers' networks.

In sum, RTP is the most feasible number portability network deployment because it will involve ported numbers only, conserve number resources, enhance incumbent network design and adopts the a very efficient routing and addressing strategy.