

STATE OF ILLINOIS



ILLINOIS COMMERCE COMMISSION

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September 12, 1995

Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20544

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FCC - WASHINGTON

Re: CC Docket No. 95-116  
RM 8535

Enclosed for filing in the above-captioned matter is an original and nine copies of the Comments of the Illinois Commerce Commission.

We would appreciate your acknowledging receipt of these comments by returning a duplicate time-stamped copy of the comments in the enclosed self-addressed envelope.

Very truly yours,

A handwritten signature in cursive script that reads "H. L. Stoller".

Harold L. Stoller  
Special Assistant Attorney General

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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20544

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SEP 14 1995  
FCC - WASHINGTON

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

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TO: THE COMMISSION

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COMMENTS OF THE  
ILLINOIS COMMERCE COMMISSION

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September 12, 1995

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COMMENTS OF THE  
ILLINOIS COMMERCE COMMISSION

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## Summary

While number portability is being developed at the state level in Illinois, the Illinois Commerce Commission (ICC) recognizes the need for federal involvement if number portability is to become a reality nationwide. Because of common goals, the ICC believes that state and federal efforts can be cooperative and complementary to speed the implementation of number portability in a manner consistent with the public interest.

These Comments describe activities of the number portability Task Force created by the ICC to develop a number portability solution for implementation in Illinois. The ICC urges that the Federal Communications Commission (FCC) not take any steps that would intrude into the authority of the states in the area of number portability requirements, or that would prevent or delay implementation of number portability in Illinois. Because of varying regional needs, a phased approach, with early implementation in areas with rising competitive pressures such as Chicago, is likely to be more cost-effective than a flash cut nationwide. Further, much valuable information and experience can be obtained through state or regional efforts.

The ICC suggests that the FCC allow Illinois and other states to submit additional analysis and results to the FCC as they become available, to strengthen the national number portability program. The FCC may wish to consider establishment of a federal/state Joint Board to fashion nationwide number portability policies and guidelines.



be implemented in Illinois.<sup>1</sup> The ICC required Ameritech Illinois to provide certain interim number portability options. In addition, an industry task force (Task Force) is developing a long-term number portability proposal and implementation plan for submission to the ICC in the near future.

While number portability is being developed at the state level in Illinois, the ICC recognizes the need for federal involvement if number portability is to become a reality nationwide. The FCC has similarly recognized that state regulators have legitimate interests in the development of number portability, while expressing concern that state and federal policies may diverge or become inconsistent.<sup>2</sup> The ICC is in general agreement with the FCC that number portability solutions should not be unreasonably discriminatory and should be competitively neutral. Because of our common goals, the ICC believes that state and federal efforts can be cooperative and complementary to speed the implementation of number portability in a manner consistent with the public interest

As described in these Comments, number portability is being developed in Illinois with a goal of widespread industry consensus. As a result, the solution adopted in Illinois may also be appropriate for implementation on a nationwide

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<sup>1</sup>Order, Proposed Introduction of a Trial of Ameritech's Customers First Plan, and AT&T Communications of Illinois, Inc. Petition for an Investigation and Order Establishing Conditions Necessary to Permit Effective Exchange Competition to the Extent Feasible in Areas Served by Illinois Bell Telephone Company, ICC Docket 94-0096 Consolidated (Order), April 7, 1995, at 109-110.

<sup>2</sup>Notice of Proposed Rulemaking, In the Matter of Telephone Number Portability, CC Docket No. 95-116 and RM 8535 (NPRM), July 13, 1995, at paragraph 32.

basis. At a minimum, the intent is that the Illinois solution be compatible with any solutions that may be developed in other regions.

II. The ICC Has Determined That Number Portability Should Be Implemented in Illinois.

The ICC considered number portability in its April 7, 1995 Order that addressed Ameritech Illinois' Customers First proposal and several other local competition issues. The ICC found that the lack of adequate number portability can be a considerable deterrent to any customer contemplating a switch in local carriers, and can impose significant costs on those customers who do switch. It also concluded that number portability is important not only between wireline carriers, but also between wireline and other technologies such as cellular.<sup>3</sup>

The ICC created the number portability Task Force, with its primary work to be development and implementation of number portability in Illinois. The ICC stressed that the issue is no longer whether--but when and how--to implement number portability in Illinois.

The ICC also directed Ameritech Illinois to tariff interim number portability approaches, specifically foreign exchange service, remote call forwarding, enhanced remote call forwarding, and direct inward dialing (DID) trunks. Because of the importance of number portability to the development of competition, Ameritech Illinois was required to make these interim solutions available to competitors and/or competitors' customers at cost-based rates with only a

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<sup>3</sup>Order at 110.

reasonable level of contribution.<sup>4</sup> The ICC did not require that Ameritech Illinois offer Route Index-Portability Hub and Hub Routing with AIN, due to technical uncertainties regarding these arrangements. The Task Force may recommend tariffing such additional interim methods at a later date.

Ameritech Illinois filed interim number portability tariffs on May 22, 1995, with revisions filed on July 17, 1995. In response to concerns raised by a number of parties, the ICC recently expanded the scope of its investigation of the Customers First tariffs to include pricing of the interim number portability options.

### III. Number Portability Task Force Activities

Considerable time and effort have been expended by the Task Force participants in their drive to develop and implement number portability. The Task Force has held eight meetings covering twelve days over the last four and a half months. Outside the meetings, much additional work has been done through subcommittees, conference calls, and the work efforts of individual participants.

The Task Force adopted a near-term goal to implement service provider portability for wireline carriers in the Chicago LATA<sup>5</sup> by the fourth quarter of 1996. The Task Force has determined that its number portability solution should be compatible with a national number portability solution; should be expandable to other types of number portability such as geographic and service portability, if they

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<sup>4</sup>*Id.* at 110.

<sup>5</sup>LATAs are called Market Service Areas (MSAs) in Illinois.

prove desirable; and should allow expansion to wireless carriers when feasible for their networks.

The Task Force is coordinated by ICC Staff representatives, and is open to all interested parties. As shown in Attachment 1, participants have included representatives from other state commissions, various community organizations, consultants, and telecommunications equipment manufacturers. Represented carriers have included Ameritech, several other Regional Bell Operating Companies, GTE, other independent incumbent local exchange carriers in Illinois, wireless carriers, new local exchange carriers, and interexchange carriers.<sup>6</sup> Many of the participating carriers operate on a multistate basis.

To date, the Task Force has produced several documents that it is using to guide selection of a number portability solution for submission to the ICC for review and approval. The documents include the ICC Staff's Number Portability Guidelines (Attachment 2), the Task Force's Mission Statement (Attachment 3), the Task Force's Implementation Plan Scope (Attachment 4), and the Task Force's LNP Framework document (Attachment 5). While the ICC has not formally approved these documents, they are widely (although perhaps not unanimously) supported by the Task Force participants. With these caveats, the ICC is conveying these documents to the FCC in hopes that the extensive recitation of number portability issues in these documents will be beneficial to the FCC in its number portability work.

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<sup>6</sup>Attachment 1 includes all entities that have attended at least one workshop.

The Number Portability Guidelines (Guidelines) contain a set of general policy statements developed by ICC Staff representatives with the general agreement of the Task Force to guide its work. The Mission Statement spells out the near-term and long-term number portability goals adopted by the Task Force. The near-term goal of the Task Force is to develop, evaluate, and recommend a wireline service provider portability solution that is competitively neutral, is technically and economically feasible, and meets the needs of Illinois consumers and carriers. The long-term goal is to explore the desirability and feasibility of expanding wireline service provider portability to allow broader number portability, for example, location, wireless, service, and/or time-sensitive number portability.

The Implementation Plan Scope developed by the Task Force is Illinois-specific and identifies the initial number portability area and carriers<sup>7</sup> that would participate in number portability in Illinois in the near term. The Task Force set a goal of implementing this initial phase by the end of 1996. Afterward, number portability could be expanded to other areas and carriers, and other types of number portability, as market conditions warrant.

The LNP (Local Number Portability) Framework contains an extensive list of elements that can be affected by the implementation of number portability. The LNP Framework document has been used to evaluate and compare the impacts on networks and users of the basic types of call processing models that have been

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<sup>7</sup>Carriers that are referenced as "13-405 certified" in the Implementation Plan Scope document are those that have received Certificates of Exchange Service Authority from the ICC under Section 13-405 of the Illinois Public Utilities Act.

proposed. While all Task Force participants took part in meetings and discussion, only representatives of participating carriers that operate in the Chicago LATA (including a wireless carrier) were allowed to score proposals, as provided in this document, due to the fact that they will be the ones to implement number portability.<sup>8</sup> The document has been used solely as a tool to aid in the selection of a basic call processing model to be recommended for adoption by the ICC. The Task Force informed the proponents of the different approaches under consideration that other factors would also be considered in deciding which solution to recommend to the ICC. For example, important factors such as cost and time required to implement are not included in the LNP Framework document.

Much of the Task Force work to date has focused on selection of the basic call processing model to be recommended. On September 8, 1995, the eight participating carriers that operate in the Chicago LATA and ICC Staff representatives chose a basic call processing model. They reached a consensus that what has been called the Location Routing Number (LRN) model should be recommended for long-term implementation in Illinois. In this approach, a single,

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<sup>8</sup>The LNP Framework document includes a "Description" column, which explains what the Task Force needs to know to evaluate the impact on the elements contained in the "Attribute" column. The "I" (importance) weighting column contains an "M" (mandatory) if the Task Force determined that compliance with the description should be required. The "I" column, if it does not contain an "M," contains a number that represents the importance, as well as the maximum possible score, that the evaluators assigned to that particular attribute or group of attributes. The mandatory items were scored separately, based on degree of compliance.

The eight participating carriers are Ameritech Illinois, GTE North, Sprint/Centel, AT&T, MCI, TCG, MFS, and Cellular One.

unique ten-digit number in the form of NPA-NXX-XXXX (the LRN) would be assigned to each end office switch of each local service provider. For each customer, the customer's telephone number and the LRN of the end office serving that customer would be placed in customer records stored in routing data bases. Whereas calls are routed today based on the first six digits of the customer's telephone number, this model would provide for call routing based on the first six digits of the LRN.

Preliminary work has also begun on design of the needed database architecture and on billing issues. An implementation timeline will be developed using these factors. Depending on the time needed for full implementation of the LRN approach, the Task Force plans to consider whether intermediate steps may be desirable.

Task Force participants have worked well together and there is hope for a consensus on how number portability should be implemented in Illinois. However, consensus may not be realized for all implementation details. In either event, the Task Force plans to report its recommendations to the ICC for review and approval of a number portability solution prior to its implementation.

#### IV. Number Portability Efforts in Illinois are Likely to be Valuable to the FCC and Other States

As the above description indicates, the scope of the number portability efforts in Illinois goes beyond what may be occurring anywhere else in the country. The Industry Numbering Committee (INC) appears to be addressing the same

technical issues, although at a much slower pace. The trials in New York and Washington focus on testing the technical feasibility of particular companies' proposals. In Illinois, the intent is to address all policy issues, as well as technical issues, that need to be resolved to allow full implementation in Illinois.

The FCC certainly has a valuable national role in setting policies and guidelines for number portability. However, for several reasons, the ICC urges that the FCC not take any steps that would intrude into the authority of the states in the area of number portability requirements, or that would prevent or delay implementation of number portability in Illinois.

First, the need for timely implementation of number portability is particularly strong in Illinois, in light of the potential trial of interLATA entry by Ameritech that the U.S. Department of Justice has proposed to the U.S. District Court. Illinois needs to move quickly on number portability, as well as other aspects of local competition, so that local competition is allowed to develop and, if approved, the interLATA trial can go forward in a timely fashion

Second, because of varying regional needs, a phased approach, with early implementation in areas with rising competitive pressures such as Chicago, is likely to be more cost-effective and more feasible technically than a flash cut nationwide.

Further, much valuable information and experience can be obtained through state or regional efforts. The Illinois process has benefitted from the trials begun elsewhere. Similarly, the FCC's efforts can be expected to benefit from the work in Illinois. While the ICC's intent is to develop an approach for Illinois that will be the best currently available, our experience may well lead to further refinements or

technological advances that would improve a nationwide number portability solution. In addition, the empirical information regarding costs and customer demand should be extremely helpful to the FCC in deciding whether to mandate number portability on a nationwide basis.

As shown in Attachment 1, representatives of most industry players with a stake in number portability are participating actively in the Task Force. The ICC Staff representatives report that participants are generally supportive of the ICC policy that number portability should be implemented expeditiously and are working cooperatively toward this goal. Parties' proposals have evolved during the process as a result of the frank and open-minded discussions. Participants have also agreed that the solution to be presented to the ICC for its consideration may differ from any party's original proposal, and may instead be a joint work product, combining the strengths of more than one proposal. As a result, the expectation is that the solution will have wide-spread industry support.

Based on preliminary reports from our Staff, the ICC believes that the task force approach taken in Illinois will prove to be very beneficial, in terms of both the quality of the product and its timeliness. The Task Force has brought together some of the nation's most knowledgeable experts on number portability; their many hours of discussion have helped clarify issues in a manner that would not be possible solely through written comments or adversarial proceedings.

The level of industry cooperation seen to date in the Illinois Task Force efforts is higher than might be expected from a nationwide industry forum, for several reasons. The ICC has given explicit direction to the Task Force to develop

a number portability solution for ICC consideration. ICC Staff representatives are guiding the Task Force and are actively pursuing industry cooperation, consensus and, where appropriate, compromise. Further, Ameritech Illinois and other incumbent local exchange carriers in Illinois have appeared generally supportive of number portability, whereas this experience may not occur on a nationwide basis.

The ICC notes that, while the Task Force has reached agreement on a number of critical components of a number portability solution, the Task Force will not have completed its work in time for the ICC to provide a full report to the FCC within the timeline of comments and reply comments in response to the FCC's NPRM. Efforts in other states are in fairly early stages as well. As a result, it may be useful for the FCC to allow Illinois and other states to make later filings in this docket as additional analysis and results become available, with opportunity for other parties to comment as appropriate. Such a step would allow the FCC to take advantage of the valuable information and experience being developed and could lead to a stronger national number portability program. FCC participation in the Illinois Task Force would be most welcome, as well. The FCC may also wish to consider establishment of a federal/state Joint Board as a mechanism by which the FCC and states active in number portability may work together to fashion nationwide number portability policies and guidelines.

## V. Comments on Other Issues in the NPRM

While the stage of the Task Force work, as described in Section III of these Comments, prevents the ICC from commenting on many of the issues raised in the NPRM, there are limited areas that we wish to address at this time.

### A. Conceptual Framework of Number Portability

The ICC is concerned that number portability not be conceptualized as a service offered by incumbent LECs.<sup>9</sup> Such a view is inconsistent with the recent decision by the FCC, which the ICC supports, to transfer number administration to an independent party. Rather, number portability should be a function of the public switched network, implemented by the telecommunications industry as a whole with governmental oversight as needed. It is true that interim number portability, by its nature, is tarified by individual companies. However, care must be taken that longer-term number portability solutions be structured in a way that does not vest control with any particular industry segment.

The reference in paragraph 8 of the NPRM that "NXX codes will be assigned in the future by the new NANP administrator to carriers requiring telephone numbers..." may similarly be inconsistent with desirable forms of number portability. If vacant customer numbers are pooled, which would further the goal of number conservation, new NXX codes for customer numbers may be assigned to geographic areas rather than to individual carriers. This would be comparable to the way that area codes (NPAs) are assigned today.

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<sup>9</sup>See, for example, the language in S.652 referenced in footnote 17 of the NPRM.

## B. Location Portability

The FCC discusses the issue of location portability and seeks comment on the extent to which there is demand for location portability.<sup>10</sup>

The ICC has found that many customers want to retain the geographic identity inherent in the current geographic numbering system.<sup>11</sup> As a result, a type of number portability that maintains the geographic identity of numbers may be the most acceptable to customers, at least in the near term. If so, number portability should be limited, at least initially, to service provider portability and possibly service portability, in order to facilitate public acceptance. The nongeographic 500 Service Access Code (and others that may be assigned if the 500 Service Access Code exhausts) would continue to be used to provide location portability for those desiring such portability.

The Task Force is focusing on methods that would provide service provider portability initially and be expandable to location portability later, if and when a policy decision is made that location portability is desirable. In particular, the Task Force is developing a proposal in which NXXs would continue to be associated with the existing rate centers of incumbent LECs. Billing could continue to be based on the NXX, which would lessen impacts on current billing systems and allow customers to continue to know call charges based on the NXX. Contrary to

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<sup>10</sup>See, for example, paragraphs 26, 48, and 66 of the NPRM.

<sup>11</sup>This was one of the central reasons why the ICC recently approved a geographic split rather than an overlay to provide area code relief in the Chicago suburbs.

some concerns, this approach would not require new entrants to match switch locations of incumbent LECs or have the same local calling areas. Rather, their switches would need to accommodate all NXXs for the rate centers in the geographic area served by the switches. The new entrants would assign customer numbers with NXXs reflecting the incumbents' rate centers, either on a pooled basis or using NXXs assigned to the new entrants. Consistent with current practice regarding moves within an exchange, limited location portability would be possible for moves within a rate center. Under this scenario, NXXs could be pooled and new NXXs assigned to a rate center as needed, rather than to individual carriers, thus promoting number conservation.

Number portability solutions may evolve as customer needs and expectations evolve. For example, location portability may become more acceptable to customers if rates become non-distance-sensitive ("postalized"). A move to postalized rates in the future may not be unrealistic, given the decreasing distance sensitivity of costs. With postalized rates, the location of the called party would not affect rates, and the related need for easy geographic identification of numbers would disappear. Because of such possibilities, the FCC should not attempt to set permanent guidelines for number portability at this time.

#### C. Number Portability Standards and Deadlines

The FCC asked for comments on the appropriate role of the FCC in establishing technical and performance standards and implementation deadlines for

number portability.<sup>12</sup> Because of the broad public policy ramifications and also because of the divergent interests among industry players, clear guidance and direction from governmental bodies is needed to ensure that number portability is implemented in a timely fashion and consistent with the public interest. While the experience in Illinois and other states should provide valuable guidance, it is likely that national policies and standards will also be needed if number portability is to become ubiquitous.

While a phased approach based on competitive pressures in an area appears most desirable, regional deadlines may be needed once it has been determined that number portability within a region is in the public interest. This is particularly true if implementation is dependent on work by industry players whose interests may not be in line with quick and successful implementation of number portability. However, the FCC should exercise caution in setting deadlines for nationwide implementation until more experience is gained regarding the technical design, economic costs, and desire for competitive entry in various areas.

## VI. Conclusion

As described in these Comments, the ICC is actively developing number portability in Illinois and supports the FCC's efforts to address number portability issues on a nationwide basis. Because efforts in Illinois and other states are in progress, the FCC may wish to allow states to make later filings as additional

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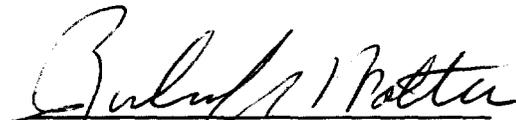
<sup>12</sup>NPRM at paragraph 34.

analysis and results become available. The FCC may also wish to consider establishment of a federal/state Joint Board on number portability issues.

Respectfully submitted,

ILLINOIS COMMERCE COMMISSION

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September 12, 1995

Attachment 1  
Illinois Number Portability Task Force Participants \*

AG Communication Systems  
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Ameritech Cellular  
Andersen Consulting  
AT&T  
AT&T Bell Labs  
BCR  
Bell Atlantic  
Bellcore  
Bell South Cellular  
Cellular One  
Cincinnati Bell Telephone  
Citizens Utility Board  
City of Chicago  
DSC Communications  
Ericsson  
Evolving Systems, Inc.  
GTE  
IBEW-165  
ICC Staff  
Illinois Consolidated Telephone Company  
ITN  
JFS Telecom Consulting  
Kern & Assoc. Inc.  
Mansio & Wallace  
Maryland Public Service Commission  
McCaw  
MCI  
MDF Assoc.  
MFS  
MST  
Motorola  
Nextel Communications  
NORTEL  
Pacific Bell  
Public Utilities Commission of Ohio  
Siemens-Stromberg-Carlson  
Sprint/Centel/United Telephone Co.  
Stratus Computer  
TCG  
Time Warner Communications  
U.S. Intelco

\* Entities that have attended at least one workshop. All affiliated companies in attendance may not be listed.

## Attachment 2

### NUMBER PORTABILITY GUIDELINES SUBMITTED BY ICC STAFF August 1, 1995

#### General number portability guidelines:

Transparency to the end user is essential. There should be no loss of functionality, quality, or access to services caused by the implementation of a number portability solution. Examples include the following: call setup time should be minimally impacted; users should see the *dialed* number when it is necessary to identify the called or calling number (such as on bills and for Caller ID); access to 911, E911, telephone relay service, information, and other services should remain available.

Use of existing network infrastructure and standards should be retained to the extent feasible and economical.

Calls from non-number portability capable telecommunications providers must be accommodated.

The solution should allow for open competition in the vendor community. Any architecture or approach should be part of the open public domain, free of any licensing fees. Proprietary approaches, or approaches with associated licensing fees, would act to limit the ability for open competition among providers of number portability solutions and the companies that purchase them.

The solution should ensure that the existing LEC and the new LECs are benefitted in the same way and are required to deploy the same mandatory network capabilities regardless of their network topologies and whether the customers are switching from the existing LEC to a new LEC, from a new LEC to the existing LEC, or from one new LEC to another new LEC.

The first phase of the number portability solution should immediately support wireline service provider portability within the chosen geographic area. It should accommodate expanded volume usage, be geographically scalable and expandable to wireless and, ideally, expandable to geographic and service portability. Ideally, the number portability solution could support all types of number portability immediately.

The number portability solution should not unduly accelerate the depletion of the numbering resource. Ideally, the number portability solution should conserve the North American Numbering Plan (NANP). Therefore, solutions that allow for the pooling of numbers (initially at the NXX level) should be accorded high weight. Conversely, solutions that deplete the NANP would be less desirable.

The number portability solution should allow billing for calls to ported numbers to not be changed (unless that number has been moved to a different geographic

location). The purpose of this policy is to avoid rate shock for the customer who had traditionally dialed a number prior to it being ported. The pricing for calls originating from ported numbers is of less concern, since these customers have chosen to have their numbers ported.

The Illinois plan should support a national effort should one emerge to the fullest extent possible. It is hoped that the national effort will yield a standard for the call model and the network routing. Standardization will make it easier for vendors to build to the solution and for carriers to interact with it. Illinois, however, will reserve the right to implement a solution even if no national effort emerges, or may implement a solution of its own if other jurisdictions implement inferior solutions.

**ICC NP WORKSHOP**  
**MISSION STATEMENT**

**Near Term**

Develop, evaluate and recommend a wireline service provider number portability solution and propose an implementation plan which:

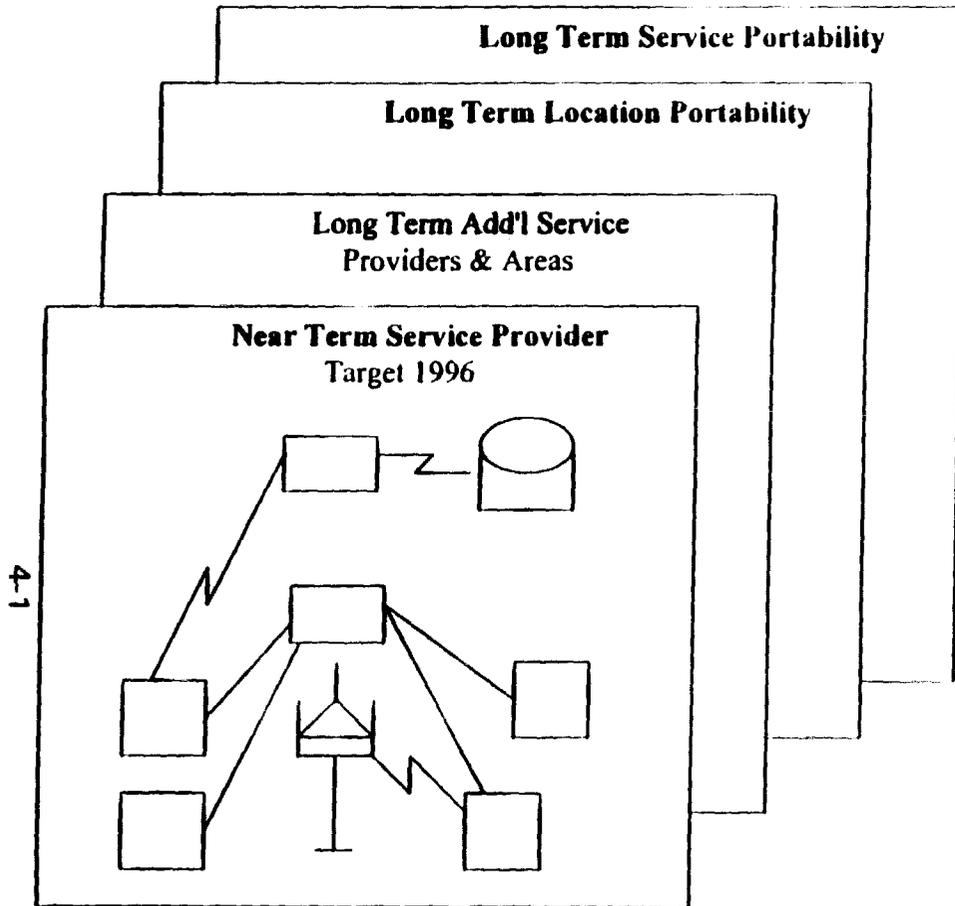
- Meets the needs of MSA 1 consumers and carriers
- Is competitively neutral
- Is technically and economically feasible
- Satisfactorily meets the criteria described in the LNP Framework

The end result will allow for an implementation plan which facilitates local service competition, in accordance with the Commission's order in Docket No. 94-0048 et al.

**Long Term**

Explore the desirability and feasibility of expanding wireline service provider number portability to provide number portability unencumbered geography, service provider, service or time of day/day of week.

# ICC NUMBER PORTABILITY IMPLEMENTATION PLAN SCOPE



## Near Term - Mandatory

### Area

- MSA 1  
(Ameritech and Centel Service Areas only)

### Service Providers

- Ameritech
- Centel
- 13-405 wireline certificated, facility based providers

## Currently Not Included

Wireless to wireless network Number Portability

Wireline to wireless network Number Portability

Wireless to wireline Number Portability

PCS Networks