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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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

DOCKET FILE COPY ORIGINAL

ERRATUM

BellSouth Corporation and Bellsouth Telecommunications, Inc. ("BellSouth") hereby submit the following Erratum to their Comments and Motion to Accept Late Filed Comments ("Motion") submitted in the above-referenced proceeding.

1. BellSouth has learned that three pages of its Comments, pages 38, 39 and 51, contain printing overstrikes and/or omissions. Substitute pages are attached hereto.
2. The quote appearing across pp. 48-49 should be attributed as follows: Memorandum from the Division of Communications, Office of General Counsel to the Executive Director, Florida Public Service Commission (Aug. 23, 1995).

RESPECTFULLY SUBMITTED,

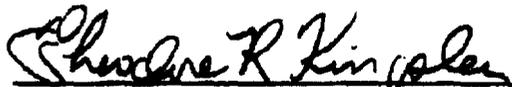
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September 21, 1995

number of STP's required to route SS7 messages, or a significant increase in STP capabilities.

The costs associated with these increases are considerable but at least the technology exists in most wireline networks. Long term (i.e. database) portability would require full implementation of SS7 and, in most current scenarios, at least basic AIN functionality. Neither SS7 nor AIN is widely deployed in today's wireless networks and would be quite costly to implement. The lack of widely deployed AIN and SS7 technology in CMRS networks may lead CMRS providers to seek a third party to process parts of their calls. In addition to STP additions, number portability may also require increased switch hardware and processor capacity.

2. Billing Systems.

BellSouth and industry billing and switch recording processes are designed to rely on the NPA/NXX combination for a number of fundamentally important functions. Among these are:

- to determine which local service provider should bill for calls
- to determine if a call is local or toll (and therefore whether or not a recording should be made)
- to calculate the distances between calling and called parties using vertical and horizontal coordinates

- to identify the appropriate databases to search to verify third number billing attempts
- accessing Line Information Database ("LIDB") information to determine call blocking and third number verification.

Assuming that, generally, the billing elements for local, toll and access calls will remain unchanged in a ported environment, the billing system will require extensive modification to compensate for the loss of the NPA-NXX as a pointer of a customer's geographic location and/or service provider. In a pure service provider environment, without the inherent location portability problems, the industry will need to decide how to handle the transmission and passing of billing records between providers. When location portability is factored in, even if this is only location portability for the new entrants, many other issues and impacts are added. At the least, additional information will be required for calls involving ported numbers to define the location of the calling and called party. The best approach has yet to be defined but it is clear that a fundamental reworking of the various systems and industry standards involved will be necessary.

CMRS providers will be doubly impacted by number portability. Wireless providers will be forced to amend the rating and billing systems which enable them to continue to interact as necessary with the wireline networks. Because

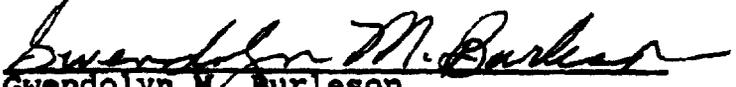
solutions in the wireline local exchange wireline market do not conflict with the orderly development by the industry of a long term number portability solution that can accommodate all service providers, including CMRS.

In BellSouth's view, state regulation should play a key role in the deployment of a number portability capability. Specifically, the states should determine when permanent portability capabilities are deployed after the FCC and the industry determines the most appropriate long term solution. State regulators are in the best position to determine when market demand and competitive forces dictate the need for number portability in their jurisdictions. As noted below, BellSouth believes the states should be the primary determinant of interim number portability arrangements. Moreover, state proceedings on local competition and local number portability are proceeding well in advance of the FCC's consideration of number portability.

As the Commission notes in its NPRM, state trials can provide valuable insight into future permanent solutions. However, caution must be exercised to ensure that individual state efforts do not thwart national policy objectives for a uniform, national, efficient, and cost effective long term solution. Additional trials in individual states should have clearly defined objectives which provide new or unique insights into long term solutions. These insights, as the Florida PSC staff notes, should be communicated to the

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of September, 1995, serviced all parties to this action with the foregoing ERRATUM reference to Docket CC 95-116, by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties as set forth on the attached service list.


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