EX PARTE OR LATE FILED

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

ORIGINAL

JEFFREY S. LINDER
(202) 429-7384

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

September 25, 1995

William F. Caton
Federal Communications Commission
1919 M Street, N.W., Suite 122
Washington, D.C. 20554

Re: Ex Parte Filing in CC Docket No. 95-116

Dear Mr. Caton:

Please place the attached Summary of Opening Comments in CC Docket No. 95-116 in the file for this proceeding. A copy is being provided to Michael Specht of the Network Services Division.

Please call me if there are any questions regarding this matter.

Respectfully submitted,

Jeffrey S. Linder

cc: Michael Specht

SUMMARY OF

OPENING COMMENTS IN

CC DOCKET NO. 95-116

TELEPHONE NUMBER PORTABILITY

WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7000

September 22, 1995

FORWARD

On September 12, 1995, approximately 62 comments were filed in response to the FCC's Notice of Proposed Rulemaking in CC Docket No. 95-116 concerning telephone number portability. The comments are arranged alphabetically by company or organization name.

We have done our best to represent each commenter's positions accurately on a range of issues within three pages and in a consistent format. Due to the complexity of the issues and space and time constraints, however, many supporting arguments have been truncated and rephrased to conserve space. Accordingly, in all cases, it is highly advisable to review the actual commenter's text. All summaries have page references to the actual commenter's text.

TABLE OF CONTENTS

Page

AD HOC COALITION OF COMPETITIVE CARRIERS 1

AIRTOUCH PAGING AND ARCH COMMUNICATIONS GROUP 4

AMERICA'S CARRIERS TELECOMMUNICATIONS ASSOCIATION 7

AMERITECH 9

ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES 11

ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-INTERNATIONAL, INC. 13

AT&T CORP. 14

BELL ATLANTIC 18

BELL ATLANTIC NYNEX MOBILE 21

CALIFORNIA CABLE TELEVISION ASSOCIATION 22

CALIFORNIA PUBLIC UTILITIES COMMISSION 24

CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION 26

CINCINNATI BELL TELEPHONE COMPANY 27

CITIZENS UTILITY COMPANY 29

COMPETITIVE TELECOMMUNICATIONS ASSOCIATION 31

THE ERICSSON CORPORATION 32

GENERAL COMMUNICATION, INC. 33

GENERAL SERVICES ADMINISTRATION 34

Page

GO COMMUNICATIONS CORPORATION 35

GTE SERVICE CORPORATION 37

GVNW INC./MANAGEMENT 40

ILLINOIS COMMERCE COMMISSION 42

INTERACTIVE SERVICES ASSOCIATION 44

JONES INTERCABLE 45

DAVID L. KAHN 46

MARION COUNTY, FLORIDA, 911 SYSTEM SUPPORT DEPARTMENT . . . 48

MCI AND MCIMETRO 49

MFS COMMUNICATIONS COMPANY 52

MISSOURI PUBLIC SERVICE COMMISSION 54

NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS 56

NATIONAL CABLE TELEVISION ASSOCIATION 57

NATIONAL EMERGENCY NUMBER ASSOCIATION 59

NATIONAL EXCHANGE CARRIER ASSOCIATION 60

NATIONAL TELEPHONE COOPERATIVE ASSOCIATION 61

NATIONAL WIRELESS RESELLERS ASSOCIATION 62

NEW YORK PUBLIC SERVICE COMMISSION 63

NEXTEL COMMUNICATIONS, INC. 65

Page

NYNEX 67

OHIO PUBLIC UTILITIES COMMISSION 70

OMNIPOINT CORPORATION 72

OPASTCO 73

PACIFIC COMPANIES 74

PAGING NETWORK 78

SBC COMMUNICATIONS INC. 80

PCS PRIMECO 84

PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION 85

SCHERERS COMMUNICATIONS GROUP 87

SPRINT CORPORATION 88

TDS TELECOMMUNICATIONS CORP. 91

TELECOMMUNICATIONS RESELLERS ASSOCIATION 93

TELEMATION INTERNATIONAL, INC. 94

TELEPORT COMMUNICATIONS GROUP 95

TELESERVICES INDUSTRY ASSOCIATION 97

TEXAS ADVISORY COMMISSION ON EMERGENCY COMMUNICATIONS 98

TIME WARNER COMMUNICATIONS HOLDINGS, INC. 99

U.S. AIRWAVES, INC. 102

Page

U.S. INTELCO NETWORKS, INC. 104

U S WEST, INC. 105

UNITED STATES SMALL BUSINESS ADMINISTRATION 107

UNITED STATES TELEPHONE ASSOCIATION 108

WORLDCOM, INC., D/B/A LDDS WORLDCOM 111

YELLOW PAGES PUBLISHERS ASSOCIATION 112

AD HOC COALITION OF COMPETITIVE CARRIERS

Interest: Group of cable operators, competitive access providers, and wireless providers.

Importance of number portability:

Service provider number portability:

A crucial element in the development of local telephone competition. The advantages of provider portability were demonstrated by the implementation of 800 number portability and long distance equal access, where prices fell and quality increased as competition was introduced (4-5).

A study of residential and business customers commissioned by Pacific Bell revealed a number of important conclusions, including: (1) customers require an 11% discount in addition to discounts already offered in order to be induced to switch carriers in the absence of number portability; and (2) some consumers would be willing to change providers only if they did not have to change phone numbers (5-7).

Even customers who do not change carriers will benefit from the lowered costs and increased quality resulting from more competition (8).

Service portability:

Significantly less important than service provider portability, because it has little direct effect on competition (13). Raises complex policy issues if portability is between geographic and non-geographic numbers. These issues should be resolved in a separate proceeding (14).

Location portability:

Significantly less important than service provider portability, because it has little direct effect on competition (13). Raises complex policy issues involving the NANP which should be resolved in a separate proceeding (14).

The FCC's role in number portability:

The FCC should take the lead in ensuring the prompt nationwide implementation of service provider local number portability. Specifically, the FCC should implement network performance and interoperability standards (8-9). Varying standards would: (1) increase costs (by eliminating economies of scale); (2) increase deployment time; (3) result in inconsistent treatment of calls to ported numbers; and (4) discourage equipment vendors from competing for the largest number of customers (9-10).

The FCC should emulate its actions in implementing telecommunications relay service rules and 800 number portability rules and promulgate a firm implementation schedule (11). Service provider portability should be implemented in the top 100 MSAs within 24 months of an order in this proceeding and in all other areas within 24 months of a bona fide request (15). A request is considered to be bona fide if the carrier would be eligible for central office codes under current guidelines (16). Non-Tier 1 LECs and small CMRS providers should be permitted to petition for extensions of time if they are technically incapable of implementing portability (16). States should be encouraged to implement service provider portability ahead of the FCC's schedule, provided the states follow FCC standards in doing so (12).

Long-term solutions regarding number portability:

Any long-term solution must ensure that there is no perceptible effect on call set-up time or post-dial delay, ensure that there are no negative effects on carrier routing or signalling, facilitate accurate billing, allow the display of called and calling numbers, allow for caller ID and call forwarding, permit the development of new services, and leave undisturbed 911, directory assistance, and call intercept (7, 23).

Neutral administration is necessary in order to avoid conflicts of interest and anti-competitive behavior (11, 17-18). The information in the database should be limited to that necessary to implement the portability architecture (18).

Cost recovery:

Database administration costs should be borne by carriers in proportion to their database use (18). As with network upgrades to AIN and SS7, each carrier should bear its own costs in upgrading its network to implement number portability. In this fashion, the customers who benefit from number portability will pay for it through higher rates (21). In order to prevent the costs of implementing number portability from being shifted to new entrants, the FCC should carefully scrutinize the LECs' cost estimates (22).

Interim measures regarding number portability:

In order to encourage the rapid implementation of long-term number portability measures by LECs, LECs should be required to make RCF and other interim measures available for free, and interconnection charges should be reduced until true portability is available (12, 20). Interim measures must be implemented, although they are no substitute for a long-term solution (18). In addition to degrading call quality, perhaps the most serious limitation of RCF and DID is that they require all calls to a customer to be routed through the original carrier, thereby creating a bottleneck (19).

Other:

888 numbers and NPAs assigned to PCS providers should be portable from the outset (24).

AIRTOUCH PAGING AND ARCH COMMUNICATIONS GROUP

Interest: Narrowband wireless service providers

Importance of number portability:

The paging industry, a segment of the market highly dependent on telephone numbers, has been successful in reaching a highly competitive state in the absence of number portability. This suggests that, although portability benefits consumers by developing competition among alternative providers of local telephone and other telecommunications services, the FCC can take the time necessary to fully consider the implications of a comprehensive long-term portability plan with the expectation that competition in the telecommunications industry will continue to develop in the interim (3-5). Those seeking to reach telephone customers are getting used to changed numbers for a variety of reasons, such as the proliferation of area codes (5). Moreover, flexible alternatives are available in 800 numbers and should be available in other non-geographic numbers (900 and 500) as well (6).

As was the case when 1+ dialing became necessary, additional time to implement portability might be necessary in order to educate consumers, who might no longer be able to identify whether a call is "local" or "long distance" simply by viewing the area code or might no longer be able to use 7-digit dialing for "local" numbers (6-7).

The FCC's role in number portability:

The FCC has a legitimate interest in fostering a uniform, nationwide system of numbering because vastly different number portability solutions would have a significant adverse impact on the provision of interstate telecommunications services, and because there is a substantial federal interest in efficient use of the numbering resource, particularly where the same telephone number is used to originate and terminate both intrastate and interstate services (8-9). The states have a role to play as well, based not only on the Communications Act's allocation of responsibility over wireline intrastate rates, classifications and service offerings (preserved in the telecommunications reform bill), but also on the experience that the states have in dealing with portability issues (10).

The FCC should balance state and federal responsibilities by adopting a template that establishes the technical and administrative framework, and then should accord states responsibility for implementing the solutions--such as precise implementation schedules, charges that non-CMRS carriers impose, compensation structure among connecting carriers, or the size of the portability domains--within their borders consistent with the template (11-12).

Cost recovery:

While cost recovery touches on a complex set of issues, there is substantial logic to treating all exchange service providers equally in the mutual compensation process (19). Paging companies should be treated equally with other exchange carriers with regard to calls they terminate when determinations are made regarding the allocations of costs and recoveries (20).

Interim measures regarding number portability:

As noted below, if the FCC imposes interim solutions on any segment of the telecommunications industry, it should not place this significant burden on paging carriers, which have developed a highly competitive business without number portability, and which should, in any event be properly viewed as the "customer" who holds the telephone number (16).

The transition from interim measures regarding number portability:

Because there is no smooth way to transition from an interim measure to the kinds of longer-term solutions that may be necessary of universal portability to be adopted on a well-conceived basis, it would be better to take the time necessary to adopt and implement from the outset an optimal portability plan (15).

Services excluded from number portability:

Paging carriers should be exempted from any interim measures because the available interim measures are subject to significant limitations, such as increased local network facility usage, double number consumption, and impairment of CLASS functionality and transmission quality, that would place a heavy burden on the high volume/low margin business of paging (12-14). Increased number consumption could contribute to area code exhaust, which would lead to disruption that could undermine the purposes of portability (13). Interim measures are also subject to difficult cost and revenue allocation issues (14). Therefore, if the FCC imposes interim solutions on any segment of the telecommunications industry, it should except paging carriers, which have developed a highly competitive business without number portability (15). In any event, because the paging carrier is properly viewed as the "customer" who holds the telephone number, the FCC should allow the paging carrier to transport these numbers from one LEC to a competitive LEC, but not require the company to implement interim measures to allow paging end users to transport these numbers to another provider (16).

500 and 900 service provider portability:

The public interest would be served by mandating service-provider portability for 500 and 900 services because doing so would make additional portability options available to end users, although mandated service portability would result in only public confusion and aggravation, not convenience or competition (17). Based on transition to portability for 800 services, portability is technically and economically feasible in the near term and can be facilitated by the formation of the North American Numbering Council. The costs of wasteful number usage and administrative burdens outweigh the benefits of implementing an interim solution (18).

Where the paging carrier is paying another entity for a non-geographic telephone number, the paging carrier should be viewed as the customer and as the entity capable of determining where the number is terminated (19).

AMERICA'S CARRIERS TELECOMMUNICATIONS ASSOCIATION

Interest: Association of smaller IXCs

Importance of number portability:

Service provider number portability:

Portable numbers will be important for competition in both the wireline and cellular markets (3-4).

Service portability:

Service portability will be needed in the future. It should be encouraged, but it is far more critical to have service provider portability first (4-5).

Location portability:

This capability should have the highest priority, although it will have networking and call processing impacts (6). Local portability should be available within the operating tandem area, or for smaller LECs, throughout their operating territory (9).

The FCC's role in number portability:

Number portability issues cut across state boundaries, and FCC preemption is imperative (6). The FCC must mandate an implementation date, because the RBOCs have no incentive to make portability easy (7). Local number portability should be available on January 1, 1997 (7). The FCC should not set standards, but should let the industry do so subject to FCC review and public comment (7).

Long-term solutions regarding number portability:

The originating service provider should determine the destination of calls (8-9). Today's SS7 networks are predominantly capable of routing look-up calls, and there should be no discernible difference in call set-up times (9). The 800 data base is a useful model, which should be used as the design structure of a total translation model. A single nationwide data base is feasible, but regional, distributed data bases is preferable (10). The system should be administered by a non-LEC and non-IXC entity.

Cost recovery:

Each look-up will cost $0.0015 or less; this will fund the network, computer programming, maintenance and manpower (11). Total costs will be in the range of $100 million (11). The entire industry must share the costs (12).

Interim measures regarding number portability:

Interim solutions to local number portability are obstructionist, costly, and should not be considered (2, 13).

900 service provider portability:

Portability should be mandated, using the 800 data base model (17) -- but not separately from number portability generally (18).

500 service provider portability:

Favors 500 number portability. Portability for all number groups should be considered together (20).

AMERITECH

Interest: RBOC

Importance of number portability:

Service provider number portability:

Given that competitors are rushing into the local exchange market even in the absence of number portability, Ameritech does not agree that lack of full long-term number portability is a barrier to competition (7-8).

Service portability:

Because service portability does not involve issues of competitive equity, its regulation is less essential than that of service provider portability. However, the FCC should still consider applying the interoperability and cost-recovery rules developed for service provider portability to service portability (8).

Location portability:

Supports location number portability options where technically and economically feasible. In order to simplify the technical and federal-state aspects of implementation, location portability initially should be limited to NPAs (9-10).

The FCC's role in number portability:

The FCC should focus on nationwide interoperability of number portability between all jurisdictions and providers, and inter-jurisdictional cost assignment and cost recovery (3-4). However, specific architectures, standards, and performance requirements are best left to industry standards setting bodies (10).

Because number portability often relates to local exchange services, local providers should be allowed to implement the portability solution which best suits their needs and is most compatible with their network. However, the FCC should ensure that all such solutions are compatible and interoperable by tasking the INC with developing interoperability guidelines (4-5). It is possible that a single national portability platform is unnecessary (5-6).

Long-term solutions regarding number portability:

The FCC should ensure that any long-term solution conforms to the following general principles: (1) it should support all forms of number portability; (2) it should support a robust set of new capabilities without having an adverse impact on existing services and features; (3) in order to conserve numbering resources, it must uniquely identify the terminating switch; (4) in order to efficiently route calls, data base queries must be launched from the originating service provider's network; (5) it must work with all types of calls without necessitating modifications of existing billing and operations support systems; and (6) carriers must be given the maximum flexibility to tailor the network architectures and service designs to their own networks, provided they meet compatibility requirements (10-12).

Cost recovery:

Inter-jurisdictional cost assignment and recovery rules should be promulgated by a federal-state joint board convened by the FCC for that purpose. The board should promulgate cost recovery rules according to the following general principles: (1) providers of portability should recover all costs incremental to the provision of the service, plus a reasonable allocation of joint and common costs; (2) the cost-causers (*i.e.*, the beneficiaries of number portability) should bear the costs of the service; (3) cost-recovery rules should give carriers and end-users incentives to act efficiently; and (4) cost recovery rules should be promulgated within 6 months (6-7).

Interim measures regarding number portability:

Interim measures should be implemented where technically feasible and where they provide reasonably priced service provider portability with a minimum loss of functionality. Such measures should avoid excessive costs and double deployments of equipment (12). Ameritech has already utilized RCF and DID, and is experimenting with SSNP-Direct utilizing SS7 signalling (13).

500 and 900 service provider portability:

Because of differing competitive and technical circumstances, non-geographic (*i.e.*, 900 and 500) number portability should be considered in a separate proceeding, and should not be mandated at this time (13, 16). The following technical points apply: (1) due to capacity, survivability, and cost considerations, data bases for geographic and non-geographic numbers should be developed separately; (2) it is impractical to upgrade the 800 database to support 900 portability; and (3) it is not technically or economically feasible to provide PCS 900 portability in a switch-based translation environment (15-16).

ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES

Interest: Trade association of competitive local service providers

Importance of number portability:

ALTS' members are seriously handicapped by the absence of number portability in seeking to compete with entrenched local exchange providers (2). Congress (2-4) and many states (4-6) have concluded number portability is in the public interest.

Service provider number portability:

Studies from MCI, MFS, and even Pacific Bell show that service provider number portability is essential to competition (6-8).

Location portability:

No need to address at this time (13).

The FCC's role in number portability:

The Commission should not designate a technology or appoint an advisory body (8-9). Consensus decision-making will not work because of the tremendous financial implications for entrenched service providers (10). Accordingly, the Commission should adopt principles and schedules that create incentives for all parties to work together (10). The Commission should sketch out the minimal features and functions of number portability, not the technology (12-13), and the industry should meet with FCC staff within 60 days to develop procedures and benchmarks (18). The features should be service provider portability and no undue post-dial delay or other palpable network harm (13). Local jurisdictions should be free to pursue full, intermediate, or interim number portability solutions as long as they do not interfere with the FCC-mandated features and schedules for full portability (17).

Long-term solutions regarding number portability:

Full number portability should be implemented in major markets and upon bona fide request within 24 months (10).

Cost recovery:

The costs of number portability should be borne by the customers that benefit from its implementation (all local exchange customers) (20), but cost recovery mechanisms will first involve the States (19).

Interim measures regarding number portability:

To expedite implementation of full number portability, LECs should be required to offer interconnection at a 50 percent discount in the interim (14-16).

ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-INTERNATIONAL, INC.

Interest: Public safety communications organization

Importance of number portability:

Recognizes that telephone number portability has potential value (2).

Long-term solutions regarding number portability:

Enhanced 9-1-1 systems (the majority of current 9-1-1 systems in the United States) rely on the ability to identify the number and location of a caller in order to provide automatic call-back and rapid, accurate dispatch of appropriate personnel to an emergency scene (2). A number portability environment should support Enhanced 9-1-1 services. (2-3)

Interim measures regarding number portability:

Interim number portability measures should support Enhanced 9-1-1 services as well (2-3).

AT&T CORP.

Interest: Interexchange carrier

Importance of number portability:

Service provider number portability:

Competition has proven beneficial in many areas of telecommunications services and could prove equally beneficial in the local exchange services as well (3-4). The FCC should develop number portability policy in the context of an overall plan to promote local competition, because service provider portability is a critical element of testing whether local competition is feasible (4). Portability arrangements that preserve numbers can help avoid number exhaustion (5).

The $1 to $2 billion costs of number portability are justified in light of the benefits because they are small in relation to the capital investments that have already been made in the public network (33 & n.36).

Service portability:

Service portability is not critical to local competition and may present implementation problems not associated with service provider portability (7).

Location portability:

Location portability is not critical to local competition and may present implementation problems not associated with service provider portability (7). Customers rely on NPAs to assess whether calls are local, toll, or interexchange and location portability could add digits to their dialing (7-8).

The FCC's role in number portability:

Because of the monopoly status of incumbent local exchange carriers, the FCC must exercise leadership in the selection and the deployment of a permanent number portability solution (9-10, 38). Immediate industry focus on a Service Management System (SMS) for number portability is of paramount importance (36). The FCC should direct an industry group to make recommendations on the requirements for an industry SMS that will support interim and permanent number portability solutions and to develop a full plan for implementation of a number portability solution, concluding by early 1996 (37).

The FCC should make a final determination on the interim and permanent portability solutions (37). Then, the FCC should require all carriers to upgrade their networks to support number portability while selecting a neutral industry group to choose a neutral third party to develop an evaluation process for request for proposals, to solicit bids, and to select a vendor for the SMS (37-38). Implementation should be required as soon as possible (38), with implementation of the interim solution by mid-1996 (10).

Long-term solutions regarding number portability:

The Location Routing Number (LRN) proposal is the best choice for a permanent number portability solution. Under the LRN proposal, analogous to the 800 number portability solution, local exchange carriers load information into an industry-supported service management system (SMS) which is downloaded into regional routing systems by individual toll and exchange carriers (17). This solution requires modification of current routing systems to include a query to a number portability database, generally by the next to last (N-1) carrier to determine the correct end office (18-19 & n.24).

Ownership, oversight and administration of the SMS should be vested in a neutral third party, selected by industry consensus, because they can favor affiliates in a variety of ways (33-34).

LRN achieves every objective a permanent number portability solution should achieve (20). It does not require calls to be routed first to the incumbent carrier's network and effectively conserves numbering resources while supporting continued availability of vertical features and advanced services for customers of all exchange carriers (20-21). Moreover, it uses the existing numbering format (21). The next-to-last (N-1) carrier routing is highly efficient, permits portability to be rolled out on a region-by-region basis and avoids the problems associated with terminating access provider systems, which place incumbent exchange carriers in the position of performing database queries on all calls originated by their customers to customers of alternative services (22-23).

LRN is superior to the Stratus Computer/US Intelco proposal, which decouples the dialed number from the routing and termination number (located by querying a database with the dialed number) because that system uses too many numbers, may not support advanced services and features, and may present practical problems for certain service arrangements, administration and billing (24-27). LRN is superior to the GTE proposal, which assigns a non-geographic number--which may be mapped to any geographic number--to customers who desire a portable telephone address, because it will require all "ported" customers to change their telephone number as well as relinquish the geographic significance of their current telephone number while requiring a nationwide "flash-cut" to portability (27-28). LRN is superior to the MCI Metro proposal, which uses N-1 type routing to look up a three-digit Carrier Portability Code (CPC) to replace the NPA for "ported" customers, but which would route only to the carrier rather than

the end office and would utilize significant numbers of CPCs and place pressure on numbering resources in a way not acceptable to the industry (28-30).

Cost recovery:

Cost recovery, particularly of the SMS and its administration, should be competitively neutral. Therefore, recovery of the costs of administering the SMS should be borne through fees in the form of tariffed rate elements on a usage basis (35). In order to avoid unnecessary upgrades, costs of network upgrades should be borne by the carriers owning or using the networks (36).

Interim measures regarding number portability:

Current interim measures are flawed. Remote call forwarding (RCF) and flexible direct inward dialing (DID) both keep the incumbent monopoly in the path of calls to alternative carrier customers, which decreases efficiency of routing, increases costs of call completion, increases post-dialing delay, uses unnecessary phone numbers, and diminishes network reliability, transmission quality, and network maintenance capabilities. RCF disables certain CLASS features, and is of limited utility to many business customers, because it limits the number of calls that may be placed simultaneously to a single "ported" number (11-12). DID's trunking arrangement constrains engineering of alternative carrier networks and prevents provision of vertical features such as caller ID (13-14). Because these interim measures severely disadvantage alternative carriers, they do not substantially promote local competition (14-15).

The transition from interim measures regarding number portability:

The MCI Metro (CPC) proposal provides a useful transition to permanent number portability because it avoids the incumbent's network, it allows carriers to own or control their own routing databases, it permits vertical features to be offered to all local exchange customers, and it may be implemented by early 1996 (31). CPC is also compatible with the endorsed permanent solution, LRN (31).

900 service provider portability:

While 900 service provider portability could lower the price of transport used by information providers using 900 service, those lower costs may not result in lower prices for end users because transport costs account for only a small fraction of the total price paid by callers to 900 services (41-42). 900 service portability would almost certainly cause a significant increase in costs of 900 service by increasing network administration costs, uncollectible billings, and driving an overall increase in billing charges for 900 services (42).

500 service provider portability:

The market for PCS N00 services has yet to emerge and many of the consumer needs that will define PCS are still evolving (40). Therefore, the FCC should not attempt to implement portability for PCS N00 services now in order that it may move ahead with portability of geographic numbers immediately (40-41).

BELL ATLANTIC

Interest: RBOC

Importance of number portability:

No long-term solution (beyond RCF and DID) should be implemented until such time as it is economically reasonable, technically feasible, and the benefits exceed the costs (8). At present, neither the costs nor the benefits of number portability have been accurately estimated. Absent agreement on technical specifications and vendor input, costs can not be estimated. Further, the studies cited by the FCC come to either ambiguous or contradictory conclusions regarding the competitive benefits of number portability. Therefore, any portability mandate must await more accurate cost-benefit studies (15-19).

The FCC's role in number portability:

A nationwide solution is necessary in order to ensure interoperability of networks, lower development and equipment costs, and conserve numbering resources (10). However, carriers should be allowed enough flexibility to utilize whatever network architecture best meets their needs. For example, some carriers may prefer to utilize AIN while others may prefer to utilize intelligent network capabilities to launch database queries (11).

While federal regulatory authorities should determine the technical standards, state regulatory authorities should determine the implementation time table, to the extent feasible (11). While encouraging state regulatory authorities to work with carriers to develop voluntary interim and long-term solutions, the FCC should preempt any mandatory state requirements which conflict with a uniform national solution (21-22).

Long-term solutions regarding number portability:

Before mandating long-term number portability, the FCC should direct an industry task force to study the technical requirements of implementing number portability, whether there is consensus on how to implement number portability, the costs of implementation, and the demand for number portability (9). The efficacy of existing interim solutions and the technical requirements and costs of long-term solutions should be studied by an industry task operating under the auspices of ATIS, while the FCC and industry should further study consumer demand (19-21).

Any long-term solution must meet the following requirements: (1) be capable of supporting all three types of number portability; (2) permit delivery of any existing service (*e.g.*, E-911, operator, CLASS); (3) utilize only one number per line; (4) not result in any increased post-dial delay; (5) maintain efficient, unambiguous routing of