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

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FEDERAL COMMUNICATIONS COMMISSION

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

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REPLY COMMENTS

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SUMMARY

MCI agrees that the FCC's role in implementation of provider portability should be to establish broad policy outlines for its prompt implementation in the major markets and to set an outside date for implementation. Commenters agree that interim measures offered by the local exchange carriers -- such as Remote Call Forwarding and Flexible Direct Inward Dialing -- do not provide customers with true number portability and will not promote competition among local service providers. MCI responds to comments critical of its Carrier Provider Portability model and shows the inadequacy of GTE Service Corporation's nongeographic number proposal. MCI continues to believe that a CPC to LRN combination will bring portability -- and thus a certain level of competition -- to the local marketplace in the quickest, most economical manner. MCI also believes that cost recovery measures should not discriminate against any group of carriers and that costs of implementation should be shared among all carriers.

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REPLY COMMENTS

MCI Telecommunications Corporation and MCImetro (collectively referred to as MCI) respectfully submit these comments in the captioned proceeding. Briefly, MCI states that parties agree with MCI that the Federal Communications Commission (FCC or Commission) should establish broad guidelines to assist the industry and the state commissions in implementing provider portability, and MCI agrees that the FCC should set an outside date for its implementation. MCI and others agree that provider portability is an important in promoting competition in the local markets. Many commenters agree that interim measures offered by the local exchange carriers (LECs), such as Remote Call Forwarding (RCF) and Flexible Direct Inward Dialing (FDID), have severe technical and operational defects and therefore do not provide customers with true number portability. Interim number portability will do little if anything to promote competition among local service providers. MCI responds to comments critical of its Carrier Provider Portability model and notes the inadequacy of GTE Service

Corporation's (GTE's) proposal. And, MCI notes that parties generally agree that cost recovery measures should not discriminate against any group of carriers.

I. THE FCC SHOULD ESTABLISH NATIONAL GUIDELINES AND SET A DATE CERTAIN FOR IMPLEMENTATION OF PROVIDER PORTABILITY

Parties generally agree with MCI that the appropriate role for the FCC is to establish broad, national guidelines[1] for an acceptable long-term portability solution (Paging Network, Inc., Personal Communications Industry Association, SBC Communications, Inc., Sprint Corporation, United States Telephone Association, USWest, Inc.). Most commenters believe the FCC should not select a portability solution, but should instead set parameters or principles (Teleport Communications Group, Inc., Competitive Telecommunications

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[1] MCI suggested the FCC adopt the following guidelines, and there was support from commenters for most of these:

> (1) portability must be transparent to the user; (2) existing network infrastructure and standards should be used to the extent feasible; (3) the solution should not be proprietary or have licensing fees associated with it; (4) all providers should be benefitted in the same way and should be required to deploy the same network capabilities; (5) the solution should immediately support wireline provider portability and be capable of expanding to accommodate wireless location and service portability; (6) the solution should have minimal impact on the numbering resource; (7) call rating should not change as a result of the solution; (8) the solution should accommodate calls from areas not capable of portability; (9) the solution should support any national standards adopted for portability; (10) the industry's provisioning databases should be built, deployed and administered in a neutral manner; and (11) database information must be accessible to all providers (MCI Comments at 7-8).

Association, Pacific Companies, Time Warner Communications Holdings, Inc.) that will be used by the states (Association for Local Telecommunications Services, Ameritech, Illinois Commerce Commission, MCI, National Association of Regulatory Utility Commissioners, New York State Department of Public Service, PageNet, TCG), or an industry group (GTE, NYNEX Telephone Companies, SBC, USWest), when adopting a technical solution. As stated in its initial comments, MCI believes that the states are in the best position to select a solution for particular markets.

Some parties are asking the FCC to refer issues to the Industry Numbering Committee (INC) (ALTS, Pacific). As MCI pointed out in its initial comments, the INC has fostered discussion of portability definitions and preliminary proposals, but it is not in a position to make the determinations necessary for implementation in particular markets. The INC has been working on portability issues since November of 1993 and has not published any recommendations to date. The INC simply is not the primary force for development of portability and it should not be placed in that role.

Bell Atlantic (at 19-20) asserts that the FCC should order the establishment of a special committee of Alliance for Telecommunications Industry Solutions (ATIS) to take up the portability discussions where INC has left off. MCI believes that assigning portability issues to ATIS would

stall the progress being made by the industry in state workshops and proceedings. Bell Atlantic is well aware that these workshops are producing results because it is an active participant in the Maryland workshop. There is no reason to believe that a committee of the ATIS will achieve progress on provider portability with any greater efficiency than the INC.

MCI agrees with commenters who ask the FCC to set an outside date for consideration and implementation or portability in the top markets (MFS Communications Company, Inc., Sprint, TCG). MCI proposes that all states that have authorized competition must have a true portability program in place no later than January 1, 1998, that meets the FCC's guidelines (as recommended by MCI in its initial Comments). In states where local competition has not been authorized by that date, the FCC should direct the local exchange and other carriers to implement a plan for provider portability which could be implemented within six months of eventual approval of local competition in that state.

A number of commenters supported a national portability solution (ACTA, GTE SBC, USTA, USWest). Others agree with MCI that it is not necessary to have a uniform, nationwide solution as long as multiple solutions are compatible (MFS, Time Warner, Pacific, Ameritech, US Intelco). The market will drive the selection process toward one or more common solutions. Most of the same parties are participating in

state portability workshops, and the process is driving toward compatible solutions. This should not be surprising, because the parameters of a database solution substantially depend on switch capabilities, and switch manufacturers have been heavily involved in all the leading state workshops and trials. Thus, there is not a great divergence in the leading proposals. For example, the proposal promoted by US Intelco is moving closer toward a resemblance to the AT&T proposal.

It is not technically necessary to have a nationwide solution and to support a nationwide solution is to encourage delay in implementation. State workshops are making progress toward solutions that are compatible. The progress in New York and Illinois is being repeated in California and Maryland. In fact, more progress has been made in these state workshops in one year than had been made in the INC in two years. Logically, some states are taking advantage of the work conducted in other states by adopting the technical criteria already agreed to and going forward toward selecting a technical solution.

II. COMPETITION IS IMPAIRED BY LACK OF PROVIDER PORTABILITY

Many parties agree that provider portability is important to promoting competition in the local exchange market (Cincinnati Bell Telephone Company, CompTel, MFS, Sprint, Time Warner). Even state commenters, which have no

commercial interest in promoting portability, agree that portability is important (New York, State of California and Public Utilities Commission of California). There is broad support for an immediate focus on provider portability, with other forms of portability following at a later time (Ad Hoc Coalition of Competitive Carriers, General Communication, Inc., NYNEX, Time Warner, USWest).

The benefits of portability include increased competition among service providers, reduction in prices for all customers, and introduction of new services. Portability is important not only for consumers but also for non-local carriers. So long as interim measures are the only means of providing portability IXCs will receive no benefits from competition among access providers.

The comments of mostly LECs claiming that portability is not important (Ameritech, Bell Atlantic, GTE, Pacific, SBC, USTA, USWest) should be viewed in the context of their interest in protecting their monopoly status in the local market. Specifically, Pacific has commissioned a mail questionnaire survey which it claims is superior to the MCI/Gallup telephone survey (Pacific at 4). Mail questionnaires suffer from their own deficiencies. They tend to be answered by a self-selected group of people with strong feelings on the subject. Other people won't take the time to fill out a lengthy questionnaire and are less likely to participate in such a survey. This leads to bias

because, depending on who the nonrespondents are, the survey may miss important segments of the telephone consumer population (certain age groups, economic groups). In fact, Pacific's survey intentionally targeted business customers (Pacific Att. at 2). The MCI/Gallup survey valued and sought the views of residential consumers as well as business customers. In this sense, the MCI/Gallup telephone survey yielded a truer measure of the broad consuming population.

Also, Pacific's consultant called potential candidates and only mailed surveys to those who said they were interested (Pacific at 6). That procedure itself limits the likelihood that the survey reached a broad spectrum of respondents. Pacific provides no data on how many individuals were contacted and refused to participate. Pacific only states how many surveys were sent compared with how many were answered. Accounting for these preliminary refusals would yield a higher nonresponse rate than Pacific is claiming.

As to Pacific's claim that telephone respondents did not have time to reflect about their responses, the Pacific survey had 25 combinations of options for the respondent to consider. A survey this complex would not give a respondent more time to reflect on answers than a telephone survey, unless the respondent were willing to spend hours on the survey, which seems unlikely.

Pacific contends that the MCI/Gallup survey failed to account for inflating tendencies such as the ease of saying "yes" or the desire to give a positive response to an interviewer (Pacific at 5). The MCI/Gallup questions were not phrased to elicit positive answers, and the majority of respondents gave a negative response (that they wouldn't change numbers). The incentive described by Pacific, if anything, adds strength to the negative responses received.

Pacific states that the MCI/Gallup survey did not inform customers that they could have their former telephone number referred to an announcement of the new number (Pacific at 7). This point is irrelevant given the customer's tendency not to redial the referred telephone number. It is worth noting that Pacific's own survey shows that only 56 percent of callers to a business will always hang up and redial the referred number (Pacific Att., ConStat Final Report at 49, "Impact of Referral Announcement on Calling Behavior," dated May 1995). Obviously a business that stood to lose nearly half its callers would not take much comfort in this number. Nor would a residential customer be content to lose more than a third (36 percent) of its callers. The fact that Pacific considers this to be acceptable, and "proof" that number portability is not important, merely shows that Pacific's assessment is based not on an objective understanding of what is important to customers but instead on its own bias as an incumbent LEC

with all of the current customer numbers in its network.

Finally, Pacific states that the MCI/Gallup survey did not give information as to how portability fit in with other factors involved in a customer's decision to switch providers, such as price, brand awareness, bundling of services or quality of service (Pacific at 5). This statement is correct, however it is not a deficiency of that survey. The MCI/Gallup survey was seeking information only on number portability, so it did not ask questions of this nature. The Pacific survey, on the other hand, has been structured for a different purpose: to yield information on how much business Pacific stands to lose from the eventual introduction of local competition, with number portability being one indicator. These other factors are relevant only to the type of information Pacific was seeking, not to a survey focused on measuring the importance of number portability to customers.

As noted by several parties, there can be no direct comparison of survey data. Methodologies and conclusions of these studies must be carefully examined before making further conclusions about the significance of portability to the development of local competition (California). As noted by California, and by MCI in its initial comments, even Pacific's survey -- which claims to disprove the importance of portability -- shows that approximately 10% more customers of the entire customer base are willing to switch

providers when offered number portability (California). Needless to say, 10% market share can be significant to a new competitor.

III. MCI'S CARRIER PORTABILITY CODE MODEL PROVIDES AN EFFICIENT NEAR TERM PORTABILITY SOLUTION

MCI provided an explanation of its Carrier Portability Code (CPC) model in its initial comments. In those comments, MCI explained that the CPC model would provide a near term solution for provider portability making maximum use of existing network capabilities. MCI also stated that CPC could gracefully migrate to the more robust Location Routing Number (LRN) solution, proposed by AT&T Corp., when it becomes available. AT&T (at 31-32) made similar statements in its comments.

Several commenters have criticized the CPC model on the basis that it would not provide a permanent solution for number portability. MCI addresses these points below.

As a preliminary matter, however, it is worth noting that the CPC proposal is doing well in state evaluations. The New York Number Portability task force has selected CPC for a trial to begin in early 1996. In Illinois, CPC came in second, as rated by industry participants, behind AT&T's LRN proposal. MCI expects that other state portability workshops will rate CPC high among the choices.

To the extent that MCI does not suggest that CPC be used as the long-term provider portability solution, many of

these criticisms are moot. However, several of the critical comments noted above deserve a limited response to clarify the record as to CPC's capabilities and characteristics.

It is important to note that many of the criticisms leveled at the CPC approach are inherent in any database solution to number portability, and should be dismissed as irrelevant as a specific critique of the CPC model. Such items as increased Signaling System 7 (SS7) infrastructure deployment, software deployment at the end office level and deployment of databases as suggested by Pacific are part and parcel of any database dependent solution. The industry is in general agreement that a database architecture will be required to provide effective provider portability.

Criticism of CPC on the basis that is does not support location portability (SBC, BellSouth Corporation, and Bell Atlantic), is unimportant since it was not designed to provide this capability and competitors have not generally requested this capability in the near term. Location portability, while possibly desirable to an end user, is not required to differentiate among competitors in the market place (MCI, NYSDPS, Pacific, PCS Primeco, L.P.), and is therefore not critical to the development of competition in the local service market. To the extent location portability may be desirable at some point in the future the transition to LRN should address this need.

Bell Atlantic, also argues that the CPC approach

prevents the network from identifying the specific switch to which a call is to route. This assertion is without merit. The combination of a network's CPC code with the dialed NXX or central office code, identifies one, and only one switch in the terminating network. Thus, the network knows precisely how to route a call.

Finally, several commenters (Bell Atlantic, BellSouth and SBC) mistakenly assert that the CPC solution will hasten the exhaust of the North American Numbering Plan (NANP) ten digit number resource. MCI originally proposed replacing the NPA digits of the directory number in call processing with the CPC code as this makes use of routing paradigms used in the network today. It was not intended that NPA codes which were used as CPCs would not also be available as NPAs as well. Though several current switch vendors had indicated to MCI that a single NPA code could be used as both an NPA and as a CPC without ambiguity, a major switch vendor now says it would need some degree of development to accomplish this task. Consequently, MCI determined that CPC was best viewed as a transitional technology which would use only unassigned NPAs as CPCs and would be replaced with LRN before the codes used as CPCs would be required for use as NPAs. There is no hastening of the exhaust of the NPA resource if CPC is adopted as suggested for near-term transitional use until LRN is available.

IV. INTERIM MEASURES ARE NOT SUFFICIENT TO PROMOTE COMPETITION AMONG LOCAL SERVICE PROVIDERS

MCI agrees with commenters who state that interim measures, such as Remote Call Forwarding (RCF and Flexible Direct Inward Dialing (FDID), have significant drawbacks which make them unsuitable for long-term use (Ad Hoc Coalition, America's Carriers Telecommunication Association, California, CompTel, GCI, MCI, MFS, SBC, Sprint, TCG, Time Warner). Several commenters note that these interim measures cause inefficient network operation, use numbering resources inefficiently, require routing to be controlled through the LEC network, and distort settlement of interstate access charges. In addition, as MCI noted in its initial comments, interim measures degrade transmission quality, add call set-up time, increase call blocking, cause loss of customer calling features, impair 911 and enhanced 911 compatibility, impair the competing carrier's ability to provide operator services, limit the ability to make simultaneous calls to the same individual number, complicate reconciliation of customer complaints, increase customer confusion, and affect the standard recording equipment used for customer billing (MCI Comments at 21-22).

MCI also agrees with some parties that interim measures can be used to permit customers to subscribe to their services while true provider portability is being developed (CompTel, MFS, NYNEX, Sprint, Time Warner). Their use as a portability measure, however, should be phased out once

provider portability is implemented.

The FCC could advance the portability discussion if it were to formally recognize that portability is a network function, not a service whose provision and pricing are controlled by the LECs. Now that tariffs are being filed, it is evident why LECs wish to have these interim measures used for number portability purposes, and why the FCC and state commissions must limit their use by setting a date certain for deployment of true number portability. Some LECs see interim portability arrangements as a means to extract exorbitant fees from potential competitors.

For example, Pacific is proposing to charge competitors a $95 per telephone number non-recurring fee to add RCF instructions in a switch -- a simple task which requires only a few minutes at a computer.[2] The following description demonstrates the financial windfall to Pacific if the proposed rates were approved. Assuming 50,000 customers migrate to new entrant competitors of Pacific, using RCF to retain their telephone numbers, Pacific would receive $4.75 million in non-recurring revenues and an additional $162,500 per month in recurring charges (at Pacific's proposed monthly rate of $3.25).

Similarly, Ameritech has proposed tariffs in Michigan which would charge competitors $212 in non-recurring charges

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[2] Pacific Bell's proposed tariffs in California Pub. Util. Comm. Local Competition Proceeding (R.95-04-043; I.95-04-004).

per FDID voice grade trunk and $36.40 per month for the arrangement.[3] FDID rates proposed by Ameritech in Illinois are similar.[4] When extending the need for interim arrangements provides such a revenue windfall and competitive advantage vis-a-vis competitors, it is not surprising that Ameritech is proposing, in the Illinois number portability workshop, to offer an "enhancement" to FDID (hub-routed DID) rather than a true number portability solution like CPC that is available now.[5]

As noted by some commenters (ALTS, California, GCI, National Cable Television Association), as long as interim measures are the only available method of providing number portability, competing providers should not be required to pay full retail rates for RCF and FDID routing. Optimally, the additional costs of providing RCF and FDID routing should be shared proportionately by all local carriers, for the same reasons MCI recommends such a cost recovery approach for database portability. At a minimum, LECs

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[3] See Direct Testimony of William DeFrance, tariff attachment, Mich. Pub. Util. Comm. Case No. U-10860, filed July 1995.

[4] Ill. C.C. No. 5, Original Sheet 5.

[5] Although it is presented as an enhancement, hub-routed DID (called "SPNP-Hub") retains many of the technical deficiencies identified for direct-routed DID (e.g., prohibits some CLASS features such as automatic callback/automatic recall, results in transmission degradation and additional call delay and blocking, etc.) and, presumably, it would be priced at a substantial profit to Ameritech as is direct-routed DID.

should recover no more than the incremental cost of providing RCF and FDID functionality in their switches, which would result in rates that are a fraction of the prices they are proposing.

The LEC tariffs have been submitted to state Commission, and it will be up to those Commissions to review and set rates. For interim number portability. However, the potential for anticompetitive mischief by the LECs via interim number portability tariffs is clear. The only way to neutralize this potential is to require deployment of true number portability no later than January 1, 1998, as recommended above.

V. GTE'S PROPOSAL IS NOT ACCEPTABLE AS A METHOD OF PROVIDING PORTABILITY OF THE CUSTOMER'S EXISTING NUMBER

GTE continues to offer a proposal for provider portability that has been discussed and rejected by competitors in the industry forum as not acceptable for number portability.[6] Its proposal calls for the customer to change from the current telephone number to a nongeographic number. GTE apparently does not appreciate that one of the primary requirements for provider number portability is that it would allow the customer to keep the telephone number currently in use. Indeed the industry has defined provider portability as the ability of customers to take their

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[6] INC Meeting No. 14, dated Feb. 27 - March 3, 1995.

numbers with them as they change providers of local service.

GTE's proposal could cause a tremendous drain on the World Zone 1 numbering resource that is already severely strained. Any customer wanting a "portable" number would need a number assignment from the N00 resource. This resource could deplete quickly, and the industry would be faced with an effort similar to that required to supplement the 800 toll-free numbers.[7] With GTE's proposal, ported telephone numbers would lose their geographic significance, which could cause customer confusion. Also, this solution would require a flash-cut, nationwide approach, which many commenters agree would be less desirable than a localized portability solution (Ameritech, MFS, Pacific, Time Warner, US Intelco Networks, Inc.).

It is worth noting that the New York Commission, in its evaluation of provider portability solutions, dismissed any solution that required a number change. GTE's solution would have been dismissed under that criterion and does not deserve further consideration by the FCC.

VI. COSTS FOR PROVIDER PORTABILITY SHOULD BE SHARED AMONG ALL CARRIERS PARTICIPATING IN THE SOLUTION

Some commenters agree with MCI that costs will be determined by the architecture and administration model that is selected (Bell Atlantic, NYNEX, Pacific, US Intelco).

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[7] See CC Docket No. 95-155, Toll Free Service Access Codes, Notice of Proposed Rulemaking, FCC 95-419, released Oct. 5, 1995.

There is some agreement that cost recovery should not discriminate against any carriers (NYNEX, PageNet, PCIA, USTA), that costs of common elements should be shared by customers of all local exchange service providers, not just by customers of competitive providers (ALTS, MCI, MFS, Pacific, PageNet), and that each network provider should bear the costs required to make its network operations compatible with the provider portability solution (Ad Hoc Coalition, GCI, MFS, TCG, Time Warner).

Nevertheless, some carriers argue that only customers porting their numbers should pay the costs of implementation (Ameritech, BellSouth, Bell Atlantic, Cincinnati, GTE, NYNEX, National Telephone Cooperative Association, SBC). As MCI and others stated in comments, all customers benefit from portability (see Section II above). Indeed, the FCC acknowledged the public interest benefits of number portability in the 800 portability proceeding and that these benefits are enjoyed by all customers, not just by those customers choosing to port their numbers.[8] Consequently, these costs should be shared among all service providers and their customers.

One commenter that speculated on costs of implementation, GTE, estimates its network costs would exceed $1.65 billion. GTE is attempting to update its

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[8] Provision of Access for 800 Service, Report and Order, 4 FCC Rcd 2824 (1989).

entire network to state-of-the-art technology and to attribute this entire cost to portability deployment. GTE has asserted this cost estimate in certain state proceedings and has revealed that this cost includes replacement of non-digital switches with up-to-date technology, deployment of Service Signaling Point technology in all end offices, Advanced Intelligent Network capability in end offices, and deployment of SS7 technology to all end offices, in a network with little SS7 deployment at this time. Only a relatively minor portion of the estimate is directly attributable solely to implementation of portability.

MCI believes that the FCC and state regulators should not attribute to provider portability costs that are required to bring a carrier's network up to date with present technology. Only the incremental costs required to implement portability should be measured for any calculation of the costs of portability. In fact, in the 800 portability proceeding, the FCC has already determined that SS7 costs "represent[] a general network upgrade, the core costs of which should be borne by all network users."[9] The Commission there decided to treat as the costs of providing database access service only those costs that are incurred specifically for the implementation and operation of the database system and directed the LECs to establish rates for database access based only on those specific costs.

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[9] 4 FCC Rcd at 2832.

VII. CONCLUSION

Therefore, MCI agrees that the FCC's role in implementation of provider portability should be to establish broad policy guidelines for its prompt implementation in the major markets, and to set an outside date for implementation. MCI continues to believe that a CPC to LRN combination will bring portability -- and thus a certain level of competition -- to the local marketplace in the quickest, most economical manner. MCI agrees that interim measures do not provide true number portability. MCI also believes that costs of implementation should be shared among all carriers.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Vernell V. Garey hereby certify that the foregoing **"MCI REPLY COMMENTS"**, CC Docket No. 95-116 was served this 12th day of October, 1995, by mailing true copies thereof, postage prepaid, to the following persons at the addresses listed below:

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