



November 22, 1995

Mr. Yog Varma
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Dear Yog:

Following are the Steering Committee's areas of consensus reached at our last meeting 11/17/95 in New York, according to my notes:

- New York should pursue LRN/NRA as a long-term Local Number Portability (LNP) solution.
- We should take a dual path approach, continuing with our trial activities at the same time that we plan for the long-term LNP deployment.
- All the trial participants wish to support the New York Commission's agenda to determine costs and feasibility for a long-term LNP solution.
- Cellular One will only participate in Phase 1 of the Rochester trial. Time Warner can only participate in Phase 1 because we have not found a cost-effective work around for CLASS Automatic Callback and Automatic Recall (AC/AR) breakage due to AIN 0.1 PODP triggers. The only other trial participant is Rochester Telephone. We should scale the trial back to Phase 1 only.
- We should do a careful evaluation of Phase 1 results in the Manhattan trial before proceeding to Phase 2. Depending on the timing of a mass market CLASS offering, Time Warner may not be able to participate in Phase 2 because of the AC/AR breakage mentioned above.
- All the trial participants see value in testing 10-digit Global Title Translations in the SCP data base.

Notes from 11/17/95 Steering Committee Meeting
11/22/95
Page 2

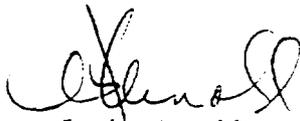
Time Warner sees marginal value in Phases 2 and 3. Since this is a technical trial, there is no plan to measure value versus cost as in a true market trial. We can objectively measure quality of service in Phase 1, rather than subjectively measure quality from a customer's perspective in Phase 2 and 3. This significantly reduces the risk, effort, cost and workarounds necessary for the trial.

If mass market deployment plans enable us to participate in Manhattan Phase 2 and beyond, and the other trial participants need us to conduct testing, we will be happy to continue into Phase 2. It's not clear yet what unique contribution we could make in Phase 2 and 3.

Rochester Tel suggested we use Ridge Road instead of the Stone Street office for the trial. Since Ridge Road is predominantly residential, this poses less risk for their customer base. Our translations and operations people have no problem with this. Today we complete calls to Ridge Road via the tandem.

If you have any questions, please do not hesitate to contact me at (303) 799-5685.

Sincerely yours,



Larita Arnold
Switched Network Planner



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SYSTEM PLANNING SECTION
COMMUNICATIONS DIVISION

November 28, 1995

Mr. Yog Varma
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Dear Yog:

The attached position paper represents MFS' comments regarding the start of the number portability trial in New York and specific issues to be incorporated in the January 1996 report to the Commission. I look forward to working towards implementation of number portability in New York.

If you have any questions, please do not hesitate contact me. My telephone number is 201 938-7387. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Kenworthy".

Pamela Kenworthy
Manager - Number Administration

NEW YORK NUMBER PORTABILITY POSITION PAPER

Pursuant to the Commission's September 25, 1995 Order authorizing trials of service provider number portability, MFS Communications Company, Inc. is prepared to participate in the Manhattan trial scheduled to commence on February 1, 1996. The decision to move forward with the trial clearly indicates the Commission's strong leadership role in promoting local number portability.

The experience to be gained from all three phases of the trial will undoubtedly prove valuable, and completing all three phases should be the objective of the trial. However, MFS believes that it would be prudent to evaluate the completed first phase before the second or third phases progress. If negative results are achieved or no new objectives can be accomplished, it is only at that time that MFS would suggest a halt to continuation of the trial.

MFS favors a ten digit trigger mechanism. Ten digits are beneficial in a number portable environment to ensure the SS7 TCAP message routing reaches the intended destination. MFS believes that to trial this mechanism is one of the main purposes of the trial. The easiest way to minimize the impact of deploying LNP initially is to perform 10-D Global Title Translation in the local number portability service control point so that it is transparent to the rest of the network. Further, an additional benefit of the trial is testing the ability to depict routing performance and to measure any additional message load.

The trial will enable the industry to unfold switching and network requirements in a local number portability environment for the future. With that in mind, it is important for the New York steering committee to pursue the appropriate steps for a long term number portability solution in conjunction with the trial activities.

Based on the knowledge the industry participants have to date, consensus was reached at the last steering committee meeting held on November 17, 1995 that AT&T's Network Routing Address or Location Routing Number (NRA/LRN) solution appears to be the best long term solution. An implementation workplan for LRN should not be delayed. The Commission's affirmation of this call model selection will encourage the communications industry to speed to the development of LRN and ultimately speed the implementation of local number portability in New York.

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SYSTEM PLANNING SECTION
COMMUNICATIONS DIVISION



Mr. Yog Varma
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223

November 28, 1995

Dear Mr. Varma:

As discussed at our Steering Committee meeting in New York, on November 17th, Rochester supported a consensus agreement on the parameters of the Rochester based trial of the USIN/Stratus CNA/NNA approach. Following are the main points upon which we believe consensus was reached.

- 1) The participants are to be Rochester Telephone, Time Warner Communications, and Cellular One. Other parties have declined to participate.
- 2) The trial site is to be moved from the Stone Street office to the Ridge Road office.
- 3) Due to the unavailability of acceptable and/or cost effective resolutions to most of the technical problems that have been noted, in the trial timeframe, we agreed to scale back the trial to include only Phase One, thus excluding active NXXs and live traffic.
- 4) Those agent types which incur adverse interactions with the AIN triggers will be excluded from the trial.
- 5) We will explicitly test the ten digit global title translation application of the SCP.
- 6) Due to slippage in the timeline for USIN/Stratus to develop this application the new target start date is on or about March 1, 1996.

Further, we agreed that a parallel work effort is needed to identify and detail other issues and critical paths that would have to be addressed in any subsequently developed plan which addresses implementation. Discussed was the need to identify the processes and procedures that would have to be in place to support database dependent number portability. These practices would, in turn, drive the requirements for an SMS, OSS administration, and billing systems.

This effort will allow each company to then independently determine the impacts on its existing or planned systems, and develop cost and timeframe data. This data, along with trial results, can then be used by these companies as an input to the development of their implementation plans and timelines.

As we also discussed, Rochester does not consider its participation in this effort to be equivalent to a commitment to begin implementation once this information is developed. Nor is it our expectation that the outcome of this effort should be an implementation plan or binding commitment; given the concerns voiced about the uncertainty of the cost and timeframe of upgrading the network to the 5E11 baseline generic, and the unknown incremental cost of the LNP trigger software.

I can be reached at 716-777-6932 if you have any questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "David A. Keech".

David A. Keech
Manager - Technology Planning

CELLULARONE
Genesee Telephone Company

Yog Varma
New York State
Department of Public Service
Three Empire State Plaza
Albany, New York 12223

3144 Winton Road South
Rochester, NY 14623-2932
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November 29, 1995

Dear Mr. Varma:

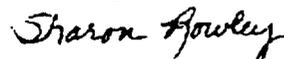
Cellular One's intent in participating in the number portability trial, to be held in Rochester, was to gather cost and operational data in order to test the economic and technical viability of a potential long term number portability solution. Even though the New York trial will not be testing the "currently perceived" long term national solution - LRN, we still believe that there is value to be derived from conducting a number portability trial in New York State.

Value will not only be gained from the participation in and exposure to the operation of a network in a number portability environment, but also from the resulting impacts on the operational support and billing systems.

We feel that the decision regarding six versus ten digit translations should be driven by the option that is the most beneficial to both the consumer and the network provider. With a ten digit trigger every call will require a database dip which incurs post dialing call delays and additional unproductive burden on the signaling networks. With a six digit trigger only those NXX's with ported numbers will require a database dip. This effectively eliminates unnecessary post dialing delays and reduces call set up times; therefore, a six digit translation offers a sound basis on which to start - offering the least impact on the consumer and on the SS7 network. We do recognize that as the quantity of ported numbers increases the savings of a six digit over a ten digit translation will become a moot point, and that some subscriber features will require ten digit triggers.

In conclusion, we feel that a number portability trial in New York State should continue according to plan to serve as an evaluation of the overall feasibility, and as an assessment of the end user and service impacts, concluding with an examination of all relative costs.

Respectfully submitted,



Sharon Rowley
Director of Expanded Access



**MCI Telecommunications
Corporation**

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Richard C. Fipphen
Senior Attorney

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SYSTEM PLANNING SECTION
COMMUNICATIONS DIVISION

By Hand

November 29, 1995

Mr. Yog Varma
New York Department of Public Service
Three Empire State Plaza
Albany, New York 12223

Re: Case 94-C-0095 - Local Number Portability Trial

Dear Mr. Varma:

MCI Telecommunications Corporation and MCImetro
(collectively "MCI") submit these comments on the current and
future status of the local number portability trial in New York
State. These comments are a summary of the views presented by
MCI at the last steering committee meeting, which was held in New
York City on November 17, 1995.

MCI submits that phase I of the trial should proceed as
planned. Phase I of the trial will provide the Commission and
the industry with valuable information about the operation and
interaction of networks in an LNP environment. This information
will help expedite the deployment of "true" local number



portability, regardless of which call model is adopted as the LNP solution for New York State. In addition, the educational value of the trial will be maximized if the trial participants are able to use six digit triggering mechanisms, rather than the ten digit triggers discussed at the last meeting.

As you know, in recent filings with the Federal Communications Commission as well as in other fora, MCI and AT&T have recommended a single, integrated approach to LNP deployment, under which MCI's "Carrier Portability Code" model is implemented as an interim means of providing "true" local number portability, followed by a transition to AT&T's "Location Routing Number" model when that solution becomes available in the future. The recommendation is based on numerous factors, including:

- Phase I deployment -- CPC -- has the advantage of being in service as early as the second half of 1996 and requires relatively minor switch development, while Phase II deployment -- LRN -- delivers a full range of capabilities when it becomes available at a future date.
- The vast majority of network elements and switch development required for Phase 1 CPC would be reusable and necessary when the permanent Phase 2 LRN solution is implemented. These reusable costs include those

associated with: operational support systems modifications, SS7 links, STP and SCP hardware, and end office hardware and software.

- Non-reusable costs are limited to CPC-specific software and some incoming call handling and translation modifications in end offices. The non-reusable end office costs can be minimized by limiting (i.e., targeting) the number of RBOC end offices in which Phase 1 CPC would be installed.
- For example, Ameritech estimated the non-reusable costs of such a two- phase deployment plan at around \$4 million for implementation of CPC in 50 of its end offices (containing 200+ NXXs). If, on the other hand, new entrants were forced to use the RCF and DID alternatives proposed by the RBOCs, new entrants could end up paying as much or more to the RBOCs (based on RCF and DID rates proposed by RBOCs throughout the country) for portability alternatives that are vastly and unquestionably inferior to Phase 1 CPC portability.
- Although switch vendors are working towards making Phase II LNP available at the earliest date possible, the most optimistic projected date--mid-1997--is at significant risk. This availability uncertainty,

combined with the certainty that high-priced RCF and DID alternatives create a financial *disincentive* for RBOCs to facilitate rapid true portability deployment, make this two-phase deployment plan the optimal approach toward the development of robust competition in the local exchange.

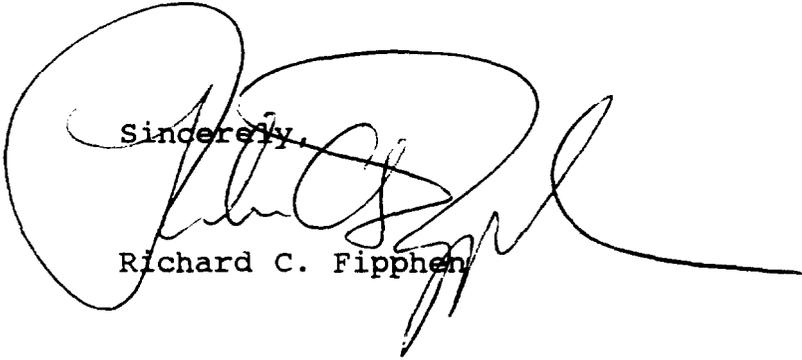
- On the other hand, leaving new entrants with only the deficient and expensive RCF and DID options for as long as two years or more, will seriously undermine their attempts to establish a competitive marketplace.

Despite vendor statements about LRN availability in the second quarter of 1997, MCI does not believe that LRN-based number portability can or will be implemented in that time frame, given a number of unresolved issues and the incumbent LECs' lack of commitment to deploy LRN when that solution is available.

Accordingly, MCI believes that the steering committee and the Commission should consider limiting the New York trial to Phase I only and that the Commission should order the industry to begin the work that is necessary to achieve state wide implementation of local number portability during 1996. Further, the steering committee should be directed to address a number of issues while Phase I is in process, including SMS development, legal issues, etc. The Commission and industry should not wait

for the completion of the trial to begin to address these issues. Further, we submit that the integrated two-step approach advocated by MCI and AT&T should be adopted as the local number portability solution for New York State. MCI is willing to make a formal presentation of this proposal to Staff and the steering committee at a future steering committee meeting.

Sincerely,


Richard C. Fipphen

cc. Steering Committee

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SYSTEMS DIVISION
COMMUNICATIONS

AT&T Bell Laboratories
101 Crawfords Corner Road
Holmdel, New Jersey 07733

November 29, 1995

Mr. Yog Varma
New York Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Dear Mr. Varma:

This letter responds to your request at the November 17 meeting of the New York Local Number Portability Trial Steering Committee that each participating company state its views with respect to

1. Conducting the trial and moving towards implementation of permanent number portability in New York
2. Scope of the trial including use of 6- versus 10-digit triggers.
3. Feasibility of the proposed 2/1/96 trial start date.

As stated at the Steering Committee meeting, AT&T believes that it is important to move forward with both the New York trial as currently planned and, on a parallel track, the work necessary to implement local number portability in New York state. Although the trial will not test the Location Routing Number (LRN) solution that AT&T supports and which appears to be emerging as the industry consensus, we believe the trial offers important learning opportunities for the industry. These include experience with capabilities such as 10-digit Global Title Translations in a Service Control Point and procedures such as those for seamless porting of customers that will be required by any permanent LNP solution. These opportunities do not exist in other jurisdictions yet will contribute to the successful implementation of number portability nationally just as the work already done in defining the New York trial played a major role in driving the evolution of the industry's approach to number portability

AT&T also believes that choice of a call model, development of an industry Service Management System, and other work required for full scale implementation of permanent portability should not be put off until the trial's completion but can and should begin now. The Commission should authorize the industry to choose a call model and then order the implementation of portability. AT&T will offer a more detailed proposal as to how this goal may best be achieved so as to insure that implementation of LNP in New York does not lag behind other states.

With respect to the scope of the trial, AT&T believes that the benefits derived will be directly related to the degree to which the trial approximates deployment conditions. For this reason we believe it is important that the incumbent deploy 6- rather than 10-digit triggers where technically feasible. AT&T plans to deploy such triggers in its local switch, but in the trial timeframe only the incumbent will have the call volumes necessary to provide a reasonable test of the situation in which most calls to a portable NXX are queried. In as much as NYNEX has already requested recovery of its costs from the trial, we think it reasonable that NYNEX be directed to obtain the software necessary to deploy 6-digit triggers on its 5ESS® switch.¹

Since significant call volumes will only be achieved in phases 2 and 3, AT&T believes that it is important to pursue the trial through these phases if possible. We agree with other participants that successful completion of phase 1 is a prerequisite to entry into subsequent phases without risking adverse customer impact.

Scheduling of trial phases must also take into account the availability of the software patches needed to deploy 6-digit triggers in phases 2 and 3 and the necessity of testing such modifications first in phase 1. Although AT&T Network Systems is scheduled to deliver the initial CPC capability for the 5ESS switch in early February 1996, delivery of the LASS interworking package is not expected until early April. The 5ESS switch that AT&T will use to participate in the trial as a local service provider is currently being installed. It will be available and ready to participate in phase 1 of the trial in early April. While AT&T may be able to participate as an interexchange carrier in February, we are not confident that, given the short time between now and February and the work that remains to be done, that the trial can or should begin February 1 as scheduled. Instead, AT&T believes a trial start in April would permit more complete preparations and allow all needed software to be deployed before phase 1 begins.

If you have any questions, please contact me at 908-949-8918.



Penn Pfautz

¹ Nortel is not offering a LASS interworking (Automatic Callback/Automatic Recall) fix for the DMS100® switch in the trial timeframe so NYNEX cannot deploy 6-digit triggers on the DMS switch in phase 2 without breaking these features for ported as well as non-ported customers. With respect to the 5ESS switch, NYNEX has stated that they do not have the PBX class of service that presents one potential interaction with 6-digit triggers and currently have no AIN services on the trial switch which might negatively interact with 6-digit triggers. Given that NYNEX has offered no plan for such AIN services, we believe it unlikely that such will be deployed during the trial.



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November 29, 1995

Mr. Yog Varma
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Dear Mr. Varma,

Per your request, this letter constitutes U.S. Intelco's position statement with respect to the Rochester, NY Local Number Portability Trial.

As we stated at the most recent Steering Committee meeting, it is U.S. Intelco's goal to further the implementation of number portability in the state of New York and to support the trial participants in Rochester. It is our position that the parallel path approach to implementation be pursued, with the following considerations:

1. Given the certainty of the selection of LRN as the preferred wireline implementation in New York, and the fact that LRN will not be trialed in either venue, trial parameters, purpose, goals and duration need to be completely and clearly redefined.
2. Given the complexity and the additional time and cost involved to participants and administrators by including live customers in the trial, we suggest the trial should only proceed through Phase I.
3. Given the very limited number of active participants in Rochester (RochesterTel, Time Warner as full participants and Cellular One on a limited/passive basis), we suggest it may make sense to forego the Rochester portion of the trial and concentrate all efforts in Manhattan. Time Warner is already participating in Manhattan; RochesterTel may also be able to participate there through the use of a foreign exchange NXX. Participation will, unfortunately, be of limited value to Cellular One, because of its switching limitations during the trial period.
4. We suggest that the Rochester trial (if held) be slipped from its original start date of 2/1/96 to 4/1/96 for the following reasons:
 - Delay in commission order to proceed with trial
 - Delay in participant commitment to trial
 - Delay in switch vendors commitment of new LNP generics
 - Selection of LRN as call model
 - Uncertainty of participants as to purpose, scope, duration and number of phases that should be included in the trial.
 - Final decision on if and what to trial will not be made until 12/8/95

In closing, it is and has been U.S. Intelco, Inc.'s long term goal in the state of New York to be the SMS provider, database administrator, and LNASC facilities provider/manager. The motivation behind our promotion of the LANP call model was to speed implementation of number portability by offering a valid technical solution to the industry. We believe in doing so, we have already provided significant value to the industry in several ways, an example of which is LANP's 10 digit global title translation solution. Our suggestion to forego the Rochester portion of the trial should not be interpreted to mean that we no longer believe LANP to be a viable solution for number portability, but rather that it pragmatically reflects the selection of LRN as the long term solution, and the majority concentration of trial participants in Manhattan. In view of these facts, we now believe the best and most economically-justified use of our resources is to focus them fully on developing SMS-related solutions. If, however, it is the desire of the New York service providers and of the New York Public Services Commission, U.S. Intelco will continue its support of the Rochester trial.

We look forward to the early resolution of these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Walker". The signature is fluid and cursive, with the first name "Christine" written in a larger, more prominent script than the last name "Walker".

Christine Walker
Manager, Client Relations



New York Telephone

A **NYNEX** Company

1095 Avenue of the Americas Room 3429
New York, New York 10036
Phone (212) 395-1209

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DEC 05 1995

SYSTEM PLANNING SECTION
COMMUNICATIONS DIVISION

Lawrence J. Chu
Director
Regulatory Planning

December 4, 1995

Mr. Yog Varma
Chief System Planner, Communications Division
State of New York Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Dear Mr. Varma,

At the November 17th meeting of the New York Local Number Portability (LNP) Trial Steering Committee, you asked each participating company to respond to a set of questions regarding the direction/scope of the trial. The questions and our responses are shown below:

1. Q. What is your ability to meet the 2-1-96 trial start date?

A. NYT is ready to begin the trial on 2-1-96 as previously scheduled.

2. Q. Should the trial proceed with 10 digit triggers or 6 digit triggers?

A. The use of six digit triggers has the potential to adversely affect the service of every customer in the ported NXX. Although one vendor has proposed a solution designed to limit the impact of anticipated service affecting problems, this solution involves trial specific non-commercial grade software which, in our opinion, is not suitable for use outside a "lab" environment. New York Telephone has serious reservations about deploying such software in its trial switches due to possible service impacts on large numbers of customers not participating in the trial. In our opinion, the use of ten digit triggers is the only available workaround which is acceptable for the trial allowing us to limit the scope of service affecting problems.



3. Q. How would you like to see the trial effort proceed? Either:

- **Proceed with the existing trial and plan LNP deployment later**
- **Proceed with the existing trial and simultaneously plan LNP deployment**
- **Bypass the existing trial and begin planning LNP deployment**

A. As noted in my November 6th letter to you, we should modify the trial to include appropriate safeguards and/or workarounds to ensure that service to existing customers is not affected or jeopardized. We recommend moving forward with a modified trial and a reduced set of evaluation elements in order to learn as soon as possible about public safety issues, operational issues, operator systems impacts, etc. Finally, New York Telephone continues to strongly recommend that, at the completion of phase one, the committee pause to carefully evaluate all outstanding issues and the need for/availability of suitable solutions prior to moving forward into phase two. At this juncture it appears to be unlikely that New York Telephone would recommend moving to phase two or phase three. Moreover, New York Telephone does not believe that deployment of LNP can occur until a suitable addressing scheme is critically evaluated. In order to evaluate an addressing scheme which may be suitable for deployment, we recommend trialing the Location Routing Number (LRN) addressing scheme.

4. Q. Would you support LNP deployment using the LRN addressing scheme?

A. As indicated in my answer to question 3, New York Telephone believes that LRN is an addressing scheme which has the potential to serve as a suitable addressing scheme for long term LNP and should be included in the trial for evaluation. An industry consensus appears to be forming in support of LRN and we must be mindful of efforts in other state jurisdictions and at the national level as well, to achieve a uniform LNP solution.

5. Q. Should a committee be formed to develop a Request for Proposal for a Service Management System to support LNP deployment?

A. The question on the formation of a committee to develop a Request for Proposal for a Service Management System (SMS), the composition of such a committee, and its authority is premature. If the New York LNP Steering Committee does decide to modify the current trial to include a more suitable addressing scheme, such as LRN, it may be appropriate to address such questions regarding an SMS at that time.

New York Telephone continues to support the trial effort and remains committed to deploying a suitable long term number portability solution which the Commission has determined to be in the public interest. The evaluation of such solutions should be based on a comprehensive analysis of deployment cost, cost recovery, and other technical and operational issues which can best be identified and addressed in the context of a trial. While discussion of implementation planning may be appropriate, actual deployment cannot proceed before such issues are addressed. If you have any questions or comments on this information, please call me on 212-395-1209 or your staff can contact Bill Higgins on 212-395-0904

Sincerely,



Copy to:

LNP Trial Steering Committee Members



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December 5, 1995

Mr. Yog Varma
Chief System Planner, Communications Division
State of New York Department of Public Service
Three Empire Plaza
Albany, NY 12223-1350

Dear Mr. Varma,

TCG continues to fully support the NY Public Service Commission in making a long term database solution for Number Portability available to New York State consumers. The leadership efforts in New York State have advanced the availability of database solutions for Number Portability. The first RFP created awareness in the vendor community of the importance of Number Portability. However, responses to this industry first RFP did not include all the eventual satisfactory solutions. A later entrant, the AT&T Local Routing Number (LRN) solution has now been selected as the best long term solution by three States and is likely to be selected by others. Today, the solutions being trialed in Rochester and Manhattan do not include any solution likely to be the final long term industry solution. It is possible the solutions being trialed could be adopted as an interim solution in some States. But today this is not assured. The NY trial activities currently have much less industry significance than at the time of the RFP activities.

TCG considers the NY trials at this time as having marginal value to itself and to NY consumers. Considerable money will be expended to create an industry interoperability testing platform for solutions that are not guaranteed to ever be deployed for the benefit of NY consumers. The trial start date of February 1996 creates undesirable problems. Some workarounds are required to the solutions being tested. This means the trial will not test the final switching generic program code nor the intercompany methods that will eventually be utilized to initiate Number Portability. It is desirable that the trial minimize these workarounds. Therefore, if at all technically possible, 6 digit triggers should be utilized in the trial offices. TCG feels that the well documented feature interactions make it undesirable to complete the trial beyond Phase 1, no live traffic. In essence, this reduces the trial to a proof-of-concept trial of solutions not likely to be deployed in NY State. This proof -of-concept has been already established in proponents' laboratory environments with results purported to be available to those parties interested in the results. Delaying the trial start awaiting improved capabilities is unfortunately not a desirable option. A later start means trial activities will begin to overlap with the need to devote available resources to States beginning implementation of their selected long term solution.

This is not to say that no advantages exist in proceeding with the trial. There are advantages to a trial where cooperative participants work together to better understand the intricacies of the carrier interworking required to make Number Portability a reality. Working

together to anticipate the final methods required is likely to make the eventual implementation of a long term solution go smoother. Since TCG has worked with NYNEX for many years to establish methods for interconnection, a lesser advantage accrues to TCG than some other participants. TCG recognizes that other trial participants may recognize sufficient benefits to desire the trial to continue as originally constituted.

At this time TCG would suggest that a redirection of the trial parties to also focus on selection and implementation of the long term Number Portability solution for NY State is now more beneficial to NY consumers. TCG wishes to have the long term solution for Number Portability available as soon as possible in NY State. TCG does not believe that devoting resources at hand to the trials as presently constituted will enhance the availability of this long term solution and in fact has the potential to delay the availability of the long term solution. There are many other business tasks required before Number Portability can be made available to consumers. These activities have not begun in NY. The trial has detracted from getting these other tasks accomplished. These other necessary activities should be done in parallel with the currently planned trial activities.

A change in trial goals might enhance the value of the trial. For example, if a long term solution is quickly chosen and the current trial solutions are compatible, it may be possible to sustain the trial networks for a longer test period to test transitions to the long range solution.

In spite of TCG's perception of marginal value of the current trials, we remain committed to advancing Number Portability and will remain a participant in the Manhattan trial consistent with the availability of our resources.

Sincerely yours,



Director- Network Architecture and Modeling