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

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

COMMENTS OF AT&T CORP.

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These provisions of the Act resolve three major issues raised in the NPRM. First, the Act conclusively establishes that number portability is in the public interest. Second, the Act makes clear that the Commission is empowered and obliged to ensure the implementation of number portability. Finally, the Act recognizes that "permanent" number portability is critical to the development of local competition, and thus must be implemented properly and expeditiously. The only questions for the Commission to resolve are how to implement number portability, and when. AT&T submits that, based on the record developed in this docket, the Commission should fulfill its statutory duty by selecting the Location Routing Number ("LRN") permanent solution, and ordering its implementation beginning in mid-1997 pursuant to the schedule set forth herein.

I. LRN is the Consensus Choice for a Permanent Number Portability Solution

Carriers have agreed that a permanent number portability solution must perform six essential functions.<sup>2</sup>

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<sup>2</sup> Carriers have agreed that the solution must allow customers to "port" their telephone numbers to the carrier of their choice, while (i) conserving numbering resources, (ii) eliminating the need to route through incumbent carriers' networks, (iii) maintaining the quality of all service interactions, (iv) maintaining provision of operator services, (v) ensuring proper routing of 911 and E911 calls, and (vi) preserving existing rating and billing arrangements.

AT&T's LRN solution has proven to be the only proposal that meets all of these criteria. For this reason, LRN has been selected for implementation by two state commissions, and chosen by industry workshops sponsored by state commissions in five others.<sup>3</sup> No state commission or workshop has selected a different portability solution.

II. The LRN Permanent Number Portability Solution  
Can Be Initially Deployed By Third Quarter 1997

The Commission should require deployment of the LRN permanent solution in selected markets by the close of third quarter of 1997, thereafter promptly expanding, in stages, the availability of portability to other markets. The two principal tasks necessary to this schedule -- deployment of the industry (or "regional") Service Management System/database ("SMS")<sup>4</sup> and implementation of necessary

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<sup>3</sup> LRN has been selected by state commissions in Georgia and New York. It has been endorsed in state sponsored workshops in California, Colorado, Florida, Illinois, and Maryland.

<sup>4</sup> As explained in AT&T's Comments, an industry SMS containing all necessary customer and network address information will be made available for telecommunications carriers to use to download such information into their own network routing systems. One such industry SMS (the "regional SMS") will be deployed to support number portability in each "portability" region. Each of these regional SMSs should be designed to the same specification requirements and operational procedures.

network upgrades by individual telecommunications carriers -- can easily be completed within this timeframe.<sup>5</sup>

A. Deployment of the Regional SMSs

The Commission should first direct a neutral and inclusive industry body to develop an evaluation process for responses to a request for proposal ("RFP"), and to solicit bids and select a vendor for the SMS to be deployed in a specific "portability" region. This inclusive industry group should also select a neutral third party to administer the SMS. If the Commission acts promptly, the RFP solicitation and selection process can be completed by early fourth quarter 1996, and the regional SMSs may be tested and deployed by the close of second quarter 1997.

Experience in the states shows that this schedule is entirely realistic. In Illinois, the process to select both the SMS vendor and administrator began in October 1995, and is expected by all parties to be completed in April 1996.<sup>6</sup> The

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<sup>5</sup> See, e.g., Georgia Number Portability, Docket No. 5840-U, Selection Committee Report ("Georgia Selection Report") to the Georgia Public Service Commission ("Georgia PSC"), January 8, 1996, Attachment 7. (showing completion of these two requirements to support LRN in third quarter 1997). AT&T recognizes that STPS, SCPs, and billing and operations support systems will also need to be upgraded to support LRN. These modifications can also be accomplished in this timeframe. See, *id.*, (calling for carrier SMSs, and changes to billing and operations systems, to be completed by May 1997).

<sup>6</sup> In Illinois, an industry body acting at the direction of the Commerce Commission began seriously developing the

SMS will be constructed and ready for testing in December 1996, and made operational by the second quarter of 1997. Thus, in its entirety, the SMS development process in Illinois will take approximately eighteen months. This is a time frame that likely can be compressed in the future based on the experience and information that will be acquired from this first development process.<sup>7</sup>

B. Modifications to Carrier Networks

Carriers should be able to complete network upgrades necessary to support LRN deployment in the third quarter of

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criteria for evaluating responses to an RFP for an industry SMS for the state in October 1995, issued the RFP based on these criteria in February 1996, received responses in March, and will chose the SMS vendor and SMS administrator in April.

<sup>7</sup> AT&T believes that the Commission can direct industry groups to develop regional SMSs for deployment in support of a permanent, national solution within 12 to 13 months. Such a process would allow one month for the industry groups to review the Illinois RFP, and an additional month for the groups to make appropriate technical and legal changes to the RFP. The RFP would then be issued for bid, and a vendor and neutral administrator selected, within two additional months.

The vendor would then build the SMS within six months based upon detailed interface requirements. The vendor and the industry would be afforded three months to fully test the SMS. This nine month development process would bring the total selection and development time to 13 months. This is consistent with the schedule in Georgia, where the RFP will be issued in April 1996 and is expected to be deployed in May 1997.

1997.<sup>8</sup> As a preliminary matter, all major switch vendors have indicated that they can provide all of the software upgrades necessary for deployment of the permanent LRN solution by the second quarter of 1997.<sup>9</sup> This includes both "generic" switch software, and any application software necessary to enable switches to support LRN.

Software deployment should consume significantly less time than software development. Industry estimates developed in workshops sponsored by the Georgia PSC have shown that LRN software upgrades can be integrated and tested in Lucent 5ESS<sup>TM</sup> switches in the Atlanta area within six months of the software's initial availability,<sup>10</sup> and that LRN upgrades

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<sup>8</sup> Indeed, carriers have already committed to the minimum level of upgrades within the timeframe necessary for AT&T's "phased" schedule, as hereafter described. For reasons stated in AT&T's Reply Comments (pp. 23-24), the Commission should "phase" deployment so as to afford sufficient time for carriers, such as wireless carriers and rural exchange carriers, that may be required to make more extensive network modifications to support number portability.

<sup>9</sup> These vendors include Lucent Technologies, Northern Telecom, Siemens, and Ericsson. See, e.g., Joint Petition for Approval of Stipulation and Agreement Relating to the Implementation of Local Number Portability, p. 3, Illinois Commerce Commission, Dkt. No. 96-0089, February 23, 1996.

<sup>10</sup> The "generic" software for Lucent Technologies 5ESS<sup>TM</sup> switches will first be available in Decemebr 1996. See Georgia Selection Report, Attachment 7. The Georgia PSC intends to have all LRN software deployed and fully operational in 20 of the approximately 70 BellSouth switches in the Atlanta area by the third quarter of 1997. The 5ESS and other Lucent switches will require upgrades of the "generic" software, and installation of LRN

can be integrated into other switches in the Atlanta area within a similar period of time.<sup>11</sup> Thus, the Georgia PSC, which established a final implementation schedule as recently as January, has targeted July 1997 as the deployment date for LRN in Atlanta.<sup>12</sup>

Importantly, the Georgia proceeding demonstrates that only a portion of each carrier's switches in any area will initially need to be modified to introduce LRN.<sup>13</sup> Based on the Georgia experience, AT&T believes that a similar approach to a national implementation schedule is feasible.

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applications software. Switches of other manufacturers will require at a minimum the installation of the LRN application software.

<sup>11</sup> Id. These include the Ericsson, Siemens, Northern Telecom, and other Lucent switches.

<sup>12</sup> Id. Once the generic software for Lucent switches is made available, AT&T understands that, after a short "ramp-up" period, Lucent will be able to provide technical support for upgrades in the "generic" of approximately 50 Lucent switches per week, for carriers across the nation. AT&T also believes that individual LECs can upgrade the generic software in approximately 10 to 15 switches per week. Based on experience with 800 number portability, AT&T estimates that individual LECs can install LRN application software in 10 to 15 switches per week, once the generic software is upgraded.

<sup>13</sup> In areas where LRN has been deployed in less than all switches, customers will at a minimum be able to "port" between LRN-capable switches, and may, in certain network configurations, be able to "port" between additional switches.

AT&T notes that the Commission could adopt a schedule requiring deployment of LRN<sup>14</sup> in the Atlanta and Chicago metropolitan statistical areas ("MSAs") in third quarter 1997. Allowing for the acquisition of valuable testing, troubleshooting, and deployment information in these MSAs, the Commission could require deployment of LRN in at least 1 MSA in each of the remaining 5 RBOC service regions,<sup>15</sup> and at least 3 additional MSAs in the BellSouth and Ameritech service regions, in fourth quarter 1997. Deployment could follow in at least 3 more MSAs in each of these 5 RBOC service regions in first quarter 1998. The initial phase could be completed with deployment in at least four more MSAs in each of the 7 RBOC service areas in the second and third quarters of 1998, respectively. This conservative schedule illustrates that permanent portability could easily be introduced into at least 84 MSAs within two years.<sup>16</sup>

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<sup>14</sup> Upgrades would consist of LRN deployment in 20 to 25 switches (20 for the incumbent and at least 1 for each alternative carrier) in each market.

<sup>15</sup> As used herein, "RBOC service region" refers to all areas within those states where an RBOC provides service, including areas where a non-BOC is the incumbent.

<sup>16</sup> This schedule would achieve deployment in a total of 2 MSAs in third quarter 1997, 13 MSAs in fourth quarter 1997, 28 MSAs in first quarter 1998, 56 MSAs in second quarter 1998, and 84 MSAs in third quarter 1998. The Commission of course retains discretion to determine how markets for introduction of number portability will be selected. It is important to note that under this schedule, no carrier must upgrade more than 80 switches in any quarter, and in the

III. Current Interim Portability Arrangements Do Not Fulfill Act Competition

The Commission should not delay deployment of a permanent portability solution based on the availability of "interim" portability arrangements. The Act requires that functionality be preserved when number portability is provided and that portability costs be recovered in a neutral manner; current interim arrangements do neither.<sup>17</sup> First, "interim" arrangements impair transmission quality, network reliability, and network maintenance functions of alternative carriers, and deprive their customers of many "vertical" features. Such arrangements do not fulfill the Act's intent to allow customers to retain their numbers "without impairment of quality, reliability, or convenience,"<sup>18</sup> when switching to an alternative carrier. Second, incumbents have requested authority for rate structures for interim arrangements that

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first nine months, all carriers will be upgrading substantially fewer. In light of estimates that, given lead time, carriers can upgrade 10 to 15 switches per week, all carriers should be able to comply with such a schedule without difficulty.

<sup>17</sup> The Act expresses a clear preference that all carriers provide and support permanent number portability, and tolerates "interim" arrangements only until such time as the Commission can develop appropriate rules to implement a permanent solution.

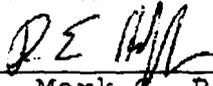
<sup>18</sup> Act, Section 3(a)(46).

place unwarranted cost burdens on alternative exchange carriers.<sup>19</sup> These rates conflict with the Act's clear directive that the costs of number portability "shall be borne by all telecommunications carriers on a competitively neutral basis."<sup>20</sup>

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<sup>19</sup> In Illinois, for example, Ameritech has proposed a service order charge of \$34.50, a one-time charge of \$20.50 for each line "ported," and a \$3.00 monthly per-line fee, for RCF. These rates appear to bear little relationship to costs. Cf., Response of New England Telephone Company, d/b/a NYNEX Corp., State of Rhode Island, Dkt. 2252, December 8, 1995 (incremental costs for RCF are 57 cents per line per month).

<sup>20</sup> Act, Section 251(e)(2). Until LRN is implemented, the Commission should require that incumbent carriers and alternative carriers absorb an appropriate share of costs of interim portability arrangements to ensure that costs are recovered "on a competitively neutral basis."

CERTIFICATE OF SERVICE

I, Karen Gillis, do hereby certify that on this 29th day of March, 1996, a copy of the foregoing Comments of AT&T Corp. was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached.

  
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Ameritech Operating Companies	Ameritech
Association for Local Telecommunications Services	ALTS
Association of Public Safety Communications Officials	APSCO
AT&T	AT&T
Bell Atlantic	Bell Atlantic
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BellSouth Corporation	BellSouth
California Cable Television Association	CCTA
California (People and State of), California Public Utility Commission	CA PUC CPUC
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<b>Telecommunications Resellers Association</b>	<b>TRA</b>
<b>Telemation International, Inc.</b>	<b>Telemation</b>
<b>Teleport Communications Group, Inc.</b>	<b>TCG</b>
<b>Teleservices Industry Association</b>	<b>TIA</b>
<b>Texas Advisory Commission on State Emergency Communications</b>	<b>TX ACSEC</b>
<b>Texas Public Utility Commission</b>	<b>Texas PUC</b>
<b>Time Warner Communications Holding Inc.</b>	<b>TWCOMM</b>
<b>US Airwaves Inc.</b>	<b>US Airwaves</b>
<b>US Intelco Networks Inc</b>	<b>US Intelco</b>
<b>US Small Business Administration</b>	<b>SBA</b>
<b>US West Communications Inc</b>	<b>U S West</b>
<b>United States Telephone Association</b>	<b>USTA</b>
<b>Yellow Pages Publishers Association</b>	<b>YPPA</b>