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April 5, 1996

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D. C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of:

Telephone Number Portability )  
 ) CC Docket No. 95-116  
 )

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Dear Mr. Caton:

Enclosed are an original and eleven copies of the Comments of Cincinnati Bell Telephone in the above referenced proceeding. A duplicate original copy of this letter and attached Comments is also provided. Please date stamp this as acknowledgment of its receipt and return it. Questions regarding these Comments may be directed to Ms. Patricia Rupich at the above address or by calling (513) 397-6671.

Sincerely,

David L. Meier  
Director - Legislative &  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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

In the Matter of

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CC Docket No. 95-116

Telephone Number Portability

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**REPLY COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY**

Cincinnati Bell Telephone Company ("CBT"), an independent, mid-size local exchange carrier, pursuant to the Commission's March 14, 1996 Public Notice in the above-captioned proceeding,<sup>1</sup> submits these reply comments to address certain issues raised in the comments filed in this proceeding on March 29, 1996.

As stated in its initial comments filed in this proceeding on September 12, 1995, CBT believes that any long-term solution should be developed with the goal of achieving maximum routing efficiency through minimal database queries; make use of flexible time lines for implementation; and be subject to a thorough cost-benefit analysis. The Telecommunications Act of 1996 (the "Act") does not override these important public policy goals.

**I. Long-Term Solution Must Combine Efficient Routing and Querying Methodologies**

As indicated in its September 12, 1995 comments, CBT supports the development of a uniform, national, long-term number portability solution. As evidenced by the comments filed in this proceeding, a solution based upon the Location Routing Number (LRN) routing

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<sup>1</sup> The Public Notice (DA 96-358), dated March 14, 1996, sought comment on how the passage of the Telecommunications Act of 1996 affects number portability issues raised in the Commission's July 13, 1995 Notice of Proposed Rulemaking ("NPRM") in this proceeding.

methodology developed by AT&T seems to have garnered the support of many parties. Although CBT believes LRN holds considerable promise as a long-term routing methodology, CBT submits that it is important that the query methodology employed with LRN be one that minimizes the number of database queries. The query methodology is just as important as the routing methodology and should be carefully examined before a long-term solution is adopted by the Commission. Contrary to MCI's suggestion,<sup>2</sup> methodologies which significantly reduce the number of database queries, such as Query on Release (QOR), should not be dismissed out of hand. CBT submits that the QOR query methodology described by Pacific Bell<sup>3</sup> can be combined with the LRN routing methodology to achieve transparent number portability in a more cost efficient manner than solutions which would require a database query on every call.

Section 3(a)(46) of the Act defines number portability as "the ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another." A number portability solution that requires a database query on each and every call could place significant stress on the network, possibly causing unnecessary delays in call completion intervals for all calls, and widespread service disruption in the event of a database failure. By significantly reducing the number of database queries, a solution that uses a QOR-type query methodology would reduce the burden on the network. It also appears that a QOR-type methodology would not perceptibly delay call setup for ported

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<sup>2</sup> MCI at pp. 8-9.

<sup>3</sup> Pacific Bell at p. 4.

numbers.<sup>4</sup> Taking these factors into consideration, along with the reduced cost of QOR or other similar methodologies which reduce the number of queries, a number portability solution which combines LRN with a QOR-type query methodology appears to have considerable merit.

## **II. A Phased-In Implementation Schedule Should Be Adopted**

While CBT believes that LRN in combination with a QOR-type methodology has merit, it must be tested on a larger scale before it is adopted as the national, long-term number portability solution. CBT agrees with AT&T's suggestion that the solution chosen by the Commission should be phased-in gradually.<sup>5</sup> This approach will permit much-needed testing before a single number portability solution is implemented nationwide. Even though there is considerable agreement that the LRN routing methodology should be part of the long-term solution, even this methodology requires additional testing in order to ascertain how it interacts with existing network capabilities. A phased-in implementation schedule will enable considerable progress to be made in implementing long-term number portability while simultaneously allowing for critical testing.

## **III. Efficiency Considerations Must Not Be Ignored**

As the Commission considers the various number portability solutions proposed in this proceeding, it must not lose sight of the costs associated with those proposals. The Commission

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<sup>4</sup> MCI, while opposing QOR, acknowledges that any additional delay may not be perceptible to the consumer. MCI, Attachment B, Section 3.1.

<sup>5</sup> AT&T at p. 8.

should choose the most economically efficient number portability solution that is technically feasible to implement. Contrary to the suggestions of Time Warner and Teleport,<sup>6</sup> the Act does not require the Commission to ignore economic efficiency considerations. Indeed, CBT submits that rational decision-making requires careful analysis of the costs and benefits associated with the various proposals under consideration. Most importantly, ignoring economic efficiency would not serve the interests of consumers who will ultimately bear the cost of any decision made by the Commission in this proceeding.

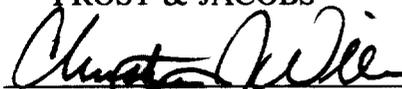
#### IV. Conclusion

CBT urges the Commission to proceed cautiously as it implements a national, number portability solution. To require nationwide deployment of a long-term solution before it has been tested on a large scale, and without adequate consideration of the costs involved, would not be rational and would not serve the public interest.

Respectfully submitted,

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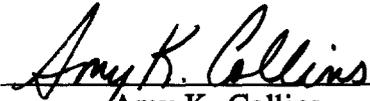
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<sup>6</sup> Time Warner at pp. 3-4; Teleport at p. 4.

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing **Comments of Cincinnati Bell Telephone Company** have been delivered by first class United States Mail, postage prepaid, on April 5, 1996, to the persons on the attached service list.

  
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