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# Georgia Public Service Commission

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DATE: April 5, 1996

TO: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

FROM: Georgia Public Service Commission

RE: Notice of Proposed Rulemaking and Request of Comments in the Matter of Telephone Number Portability (CC Docket No. 95-116)

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It is possible that the package containing the Comments of the Georgia Public Service Commission, dated March 28, 1996 contained a copying error. Some of the internal copies were missing the first line on the last page. In the event that you did not receive a complete copy, I am enclosing another copy containing the full comments. Please accept our apology for any inconvenience this may have caused.

Sincerely,

B. B. Knowles

B. B. Knowles, Director
Utilities Division

cc: Policy and Program Planning Division, Common Carrier Bureau
International Transcription Services, Inc.

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Before the
Federal Communications Commission
Washington, DC 20554

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| In the Matter of | } | |
| Telephone Number Portability | } | CC Docket No. 95-116 |

Comments of the Georgia Public Service Commission

1. The Georgia Public Service Commission ("Commission") is the regulatory agency charged by the State of Georgia to ensure that rates and terms of services provided by public utilities, including telecommunications public utilities, are just, reasonable and in the public interest. Furthermore, the Commission is charged with implementing and administering Georgia's new Telecommunications Competition and Development Act of 1995 (Section 2 of S.B. 137 effective July 1, 1995), O.C.G.A. Sections 46-5-160 *et seq*. As part of this responsibility, the Commission shall establish the framework for the implementation and administration of portability of local telephone numbers.

2. In July, 1995, the Federal Communications Commission opened this docket to gather information and reach conclusions as to what steps it should take at the national level regarding telephone number portability. Extensive comments and reply comments were provided to the FCC by many parties.

3. On February 8, 1996, the Telecommunications Act of 1996 was signed into law. That Act requires among other things that the FCC issue rules in a variety of areas, including Number Portability, within six months of enactment. The FCC has committed to meet or beat those deadlines, and has publicly released its Implementation Schedule for its responsibilities under the Act. Within that Schedule, the FCC plans to issue a final order in this docket in May of this year.

4. The FCC is providing an opportunity for further comments in this docket, prior to that final order, given passage of the Act after this docket was opened. Comments are requested to be limited to 10 pages or less.

5. The Georgia Public Service Commission strongly urges the FCC to focus on broad guidelines and more general (rather than specific or detailed) rules in its Number Portability final order. Doing so will allow states flexibility for number portability implementation, and preserve the substantial progress of the states which have been first to require implementation of permanent number portability. Preservation of, and leveraging on number portability implementation in early states by the FCC will substantially speed the deployment of permanent number portability across the country. In support of this, the Commission offers the following:

There is no need for FCC requirement of a "national solution", a "de facto" standard has emerged from state action. Industry concern that "there has to be a national standard" are becoming moot with the passage of time, and the cumulative effect of joint industry/state commission action in several large states. As a result of industry efforts, in Georgia, Illinois

and Maryland the same call model architecture (or "standard") has been selected--AT&T's Location Routing Number (LRN) model. New York's number portability trial supports the implementation of LRN. There are indications that the next cluster of states are pushing forward on number portability (California, Colorado and Washington). The cumulative impact of individual state actions is that the "standard" call model architecture is LRN. This resulting "de facto" standard has a grassroots basis, and has been unanimous to date.

Manufacturers are developing the network functionalities to deploy LRN. Based on industry and Commission decisions in Georgia, Illinois and Maryland to deploy LRN, switch manufacturers have funded development of switch software modifications to enable LRN. Development is occurring pursuant to specific technical requirements documented in Illinois in Generic Requirements FSD 30-12-0001, draft dated 2/12/96. It is extremely significant that development is funded and occurring now. This takes LRN from possibility to reality.

Substantial Commission and industry resources have been devoted to a detailed and comprehensive technical analysis of options. The industry in Georgia (and other states) has devoted a large amount of time, and technical and managerial attention to the selection process. (See attached Commission order dated 2/29/96, adopting the recommendation and Report of the Selection Committee dated 1/8/96.) The high quality of the industry effort is shown in the Selection Committee Report, which includes an Introduction, the Selection Process, Implementation Plans, Implementation Planning Issues, Recommendations, Requested Actions From the Commission, and Attachments.

In particular, the industry developed a detailed, technical and comprehensive Evaluation Framework, asked for technical proposals from solution proponents, heard substantive presentations from those proponents (including time for open questions and answers), individually graded the solutions against the Framework requirements, discussed the grades as a group, and then made a selection. From this thorough and rigorous process, LRN was selected by the industry workshop.

The selection process has been entirely "open", and participation has been substantial. The Commission opened the Number Portability Workshop proceeding in July, 1995. Broad notice was provided, and in particular all telecommunications providers were asked to participate. Commission staff monitored and facilitated the meetings and processes. The first workshop meeting was in August, with high attendance from all segments of the industry. At every step, the actions, direction and decisions of the industry in the workshop were openly decided and widely disseminated.

The Commission has conducted hearings, evaluated the record and the industry recommendation and determined that: "AT&T's Location Routing Number (LRN) proposal be selected as the permanent long-term call model for database number portability in Georgia." The Commission further ordered that number portability be implemented on a phased in basis in a manner determined jointly by the industry, and that an implementation committee be established to project manage and work the issues associated with number portability implementation. The Commission established frequent checkpoints throughout the

process to monitor status, and require regular reports from the implementation committee. (See attached Commission order dated 2/29/96.)

Implementation of number portability is proceeding expeditiously. The industry has committed, and the Commission has accepted the implementation of LRN by mid-year, 1997. As a result of the industry recommendation and the Commission order, an industry Implementation Committee (and related technical subcommittees) are striving to implement LRN in designated switches in the Atlanta area beginning in June, 1997.

6. In conclusion, the Commission urges the FCC to recognized that adoption of detailed, definitive rules in the final order in this docket poses substantial risks to the progress made by states in implementation of number portability. Research, technical evaluation and hard work by the industry and commission in several states have yielded a common direction, where disparity and disorder was once the industry fear. The FCC should leverage on this positive development, to promote the deployment of number portability nationwide.

7. An FCC determination to build on number portability progress in the states with board, general rules yields a critical further benefit. It enhances and strengthens the working federal/state partnership so essential to successful implementation of the Telecommunications Act. Deference to state efforts in number portability, and the detailed technical progress that has been made to date is wise from a practical view, but also serves to build toward higher goals and broader achievements--comprehensive and successful implementation of the manifold requirements of the Telecommunications Act, and more rapid realization of effective telecommunications competition for the benefit of all Americans.