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Carol L. Bjelland
Director
Regulatory Matters
May 24, 1996

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

RE: EX PARTE: CC Docket No. 95-116 - Local Number Portability

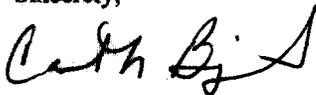
Dear Mr. Caton:

This letter shall serve as notification that, on May 23, 1996, Lynn Carlson and Bob Sclafani, representing GTE Mobilnet, together with Gordon Maxson and the undersigned on behalf of GTE Service Corporation, met with David Wye of the Wireless Bureau, and Jason Karp, Jeannie Su and Carol Matthey of the Common Carrier Bureau's Policy Division. The purpose of this meeting was to discuss the implications of number portability on wireless services and wireless service providers.

The attached material summarizes the points covered in the discussion.

Please include this notification, and the attached discussion materials, in the record of this proceeding in accordance with the Commission's rules concerning ex parte communications.

Sincerely,



Carol L. Bjelland

Attachments

CC: J. Karp
C. Matthey
J. Su
D. Wye
K. Brinkmann

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GTE LNP POSITION FOR CMRS PROVIDERS

- **Congress, Per the Telecommunications Act, Does Not Require Number Portability for CMRS Providers**
- **Congress Requires LECs to Provide Service Provider Portability Only**
- **It Would Be Premature To Impose Service Provider Portability on CMRS Providers**
- **A Service Provider Portability Solution for Wireline Services Should Be Initially Developed With Strong Consideration for Future CMRS Implementation**
- **After Implementation of a Wireline Service Provider Portability Solution, a CMRS Solution for Service Provider Portability Should Be Considered**
- **After Implementation of Service Provider Portability for Wireline and CMRS Providers, Service Portability and Location Portability Should Then be Considered**

GTE LNP POSITION CMRS CONSIDERATIONS

- 1) A single uniform national routing solution for number portability is needed due to impacts of multiple routing solutions on CMRS service providers. GTE advocates a long-term common number portability routing solution across LEC and CMRS networks with the "triggering" method being the CMRS provider's choice. (Rationale is reduced industry costs by focusing on one approach and this will ultimately help facilitate service portability between LECs and CMRS)**

- 2) Any phased-in Service Provider Portability approach involving CMRS would create significant problems for CMRS providers as they all would be impacted by the implementation of number portability in any CMRS networks, even if only a few CMRS service providers are number portability participants. A phased-in approach would effect certain CMRS functions such as roaming, fraud detection, and billing. The capability to roam within the NANP region must be maintained. In addition, the existing capability to roam internationally should not be diminished.**

- 3) GTE believes CMRS to CMRS service provider portability should be considered after LEC service provider portability is in service nationally (or in large geographic areas) and functions well with the PSTN. GTE envisions the CMRS service provider portability implementation time frame to be from year 2000 to 2005.**

- 4) GTE believes that portability of the same number between LECs and CMRS Providers today falls within the FCC's definition of service portability, and this is not addressed by the 1996 Telecommunications Act.**

- 5) Service provider portability anywhere in the PSTN network potentially impacts CMRS providers' call handling systems. This is because these systems rely on the directory number to function. Therefore, the CMRS industry needs to be involved in selection of portability technology to be deployed.**