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May 24, 1996

EX PARTE OR LATE FILED

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, DC 20554

MAY 21 1996
COMMUNICATIONS SECTION

Re: **Ex Parte - CC Docket No. 95-116 - Local Number Portability**

Dear Mr. Caton:

This is to advise that Ted Noeker and John Rollins of GTE Telephone Operations, Bob Sclafani and Lynn Carlson of GTE Mobilnet, Steve McCraney of NORTEL, Carol Bjelland of GTE Service Corporation and I met yesterday with the following Commission staff personnel to review GTE's concern with triggering mechanisms for local number portability:

Carol Matthey, Jason Karp, Jeannie Su, Susan McMaster, Mindy Littell and Jason Grant of the Common Carrier Bureau, and Karen Brinkmann of the Wireless Telecommunications Bureau.

A copy of the talking paper used in the meeting is attached.

The participation of Mr. McCraney was limited to verifying the availability of QOR software.

Two copies of this notice are filed in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Very truly yours,

F. Gordon Maxson
Director - Regulatory Affairs

C: Carol Matthey
Karen Brinkmann
Jason Karp
Jeannie Su
Susan McMaster
Mindy Littell
Jason Grant
David Wye

Attachment

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LOCAL NUMBER PORTABILITY GTE TELEPHONE OPERATIONS

PURPOSE OF MEETING

- DISCUSS EFFORTS BY PROPONENTS OF LRN TO DISCREDIT ALTERNATIVE TRIGGERING MECHANISMS.
- DISCUSS STATEMENTS MADE BY AT&T ABOUT QUERY ON RELEASE (QOR) WHICH ARE NOT FACTUAL

MANY INCONSISTENT MESSAGES BEING SENT

- STATEMENTS SUCH AS "ONLY PROVEN SOLUTION" IS MISLEADING - NO SOLUTION IS PROVEN.
- DESPITE CLAIMS THAT LRN FULLY MEETS TECHNICAL REQUIREMENTS DETAILED ANALYSIS BY SUB-TEAMS UNCOVERING SIGNIFICANT ISSUES.
- CLAIMS THAT "CARRIER CHOICE" WILL DELAY IMPLEMENTATION, IMPACT COMPETING NETWORKS, ETC., ARE UNSUBSTANTIATED.
- QOR WAS NOT EXAMINED IN ANY STATE UNTIL CALIFORNIA. THE CA PUC SAW FIT TO ORDER FURTHER REVIEW

INTEROPERABILITY IS NOT UNIQUE TO QOR

- INTEROPERABILITY WILL BE AN ISSUE WITH ALL PROPOSALS
- LRN REQUIRES ADDITIONAL LOGIC IN THE SWITCH WHICH COULD IMPACT THE INTEROPERABILITY OF OTHER SWITCHES
- QOR CAN BE SET UP AS AN INTRA-NETWORK OR INTER-NETWORK CAPABILITY WITH APPROPRIATE BUSINESS ARRANGEMENTS.

AVAILABILITY OF QOR FUNCTIONALITY - NOT AN ISSUE

- LRN AND QOR WILL BE AVAILABLE 2Q97 ON DMS - 100
- OTHER SWITCH VENDORS INDICATE THAT QOR WILL BE AVAILABLE IN THE SAME TIME FRAME AS LRN
- AT&T / LUCENT COULD UNILATERALLY DELAY QOR ON THEIR SWITCHES, THEY HAD REPORTED TO THE CALIFORNIA WORKSHOP THEY WOULD CONSIDER ONLY LRN

POST DIAL DELAY IS OVERSTATED

- AT&T ESTIMATES QOR WOULD IMPOSE INCREMENTAL DELAY OF MORE THAN ONE SECOND
- CALCULATIONS DONE BY OTHERS, THE TOTAL DELAY ATTRIBUTABLE DIRECTLY TO QOR IS ONLY 330 MS.
- LRN METHOD REQUIRES 475 MS FOR DIPPING EVERY CALL; ADDING 330 MS TO CALLS TO ONLY PORTED NUMBERS RESULTS IN 805 MS.
- IN TODAY'S ENVIRONMENT, ANY POST DIAL DELAY LESS THAN 1.5 SECONDS IS IMPERCEPTIBLE TO THE CALLER.

SIGNIFICANT COST SAVINGS CAN BE REALIZED

- MINIMIZING THE NUMBER OF QUERIES WILL RESULT IN COST SAVINGS
- AT&T'S LRN PROPOSAL REQUIRES EVERY CALL TO BE "DIPPED"
- STUDIES SUGGEST THAT QOR IS STILL MORE EFFICIENT WITH UP TO 65% OF THE CALLS GOING TO PORTED NUMBERS.

CONCLUSION

- RECORD IS CLEAR THAT PROPONENTS OF A PARTICULAR SOLUTION ARE CONFUSING THE ISSUES.
- GTE BELIEVES THAT THE TECHNICAL STANDARDS NEED TO BE DEVELOPED PRIOR TO THE SELECTION OF ANY SOLUTION
- GTE CONTINUES TO SUPPORT THE POSITION THAT ANY PROPOSAL MUST BE SUBJECTED TO A TECHNICAL TRIAL.
- GTE CONTINUES TO SUPPORT ALTERNATIVE TRIGGERING MECHANISMS PROVIDING THEY MEET STANDARDS, INCLUDING POST DIAL DELAY.