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Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the matter of:

Telephone Number Portability

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CC Docket No. 95-116
RM 8535

**PETITION OF AIRTOUCH COMMUNICATIONS, INC.
FOR RECONSIDERATION AND CLARIFICATION**

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AirTouch Communications, Inc. ("AirTouch") hereby petitions for reconsideration and clarification of the Commission's First Report and Order in the above-captioned proceeding.

Summary of Position

The Commission should not require carriers to contribute to shared number portability costs until they actually serve ported numbers. Many carriers and their customers will not derive any benefit from number portability for some time, and it would not be competitively neutral to require them to bear the cost of providing number portability to other carriers and their customers without obtaining the benefits of number portability.

The Commission needs to clarify that carriers have maximum flexibility in determining how to implement number portability, as long as they satisfy the Commission's performance criteria. Some language in the Commission's order appears to assume that all carriers will upgrade their networks to Intelligent Network or Advanced Intelligent Network capabilities in order to perform the database dips that will be required in order to route calls to ported numbers. Although most carriers are likely to do so in the long run, for many carriers it will be more cost-effective in the short and medium term to arrange with other carriers to perform

database dips and possibly other routing functions. The Commission should clarify that this option will remain available for all carriers.

The Commission should also clarify that a carrier originating a call is free to rely upon another carrier for all or a portion of the routing of that call to the terminating carrier, if it desires to do so, without the consent of the terminating carrier. If the Commission's fourth performance criterion for number portability is interpreted literally to require the consent of all carriers participating in a call for such techniques to be employed, carriers other than incumbent LECs could effectively be required to establish direct connections with other carriers despite the Commission's determination to the contrary in its interconnection rules.

The Commission needs to clarify that local number portability is limited to carriers that otherwise serve the NPA of a ported number. Without this limitation, because of the overlap of wireless service area boundaries the introduction of service provider number portability would lead unavoidably to *de facto* nationwide location portability and the need for an impossibly large database in order to determine the proper routing of calls.

The Commission should authorize the Chief of the Wireless Telecommunications Bureau to extend the deadline for implementation of wireless number portability for as long as necessary in order to develop and test a complete solution. The implementation of number portability in wireless environments will be much more complex than it will be for landline networks, and limiting the Bureau Chief to a nine month extension of the deadline could result in premature implementation of a flawed number portability solution.

Finally, the Commission should not permit states to allocate interim number portability costs on the basis of carriers' revenues. Only an allocation based upon retail minutes of use

would be competitively neutral, although an allocation based on total access or presubscribed lines may be defensible for the short period at issue.

I. Any Obligation to Contribute to Costs Incurred by Other Carriers Should Be Triggered Only at the Time of Number Portability Implementation.

The Commission should allocate shared number portability costs among only those carriers who actually serve ported numbers. To do otherwise would disproportionately burden those carriers and their customers who derive only indirect benefits from number portability.

Initially, the only direct beneficiaries of number portability will be new entrants in the wireline local exchange market, who currently face a major hurdle in trying to woo customers away from incumbents who control their numbers. IXCs will also benefit significantly from the new competition for access services, especially on the terminating end of calls, that will be facilitated by number portability. While it can be argued that all carriers and customers eventually will benefit from the opening of all telecommunications markets to competition, the benefits of number portability will be more attenuated for those carriers that do not actually serve customers who have ported their numbers.

Even assuming that the industry is able to meet the Commission's somewhat ambitious implementation schedule, wireless carriers will not be providing number portability until six to twenty months after it is implemented by wireline carriers in the 100 largest MSAs.¹ Over the medium term, wireline carriers outside the 100 largest MSAs need not provide number portability until they receive a bona fide request, and numerous carriers serving predominantly

¹ While the Commission has established a deadline, rather than a uniform implementation date, for wireless carriers to begin providing number portability, as a practical matter all cellular carriers must implement number portability at the same time because of its effect on roaming relationships.

rural areas may not provide number portability for many years. In the long run, some carriers in a fully competitive market may seek to differentiate themselves by marketing their services at a discount without number portability.

Every carrier that originates telecommunications traffic must be able to have its customers' calls terminated in areas where number portability has been implemented. Wireless carriers should not be required to contribute to the cost of long term number portability solutions until they provide number portability to their own customers. It would not be competitively neutral for carriers and customers who derive no benefit from number portability to be burdened with the cost of providing number portability to other carriers' customers.

Carriers should bear their own carrier-specific number portability costs, most of which must be incurred in order to support number portability whether or not a particular carrier provides number portability or serves ported numbers.² Fairness dictates that carriers who do not serve ported numbers should not be required to bear shared number portability costs to the same extent as those who do.

For the same reason, the Commission should also clarify that only carriers actually participating in interim number portability should bear the costs thereof. Local exchange carriers who have received no requests for interim number portability, wireless carriers, and interexchange carriers, will derive no benefit whatsoever from interim number portability, and it would not be competitively neutral to burden them with its costs.

² The administrative cost associated with transferring a particular number from one carrier to another may be the only carrier-specific cost that is unique to carriers directly involved in the porting of numbers.

II. The Commission Should Grant Telecommunications Carriers Maximum Flexibility in Determining How to Implement Number Portability in a Manner that Is Consistent with its Number Portability Performance Criteria.

A telecommunications carrier that does not directly participate in number portability has at least three options for terminating its customers' calls to customers of carriers that are directly participating in number portability. First, it can upgrade its network to IN/AIN/WIN capability and establish its own SCP database(s), perform database dips into its SCP(s) in order to determine the appropriate routing, and pass each call directly or indirectly to the terminating carrier. Second, it can upgrade to IN/AIN/WIN capability but arrange to use another carrier's SCP³ (or an SCP provided by a non-carrier), while still passing each call to the terminating carrier. Finally, a carrier that does not have IN/AIN/WIN capability can arrange with another carrier for the second carrier to both perform the database dip and route the calls directly to the proper terminating carrier.

In the *Further Notice of Proposed Rulemaking*, the Commission noted that it is mandating the deployment of number portability only in those areas where incumbents have competitive incentives to upgrade their networks.⁴ This statement implies that the Commission might expect all carriers to upgrade to IN/WIN/AIN in order to support long term number portability. The Commission should affirmatively confirm that all of these options remain available to carriers that directly participate in number portability.

³ Carriers will be able to access SCPs operated by incumbent LECs as unbundled network elements. *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, First Report and Order, ___ FCC Rcd ___ (August 8, 1996), at 232-36 (¶¶ 484-92). Carriers other than incumbent LECs are also likely to seek additional revenue by providing access to their SCPs.

⁴ *Further Notice* at 115 (¶ 228).

In the long run, most carriers will probably choose to implement IN/AIN/WIN capabilities so that they can perform their own database dips, and many will establish their own SCPs. It may often be more cost-effective, however, for several carriers to share a single SCP rather than develop a separate SCP for each carrier. And some smaller carriers, and even larger carriers in smaller markets, may find it more affordable to arrange with another carrier to perform the full switching function (*i. e.*, recognition that a database dip is required, performance of the database dip, and routing to the terminating network), even for calls that terminate on their own networks.⁵

As the Commission has noted, IN and AIN capabilities enable a carrier to offer a broad range of services unrelated to number portability that affect the relative competitive positions of carriers depending upon whether they offer such services.⁶ Competition from new entrants will over time drive most incumbents to upgrade their networks to such capabilities. Different firms face different competitive pressures in different markets, however. In the absence of Commission compulsion, each firm must decide for itself how to balance competing demands upon its capital and other resources. Some carriers might postpone upgrades to IN/AIN/WIN in favor of devoting resources to other methods of improving services, or in favor of reducing costs in order to be more competitive. Other carriers might aggressively implement advanced network features in order to offer a full array of vertical and other features. Some carriers may misjudge the market and fail because they have invested too much or too little in network functionality, while

⁵ Incumbent LECs must perform this service as an unbundled network element upon request. *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, First Report and Order, ___ FCC Rcd ___ (August 8, 1996), at 197-205 (¶¶ 410-26).

⁶ *Further Notice* at 114 (¶ 227).

others may succeed spectacularly by effectively targeting customers who are more concerned with price than features, or *vice versa*. Such is the nature of competition.

If the Commission requires all carriers to upgrade their networks in order to support number portability, rather than arranging with other carriers or non-carriers to perform the necessary number portability support functions for them when it is more cost-effective to do so, it will distort the competitive process. Even incumbent LECs in major markets should have the flexibility to determine for themselves how best to support number portability, as long as they satisfy the Commission's performance criteria for long term number portability. An incumbent that is compelled to devote capital and other resources to implementing AIN capability will take little solace from its ability to compete more effectively on the basis of features if it loses business because those resources were diverted from other network upgrades intended to improve its coverage, capacity or service reliability.

Even carriers whose networks already support AIN capabilities have isolated switches whose functionality is limited. For example, in *Rules and Policies Regarding Calling Number Identification Service — Caller ID*, 11 FCC Rcd 1743, (December 7, 1995), the Common Carrier Bureau granted BellSouth a waiver of the Caller ID rules for several switches that lacked the necessary functionality.⁷ The LRN model requires that any switch to or from which any numbers have been ported be capable of performing database dips. Yet a large, multi-switch, AIN-capable carrier could support number portability to and from a switch without database dip capability by routing all incoming and outgoing traffic to and from that switch through a nearby

⁷ BellSouth has requested a waiver of the Commission's Rules related to switched access charges in order to permit the establishment of certain AIN-based services. *See, e.g.*, Public Notice, 11 FCC Rcd 1819 (January 17, 1996).

AIN-capable switch to perform the database dip. While such a configuration would be somewhat inefficient, it might be more cost-effective, especially as a temporary arrangement, than immediately replacing a switch that serves relatively light traffic volumes. A carrier with only one switch in an area should have the same option, assuming it can make satisfactory arrangements with another carrier to perform the database dip.

"Even AT&T has limited capital resources,"⁸ and all carriers today must make choices concerning how best to deploy limited resources. Under some circumstances, such constraints may warrant extensions or waivers of Commission deadlines, especially for smaller carriers.⁹ More importantly, however, the Commission must permit all carriers, large or small, new entrant or incumbent, to determine the best way to satisfy the Commission's number portability performance criteria by balancing the competing demands on their resources. For the Commission to mandate network upgrades, rather than the implementation of other measures that satisfy the performance criteria, would favor carriers that either have already implemented IN/AIN/WIN capabilities or would do so of their own accord within the next two or three years, at the expense of carriers that would prefer to respond to competition in other ways (such as by upgrading outside plant or reducing prices) while still satisfying the number portability performance criteria. Although the Commission has initially mandated number portability only in the "areas where the incumbent carriers would, solely for competitive reasons, likely upgrade

⁸ Henry, *For Now, Buying is Quicker than Building*, WASHINGTON TECHNOLOGY (February 22, 1996) (quoting Robert Allen, Chairman of AT&T).

⁹ *Rules and Policies Regarding Calling Numbering Identification Service — Caller ID*, Order and Fourth Notice of Proposed Rulemaking, ___ FCC Rcd. ___ (1995), at ¶¶ 62-65.

their networks,"¹⁰ it should permit carriers even in those markets to decide when competitive necessity requires them to upgrade their networks, so long as they satisfy the performance criteria.

III. The Commission Should Clarify that its Number Portability Performance Criteria Do Not Prohibit a Carrier from Unilaterally Relying Upon Another Carrier for the Routing and Transport of Traffic.

Under the Commission's fourth number portability performance criterion, carriers must have the ability to route calls and provide services without depending upon the networks of other carriers. AirTouch interprets this criterion to prohibit incumbents (especially incumbent LECs) from employing number portability methodologies, such as Query on Release, that require that calls to numbers that have been ported to other carriers be routed to the switch from which those numbers originally were served. Although the Commission noted that carriers may "voluntarily agree[] to use the original service provider's network,"¹¹ it needs to clarify that carriers other than the original service provider may do so without the consent of the carrier that will ultimately terminate the call.

Currently, virtually all wireless carriers are interconnected directly with the dominant LEC serving the same general geographic area as the wireless carrier. They generally are not interconnected directly with all of the other carriers serving the area, however, because the traffic volumes do not justify the cost of the trunks that would be required for direct connections to smaller incumbent LECs, IXCs and new local entrants.¹² The same is often true of small

¹⁰ *Further Notice* at 115 (¶ 228).

¹¹ *First Report and Order* at 30 (¶ 53).

¹² Indeed, in some cases the traffic volumes do not justify the administrative cost of negotiating an interconnection agreement.

LECs, many of whom exchange traffic through connections with a larger LEC rather than directly. In *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, First Report and Order, ___ FCC Rcd ___, CC Docket No. 96-98 (August 8, 1996) at 474 (¶ 997), the Commission correctly concluded that telecommunications carriers other than incumbent LECs are not obligated to establish direct connections with other carriers. The Commission also noted that some small incumbent LECs may be able to obtain exemptions from direct interconnection requirements.¹³ Yet, if the Commission's fourth number portability criterion is read literally to prohibit such carriers from continuing to arrange with the large incumbent LEC with whom they directly interconnect to route calls from their customers to numbers that have been ported from the incumbent LEC to other carriers, they effectively could be forced to establish direct interconnections with every other carrier in the local calling area.

AirTouch believes that the intent of the fourth number portability performance criterion is (1) to prohibit the implementation of a number portability model that necessarily involves the use of an incumbent's network to route or transport calls to customers who have ported their numbers to another carrier and (2) to prohibit an incumbent from implementing number portability in a way that involves routing calls originating on other networks through the incumbent's network in order to reach such customers. The Commission should clarify, however, that the criterion does not prohibit the carrier on whose network a call originates or a carrier that is providing a "bridging" function from relying upon the network of another carrier to route or transport calls to customers of the terminating carrier whose numbers have been ported from the originating or bridging carrier.

¹³ *Id.* at 104 (¶ 206).

IV. The Commission Must Clarify the Geographic Scope of Wireless Service Provider Portability.

The Commission needs to clarify the scope of local service areas for purposes of service provider number portability for wireless carriers. In the *First Report and Order* the Commission deferred to the states on the issue of whether and to what extent to require or permit location portability,¹⁴ but it should not do so with respect to wireless services and the overlap of wireless service areas. Because wireless service areas do not respect state boundaries, only this Commission can resolve the issues related to the geographic scope of wireless service provider number portability.

An illustration may assist in elaborating this problem. AirTouch's Georgia operations include a service area in the northern portion of the state, entirely within the Atlanta LATA, consisting of two MSAs and two RSAs. AirTouch customers have numbers in three NPAs: 404, 770 and 706. Within the Atlanta toll free (wireline) calling area, AirTouch generally assigns numbers from NPAs 404 and 770 based upon customer preference, while its customers based outside that area generally have numbers in the 706 NPA. By comparison, the Block A and B PCS licenses for the Atlanta MTA cover an area consisting of most of the state of Georgia, as well as portions of Alabama, South Carolina and Tennessee. Those licensees will assign their customers numbers from NPAs 912, 803, 423, 615 and 334, in addition to the three NPAs utilized by AirTouch. Under the Commission's new rules, could an AT&T Wireless PCS customer with a number from the 912 NPA in south Georgia switch to AirTouch and retain her

¹⁴ *First Report and Order* at 98 (¶ 186).

NPA 912 number although AirTouch does not otherwise serve any customers in that NPA? What about a customer with a number from the 803, 423, 615 or 334 NPA?

The Commission's general deference to the states concerning the geographic scope of rate centers and location portability would suggest that the Georgia Public Service Commission should decide whether the 912 customer can keep her number when switching to AirTouch. Yet, wholly aside from Section 332, the Georgia Commission has extremely limited or no jurisdiction over either AirTouch or AT&T Wireless under state law. The South Carolina Public Service Commission has jurisdiction over NPA 803, and its state law jurisdiction over wireless carriers appears to be broader than that of the Georgia Commission, but it has no arguable basis for jurisdiction over AirTouch, which does not operate in South Carolina. Similar situations exist throughout the country. Only this Commission can determine the extent to which customers may port numbers to carriers that do not otherwise serve the NPAs involved.

AirTouch submits that, at least until location portability is implemented on a broad basis, number portability should be limited to carriers that serve at least a portion of the geographic area represented by the ported number's NPA. As long as this is true, a carrier originating a call can be confident that, aside from roaming issues, the NPA of the called number still identifies the geographic area in which the terminating switch is located. If customers are permitted to port numbers to carriers that do not otherwise serve their NPAs, *de facto* nationwide location portability will result. Simply stated, local number portability in a wireless environment should be limited to those carriers serving the NPA of the ported wireless number.

The boundaries of the Atlanta MTA divide the service areas of cellular carriers other than AirTouch, whose service areas in turn overlap those of PCS licensees in other MTAs. If

customers are permitted to port their numbers across NPA boundaries, an AT&T Wireless customer in South Carolina, with a number from NPA 803, could port the number to a cellular carrier in Alabama, then to a Birmingham MTA PCS carrier, and across the country, carrier by carrier, to the West Coast, finally winding up as a wireline number in Seattle. While such peripatetic customers are likely to be few, support for number portability is something of an all-or-nothing proposition. Under the LRN model, if even a single 803 NPA customer is permitted to port his number outside South Carolina, every carrier in the country that originates a call to any number in the 803 NPA must perform a database dip in order to locate the terminating switch. The database required to support such a scenario would not be possible using late twentieth century technology.

It is critical that the Commission clarify this issue at this time, because it will fundamentally affect the design of any wireless number portability solution. As noted, AirTouch believes that customers simply should not be permitted to port their numbers to carriers that do not otherwise serve their NPAs. Even if a somewhat more flexible approach would be workable, however, the Commission must promptly resolve the issue. Failure to do so would only invite delay in the development of a wireless number portability solution.

V. The Commission Should Not Limit the Authority of the Wireless Telecommunications Bureau Chief to Extend the Implementation Deadline for Wireless Number Portability.

In the *First Report and Order*, the Commission established a deadline of June 30, 1999 for the implementation of number portability among wireless carriers and between wireline and wireless carriers.¹⁵ In recognition of the fact that wireless number portability raises a number

¹⁵ *First Report and Order* at 89 (¶ 166).

of technical issues that are not involved in number portability for wireline carriers, however, the Commission authorized the Chief, Wireless Telecommunications Bureau, to waive or stay the implementation deadline for a period of not more than nine months.¹⁶ Although it would be premature to extend the deadline at this time, the Commission should eliminate the nine month limitation and authorize the Wireless Bureau Chief to waive or stay the deadline as appropriate to insure that wireless number portability is implemented without disruption of service to wireless customers, including roaming customers.

AirTouch recognizes that wireless number portability may have procompetitive benefits and does not seek reconsideration of either the Commission's decision to require wireless number portability or, at least at this time, the implementation deadline. AirTouch submits, however, that the Commission may not fully appreciate the cost and the technical complexity of the task and how little has been accomplished to date in evaluating the technical requirements and the possible solutions, compared to what has been done toward implementation of wireline number portability.

After significant development effort, AT&T first publicly proposed the LRN number portability model in late 1994. Since that time, LRN has been presented and discussed in a variety of industry fora and state regulatory proceedings. It was not until late 1995 that wireless carriers were involved in these discussions, even with respect to the implementation of number portability for wireline networks only. While there appears to be a consensus that LRN can probably be adapted to support wireless number portability (including roaming), the Illinois working group did not begin its analysis of the modifications to LRN that will be required in

¹⁶ *Id.* (¶ 167).

order to support wireless number portability until July, 1996. The Cellular Telecommunications Industry Association was to issue a Request for Information to vendors of wireless infrastructure on August 23, 1996, beginning the formal industry process for determining the technical requirements for supporting wireless number portability.

The LRN model is fundamentally based upon IN and AIN technology. Unlike IN and AIN, which are relatively mature, fixed standards for the design and operation of telecommunications networks, the Wireless Intelligent Network ("WIN") standard is still evolving. WIN is an "enhanced subset" of AIN, omitting features of AIN that are not relevant to wireless networks and adding other features and functions that are required for wireless networks, including validation, intersystem handoff and roaming. Although a few wireless carriers may implement IN or AIN in the short term, most are likely to wait until WIN "gels" rather than implement a technology having characteristics that they do not require and lacking features and functions that are essential to their operations.

In order to meet the Commission's deadline, the wireless industry must complete the development of the basic WIN standard, at least to the point that it can be reliably implemented in a variety of wireless networks, as well as identify and find solutions for all of the issues raised by the operational differences between wireline and wireless networks that are affected by number portability. While it may be possible to meet the June 30, 1999 deadline, many unresolved issues remain. It has been AirTouch's experience that many of those who are diligently focused on designing and building digital, SS7-based networks lack a full appreciation for the requirements and limitations of existing analog cellular networks and the complexity of

retrofitting them for SS7 technology, and it is possible as well that the industry, despite its best efforts, may be unable to develop and test a reliable solution in the time available.

However critical it may be to implement wireless number portability in a timely fashion, it is no less critical that it be implemented in a way that does not cause disruption of service to customers, increase wireless carriers' exposure to fraud (thereby unnecessarily increasing costs for consumers), or otherwise result in significant adverse effects. Because of customer mobility, even during the course of calls, the routing and rating of wireless calls is more complex by at least an order of magnitude than is the case for wireline networks. This is not an issue of incumbents versus new entrants. By mid- to late 1999, at least the larger PCS licensees are likely to be substantial carriers and incumbents in their own right. It will ill serve the Commission, as well as the entire wireless industry, if a flawed number portability solution is rushed to market in order to meet an inflexible deadline. In order to insure that this does not occur, the Commission should authorize the Wireless Bureau Chief to extend the deadline for implementation for as long as necessary.

VI. The Commission Must Not Permit States to Allocate Interim Number Portability Costs on the Basis of Carrier Revenues.

In the *First Report and Order* the Commission chose to permit state regulators to decide cost recovery issues for interim number portability, as long as costs are allocated in a manner that is generally competitively neutral. The Commission stated, however, that an allocation based upon telecommunications carriers' gross revenues would satisfy that requirement. As discussed in greater detail in AirTouch's comments in response to the *Further Notice of Proposed Rulemaking*, such an allocation would not be competitively neutral and should be prohibited.

Moreover, the Commission should clarify that interim number portability costs may be recovered only from carriers that participate in interim number portability.

In the *Further Notice of Proposed Rulemaking*, the Commission correctly identified the key criteria for determining a competitively neutral methodology for allocating shared number portability costs,¹⁷ but it has erroneously concluded that an allocation based upon gross revenues less payments to other carriers would satisfy those criteria. Any allocation based upon unadjusted or adjusted gross revenues will have different effects upon carriers with different cost structures and thus fails the test of competitive neutrality. An allocation based upon total profits would come as close to competitive neutrality as possible using a financial measure as the basis for allocation, but even such an approach would fail the second criterion because the telecommunications market is not fully competitive.

In addition, an allocation methodology based upon any financial measure would face significant practical problems because of the need to determine the relevant revenues or profits. The difficulty of separating revenues or profits from domestic telecommunications revenues from those derived from other operations would be compounded by the need to identify the revenues or profits associated with each number portability region. Such revenues and profits can be unreliable because they are also subject to artificial manipulation and timing issues.

The only basis for allocating shared number portability costs that is competitively neutral is using each carrier's total retail minutes of use. This is the only approach that would fully satisfy the Commission's competitive neutrality criteria. An allocation based upon carriers' total access or presubscribed lines would fail the second competitive neutrality criterion because it

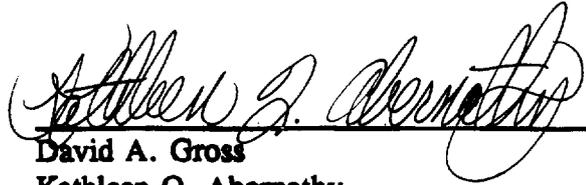
¹⁷ *Further Notice* at 109 (¶ 210).

would have differing effects on carriers depending upon whether they serve predominantly high volume or low volume customers. Because (1) an allocation based upon access or presubscribed lines would be somewhat simpler to implement than one based upon minutes of use; (2) a cost recovery method for interim number portability must be implemented immediately; and (3) interim number portability should only be an issue for a few years, the Commission may wish to permit states to allocate interim number portability costs on the basis of access or presubscribed lines. There is no justification, however, for employing an allocation methodology as flawed one based on revenues.

Conclusion

For the foregoing reasons, the Commission should reconsider its decision in the *First Report and Order* in this docket. Number portability cost recovery should be limited to those carriers actually providing number portability. The Commission should clarify that carriers have maximum flexibility in implementing number portability, as long as they satisfy the performance criteria, and that the fourth performance criterion does not prohibit an originating or bridging carrier from relying upon another carrier's network for all or a portion of the routing of calls without the consent of the terminating carrier. The Commission should clarify that local number portability is limited to carriers that serve the NPA of a ported number and should not limit the authority of the Wireless Bureau Chief to extend the deadline for number portability implementation as necessary. Finally, the Commission must not permit states to allocate interim number portability costs on the basis of carriers' revenues because such an approach would not be competitively neutral.

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