

number portability . A similar monitoring and reporting mechanism worked well during the implementation of 800 number portability, allowing the FCC, 800 service providers and customers an open forum to communicate progress, as well as quickly identify, discuss and resolve implementation issues. A similarly structured monitoring and reporting mechanism for CMRS number portability will provide an opportunity for the industry to quickly communicate and address implementation issues.

The Commission should not accede to any of the CMRS petitioners' many dilatory tactics: requests for delay in the start of the process pending further study of one issue or another, an extension of the deadline, the establishment of "targets rather than deadlines" or a grant of authority to the Chief of the Wireless Telecommunications Bureau to defer indefinitely or suspend the portability requirements. Given the Commission's experience in the 800 portability proceeding, and given the similarity of the scale and scope of the tasks presented here, a directive to the Wireless Telecommunications Bureau to monitor, report and intervene as necessary clearly is appropriate. The Chief, Wireless Telecommunications Bureau, has been given limited authority to grant individual waivers or to stay any of the deadlines prescribed in the Commission's implementation schedule for up to nine months. Nothing more is needed. If additional relief is needed by any CMRS provider, it may be granted upon a demonstration of inability to meet the deployment schedule, presented by petition at least sixty days in advance of the applicable deadline. Such further extensions should be granted only by action of the full Commission.

Some CMRS petitioners claim that it is necessary to grant a longer implementation period for wireless number portability than for the wireline carriers, due to the need to

develop standards and protocols for the continued provision of seamless roaming on cellular, broadband and covered SMR networks. The Commission should not accept at face value the unsupported claims that the wireless carriers need (or desire) to maintain current roaming arrangements and, on that basis, extend the deadlines beyond those set forth in the Order to accommodate the complexities of the current roaming technology. In point of fact, an acceleration of the existing industry trend toward deployment of IN/AIN/WIN and SS7 may simplify the movement toward number portability for the benefit of carriers and customers alike.

VII. CONCLUSION

For all the reasons stated hereinabove, MCI respectfully requests the Commission to reject the petitions for reconsideration and/or clarification discussed above, and to move ahead with implementation of the Order.

Respectfully submitted,

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I, Vernell V. Garey, hereby certify that the foregoing "OPPOSITION FOR RECONSIDERATION AND CLARIFICATION", CC Docket No. 95-116 was served this 27th day of September, 1996, by mailing true copies thereof, postage prepaid, to the following persons at the addresses listed below:

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