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FEDERAL COMMUNICATIONS COMMISSION OCT - 7 1996
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

In the Matter of)
)
Telephone Number Portability)
)

CC Docket No. 95-116

DOCKET FILE COPY ORIGINAL

Comments of Ameritech to
Petitions for Reconsideration or Clarification

Ameritech's position supporting the expeditious deployment of number portability is clearly set forth in its Comments and Reply Comments filed in this Docket. To that end, although Ameritech does not agree with all aspects of the Commission's First Report and Order and Further Notice of Proposed Rulemaking in the above captioned docket¹, it elected not to file for reconsideration, nor did it file an appeal. However, several of the Petitions for Reconsideration filed by other parties seek a clarification that Ameritech supports and believes could expedite and simplify deployment of long term number portability. This proposal could also result in significant savings for local exchange carriers ("LECs") and their customers. Basically, this proposal is that the Commission limit initial deployment of long term number portability in an MSA to exchanges where bona fide demand exists.

¹ Released July 2, 1996 ("First Number Portability Order").

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Ameritech will also propose an expedited process for converting additional offices as demand develops.²

As these parties supporting a focused deployment correctly point out, even the most densely populated MSAs, such as Chicago, include substantial rural and less densely populated suburban areas, where local competition is not likely to immediately develop.³ Ameritech agrees that inclusion of these exchanges in the initial deployment of long term number portability will provide no benefit that offsets the added cost and complexity that results from their inclusion. In fact, Ameritech believes that exclusive of exchanges where no demand exists could have a significant beneficial impact. For instance, in the Chicago MSA, the Illinois Commerce Commission (“ICC”) Industry Workshop implementing long term number portability has determined that there is no demand for number portability in 103 out of 206 exchanges in the Chicago MSA. Cutting in half the number of exchanges that must be initially converted will significantly reduce the demand on each carrier’s limited technical personnel and resources, and will greatly simplify the task of deploying and testing long term number portability. This simplification of the initial conversion is important, in light of the short 90 day period for conversion of an MSA specified by the Commission, and the significant expenses involved.

² GTE Service Corporation (“GTE”) at 8-10, National Exchange Carrier Association. (“NECA”) at 3-5 and Sprint at 11. *See*, BellSouth Corporation (“BellSouth”) at 14-15 who proposes deployment of long term number portability be initially limited to the most desirable switches in each MSA as determined by the carriers under the supervision of the administrator.

³ *GTE at 8-10 and NECA at 3-5.*

For these reasons, the ICC Workshop adopted the following procedure for selection of exchanges for conversion to long term number portability in the Chicago MSA prior to the date of the Commission's First Number Portability Order. Each competing LEC submitted a list to the ICC Staff of the exchanges it desired to have converted as a part of the initial deployment. The sole criteria for designation of an exchange was the immediate needs of the carrier. The ICC Staff then aggregated the lists and released one consolidated list that serves as the master deployment plan for the Chicago MSA implementation planned for 4th quarter of 1997, and the field tests scheduled to begin as early in January, 1997. The net effect of this exercise was to exclude from the initial deployment exchanges serving primarily rural and less densely populated suburban areas, including many areas served by small independent telephone companies and some served by older technology switches.

Subsequently, incumbent LECs in the Chicago MSA categorized the unconverted exchanges into four categories, depending upon the type of switch serving that exchange:

1. Remote switches supported by a host switch equipped for long term number portability ("Equipped Remote Switches");⁴
2. Switches that require no new hardware, but do require software changes to provide long term number portability ("Hardware Capable Switches");

⁴ Assumes that the host and remote have the same technical capabilities.

3. Switches that require new hardware before they can provide long term number portability (“Capable Switches Requiring Hardware”);⁵ and
4. Non-long term number portability capable switches (Non-Capable Switches”).

A proposal for handling requests for conversion of exchanges beyond the initial conversion is being developed by the ICC Number Portability Workshop. A draft of the proposed was submitted to the Commission in an Ameritech ex parte contact on September 23, 1996. The proposal would provide new LECs with an expedited schedule for deployment of long term number portability in response to bona fide requests. Based on the type of switch reported, conversion would occur as follows:

- Equipped Remote Switches within 30 days;
- Hardware Capable Switches within 60 days;
- Capable Switches Requiring Hardware within 180 days; and
- No agreement was reached on the appropriate time frame for changing out a Non-Capable Switch.

New LECs would be able to request additional offices at any time with the conversion to begin following the initial MSA deployment. Unconverted offices will be identified prior to the initial MSA deployment, so that a new LEC can notify the incumbent LECs to begin planning for conversion of any additional offices required by the requesting carrier as soon as possible after

⁵ Examples of hardware that may be required is processor upgrades, SS7 Network interfaces, and additional switch modules.

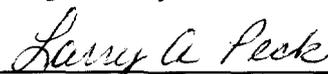
the initial deployment. Therefore, additional conversion in most cases could occur within 30-60 days following the MSA deployment.

The above plan for deploying long term number portability with the MSA has been presented to the Number Portability workshops in Michigan, Indiana and Ohio. These workshops have generally adopted plans developed by the industry in Illinois as the basis for deployment plan in their MSA's.

CONCLUSION

For the above reasons, Ameritech recommends the Commission clarify that its Rules do not require deployment of long term number portability in exchanges in the 100 MSAs specified in Appendix F of the First Number Portability Order, where there is no bona fide demand for it. Further, Ameritech suggests that the FCC delegate to the state commissions the task of supervising the selection of exchanges where demand exists, and that the Commission clarify that the above described procedures for determining demand and the time table for further upgrades of exchanges used by the ICC Workshop is reasonable.

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CERTIFICATE OF SERVICE

I, Edith Smith, do hereby certify that a copy of the foregoing Comments of Ameritech to Petitions for Reconsideration or Clarification has been served on the parties listed on the attached service list, via first class mail, postage prepaid, on this 7th day of October 1996.

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