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EX PARTE OR LATE FILED

December 4, 1996

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N. W. -- Room 222
Washington, D. C. 20554

DEC 4 1996

Re: Ex Parte -- CC Docket No. 95-116, Telephone Number Portability

Dear Mr. Caton:

On Wednesday, December 4, 1996, I delivered the attached letter to Ms. Melinda Littell of the Common Carrier Bureau's Policy and Program Planning Division. The letter expresses AT&T's views regarding a Bellcore Memorandum placed on the record in the above mentioned proceeding.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Sincerely,

Enclosure

cc: Ms. M. Littell

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December 4, 1996

Ms. Melinda Littell
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Re: CC Docket No. 95-116, Telephone Number Portability

Dear Ms. Littell:

In an attempt to further justify their assertion that the post dial delay introduced by QOR is imperceptible, Bell Atlantic has placed a 1990 Bellcore technical memorandum on the record in support of their position. The memorandum provides little, if any, useful information on the topic of perceptible post dial delay and does not support Bell Atlantic's position.

The memo describes three different studies of call setup times that were conducted from 7 to 21 years ago. The authors of the memo observe that each study provides different and contradictory results and conclude that "...additional studies must be conducted to remove the differences in the three model predictions..." Certainly no conclusions applicable to this proceeding can be drawn from the memo.

We make the following additional observations about the Bellcore memorandum:

- Because the studies are so old, the authors themselves were concerned that the results "were based on opinions provided by people whose expectations of acceptable CST [call setup time] performance were influenced by a public network that used MF signaling...As a result, customer's expectations of CST may be changing."
- The results derived from the three models in the three studies contradict each other: "...the Kurt Model is almost flat...the Sybil Model has a negative slope...the AIN-SCT model predicts the opposite result."

- Little information is given to describe the studies from which one could determine their validity, e.g., the number and background of the participants, how the experiments were conducted, and how the data were recorded and analyzed.
- The degree to which the study experiments simulated real experiences with the public switched network is not known. One study is described as playing a game, and another is based on calls within a single building.

No serious consideration can be given to this memorandum as justification for Bell Atlantic's assertion that the post dial delay introduced by QOR is imperceptible.

Sincerely,

A handwritten signature in cursive script, appearing to read "F. S. Simon".