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February 18, 1997

FEB 18 1997

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, NW - Room 222
Washington, DC 20554

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

Dear Mr. Caton:

AT&T submits the attached response to several ex parte letters filed with the Commission in this proceeding by the incumbent local exchange carriers ("ILECs"). Specifically, AT&T states its position on the ILECs offer to refrain from advertising the discriminatory treatment of new entrant calls imposed by the Query On Release ("QOR") local number portability architecture, the network reliability consequences of meeting the Commission's local number portability implementation schedule, and the reaction of one ILEC to Illuminet's recent ex parte presentation to the Commission.

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

Sincerely,

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

Attachment

No. of Copies rec'd 012
List ABCDE

CC Docket No. 95-116
Telephone Number Portability

Response to Recent Ex Parte Letters from ILECs

QOR is a discriminatory LNP architecture.

- Voluntary commitments by the ILECs to refrain from mentioning the discriminatory treatment of new entrant calls under the QOR architecture does not eliminate the discrimination.
 - The ILEC “belief” that the difference in call set-up delay is imperceptible to the potential customers of new entrant LECs is not supported in the record before the Commission.
 - AT&T believes that the difference in call set-up is perceptible to customers and will influence their perceptions of new entrant service quality.
 - The commitment does not preclude the ILECs from using these perceptions, without mentioning call set-up, to create an image of higher service quality for their services.

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Response to Recent Ex Parte Letters from ILECs

- Regarding the implementation of LRN, the record before the Commission, and in state commissions across the country, does not support the dire predictions of “catastrophic network failures” being made by SBC Communications.
 - LRN was given the highest network reliability ratings by industry subject matter experts in state commission workshops planning the deployment of long term number portability in their states.
 - At least one switch vendor developing the LRN software has assured its public carrier customers that the reliability of their network infrastructure will be maintained.
- Information recently placed on the record by Illuminet which describes alternative network architectures that will reduce LRN’s implementation costs prompted Pacific Telesis to claim that QOR’s SCP savings are no longer “major cost drivers.”
 - Setting aside AT&T’s position that QOR will not yield significant cost savings over LRN, Pacific’s claim is contradicted by information placed on the record by BellSouth and NYNEX.
 - Both of these companies claim SCP savings attributable to QOR represent over one half of the alleged total savings.