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February 19, 1997

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Federal Communications Commission  
Office of Secretary

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

**Re: CC Docket 95-116, Local Number Portability**

Dear Mr. Caton,

Today Duane Johnson and I, representing GTE, met with Daniel Gonzalez of Commissioner Chong's office and Carol Matthey, Jeannie Su, and Linda Kinney of the Policy and Program Planning Division of the Common Carrier Bureau to discuss local number portability issues raised in the proceeding mentioned above. The attached material served as point of discussion.

If you have any questions concerning this matter, please contact me at (202) 463-5293.

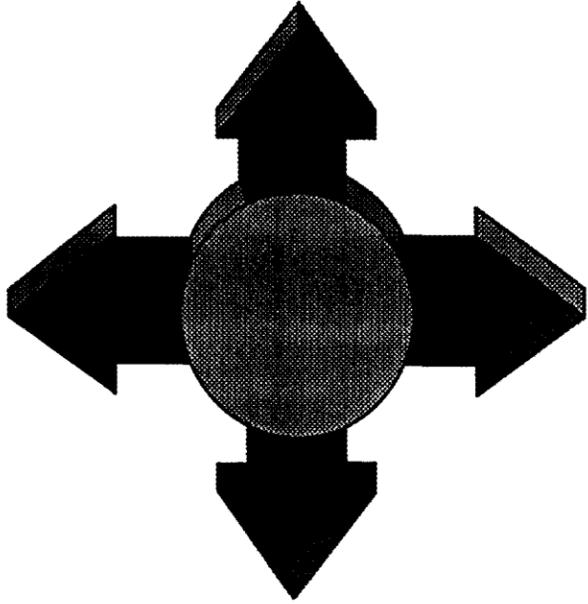
Sincerely,

W. Scott Randolph  
Director - Regulatory Affairs

cc: Daniel Gonzalez  
Carol E. Matthey  
Jeannie Su  
Linda Kinney

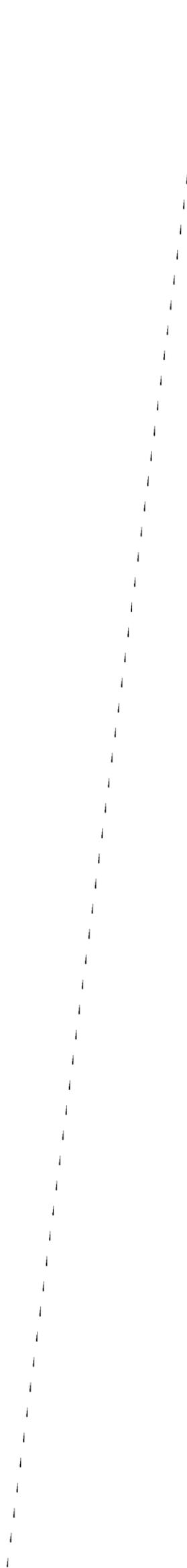
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**Local Number**  
**Portability**

***GTE Telephone Operations***  
***February 19, 1997***



- ◆ FCC chose phased deployment in the top 100 MSAs for several reasons:
  - *“Less likely to impose a significant burden on those carriers serving multiple regions”*
  - *“Help to safeguard the integrity of the public switched telephone network*
  - *“Takes in account the differing levels of local exchange competition that are likely to emerge in the different geographic areas throughout the country”*
  - *“Ensure that number portability will be made available in those regions where competing service providers are likely to offer alternative services”*

# ▼ ***Waiver Provision***



- ◆ The order allows waivers or stays to be issued when good cause can be shown:
  - “[W]e delegate to the Chief, Common Carrier Bureau, the authority to waive or stay any of the dates in the implementation schedule, as the Chief determines is necessary to ensure the efficient development of number portability, for a period not to exceed 9 months (i.e., no later than September 30, 1999).”

## ▼ ***GTE's Case for a Waiver***

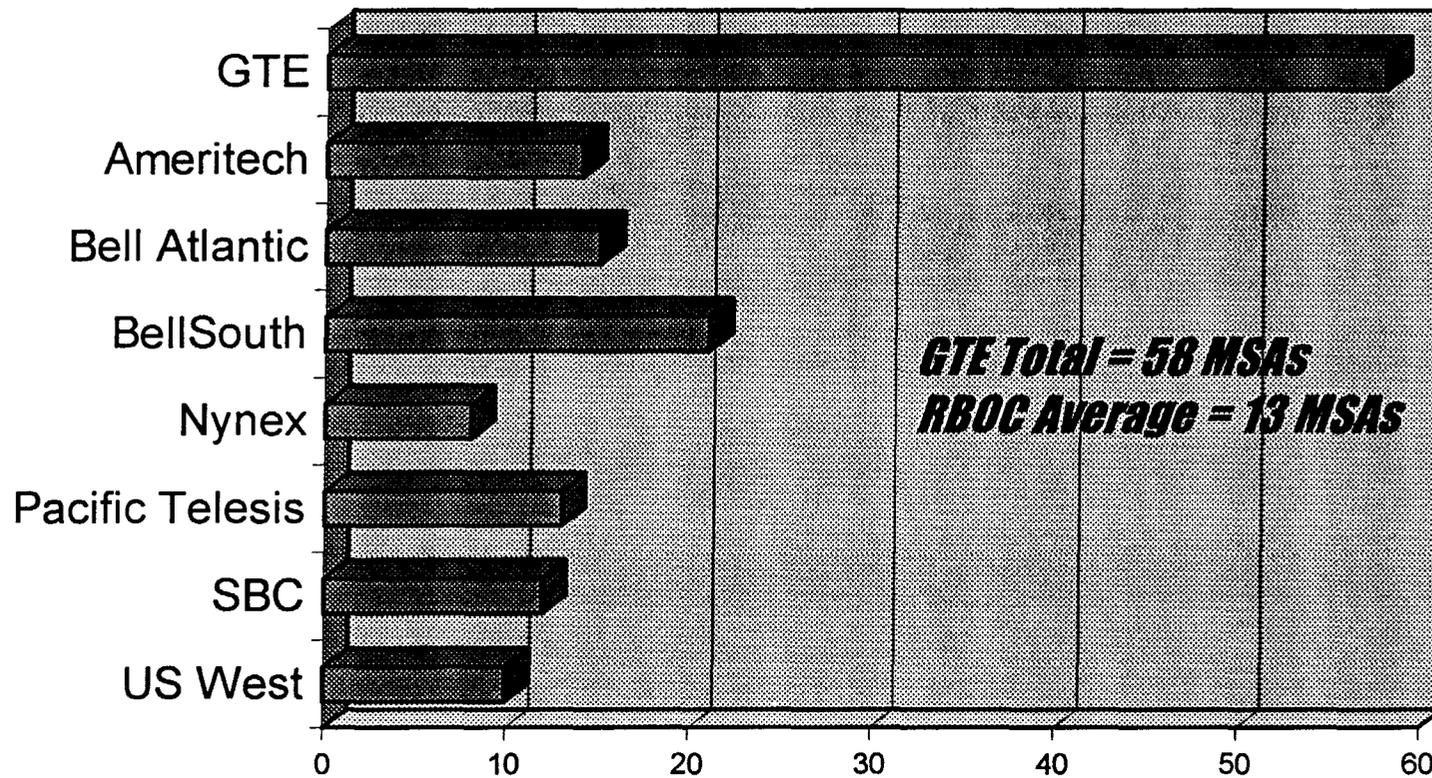


- ◆ Top 100 MSAs include central offices that do not share the characteristics of a “metropolitan” serving area
  - *Predominantly small, rural areas*
  - *Distant from the metropolitan center*
  
- ◆ For small central offices, the cost per line to implement LNP would be substantially more than for a large office serving an urban area
  - *GTE has 2,700 lines/CO; RBOCs average 12,000 lines/CO*
  
- ◆ GTE serves 28 states and would have to implement LNP in four MSAs in 4Q 97; each RBOC only has to do a single MSA in that period

# ▼ *GTE's Case for a Waiver (cont.)*



## *MSAs in LECs' Serving Areas*



## ▼ ***Scope of GTE's Waiver Request***

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- ◆ Exclude GTE-identified offices from the required deployment dates listed in the order
- ◆ GTE will deploy LNP in identified offices within six months of a *bona fide* request from another carrier
- ◆ GTE has not received any such requests for these identified offices to date

# ▼ ***Public Benefits of Granting a Waiver***

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- ◆ Improves deployment of LNP by focusing resources to areas with greater densities and prospects of facilities-based competition
- ◆ Minimizes investment in facilities in areas that would sit idle if the waiver were not granted
- ◆ Assures that a carrier making a *bona fide* request for LNP in identified offices would be accommodated in a timely fashion