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June 3, 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:

Today, Harry Sugar, Penn Pfautz and I, of AT&T, met with Carol Mattey, Steven Teplitz and John Askin, all of the Common Carrier Bureau's Policy and Program Planning Division. The purpose of the meeting was to discuss three forms of interim number portability: local exchange routing guide ("LERG") reassignment, route indexing-portability hub ("RI-PH"), and directory number-route index ("DN-RI"). During the meeting, AT&T presented call flows using each of the three methodologies and expressed its views regarding the technical feasibility of each form of interim number portability.

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,

Attachment

cc: Ms. C. Mattey
Mr. S. Teplitz
Mr. J. Askin

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Telephone Number Portability

Getting Beyond Direct Inward Dialing

- DID is insufficient to meet AT&T's needs

- AT&T requires Route Indexing (RI)
  - Two forms: Route Indexing-Portability Hub ("RI-PH") and Directory Number-Route Index ("DN-RI")
  - Technically feasible -- uses existing network and switch capabilities
  - Far superior to DID for medium and large business customers
  - Needed for transition to LERG Reassignment for the largest business customers

- Unavailability of Route Indexing will inhibit effective competition for a segment of the local market vital to the success of new entrants

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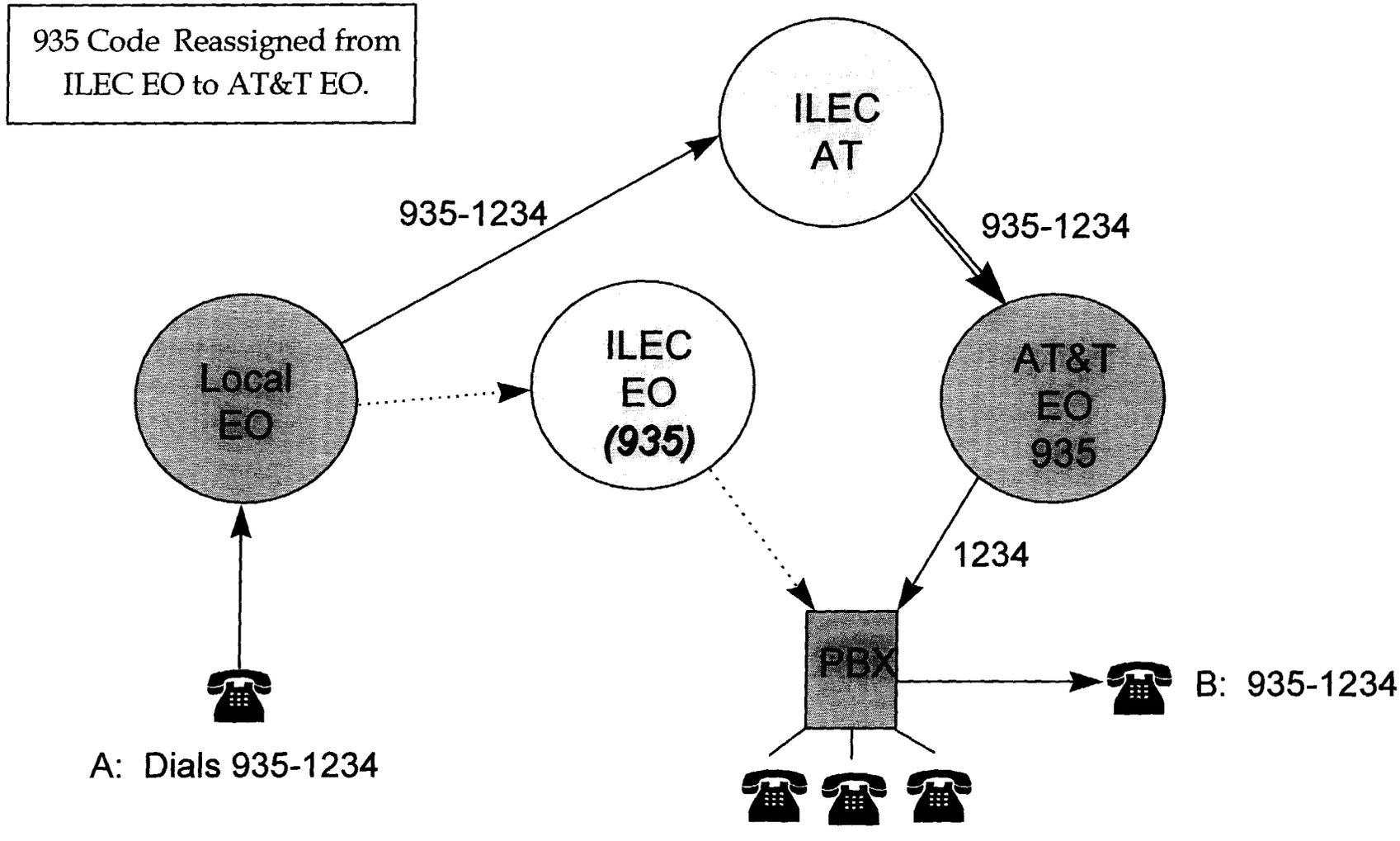
Local Exchange Routing Guide (LERG) Reassignment



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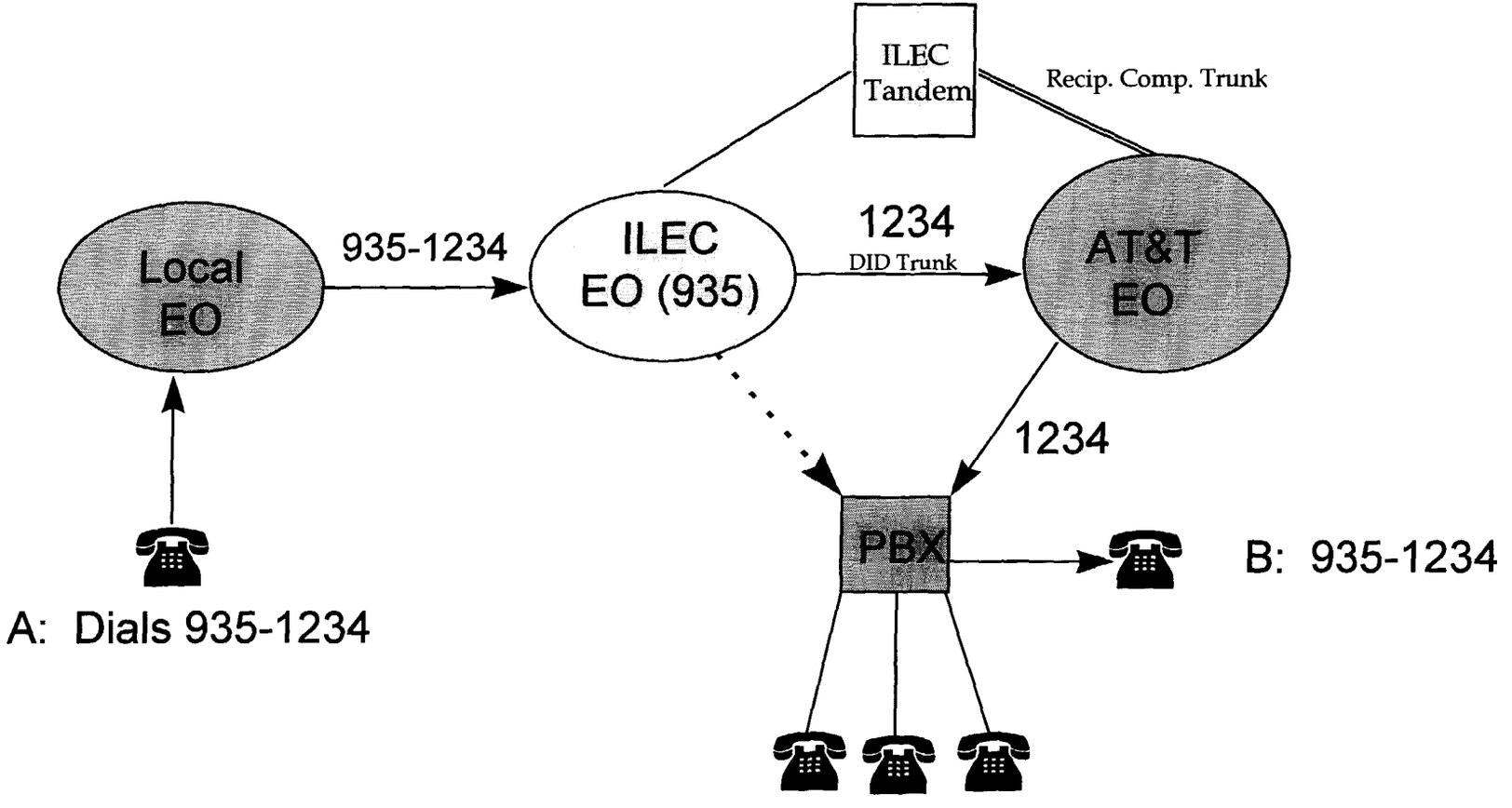
Direct Inward Dialing ("DID")



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DID Limitations

- Direct, Dedicated Trunking Requirement Burdensome
  - Customer Move (Porting) May Be Delayed While Facilities Are Built ***Or*** CLEC Must Place Facilities Before Marketing To Potential Customers, Placing Economic Burden On CLEC
  - Majority Of In-Band, Dedicated, Direct Trunks Will Have To Be Torn Out After LRN Becomes Available

- Lack Of SS7 Signaling Degrades Functionality
  - Can't Deliver SS7-Based Features
  - Increases Post-Dialing Delay (By Up To 1.5 Seconds)

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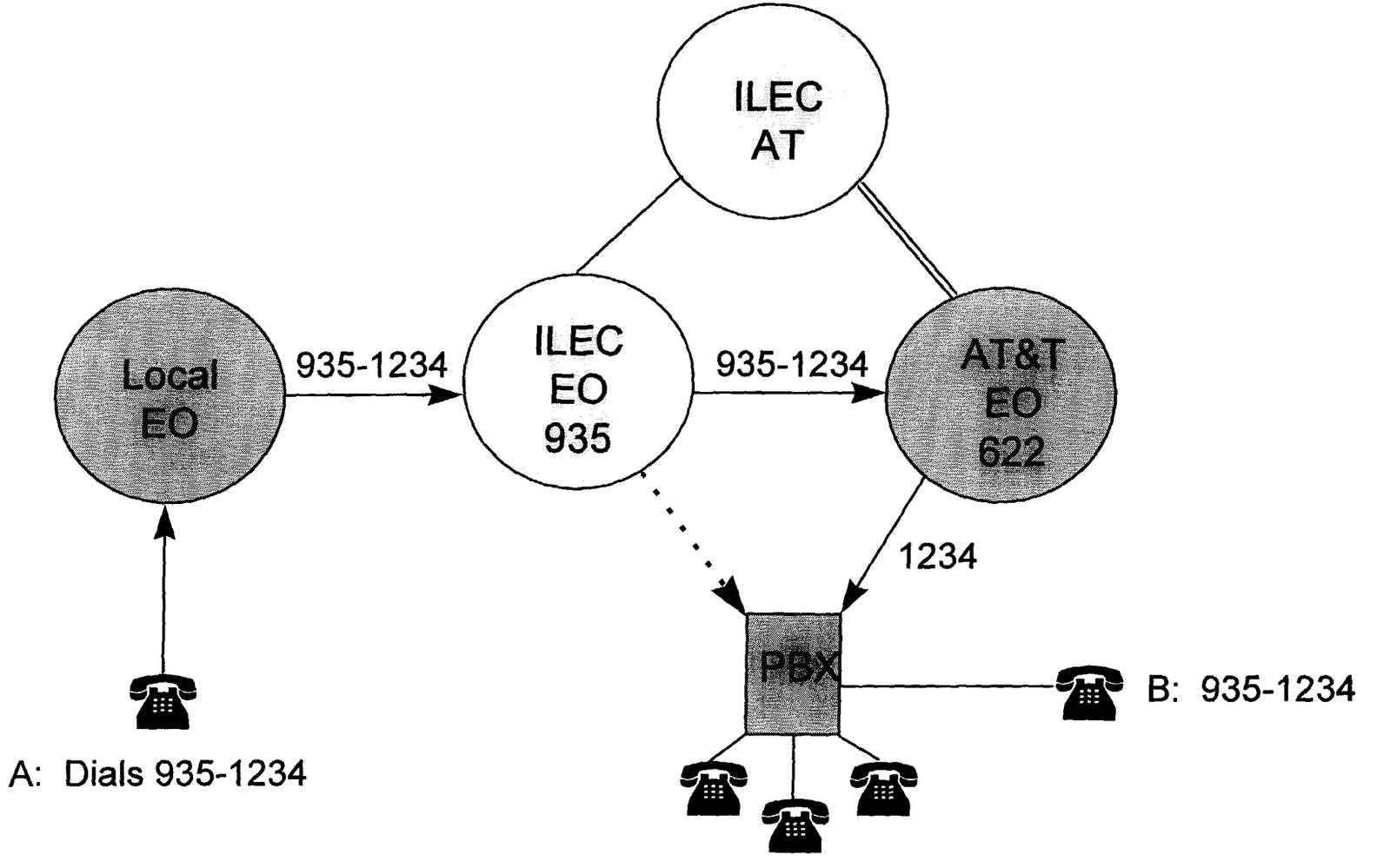
Directory Number-Route Indexing ("DN-RI")



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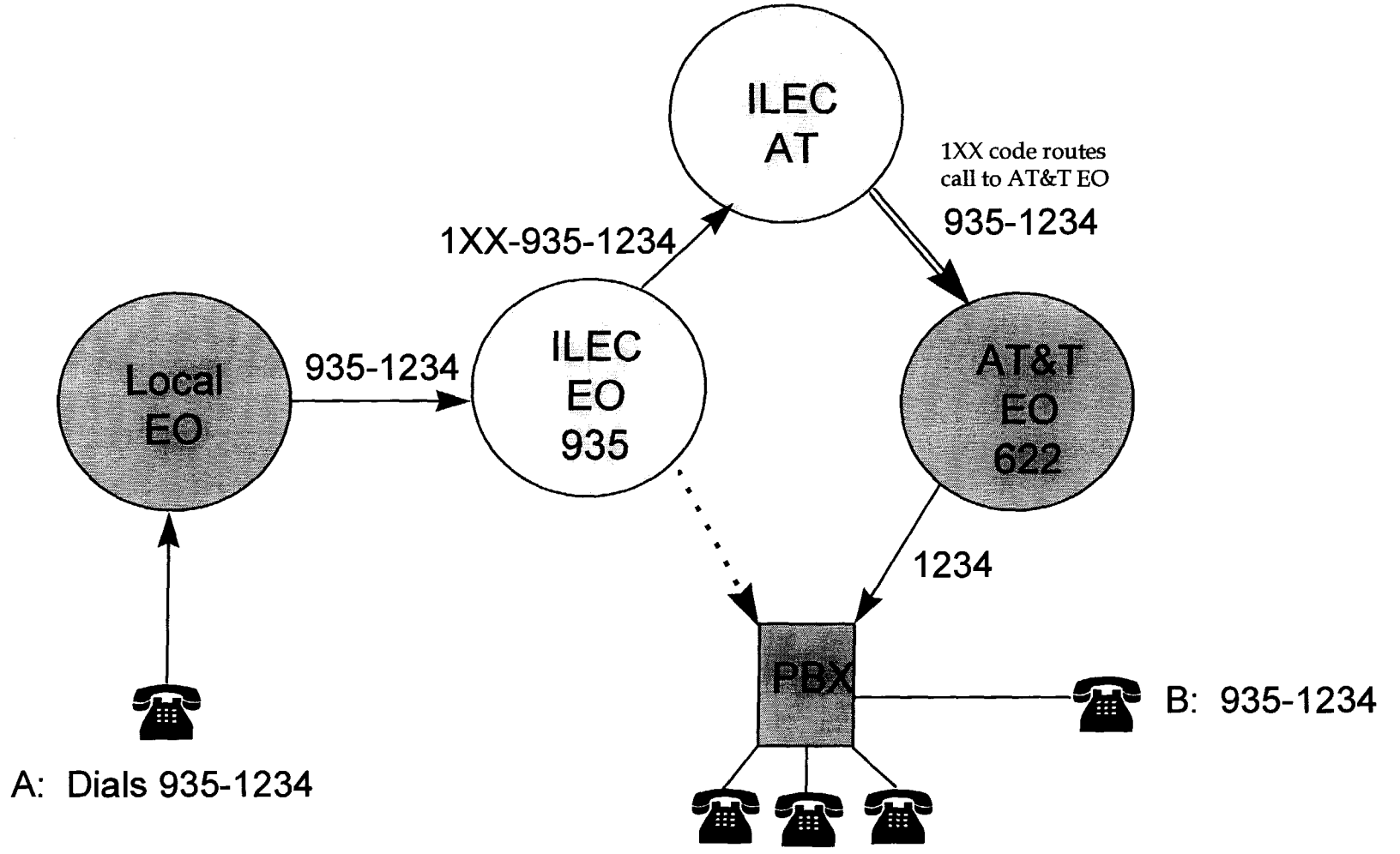
Route Indexing-Portability Hub ("RI-PH")



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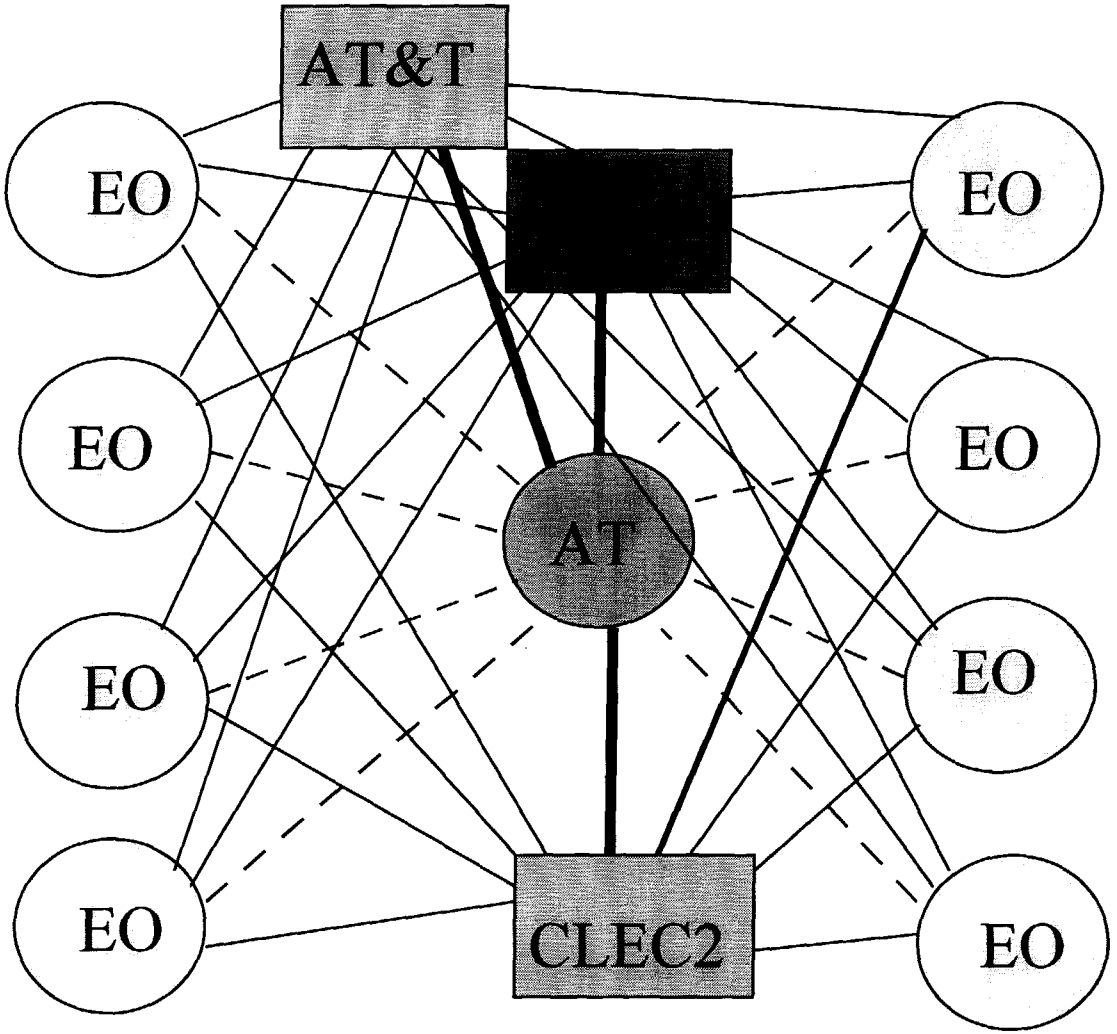
AT&T's Digital Link Without RI-PH



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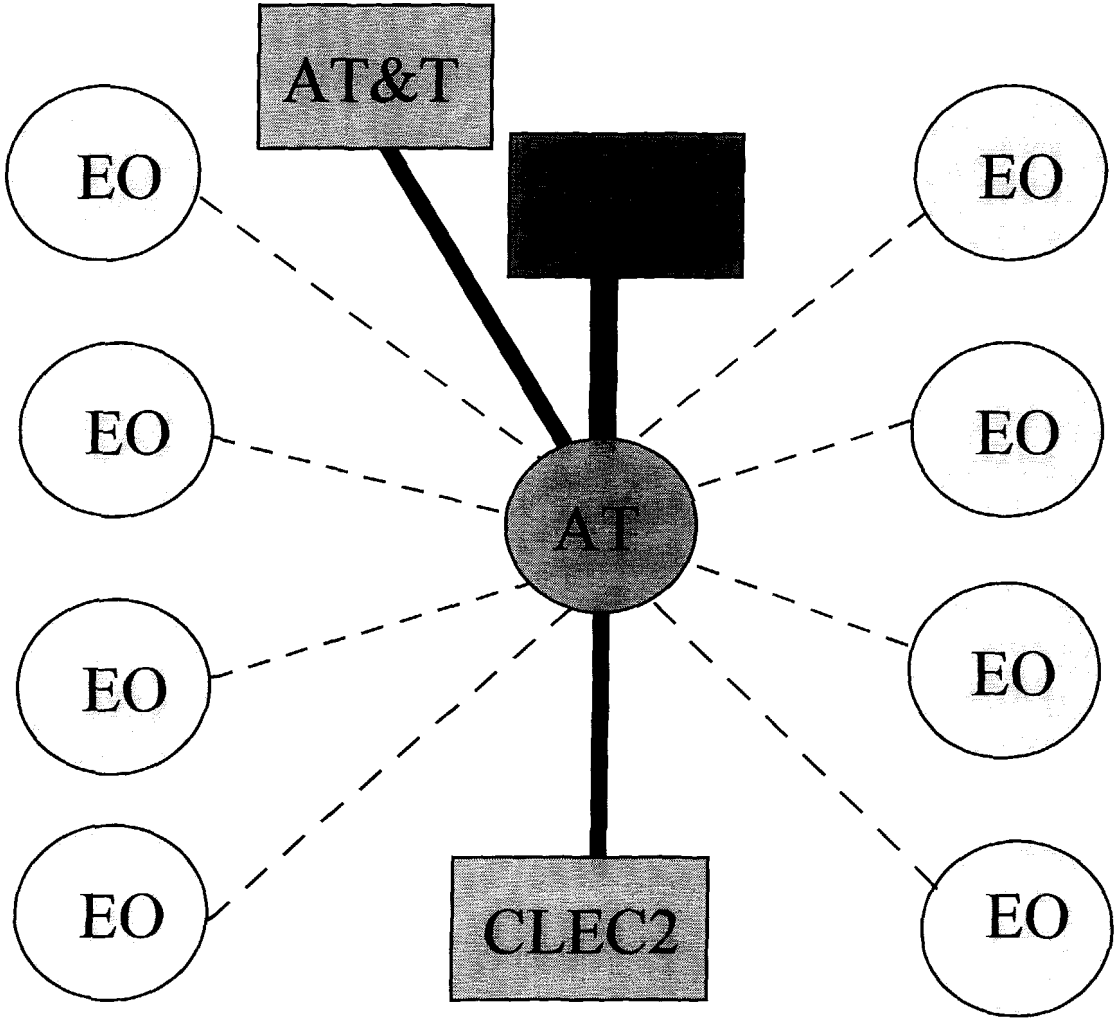

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RI-PH Addresses the Limitations Of DID

- Support SS7 And Connectivity Through Tandem Over General Interconnection Trunks Like RCF
- Allow CLECs To Address Call Center And PBX Customer Markets
- Reduces Post Dialing Delays Compared To DID
- Same Trunks Will Be Utilized For LRN Traffic When Permanent Number Portability Becomes Available

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States Where Route Indexing Will Be Implemented

- BOCs and GTE have agreed or been ordered to provide RI by state commissions in more than half of the states:
  - BellSouth agreed to provide RI-PH in all nine of its states
  - US West agreed to provide RI-PH in all of its 14 states
  - Pacific Bell & GTE were ordered to provide RI-PH in California by the PUC
  - Ameritech was ordered to provide RI-PH in Indiana by the PUC
  - GTE was ordered to provide RI in Alabama, Florida, Missouri, South Carolina, Texas, and Virginia
  - Sprint Local has agreed to provide RI-PH in areas where it provides local service, subject to field testing with AT&T
  - NYNEX has agreed to provide DN-RI in all six states in its territory

- Arbitrators in Kansas and Missouri have ordered SBC to provide RI-PH

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DID/RI-PH Cost Comparison

- RI-PH Significantly Reduces The AT&T Digital Link Trunking And Expense Requirements For 1997 As Compared To DID
  - Costs Of DID Trunking Are Fixed And Immediate
    - » All Capacity Required In AT&T's Plan Is Built Out To Each ILEC End Office Before Marketing Commences
    - » "Stranded Capacity" Exists In Small Direct Trunk Groups
    - » Uneconomic Use Of Trunk Ports On AT&T and ILEC Switches
  - Costs of RI-PH
    - » Minimal Fixed Quantity Of Trunks Initially Provisioned To Each ILEC Tandem With Increases Driven By Market Demand
    - » Better Efficiencies Realized On Larger, More Versatile Trunk Groups Between AT&T And ILEC Tandem

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Conclusion

- DID Is ***Obviously*** Technically Inferior To RI-PH and DN-RI

- RI-PH and DN-RI ***are*** Technically Feasible

- RI-PH Is More Cost-Effective For ***Both*** Incumbent LEC And CLECs--It Allows CLECs To Add Capacity As Required By Their Market Demand

- Regardless Of State Arbitration Decisions, LECs ***Are Required*** To Offer Technically Feasible INP Methods ***As Available***--Per the Commission's Order.