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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
)  
Administration of the ) CC Docket No. 92-237  
North American Numbering Plan )  
)

REPLY COMMENTS OF GTE

GTE Service Corporation and its affiliated telephone operating companies<sup>1</sup> (collectively, "GTE"), respectfully submit their Reply in the above-captioned proceeding regarding the recommendations of the North American Numbering Council ("NANC").<sup>2</sup> GTE fully supports the NANC recommendations.

GTE agrees with MCI<sup>3</sup> that the Commission should promptly adopt the NANC recommendations and begin the transition to the new model for number administration. The NANC, comprised of a broad section of telecommunications

<sup>1</sup> GTE Alaska Incorporated, GTE Arkansas Incorporated, GTE California Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc., and Contel of the South, Inc.,

<sup>2</sup> The North American Numbering Council (NANC) Issues Recommendations on the North American Numbering Plan Administrator, Billing and Collection Agent, and Related Rules: Pleading Cycle established, Public Notice, DA 97-1055, CC Docket No. 92-237, released May 19, 1997. ("Public Notice").

<sup>3</sup> Comments of MCI at 21.

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industry representatives, used an open process in developing its recommendations. Each participant in the NANC process had an opportunity to express its opinions and to present input on the appointment and oversight of the North American Numbering Plan Administrator ("NANPA"). The alternatives were debated and the recommendations finalized based on a majority vote. The recommended plan, based on this open process, meets the mandate to select a neutral and impartial number administrator and will best serve the public interest.

A number of those filing comments on the NANC recommendation ask the Commission to second-guess the conclusions of NANC by now selecting Mitretek rather than Lockheed as the NANPA.<sup>4</sup> While it was clear in the recommendation that either Lockheed or Mitretek could fulfill the role as the NANPA, Lockheed's selection was based on its fixed price bid that was \$22.5 million less than Mitretek's for services that NANC determined were technically equivalent. GTE agrees with MCI that the Commission should not second-guess this selection chosen through the open NANC process.

Those commenters asking the Commission to reverse the NANC recommendation and select Mitretek argue that Mitretek has a better plan, offering twice the manpower requirements which will be needed to meet the demand the NANPA. However, this need cannot be substantiated. The new

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<sup>4</sup> See, e.g., Comments of Southwestern Bell, Airtouch, CTIA, WorldCom, Omnipoint, Mitretek and PCIA.

NANPA will be working as a centralized administrator and will gain efficiencies over the process in place today. Furthermore, whatever the future requirements for code relief or the impact of number portability will have on activity and staff requirements is necessarily speculative. It would be unreasonable to accept a bid that is twice that of the winning bid because the speculation that there might be more staff needed. In any case, Lockheed has committed to its fixed price bid to provide the same services and if needed, will increase its staff to accommodate larger than estimated volumes. As MCI detailed in its Comments, the NANC unanimously recommended proposed Rule 52.15(d), which provides a mechanism for adjustment in the agreed upon price should activities exceed 120% of stated assumptions at the time of the NANPA selection.<sup>5</sup> This adjustment vehicle further supports the selection of the low bid among qualified vendors. The industry, individual companies and ultimately ratepayers should not pay any more than is necessary for these services.<sup>6</sup>

GTE also supports NANC's proposed Rule 52.13 which requires the transfer of intellectual property rights in the event the NANPA is replaced.<sup>7</sup>

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<sup>5</sup> Comments of MCI at 16.

<sup>6</sup> See Comments of MCI at 11.

<sup>7</sup> See Comments of MCI at 11.

Lockheed has also previously committed that, as the NANPA, it would abide by this rule.

The other issue addressed by those commenting to this Public Notice was the recommendation of NECA as the Billing and Collection Agent subject to the implementation of a neutrality cure.<sup>8</sup> Again, GTE is in support of the recommendation of NANC choosing NECA as the Billing and Collection Agent.

### **CONCLUSION**

GTE fully supports the recommendation of NANC developed by telecommunications experts from across the industry and decided by a majority vote. The selection of Lockheed must be affirmed as it delivers the most qualified and cost efficient solution for NANPA services. Any re-initiation of the selection process or change to the NANC recommendation will delay the transition to a new NANPA and will in itself be detrimental to the entire North American telecommunications industry. The intellectual property rule and the price adjustment rule as proposed by NANC and the choice of NECA as the

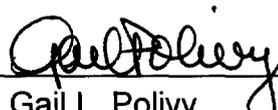
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<sup>8</sup> NANC Recommendation at 12. See Comments of MCI at 19.

billing and collection agent in the fashion recommended by NANC to assure neutrality also should be affirmed.

Respectfully submitted,

GTE Service Corporation and its  
affiliated domestic telephone operating  
companies

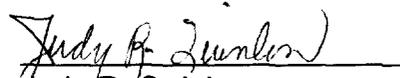
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July 3, 1997

Their Attorney

## Certificate of Service

I, Judy R. Quinlan, hereby certify that copies of the foregoing "Reply Comments of GTE" have been mailed by first class United States mail, postage prepaid, on July 3, 1997 to the parties on the attached list.

  
Judy R. Quinlan