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July 15, 1997

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, D.C. 20554

RECEIVED
JUL 15 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket 95-116: Local Number Portability

Dear Mr. Caton:

Today I distributed the attached material to Claudia Pabo, Steven Teplitz, Jonathan Askin and Kyle Dixon of the Common Carrier Bureau.

Please add this letter and the enclosed copy to the record of this proceeding.

Sincerely,


Leonard S. Sawicki

Attachments

cc: Mr. Askin
Mr. Dixon
Ms. Pabo
Mr. Teplitz

No. of Copies rec'd
List ABOVE

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ATT = AT&T
C-C = Continental Cablevision
C-V = CableVison
Cox = Cox Cable
ELI
M-1 = MediaOne
MCI
MFS = Worldcom
N-L = NextLink
R-T = Rochester Telephone
Sprint* = Sprint Tel (Central Telco)
SWB = Southwestern Bell
TCG
TCI
T-W = Time Warner

Attachment 2

Ameritech Lab testing for 1AESSs ends on 6/25/97
SWB Lab testing for 1AESSs ends on 7/18/97

Ameritech Lab testing for 5ESSs ends on 7/1/97
SWB Lab testing for 5ESSs ends on 9/30/97
(It's the same Lab - why a different date for different Region?)

SWB takes 5 months to complete Lab & Intra Company Testing. Ameritech completes this process in just under 2 months

Ameritech and BellSouth stagger deployment of switches, SWB takes 2 months to complete InterCo Testing and do a Flash Cut in all Phases.

For Phase II thru V:

If general switch vendor availability is 10/1/97 why are network ready dates for the outer MSAs 1/15/98, 3/16/98, 6/15/98 & 9/15/98? This would lead one to believe that SWB only has 1 installation crew for the whole SW?

Why is it necessary for SWB to complete Lab testing in all MSAs, when Lab testing was completed in Phase I?

INTRA COMPANY TESTING

SWB requires 3&1/2 months intra company testing for Phase 2

3&1/2	"	"	"	"	"	"	"	3
2&1/2	"	"	"	"	"	"	"	4
2	"	"	"	"	"	"	"	5

These are the same switch types. Is it necessary to test all switches?

INTER COMPANY TESTING:

SWB estimates 2 months for inter company testing for Phase 2

2	"	"	"	"	"	"	"	3
2	"	"	"	"	"	"	"	4
2&1/2	"	"	"	"	"	"	"	5

If the same CLECs are involved, is it really necessary to spend that much time completing Inter company testing for the outer Phases (might be necessary for a new CLEC)

Why have Flash Cut for the outer phases for those carriers that were ready. SWB said it is only fair to not port with 1 CLEC until we're all ready. It could be a business decision for some CLEC to not have facilities until Phase V, should the rest of the CLECs not be able to port while we wait for new carrier?

BACK-UP DETAIL:**Houston - Phase I:**

SWBs switch types	LNP Software Avail.	Approx.# Ofcs
Lucent-1AESS	7/18/97	35
Lucent-5ESS	9/30/97	17
SE	?	2
EXM2000	?	3
AXE-10	?	3
Nortel-DMS100	6/30/97	7
Nortel-DMS200 AT/LT	6/30/97	3
Nortel-DMS200 TOPS	9/01/97	1
Remotes		8

		79

AMERITECH TESTING TIMELINE:

5/1/97 Lab testing on 1AESS
6/25/97 Lab testing ends 1AESS
7/1/97 Lab testing ends on 5ESS')

SWB HOUSTON TIMELINE:

5/1/97 Begin Intra Lab Current Generation Test
8/31/97 Begin Intra Lab Next Generation Test
9/15/97 Next Generation Network Ready Date for Lab
11/15/97 Lab testing ends

10/1/97 All Offices vendor installation complete
10/17/97 Network Ready Date and begin IntraCo testing

12/1/97 All other ofc Ntwk Ready Date

1/2/98 Fail Over Testing begins
1/15/98 Fail Over Testing ends
1/30/98 IntraCo testing ends

2/2/98 Inter Company Testing begins
3/31/98 Live Porting Begins

Attachment 2

DALLAS, ST. LOUIS MSA TIMELINE:

11/14/97 All Offices Vendor Installation Complete date (10/1 for Houston)
12/1/97 Network Ready Date Test Ofc sand Begin Intra Co Test (10/17 for Houston)
1/15/98 Network Ready All Other and begin Intra Company Testing
(12/1/97 for Houston)
3/12/98 End Intra Co Tesing
3/14/98 Fail over testing complete (1/15/98 for Houston)
3/16/98 Begin Inter Co testing (2/2/98 for Houston)
5/15/98 Live (3/31/98 for Houston)

KANSAS CITY & FT WORTH MSA TIMELINE:

1/15/98 All Offices Vendor Istallation Complete Date
2/13/98 Network Ready Date Test Ofc and Begin Intra Co Testing
3/16/98 Network Ready All Other
4/14/98 Fail over testing complete
5/1/98 End Intra Co Testing
5/4/98 Begin Inter Co testing
6/30/98 Live

SAN ANTONINO, MEMPHIS, OKLAHOMA CITY & AUSTIN MSA TIMELINE:

4/15/98 All Offices Vendor Installation Complete
5/15/98 Network Ready Date for test ofc and begin Intra Co Test
6/15/98 Network Ready all other offices
7/3/98 Fail over testing complete
7/28/98 End Intra Co Testing
7/31/98 Begin Inter Co Testing
9/30/98 Live

TULSA, EL PASO, LITTLE ROCK & WICHITA MSA TIMELINE:

7/14/98 All offices Vendor Installation Complete
8/14/98 Network Ready Date for test ofc and begin Intra Co Test
9/15/98 Network Ready all other offices
10/16/98 Fail Over testing Complete
10/16/98 End Intra Co Testing
10/19/98 Begin Inter Co Testing
12/31/98 Live