



MCI Telecommunications Corporation

1801 Pennsylvania Avenue, NW
Washington, DC 20006
202 887 2017
FAX 202 887 3175

Donna M. Roberts
Senior Counsel
Federal Law and Public Policy

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EX PARTE ORIGINAL FILED

September 16, 1997

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: **EX PARTE**
CC Docket No. 95-116; Telephone Number Portability

Dear Mr. Caton:

This is to advise the Federal Communications Commission (Commission) that MCI has learned that due to recent testing delays associated with the Number Portability Administration Center/Service Management System (NPAC/SMS), the NPAC/SMS long-term local number portability (LNP) testing schedules for the regions served by US West, BellSouth and Pacific Bell will experience some delay. This delay is due to the fact that the production NPAC/SMS will not be available in those regions until later in the fourth quarter 1997, instead of on October 1, 1997.

The delayed NPAC/SMS implementation date should not affect the current LNP deployment plans of US West and Pacific Bell, since neither planned to deploy LNP in any switches until the first quarter 1998. Similarly, since BellSouth has had no plans to deploy LNP in any significant number of switches until later in the fourth quarter, MCI believes that any impact in its region will be minimal.

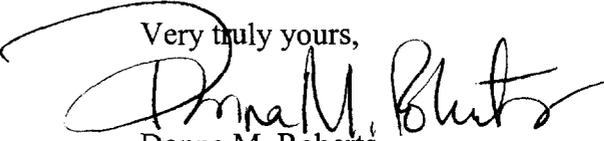
In addition to having little or no impact on US West's, Pacific Bell's and BellSouth's deployment plans, the NPAC/SMS testing delays do not affect any of those incumbent local exchange carriers' (ILECs') ability to conduct testing of non-NPAC related Location Routing Number (LRN) software to be loaded in their switches. Thus, it is more important than ever that the Commission stress that, notwithstanding any NPAC/SMS delays, ILECs must begin such testing of LRN capabilities forthwith. It is also important for the Commission to underscore the fact that these NPAC/SMS testing delays, which do not affect an ILEC's ability to test LRN switch software, are not acceptable reasons to request a delay or a waiver of the Commission's Phase I implementation schedule.

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MCI is disappointed that these delays will postpone carriers' ability to fully test the NPAC/SMS database in the affected regions. It is important to note that the March 31, 1998, LNP Phase I completion date is not jeopardized.

Very truly yours,

Donna M. Roberts

cc: James Schlichting
Neal Fried
Patrick Donovan
Richard Metzger
Tom Boasberg
Paul Gallant
Kathy Franco
Jim Casserly
Carol Matthey
Richard Welch
Jonathan Askin
Kyle Dixon