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EX PARTE OR LATE FILED

USWEST

Elridge A. Stafford
Executive Director-
Federal Regulatory

EX PARTE

DOCKET FILE COPY ORIGINAL

October 2, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222, SC-1170
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Telephone Number Portability
Further Notice of Proposed Rulemaking
CC Docket No. 95-116

Dear Mr. Caton:

U S WEST, Inc. respectfully submits the following summary of revised cost data in conjunction with the Commission's Further Notice of Proposed Rulemaking in the above-numbered docket. The data represent the current best estimate by the U S WEST Communications, Inc. ("USWC") of the extensive costs that it will incur in order to comply with the Commission's number portability mandate. The cost data filed under this cover letter revises cost data filed with the Commission under protective cover on January 17, 1997.¹

As a result of continued negotiations with vendors and a better understanding of the technology used to provide number portability, we believe the accompanying cost data more accurately reflect the costs that are and will be incurred to provide number portability than those filed earlier. However, as true for previously submitted cost data, the costs data contained in this submission remain necessarily estimates. The technology supporting number portability has never been tested on the scale that would be required by the Commission's mandate. These figures are heavily based upon information currently provided by equipment vendors and will continue to change somewhat as further results of the planned field tests become known and vendors continue to provide additional information.

¹ Letter from Robert H. Jackson to William F. Caton, January 17, 1997, filed in CC Docket No. 95-116.

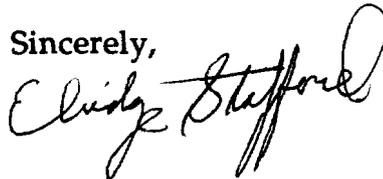
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Mr. William F. Caton
October 2, 1997
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In accordance with 47 C.F.R. § 1.1206(a)(1) of the Commission's rules, the original and one copy of this letter and the attachment are being filed with your office. Acknowledgment and date of receipt are requested. A duplicate of this letter is attached for this purpose.

Please call me if you have any questions about this submission.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elvige Stafford". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Attachment

cc: Richard Metzger
Lloyd Colling
Neil Fried
Linda Kinney
Carol Matthey
Susan McMaster
Andre` Rausch
James Schlichting
Lenworth Smith
Don Stockdale
Jeannie Su
Steven Teplitz
Richard Welch

CC Docket No. 95-116
Telephone Number Portability

**Summary of Infrastructure & System Requirements
to Deploy Long-Term Number Portability**

U S WEST Communications

October 1, 1997

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

LNP Budget Review - Top 10 MSA Network/System Modification (\$Millions)

NETWORK MODIFICATIONS (Millions \$)	Jan-97	Current	SYSTEM MODIFICATIONS (Millions \$)	Jan-97	Current	TOTALS	Prior Estimate	Current Estimate
Capital Costs-			Capital Costs-					
Network Reliability Center:	\$ 1.8	\$ 3.1	Local Service Management:	\$ 16.0	\$ 1.4			
SS7 Equipment:	\$ 55.0	\$ 46.5	Billing:	\$ 2.0	\$ 1.6			
*Switching Equipment:	\$ 79.2	\$ 108.6	Service Delivery:	\$ -	\$ 16.0			
AMA Software:	\$ -	\$ -	Service Assurance:	\$ 2.7	\$ 0.4			
LRN:	\$ 29.1	\$ 42.4	Miscellaneous:	\$ -	\$ -			
AIN Software:	\$ 0.4	\$ -	Provisioning:	\$ 2.3	\$ 1.2			
SS7 Software:	\$ 3.6	\$ 10.4						
Subtotal-	\$ 169.1	\$ 211.0	Subtotal-	\$ 23.0	\$ 20.6	TOTAL CAPITAL	\$ 192.1	\$ 231.6
Expenses-			Expenses-					
Network Reliability Center:	\$ 0.2	\$ 1.2	Local Service Management:	\$ 11.0	\$ 13.4			
SS7 Equipment:	\$ 36.7	\$ 39.5	Billing:	\$ 1.7	\$ 3.2			
Generics:	\$ 17.2	\$ 47.8	Service Delivery:	\$ 9.5	\$ 56.5			
Switch Modifications:	\$ 10.6	\$ -	Service Assurance:	\$ 11.8	\$ 4.9			
LRN Software:	\$ 5.1	\$ -	Capacity Provisioning:	\$ -	\$ -			
AMA Software:	\$ -	\$ -	Miscellaneous:	\$ -	\$ 27.9			
Other:	\$ -	\$ 13.3	Provisioning:	\$ 13.2	\$ 4.1			
Subtotal-	\$ 69.8	\$ 101.8	Subtotal-	\$ 47.2	\$ 110.0	TOTAL EXPENSE	\$ 117.0	\$ 211.8
TOTAL-	\$ 238.9	\$ 312.8	TOTAL-	\$ 70.2	\$ 130.6	GRAND TOTAL-	\$ 309.1	\$ 443.4

Note: Above numbers are current planning estimates and are subject to change as additional requirements and final costs are determined.

	Jan-97	Current
* Includes: 1A Acceleration Costs	13.9	16.3
1A Lost Depreciation	22.5	58.5

10.01.1997

LNP Budget Review - 5 Year View Network/System Modification (\$Millions)

NETWORK MODIFICATIONS (Millions \$)			SYSTEM MODIFICATIONS (Millions \$)			TOTALS		
	Jan-97	Current		Jan-97	Current	Prior Estimate	Current Estimate	
Capital Costs-			Capital Costs-					
Network Reliability Center:	\$ 1.8	\$ 3.1	Local Service Management:	\$ 16.0	\$ 1.4			
SS7 Equipment:	\$ 57.0	\$ 48.2	Billing:	\$ 2.0	\$ 1.6			
* Switching Equipment:	\$ 105.9	\$ 124.0	Service Delivery:	\$ 0.0	\$ 16.0			
AMA Software:	\$ -	\$ -	Service Assurance:	\$ 2.7	\$ 0.4			
LRN:	\$ 62.1	\$ 56.8	Miscellaneous:	\$ -	\$ -			
AIN Software:	\$ 0.6	\$ -	Provisioning:	\$ 2.3	\$ 1.2			
SS7 Software:	\$ 4.5	\$ 10.4						
Subtotal-	\$ 231.9	\$ 242.5	Subtotal-	\$ 23.0	\$ 20.6	TOTAL CAPITAL-	\$ 254.9	\$ 263.1
Expenses-			Expenses-					
Network Reliability Center:	\$ 0.2	\$ 1.2	Local Service Management:	\$ 11.0	\$ 13.4			
SS7 Equipment:	\$ 45.9	\$ 42.6	Billing:	\$ 1.7	\$ 3.2			
Generics:	\$ 29.8	\$ 64.8	Service Delivery:	\$ 9.5	\$ 56.5			
Switch Modifications:	\$ 17.2	\$ -	Service Assurance:	\$ 11.8	\$ 4.9			
LRN Software:	\$ 10.0	\$ -	Capacity Provisioning:	\$ -	\$ -			
AMA Software:	\$ -	\$ -	Miscellaneous:	\$ -	\$ 27.9			
Other:	\$ -	\$ 34.9	Provisioning:	\$ 13.2	\$ 4.1			
Subtotal-	\$ 103.1	\$ 143.5	Subtotal-	\$ 47.2	\$ 110.0	TOTAL EXPENSE-	\$ 150.3	\$ 253.5
TOTAL-	\$ 335.0	\$ 386.0	TOTAL-	\$ 70.2	\$ 130.6	GRAND TOTAL-	\$ 405.2	\$ 516.6

Note: Above numbers are current planning estimates and are subject to change as additional requirements and final costs are determined.

	Jan-97	Current
* Includes: 1A Acceleration Costs	14.7	17.1
1A Lost Depreciation	22.6	65.0

10.01.1997