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October 16, 1997

EX PARTE

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

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OCT 16 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Telephone Number Portability (CC Docket No. 95-116)

Dear Mr. Caton:

On Wednesday, October 15, 1997, I, on behalf of AirTouch Communications, Inc. met with Rosalind Allen, Jeanine Poltronieri, and David Wye of the Wireless Telecommunications Bureau to discuss the above proceeding. Please associate the attached material with the above-referenced proceeding.

Two copies of this notice are being submitted to the Secretary in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me at 202-293-4960 should you have any questions or require additional information concerning this matter.

Sincerely,

Kathleen Q. Abernathy

Attachment

cc: Rosalind Allen
Jeanine Poltronieri
David Wye

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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

In the Matter of)
)
 Telephone Number Portability) CC Docket No. 95-116
) RM 8535
)

**FIRST REPORT AND ORDER AND
 FURTHER NOTICE OF PROPOSED RULEMAKING**

Adopted: June 27, 1996

Released: July 2, 1996

Comment Date: August 16, 1996
 Reply Comment Date: September 16, 1996

By the Commission:

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covered SMR carriers should be able to complete these upgrades by the date by which wireline carriers must complete implementation of number portability in the largest 100 MSAs. Second, the carrier may make arrangements with other carriers that are capable of performing database queries. Cellular, broadband PCS, and covered SMR carriers operating in areas outside the largest 100 MSAs thus would need to make arrangements with other CMRS providers that have the capability to query databases, or with wireline carriers in the largest 100 MSAs, which will have completed deployment of number portability by December 31, 1998.

166. We require all cellular, broadband PCS, and covered SMR carriers to offer service provider portability throughout their networks, including the ability to support roaming, by June 30, 1999.⁴⁴⁵ The record indicates that additional time is needed to develop standards and protocols, such as ten-digit-based screening, to overcome the technical burdens unique to the provision of seamless roaming on cellular, broadband PCS, and covered SMR networks.⁴⁴⁶ Individual carriers, of course, may implement number portability sooner, and we expect that some carriers will do so based on individual technical, economic, and marketing considerations. We believe a nationwide implementation date for number portability for cellular, broadband PCS, and covered SMR providers is necessary to ensure that validation necessary for roaming can be maintained.⁴⁴⁷ We delegate authority to the Chief, Wireless Telecommunications Bureau, to establish reporting requirements in order to monitor the progress of cellular, broadband PCS, and covered SMR providers implementing number portability, and to direct such carriers to take any actions necessary to ensure compliance with this deployment schedule. We believe it necessary to establish reporting requirements for CMRS to ensure timely resolution of the standards issues unique to CMRS number portability, particularly roaming.

167. We recognize, however, that additional technical issues may arise as the industry begins to focus on provision of portability by CMRS carriers. We therefore delegate authority to the Chief, Wireless Telecommunications Bureau, to waive or stay any of the dates in the implementation schedule, as the Chief determines is necessary to ensure the efficient development of number portability, for a period not to exceed 9

⁴⁴⁵ See Interconnection and Resale Obligations Pertaining to Commercial Mobile Radio Services, Second Report and Order and Third Notice of Proposed Rulemaking, CC Docket No. 94-54, FCC 96-284 (adopted June 27, 1996) (imposing manual roaming non-discrimination requirements). We recognize that customers may not be able to roam into some systems due to technical incompatibilities (e.g. different air interface technologies) between the system and the customer's handset. Nothing in this Order should be interpreted as requiring such capability.

⁴⁴⁶ See, e.g., AirTouch Cellular May 15, 1996 Ex Parte Filing at 15-17; CTIA April 18, 1996 Ex Parte Filing at 28-29; CTIA Further Comments at 4-6.

⁴⁴⁷ See AirTouch Cellular May 15, 1996 Ex Parte Filing at 10-17; CTIA April 18, 1996 Ex Parte Filing at 25-29; Nortel May 21, 1996 Ex Parte Filing at 5-7.

months (*i.e.*, no later than September 30, 1999, for the first deadline, and no later than March 31, 2000, for the second deadline).

168. In the event a carrier is unable to meet our deadlines for implementing a long-term number portability solution, it may file with the Commission at least 60 days in advance of the deadline a petition to extend the time by which implementation in its network will be completed. We emphasize, however, that carriers are expected to meet the prescribed deadlines, and a carrier seeking relief must present extraordinary circumstances beyond its control in order to obtain an extension of time. Carriers seeking such relief must demonstrate through substantial, credible evidence the basis for its contention that it is unable to comply with our deployment schedule. Such requests must set forth: (1) the facts that demonstrate why the carrier is unable to meet our deployment schedule; (2) a detailed explanation of the activities that the carrier has undertaken to meet the implementation schedule prior to requesting an extension of time; (3) an identification of the particular switches for which the extension is requested; (4) the time within which the carrier will complete deployment in the affected switches; and (5) a proposed schedule with milestones for meeting the deployment date.

169. Interim Number Portability Measures. We do not require CMRS providers to provide RCF, DID, or comparable measures. Different treatment of CMRS and wireline carriers in this instance is justified by their differing circumstances. According to the record, RCF and DID currently cannot be provided by mobile telephone switching offices.⁴⁸⁸ Due to the different nature of CMRS networks and wireline networks, implementation of RCF or DID capability in a CMRS network appears far more problematic and expensive than in a wireline network.⁴⁸⁹ For example, PCIA claims that RCF requires carriers to maintain a point of interconnection within each NPA in which it intends to provide such service, and that currently, many broadband CMRS carriers' switches do not interconnect at all such points.⁴⁹⁰ Moreover, cellular roaming systems would have to be modified to account for the fact that, under RCF, a number different than the one dialed is used to route the call. As a result, alternative means will have to be developed to enable CMRS carriers to validate mobile subscribers who have roamed out of their service areas.⁴⁹¹ Broadband carriers may also have to purchase new switches in order to provide RCF and DID. Moreover, most new broadband carriers are already planning to deploy the components necessary to implement a long-term database method

⁴⁸⁸ PCIA March 12, 1996 Ex Parte Letter at 2-3; PCIA February 28, 1996 Ex Parte Filing at 1-2.

⁴⁸⁹ See generally PCIA March 12, 1996 Ex Parte Letter; PCIA March 28, 1996 Ex Parte Letter.

⁴⁹⁰ See PCIA March 12, 1996 Ex Parte Letter at 3.

⁴⁹¹ See AT&T Wireless, Inc. Ex Parte Letter, from Cathleen A. Massey, to William Caton, FCC, CC Docket No. 95-116, filed May 24, 1996 (AT&T May 24, 1996 Ex Parte Letter).

e n t e r p r i s e

INSIDE

EMPLOYEES

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Communications

Focus on Customer Loyalty

In today's competitive cellular industry, getting new customers is only half the battle. To reap the benefits of growing wireless awareness and demand, keeping customers is equally important.

Combating churn, the rate at which customers disconnect service, is one of the biggest challenges facing today's wireless providers. A recent study by Andersen Consulting reveals that U.S. and European cellular operators lose \$4 billion each year to churn – evidence that the problem has reached what Andersen calls “epidemic proportions.”

AirTouch has long recognized the impact of churn. Knowing that dissatisfied customers are about 10 percent more likely than satisfied customers to churn, in 1994 the company formed a corporate Customer Satisfaction group. The group helps AirTouch markets reduce churn by giving them the tools to understand and meet customer needs.

The group's focus is proactive. “At AirTouch, building customer loyalty begins the minute the customer signs up for service,” said Pat Decker, Executive Director – Customer Loyalty and Process Engineering. “If we wait until the customer calls us, it's too late.”

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Chairman's Corner

A Glance Back, A Step Forward

These days, whether I'm thinking about matters professional or personal, I find myself reflecting on the same familiar truth: Sometimes, to see where you're going, you have to take a look at where you've been.

Maybe it has something to do with recently becoming a grandfather for the first time. Lately, we spend a lot of time at home, being nostalgic about our family history while eagerly looking toward our newest family member's future.

It occurs to me that, at this point in our history, AirTouch also could benefit from a backward glance. As AirTouch 2000, our company-wide initiative for the future, takes shape, what better time to assess the path we've followed so far, the company we're becoming along the way, and the enterprise we will be?

One of the benefits of a look back is that, in the midst of so much change and uncertainty for our industry, it shows us that AirTouch — in ways that really matter — is still the same company. True, we've evolved from a start-up in a fledgling field into a globally recognized leader in one of today's fastest growing industries. But as a young company, we prized the creativity of our employees, the power of our technology, the loyalty of our customers, and the promise of our industry, and we still value these things today.

But our industry is rapidly changing and to keep pace with the increasingly competitive marketplace we are starting to do some things differently. Our U.S. cellular markets are feeling the first

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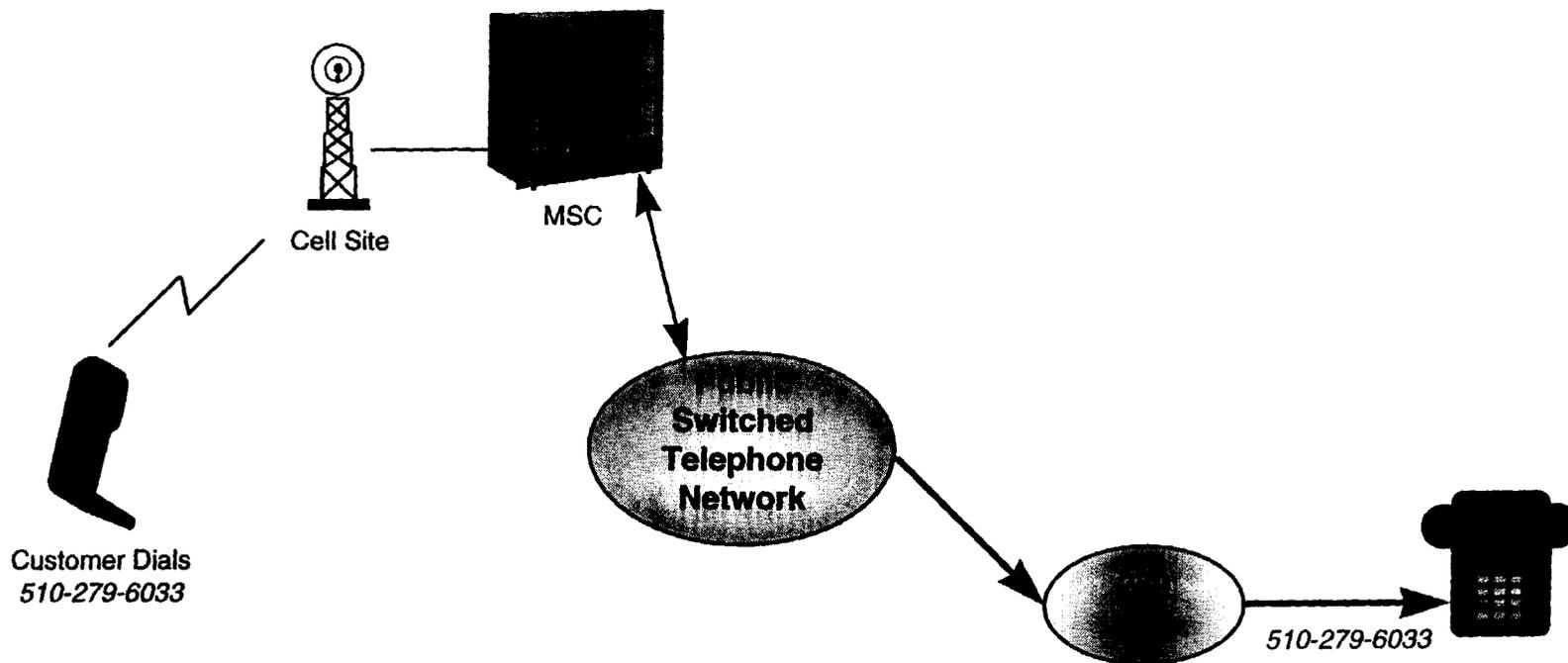
What is Number Portability

- **Number Portability refers to the ability of end users to retain their geographic or non-geographic (e.g., 800) telephone number when they change any of the following:**
 - **Location**
 - The ability of an end user to retain the same geographic or non-geographic telephone number as he/she moves from one permanent physical location to another.
 - **Service Provider**
 - The ability of an end user to retain the same geographic or non-geographic telephone number as he/she changes from one service provider to another.
 - **Service**
 - The ability of an end user to retain the same geographic or non-geographic telephone number as he/she changes from one type of service to another (e.g., POTS to ISDN).

Wireless Call Origination - Current

■ Call Routing

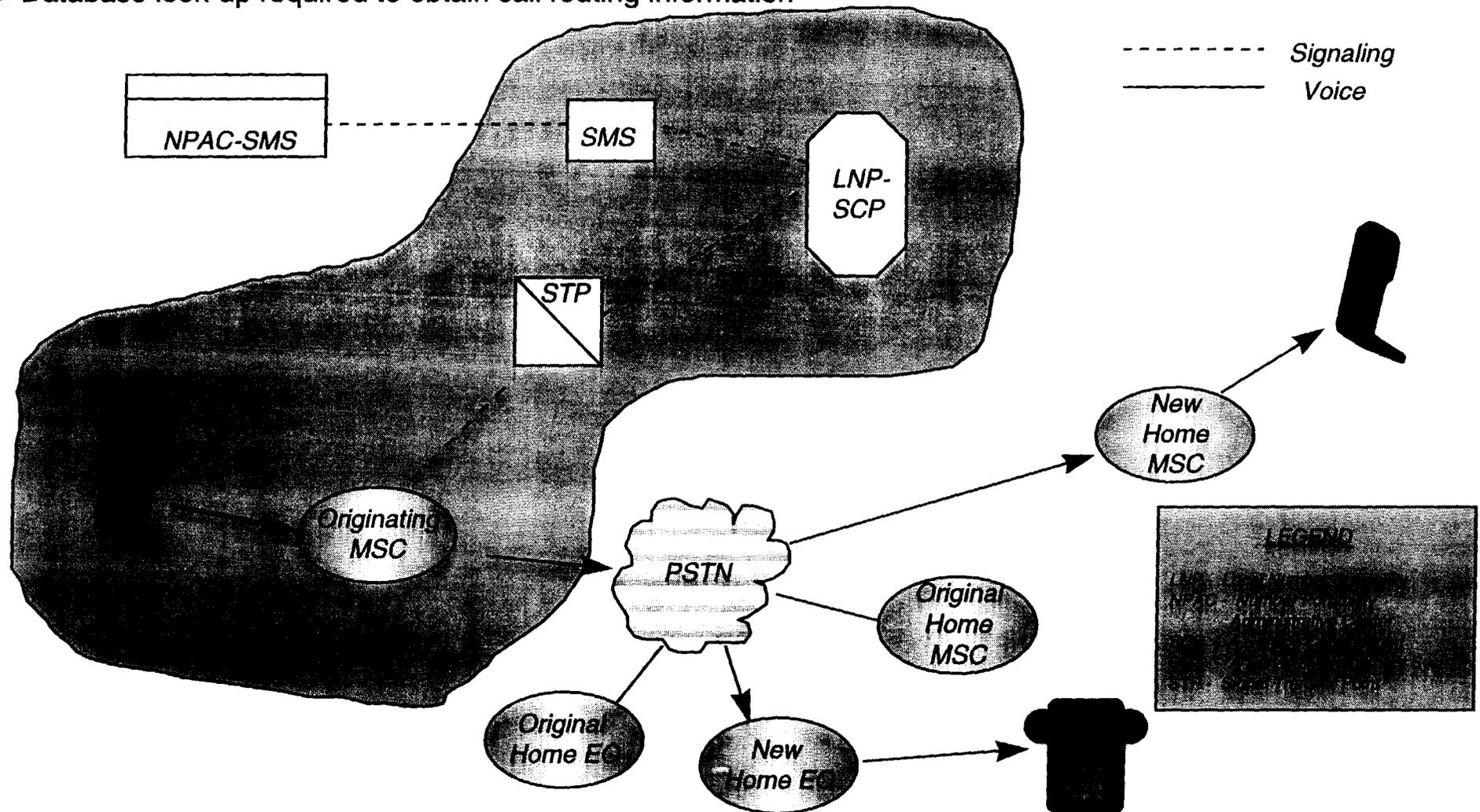
- Mobile Subscriber dials telephone number
- Cell site transmits dialed digits to the Mobile Switching Center (MSC)
- MSC uses translation tables to determine destination of called number



Wireless Call Origination - Post Number Portability

■ Call Routing

- SS7 deployment is required for database look-ups (SS7 infrastructure deployed)
- Every mobile originated call to a ported NXX will initiate a database lookup
- Database look-up required to obtain call routing information



Impacted Areas

- **Number Portability impacts every layer of a telecommunication carrier's infrastructure:**
 - **Information Technologies**
 - Billing and Provisioning Systems
 - **Network**
 - Mobile Switching Systems
 - SS7
 - Home Location Registers
 - **Business Operations**
 - Customer Care
 - **Handsets** (The ported subscriber will surrender the MIN to the donor network and receive a new MIN from the recipient network)
 - **Roaming** (Domestic & International)