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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Mr. Richard Metzger
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: **EX PARTE**
Local Number Portability, CC Docket No. 95-116

On August 18, 1997, the Federal Communications Commission (Commission) issued its Second Report and Order in the above-referenced docket, which adopted the North American Numbering Council's (NANC's) recommendation that the Commission create a committee to monitor compliance with the Commission's orders regarding deployment of long-term local number portability (LNP) in the top 100 Metropolitan Statistical Areas (MSAs).¹ The committee, comprised of the members of the NANC's LNP Working Group, represents a broad cross-section of the telecommunications industry and is chaired by the Chief of the Common Carrier Bureau (Bureau).²

The Commission's Second Report and Order confirms earlier Commission orders which recognize that the ability of consumers to retain their telephone numbers when changing service providers promotes competition, provides flexibility in the quality, price and variety of telecommunications services and, ultimately, benefits all users of telecommunications services.³ Because of the importance of LNP to the development of local competition, the Commission

¹*In the Matter of Telephone Number Portability, Second Report and Order, CC Docket No. 95-116, ¶ 132 (rel. Aug. 18, 1997) (Second Report and Order).*

²*Id.*

³*In the Matter of Telephone Number Portability, First Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 95-116, ¶ 30 (rel. July 6, 1996).*

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delegated to the Bureau Chief the authority to take actions to address problems with respect to carriers' requests for LNP deployment in specific switches,⁴ and strongly advised carriers to begin implementation of LNP as early as possible in each LNP deployment phase.⁵

Pursuant to these directives, on October 7 and 14, 1997, the LNP Working Group and a subcommittee thereof convened to discuss implementation of a plan designed to regularly advise the Bureau Chief of the status of long-term LNP deployment in the top 100 MSAs. After that meeting, the issue was also discussed briefly at the meeting of the NANC on October 21.

All industry participants agreed that the Bureau Chief should have access to information clearly outlining the status of each carrier's long-term LNP deployment in order to ensure compliance with the Commission's directive that long-term LNP be deployed in a competitively neutral fashion. The LNP Working Group will thus provide to the Bureau Chief by the Friday of the first full week of each month an LNP Deployment Plan Report containing the number of offices that have been requested in each MSA, along with the status of each carrier's efforts to make those offices LNP-capable, and to commercially deploy those offices for purposes of LNP.

MCI believes that if the Bureau Chief is to fulfill the Commission's directive to monitor compliance with Commission orders regarding LNP deployment, the LNP Deployment Plan Report must also contain detailed information concerning incumbent local exchange carriers' future plans with respect to the deployment of LNP in their switches. Without this forecasting information, there is no standard against which the Bureau Chief can measure incumbents' compliance with Commission orders. On the other hand, armed with the implementation forecasts, the Bureau Chief will be able to conduct a meaningful monthly evaluation of each carrier's progress toward its goals, and, ultimately, toward the overall goal of the Telecommunications Act of 1996 to provide consumers with meaningful choices between local service providers.

It is our understanding that the first LNP Deployment Plan Report will be submitted to the Bureau Chief on November 7. MCI requests that the Bureau Chief require incumbent local exchange carriers to submit their LNP implementations plans as a part of the LNP Deployment Report so that progress can be measured and evaluated in a truly meaningful fashion.

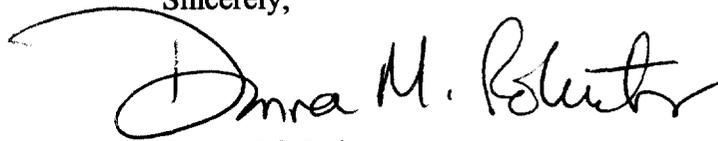
⁴*In the Matter of Telephone Number Portability*, First Memorandum Opinion and Order on Reconsideration, CC Docket No. 95-116, ¶ 71 (rel. Mar. 11, 1997).

⁵*Id.*, ¶ 82.

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In order to assist the Bureau Chief in the fulfillment of duties associated with monitoring LNP deployment, MCI also requests that it be allowed to meet with the Bureau Chief and other industry participants, and the incumbent local exchange carriers in particular, on a monthly basis to discuss the LNP Deployment Plan Report. At these monthly meetings, carriers will answer any questions the Bureau Chief may have about their deployment plans, and will also expediently correct any anti-competitive LNP deployment plans that might otherwise inhibit the smooth and pro-competitive deployment of LNP in the top 100 MSAs.

Sincerely,

A handwritten signature in black ink, appearing to read "Donna M. Roberts". The signature is fluid and cursive, with a large initial "D" that loops back under the first name.

Donna M. Roberts

cc: James Schlichting
Patrick Donovan
Kathy Franco
Paul Gallant
James Casserly
Neil Fried
John Nakahata
Carol Matthey
Tom Power
Jane Mago
Katherine King