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

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

To: Chief, Wireless Telecommunications Bureau

**COMMENTS OF 360° COMMUNICATIONS COMPANY
ON CTIA PETITION FOR EXTENSION OF IMPLEMENTATION DEADLINE**

360° Communications Company ("360°")¹ hereby submits its comments in support of the Petition by the Cellular Telecommunications Industry Association ("CTIA") in the above-captioned proceeding.² In its Petition, CTIA seeks an extension of the deadline for implementation of service provider number portability. For the reasons detailed below, 360° fully agrees that this deadline should be extended until March 31, 2000.

Like many CMRS providers, 360° has been heavily involved in efforts to develop wireless number portability standards. 360° has been an active participant in CTIA's Numbering Advisory Group and has participated on various industry committees and subcommittees focusing on number portability and related issues. To date, great

¹ 360° is the country's second largest publicly held cellular company provider. The company offers wireless voice and data services to 2.4 million customers in more than 100 markets throughout 15 states. 360° also provides residential long distance and paging services.

² See Wireless Telecommunications Bureau Seeks Comment on CTIA Petition for Waiver to Extend the Implementation Deadlines of Wireless Number Portability, *Public Notice*, DA 97-

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strides have been made in the development of wireless number portability standards – consensus has been reached on the general architecture. Yet, numerous challenging issues remain to be resolved before final standards can be adopted and implementation can begin.

As detailed by CTIA, among the most complex of these remaining issues is how to separate the Mobile Identification Number (“MIN”) and the Mobile Directory Number (“MDN”). In the current wireless call structure, the MIN and the MDN are the same. However, in order for number portability to be implemented in a manner consistent with the Commission’s directive to support nationwide roaming, it has been widely agreed that these numbers must be made distinct. The MDN can then become portable with the customer, while the MIN can remain associated with the specific CMRS provider and unique to the mobile station. Effecting this separation requires a complete redesign of the current wireless call structure and the resolution of numerous technical details.³ At the present time, such final standards are still many months away.

Further, even after these new standards are set, adequate time must be provided for testing and implementation. MIN/MDN separation will require modification of all CMRS network and back office systems, including the redesign of customer service and billing systems. As pointed out by CTIA, “[i]n a large distributed network environment it can take up to 24 months to integrate new applications from the planning

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2579 (Dec. 9, 1997).

³ As noted by CTIA, wireless number portability standards are also dependent to some extent on the standards adopted for wireline number portability. Until such wireline standards are adopted, wireless number portability standards cannot be finalized. CTIA Petition at 3.

through roll-out phases.”⁴ Given that final standards have not yet been adopted, the current June 30, 1999, implementation date is simply unrealistic.

Accordingly, 360° fully concurs with CTIA’s request to extend the implementation deadline for service provider number portability until March 31, 2000. Indeed, the Commission previously contemplated that such an extension might be necessary. In adopting the current deadline, the Commission specifically recognized the “technical burdens unique” to implementing wireless number portability.⁵ Accordingly, the Commission expressly granted the Chief of the Wireless Telecommunications Bureau authority to delay the implementation schedule for up to nine months should the need arise.⁶ The Commission renewed this grant of deadline flexibility in its reconsideration order.⁷ As such, the requested extension would be fully consistent with Commission policy.

⁴ Declaration of Arthur L. Prest (appended to CTIA Petition) at 5.

⁵ Telephone Number Portability, *First Report and Order and Further Notice of Proposed Rulemaking*, 11 FCC Rcd 8352, ¶166 (1996).

⁶ *Id.* at ¶167.

⁷ Telephone Number Portability, *First Memorandum Opinion and Order on Reconsideration*, 12 FCC Rcd 7236, ¶134 (1997).

For the foregoing reasons, 360° strongly supports CTIA's Petition and urges the Commission to extend the implementation date for service provider number portability until March 31, 2000.

Respectfully submitted,

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