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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Telephone Number Portability) CC Dkt. 95-116

Comments of the Association for Local
Telecommunications Services

TO: Chief, Wireless Telecommunications Bureau

The Association for Local Telecommunications Services ("ALTS") pursuant to Public Notice DA 97-2579 (released December 9, 1997), as amended by Public Notice released December 17, 1997, hereby files its comments on the request filed by the Cellular Telecommunications Industry Association ("CTIA") for an extension of the implementation deadlines for number portability applicable to wireless carriers in the above-captioned proceedings.

ALTS is the national trade association representing facilities-based competitive local exchange carriers. As such, the members of ALTS are vitally interested in the prompt implementation of number portability by all carriers. In addition, as new competitors in the communications marketplace, the members of ALTS need reasonable access to numbering resources. Thus, they have a significant interest in ensuring that issues relating to numbering administration not be affected by the wireless industry's inability or unwillingness to implement number portability in a timely manner.

Specifically, it is important that any delay in the

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implementation schedule for number portability for the wireless industry not result in a delay of implementation of various measures designed to address area code depletion and number conservation. If the delay in number portability implementation results in the delay of numbering conservation measures that would benefit all telecommunications carriers, it should not be granted.

The genesis of the ALTS concern is the insistence of the CMRS industry that measures such as number pooling under an NXX-X Location Routing Number (LRN) scheme not be implemented prior to the adoption of local number portability for all carriers. The members of CTIA have argued that the implementation of number pooling prior to the implementation of LNP for all carriers is not "technology neutral" and somehow is anticompetitive. Traditionally, numbers have been assigned to all carriers by full NXX, i.e., carriers receive 10,000 numbers at a time. Number pooling under an NXX-X LRN is a method of sharing NXX 10,000 blocks among multiple service providers in the same rate center by dividing the NXX code into blocks of 1000 numbers each. This enables a more efficient use of existing number resources and will necessarily result in a lessening of the need to ration numbers.¹

¹ The wireless industry appears to argue that if it somehow could not participate in number pooling it would be disadvantaged when the available numbers become scarce in a particular wire center because wireless carriers would not be given the blocks of 10,000 numbers. However, number pooling would increase numbering resources for all carriers, both wireline and wireless. To ALTS' knowledge there has never been any indication by wireline

While number pooling is not the only method of delaying the introduction to new NPAs and encouraging efficient utilization of numbering resources, it is viewed by most industry representatives as one reasonable step to take to conserve numbering resources.²

It is the wireless industry that initially sought a different schedule for the implementation of number portability in that industry.³ The deadline that CTIA wishes to have pushed back by nine months is today more than a year away. ALTS takes no position on the reasonableness of the assertions in the CTIA petition relating to the specific difficulties encountered by the wireless industry in implementing number portability. However, delay by any one type of carrier necessarily has some negative effect on all carriers. Therefore, the Commission should not

carriers that they see number pooling as a means of ensuring more numbers for wireline carriers vis a vis wireless carriers. Rather number pooling would result in the availability of additional numbers for all carriers.

² AT&T in its Reply Comments in DA 97-2234 articulated this point in perhaps the simplest, most direct terms:

The comments demonstrate that . . . more efficient utilization of numbering resources through pooling can help make numbering resources more readily available to both wireless and wireline carriers, and that relieving current number shortages will benefit both the telecommunications industry and end users.

Reply Comments of AT&T at 2 (filed Nov. 6, 1997).

³ See In re Telephone Number Portability, CC Docket No. 95-116, 11 FCC Rcd 8352 (1995).

grant the requested relief absent a thorough analysis of the technical issues involved. In addition, if the Commission agrees with CTIA that an extension is necessary, the Commission should expressly condition any grant of an extension on a commitment by the wireless industry not to object to, or seek to delay, otherwise reasonable steps being taken to implement number portability and numbering administration policies by other telecommunications carriers. Implementation of number pooling by carriers with LRN capability should not be held hostage to the wireless industry's inability or unwillingness to implement number portability in a timely manner.

Respectfully submitted,

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January 9, 1998

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of January, 1998, copies of the foregoing Comments of the Association for Local Telecommunications Services were served via first class mail, postage prepaid, or by hand as indicated to the parties listed below.


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