

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
GTE CALIFORNIA INCORPORATED)
Petition to Extend the Time For)
Number Portability Implementation)
At Its USC Switch)
)
Telephone Number Portability)

CC Docket No. 95-116

**GTE's REQUEST TO EXTEND THE
IMPLEMENTATION TIME FOR ITS USC SWITCH**

GTE California Incorporated ("GTEC"), pursuant to paragraph 85 of the First Report and Order (the "First R&O") in this CC Docket No. 95-116 ("D.95-116), 11 FCC Rcd 8352 (1996), respectfully requests an extension of two months, until June 1, 1998, of the deadline for complete implementation of Local Number Portability ("LNP") in GTEC's network with regard to a 5ESS base unit and its two remote switches located at the University of Southern California in Los Angeles and comprising the "USC Switch."

BACKGROUND

Paragraph 85 of the First R&O, 11 FCC Rcd at 8397,¹ provides that a carrier unable to meet the FCC's deadline for implementing a long-term number portability method may file with the Commission, at least sixty days in advance of

¹ See also D.95-116, First Memorandum Opinion and Order on Reconsideration, 12 FCC Rcd 7236 (1997) (the "Recon Order").

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the deadline, a petition to extend the time by which implementation in its network will be completed. Such a request must include: (1) the facts that demonstrate why the carrier is unable to meet the FCC's 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. These requirements are met *infra*.

DISCUSSION

I. THE SPECIFIC RELIEF REQUESTED

The USC Switch for which GTEC is seeking a waiver is located within the Metropolitan Statistical Area ("MSA") for Los Angeles,² which is scheduled for LNP implementation by March 31, 1998.³

In its capacity as an authorized competitive local exchange carrier ("CLEC") operating in Pacific Bell's territory, GTEC first began providing service from this switch on December 20, 1997. Prior to that time, the USC Switch

² The base unit (CILI code LSANCAIODS0) is located at 1020 West 36th Place, Los Angeles, California 90089. One remote unit (CILI code LSANCAIPRS0) is located at 649 W. 34th Street, Los Angeles, California 90089 and the other remote unit (CILI code LSANCAIKRS1) is located at 1540 Alcazar Street, Los Angeles, California 90031.

³ It is unknown at this time what impact the delay in the delivery of the Number Portability Administration Center/Service Management System by Perot Systems will have on the Phase I implementation schedule in the Los Angeles MSA.

functioned as a PBX, owned and operated by USC, and the local network services were provided by Pacific Bell.

As part of the transition of the USC Switch to GTEC, the Pacific NXX codes (442, 740 and 764) residing in Pacific Bell's switch and dedicated to USC were transferred to GTE on December 20, 1997. However, prior to this transfer process, Pacific and GTEC were required to provide a list of all switches in the Los Angeles MSA so that the CLECs could select switches for LNP implementation as contemplated in the Recon Order (§§ 59-71). Although the USC Switch was a private switch, the NXX codes associated with the USC Switch were included by Pacific in the codes listed for its LSANCA09D wire center.

This wire center was selected by several CLECs. Accordingly, these CLECs are expecting the 442, 740 and 764 NXX codes to be available for LNP implementation on March 31 along with the other Phase I sites, unless the instant request of GTEC is granted.

II. REASONS WHY GTEC IS UNABLE TO MEET THE FCC'S DEPLOYMENT SCHEDULE.

The USC Switch functioned as a PBX under the ownership of USC until as recently as last month, and USC did not upgrade the switch to enable the LNP functionality. Thus, the USC Switch was operating on the 5E9.1 software generic -- which is an outdated version unable to support LNP.

III. ACTIVITIES OF GTEC UNDERTAKEN TO MEET THE IMPLEMENTATION SCHEDULE.

Prior to GTEC's possession of the USC Switch, GTEC began ordering the hardware necessary for LNP implementation, anticipating that GTEC would soon take possession of the USC Switch. Since the time that GTEC took possession and began operating the switch on December 20, 1997, it has been working closely with its switch software vendor and has been applying its internal resources to establish a rapid LNP schedule for the necessary upgrades to make the USC Switch LNP capable.⁴

IV. THE USC SWITCH IS THE ONLY SUBJECT OF THIS REQUEST.

The only subject of this request is the USC Switch, identified *supra*.

V. GTEC's PROPOSED COMPLETION SCHEDULE.

GTEC expects and intends to assure completion of implementation with regard to the USC Switch in accordance with the following schedule.

- (1) The upgrade to 5E10 generic software is scheduled for February 6, 1998. This is currently the earliest date available from the switch software vendor. The 5E10 software upgrade is a prerequisite load to 5E11 which is necessary for LNP functionality.
- (2) The upgrade to 5E11 generic software is scheduled for March 20, 1998. This is currently the earliest date available from the switch software vendor.
- (3) Additional Signaling System Seven (SS7) hardware must be installed and is scheduled to be in service on April 3, 1998. This hardware was ordered in October 1997 in anticipation that GTEC

⁴ For example, the 5E11 generic software load described in item (2) of GTEC's proposed completion schedule *infra* was originally scheduled for May 15 and is now scheduled for completion by March 20, 1998.

would take possession of the USC Switch. This is a prerequisite to the SS7 link establishment.

- (4) SS7 link establishment from the end office to the regional Signal Transfer Point (STP) will be in place April 10, 1998--one week after the SS7 hardware installation is complete.
- (5) GTEC interoffice SS7 trunk conversions and Pacific Bell intercompany SS7 trunk establishments will occur after the SS7 links are in service. It is important to note that SS7 trunking can not be established until the SS7 links are in place. In preparation for the conversion and establishment of trunking, GTEC and Pacific will engage in trunk design activity beginning February 6, 1998. GTEC is allowing two weeks from the time SS7 links are in service to have all trunking in place by April 24, 1998.
- (6) Database management is scheduled to begin end office switch translations subsequent to the availability of 5E11 on March 20, 1998. GTE estimates the completion of the end office switch translations and the entry of the data necessary for LNP into the USC Switch by May 12, 1998.
- (7) GTE's internal network reliability testing on the USC Switch to ensure LNP functionality is scheduled to be completed by June 1, 1998.

All of the work listed above is necessary for the USC Switch to be capable of porting telephone numbers. The above schedule will result in LNP availability in the USC switch on June 1, 1998. However, GTE will open the USC Switch to porting earlier than the schedule presented herein if it is able to do so.

CONCLUSION

Since the time that GTEC has had control over the USC Switch, it has made every effort to ensure that the switch is LNP capable on an expedited schedule. GTEC estimates that the work required to accomplish this task will require two months and that the USC Switch will be available for porting on June 1, 1998 or earlier. Accordingly, pursuant to paragraph 85 of the First R&O,

GTEC respectfully requests an adjustment of the Phase I implementation schedule for the USC Switch to show completion on June 1, 1998.

Respectfully submitted,

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January 29, 1998

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Certificate of Service

I, Ann D. Berkowitz, hereby certify that copies of the foregoing "GTE's Request to Extend the Implementation Time for Its USC Switch" have been mailed by first class United States mail, postage prepaid, on January 29, 1998 to all parties of record.


Ann D. Berkowitz