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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

In the Matter of)
)
Telephone Number Portability) CC Docket 95-116
Phase I Implementation.)

PETITION FOR WAIVER

The Sprint Local Telephone Companies ("Sprint") hereby request a waiver, pursuant to Section 1.3 of the Commission's rules,¹ of the requirement to provide local number portability in the Houston MSA by March 31, 1998. The specific offices impacted by this request are listed in Attachment A appended hereto.

In its First Memorandum Opinion and Order on Reconsideration,² the Commission modified the schedule for deployment of long-term number portability ("LNP") for Phases I and II. As a result of that Order, Phase I implementation – encompassing the Chicago, Houston and Minneapolis MSAs – is to be completed no later than March 31, 1998. The Commission also directed those companies not able to meet the March 31st deadline to file a waiver request no later than January 29, 1998.

Sprint acknowledges that the waiver request being made herein is out of time; however, circumstances beyond its control have made this request necessary. Sprint asserts that its systems are in place and it is fully prepared to implement LNP in the Houston MSA in compliance with the Commission's schedule. However, in the last several days, Sprint has learned that Southwestern Bell has determined that it will not be able to meet the March 31st deployment deadline. In a waiver request filed with the Commission on February 20, 1998, Southwestern Bell explained that it requires a

¹ 47 C.F.R. Section 1.3.

² In the Matter of Telephone Number Portability, First Memorandum Opinion and Order on reconsideration, CC Docket 95-116, released March 11, 1997.

delay due to defects found in connection with the Signal Transfer Point ("STP") upgrades needed for local number portability. The company states that it is in the process of getting new software from its vendor, but will require time to test that software to ensure network reliability. Southwestern Bell expects to be in a position to deploy LNP to the Houston MSA by May 26, 1998.

Due to this recent development, Sprint now finds itself in the position of requiring a waiver of the March 31st implementation date as well. Sprint relies on Southwestern Bell for the provision of operator and directory assistance services to its Houston MSA customers. One of the essential functions performed by Southwestern Bell as a part of these services is LIDB validation. Sprint understands that Southwestern Bell's inability to load the LRN software used for LNP will result in its inability to provide LIDB validation services on ported calls into and out of Sprint's exchanges. The failure of Southwestern Bell to perform that validation function will expose Sprint to fraudulent third party and collect calls. Until such time as Southwestern Bell can properly validate those calls, Sprint should not be forced to expose itself and its customers to such fraudulent activities. Sprint, therefore, requests that it not be required to deploy its LNP service until Southwestern Bell is ready to do so.

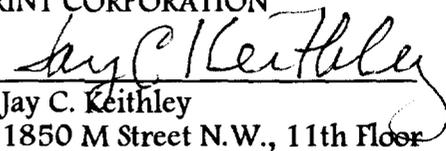
Section 1.3 of the Commission's rules states that the Commission may waive any provision of its rules if good cause is shown. Good cause is shown through the existence of special circumstances that warrant deviation from the general rule and such deviation will service the public interest. Sprint submits that special circumstances exist in this instance. Factors outside of Sprint's control, specifically the failure of Southwestern Bell's STP software to perform as necessary will cause that company to delay its LNP deployment which will, in turn, negatively effect Sprint's ability to meet the March 31st deployment deadline. Southwestern Bell's software

problems, and its failure to identify those problems until recently, are the sole reasons for Sprint's inability to comply with the Commission's LNP implementation schedule. Because Sprint is otherwise prepared to deploy LNP, the public interest will be served, even with the grant of this waiver request, since it will introduce LNP to the Houston MSA immediately once Southwestern Bell's technical problems are cured.

Based on the foregoing reasons, Sprint respectfully requests that, to the extent the Commission grants the waiver requested by Southwestern Bell for deployment of LNP in the Houston MSA until May 26, 1998, it grant a like waiver to Sprint.

Respectfully submitted,
SPRINT CORPORATION

By


Jay C. Keithley
1850 M Street N.W., 11th Floor
Washington, DC 20036-5807
(202) 857-1030

Sandra K. Williams
P. O. Box 11315
Kansas City, MO 64112
(913) 624-2086

Its Attorneys

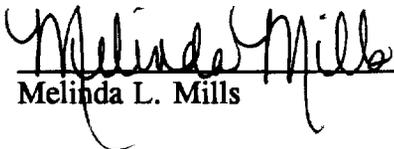
February 27, 1998

**ATTACHMENT A
LNP SWITCH LIST**

MSA	EXCHANGE	SELECTED	LOCATION ROUTING NUMBER (LRN)	READY TO PORT DATE
HOUSTON	ATASCOCITA	YES	281-852-0000	3/31/1998
HOUSTON	HUMBLE	YES	281-446-0000	3/31/1998
HOUSTON	SOUTH HUMBLE	YES	281-441-0000	3/31/1998
HOUSTON	PORTER	YES	281-354-0000	3/31/1998
HOUSTON	PORTER HEIGHTS	YES	281-429-0000	3/31/1998
HOUSTON	KINGWOOD	YES	281-348-0000	3/31/1998
HOUSTON	KINGS CROSSING	YES	281-360-0000	3/31/1998
HOUSTON	RICHARDS	YES	409-851-0000	

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 3rd day of March 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Petition for Waiver" of the Sprint LTCs in the Matter of Telephone Number Portability Phase I Implementation, CC Docket No. 95-116, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.



Melinda L. Mills

* Indicates Hand Delivery

Richard Metzger*
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW, Room 500
Washington, DC 20554

Wilbur Thomas*
ITS
1919 M Street, NW, Room 246
Washington, DC 20554

Joel Ader*
Bellcore
2101 L Street, NW
Suite 600
Washington, DC 20036

John Muleta*
FCC
1919 M Street, NW
Room 500
Washington, DC 20554

Mark J. O'Connor
Piper and Marbury, LLP
1200 19th Street, NW
7th Floor
Washington, DC 20036

Robert Sutherland
Theodore R. Kingsley
BellSouth
1155 Peachtree St.
Suite 1700
Atlanta, GA 30309

Glenn Manishin
Blumenfeld & Cohen Technology Law Group
1615 M Street, NW, Suite 700
Washington, DC 20036

Andre J. Lachance
GTE
1850 M Street, NW
Suite 1200
Washington, DC 20036

Richard S. Whitt
Anne F. LaLena
WorldCom Inc.
1120 Connecticut Avenue, NW
Suite 400
Washington, DC 20036

John Readen
Mobex Corporation, Inc.
1150 18th Street, NW
Suite 250
Washington, DC 20036

John Assonzo
Sprint PCS
4900 Main Street, 12th Floor
Kansas City, MO 64112

Caressa D. Bennet
Bennet & Bennet
1019 19th Street, NW
Suite 500
Washington, DC 20036

Carole C. Harris
Christine M Gill
McDermott Will and Emery
600 13th Street, NW
Suite 1200
Washington, DC 20005

Richard J. Metzger
Emily Williams
ALTS
888 17th Street, NW
Washington, DC 20006

William L. Roughton
PrimeCo Personal Communications
601 13th Street, NW
Suite 320 South
Washington, DC 20005

Kevin C Gallagher
360 Communications Company
8725 W. Higgins Road
Chicago, IL 60631

Peter M. Connelly
Koteen and Naftalin
1150 Connecticut Avenue, NW
Washington, DC 20036

Kathleen Abernathy
Aurtouch Communications Inc.
1818 N Street, NW
Washington, DC 20036

Cathleen A. Massey
Douglas I. Brandon
AT&T Wireless
1150 Connecticut Avenue, NW
4th Floor
Washington, DC 20036

Alan R. Shark
American Mobile Telecommunications
1150 18th Street, NW
Suite 250
Washington, DC 20036