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SUMMARY

As the Commission has recognized, the failure of the former LNP Administrator in the Western, Southeast and West Coast regions to timely provide a stable Number Portability Administration Center/Service Management System ("NPAC/SMS") will prevent carriers in those regions from deploying Phase I of permanent local number portability ("PLNP") in compliance with the schedule established in the LNP Reconsideration Order. However, none of the petitions addressed in the instant Public Notice (DA 98-449), with the exception of BellSouth's, even purports to address the specific requirements of 47 C.F.R. § 52.3(e), and so provide no basis for the Commission to adjust its PLNP schedule.

BellSouth's petition seeks to delay Phase I implementation until mid-November 1998 -- three months longer than any other ILEC's proposed Phase I timeline -- but does not, and cannot, explain why its proposed schedule differs so radically from those of other carriers that also must cope with delayed delivery of that platform. BellSouth alleges that it requires 35 weeks to upgrade its systems in order to interface with the Lockheed NPAC/SMS, but plainly fails to justify such an extraordinary delay. Further, it appears that, contrary to its claims, BellSouth has known, or should have known, of the need for the upgrades in question at least since November 1997. Accordingly, BellSouth's petition should be denied, and that carrier should be required to adhere to the timetable AT&T proposes in its petition.

To the extent the Commission even considers BellSouth's waiver request, it should require that carrier to: (i) fully document the problems that it claims require it to delay Phase I until November 11, 1998; (ii) explain in detail whether and how those problems are (or are not) linked directly to Perot's failure to timely provide an NPAC/SMS for the Southeast Region; (iii) establish an aggressive action plan to correct any deficiencies in its PLNP implementation; and

(iv) file weekly, publicly available reports documenting the status of its PLNP implementation efforts until it returns to the PLNP deployment schedule established in the LNP Reconsideration Order. Further, to the extent that BellSouth fails to demonstrate that its inability to timely implement PLNP is attributable solely to the unavailability of an NPAC/SMS, the Commission should attempt to place CLECs as nearly as possible in the same position they would have occupied had BellSouth implemented PLNP on schedule, and thereby prevent BellSouth from profiting by its waiver.

AT&T urges the Commission to complete its realignment of the entire LNP schedule in this proceeding. The record before the Commission strongly supports establishment of the following PLNP implementation deadlines for all carriers in the Western, Southeastern and West Coast regions:

- NPAC "live" date: May 11, 1998 (or the date a "live" NPAC is actually available)
- Inter-company testing completed: June 11, 1998 (or 30 days after "live" date)
- LNP implementation in Phase I MSAs completed: June 26, 1998 (or 14 days after testing)
- LNP implementation in Phase II MSAs completed: July 10, 1998 (or 14 days after Phase I)
- LNP implementation in Phase III MSAs completed: July 24, 1998 (or 14 days after Phase II)
- Remainder of LNP implementation in compliance with the schedule established in the Commission's LNP Reconsideration Order.

Commission's rules. However, as the Commission recognized in the Phase I Waiver Order,¹ the failure of the former LNP Administrator ("LNPA") in the Western, Southeast and West Coast regions to timely provide a stable Number Portability Administration Center/Service Management System ("NPAC/SMS")² will prevent carriers in those regions from offering long-term portability in compliance with the schedule established in the LNP Reconsideration Order.³ There is no dispute among the petitioners that some delay in the LNP schedule will be necessary for all facilities-based LECs operating in the affected regions. The sole point of contention among the parties concerns the duration of that delay. Accordingly, AT&T will confine these comments to that issue.⁴

¹ Order, Telephone Number Portability, CC Docket No. 95-116, DA 98-152, released January 28, 1998 ("Phase I Waiver Order").

² The NPAC/SMS is

a hardware and software platform that will contain the database of information required to effect the porting of telephone numbers. In general, the Number Portability Administration Center Service Management System will receive customer information from both the old and new service providers, validate the information received, and download the new routing information when an "activate" message is received indicating that the customer has been physically connected to the new service provider's network.

Second Report and Order, Telephone Number Portability, CC Docket No. 95-116, FCC 97-289, released August 18, 1997, ¶ 9, n.28 ("LNP Second Report and Order").

³ First Memorandum Opinion and Order On Reconsideration, Telephone Number Portability, CC Docket No. 95-116, FCC 97-74, released March 11, 1997 ("LNP Reconsideration Order").

⁴ The eight petitions addressed in the Public Notice are only a portion of the Phase I waiver requests lodged with the Commission. Five additional waivers were the

(footnote continued on next page)

I. THE MAJORITY OF THE PETITIONS ARE INADEQUATE TO PROVIDE A BASIS FOR A NEW PHASE I LNP SCHEDULE

As a preliminary matter, seven of the eight petitions addressed in the Public Notice fail to provide an adequate basis on which the Commission could rest a decision to revise its LNP schedule. Section 52.3(e) of the Commission's rules sets forth explicit prerequisites for petitions for waiver of the LNP deployment schedule, requiring a carrier to

demonstrate through substantial, credible evidence the basis for its contention that it is unable to comply with the deployment schedule set forth in Appendix A to Part 52 of this chapter. Such requests must set forth: (1) the facts that demonstrate why the carrier is unable to meet the Commission'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.

With the exception of BellSouth, none of the petitioners even purports to address these provisions. Because the unavailability of the NPAC/SMS affects all carriers in the Western, Southeast and West Coast regions, the Commission should adjust its current March 31, 1998 Phase I deadline. However, the other LECs' petitions are of no real relevance to the Commission's efforts to determine what the new LNP implementation timetable in the affected regions should be, except to the extent that they underscore the fact that

(footnote continued from previous page)

subject of a Public Notice (DA 98-451) issued on March 5, 1998, which requested comments on the same schedule as the instant Notice. In order to ensure a complete record for the Commission's consideration of a new LNP implementation schedule in the affected regions, AT&T hereby incorporates its comments on the March 5th Public Notice into the instant pleading by reference.

BellSouth's proposal to extend the current deadline by more than seven months -- a period that far exceeds even the timelines proposed by other ILECs -- is patently unreasonable.⁵

II. AS THE COMMISSION HAS FOUND, PLNP IS "ESSENTIAL" TO LOCAL EXCHANGE COMPETITION

It is important to note that any delay in PLNP implementation would be costless, if not beneficial, to an ILEC monopolist such as BellSouth, but will seriously impact carriers seeking to enter local exchange markets in its territory. AT&T does not contend that delays which are actually caused by the unavailability of the NPAC/SMS are attributable to any fault on BellSouth's part. It is clear, however, that BellSouth seeks to delay PLNP deployment far longer than can possibly be justified by late delivery of the NPAC/SMS for its region. It is equally plain that BellSouth potentially can gain significant advantages by delaying the implementation of PLNP for as long as possible.

Congress recognized the importance of LNP to local competition by expressly requiring all LECs to provide that capability in § 251(b)(2), and by also including "full compliance" with the Commission's LNP rules as a component of the § 271 "checklist."⁶ Any delay in the implementation of PLNP potentially will injure nascent local exchange competition. First, the Commission recognized in its First LNP Order that interim methods of local number portability ("ILNP") can impair "the quality, reliability, or

⁵ See GST, p. 1 (proposing June 11th Phase I deadline); NextLink, p. 3 (proposing July 1st deadline); Sprint, p. 2 (proposing to "roll-out" service between June 8th and July 13th). The two petitioners that support BellSouth's proposed timeline, Allegiance and DeltaCom, simply defer to that BOC's proposal, and offer no evidence or analysis.

⁶ See 47 U.S.C. § 271(c)(2)(B)(xi).

convenience of telecommunications services” offered by new entrants into local exchange markets.⁷ Accordingly, that order found that “[permanent] number portability is essential to ensure meaningful competition in the provision of local exchange services.”⁸

Second, CLECs in the affected regions already have incurred the expense of implementing PLNP in their own networks, and will soon begin to bear their share of the NPAC/SMS costs as well. Nevertheless, although CLECs will be paying for PLNP, until BellSouth begins to support that capability its competitors will have no choice but to port numbers using ILNP -- and thus they will, in effect, be required to pay for both interim and permanent portability for each customer that ports a number. Third, when BellSouth does begin to support PLNP, CLECs will bear the costs of converting customers from interim to permanent portability -- an expense they would not have borne for customers acquired after the Commission’s PLNP implementation deadline, but for the delay of that capability.

In contrast to CLECs, ILECs potentially benefit by delaying PLNP. Most importantly, their CLEC competitors will be handicapped by being forced to offer potentially lower-quality service to customers porting their numbers using ILNP methods. In addition, the ILECs will obtain additional payments from CLECs for ILNP services provided to existing CLEC customers after the date on which PLNP should have been available, payments for ILNP services provided to new CLEC customers that port their

⁷ Telephone Number Portability, CC Docket No. 95-116, First Report and Order and Further Notice of Proposed Rulemaking, FCC 96-286, released July 2, 1996, ¶ 110 (“First LNP Order”).

⁸ Id., ¶ 28.

numbers after the original PLNP implementation date, and payments to convert such new CLEC customers from ILNP to PLNP.

III. AN NPAC/SMS WILL BE AVAILABLE FOR INTERCOMPANY TESTING IN EACH OF THE AFFECTED REGIONS ON MAY 11, 1998

The LLCs of all three affected regions recently replaced Perot Systems with Lockheed Martin IMS as LNPA. As the Commission knows, Lockheed was selected as the LNPA for the four other LNP regions, and that company has developed and implemented a workable NPAC/SMS in those areas. Lockheed has committed to deliver an NPAC/SMS for the Western, Southeast and West Coast regions that is ready for intercompany testing on May 11, 1998.⁹ With the exception of NextLink, which incorrectly states (without explanation) that Lockheed will deliver an NPAC/SMS on May 13, 1998,¹⁰ the petitioners do not dispute that May 11 is planned as the NPAC/SMS "live" date, and their proposed schedules all are based on this starting point, as intercompany testing cannot proceed until this milestone is achieved.

IV. BELLSOUTH'S PROPOSAL TO DELAY PHASE I BY OVER SEVEN MONTHS IS UNSUPPORTED AND SHOULD BE REJECTED

BellSouth's proposed schedule seeks to delay Phase I implementation until mid-November 1998 -- three months longer than any other ILEC's proposed Phase I

⁹ See AT&T Phase I Waiver Petition, p. 5.

¹⁰ See NextLink, p. 3.

timeline.¹¹ BellSouth attempts to blame its problems exclusively on the NPAC/SMS, but it does not -- and cannot -- explain why its timeline differs so radically from those of other carriers that also must cope with delayed delivery of that platform. As demonstrated below, BellSouth's claim that it will require 35 weeks to upgrade its systems in order to interface with the Lockheed NPAC/SMS are patently untenable. The information presented in BellSouth's petition plainly fails to justify the extraordinary delay that BOC seeks to impose on Phase I PLNP deployment. Accordingly, BellSouth's petition should be denied, and that carrier should be required to adhere to the timetable AT&T proposed in its Phase I waiver request.

To the extent the Commission even considers BellSouth's waiver request, it should require that carrier to: (i) fully document the problems that it claims require it to delay Phase I until November 11, 1998; (ii) explain in detail whether and how those problems are (or are not) linked directly to Perot's failure to timely provide an NPAC/SMS for the Southeast Region; (iii) establish an aggressive action plan to correct any deficiencies in its PLNP implementation; and (iv) file weekly, publicly available reports documenting the status of its PLNP implementation efforts until it returns to the PLNP deployment schedule established in the LNP Reconsideration Order. Further, to the extent that BellSouth fails to demonstrate that its inability to timely implement PLNP is attributable solely to the unavailability of an NPAC/SMS, the Commission should attempt to place CLECs as nearly

¹¹ GTE's petition proposes the latest Phase I date of any ILEC other than BellSouth, suggesting that deployment be completed by August 18, 1998. Pacific Bell And U S West each propose mid-July 1998 dates for completion of Phase I.

as possible in the same position they would have occupied had BellSouth implemented PLNP on schedule, and thereby prevent BellSouth from profiting by its waiver.

A. Contrary To Its Claims, BellSouth Knew Or Should Have Known Well In Advance Of February 1998 About The Systems Changes It Contends Support Its Waiver Request

BellSouth contends that it will take 35 weeks -- 16 weeks beyond the May 11, 1998 date that the NPAC/SMS will be ready to begin intercompany testing -- to complete the upgrades and fixes required to enable its internal systems to interface properly with Lockheed's NPAC/SMS. This nearly 9-month interval purportedly is necessary because Perot's NPAC/SMS "was built to NANC specification 1.1," while the Lockheed NPAC/SMS "is built to NANC specification 1.8, a full seven software releases beyond the NPAC that was to have been delivered by the former LNPA."¹² BellSouth's petition implies that it first learned of this software development gap on February 20, 1998, when it concluded discussions with Lockheed concerning the specifications of that company's NPAC/SMS.¹³ This claim simply cannot be credited.

As BellSouth well knows, the Commission's Second LNP Order, released in August of last year, required the use of identical interfaces for both the Lockheed Martin and Perot Systems NPAC/SMSs.¹⁴ In that order, the Commission ruled that

¹² BellSouth, p. 20.

¹³ See id., p. 13.

¹⁴ See Second Report and Order, Telephone Number Portability, CC Docket No. 95-116, FCC 97-289, released August 18, 1997, ¶ 62 ("Second LNP Order").

We adopt the NANC's recommendation that the local number portability administrators and any entity directly connecting to the Number Portability Administration Center Service Management System use the Number Portability Administration Center Service Management System Interoperable Interface Specification (Interoperable Interface Specification or IIS) as described in the *North American Numbering Council -- Interoperable Interface Specification -- Number Portability Administration Center -- Service Management System, Version 1.0, dated April 7, 1997 (NANC IIS)*. The *NANC IIS* will serve as an industry standard for use in developing and maintaining the Number Portability Administration Center Service Management System interfaces in each of the seven Number Portability Administration Center regions.¹⁵

Release 1.0 of the NANC NPAC/SMS interface underwent subsequent development and upgrading pursuant to a process managed by the NANC Technical and Operational Requirements Task Force, with the participation of a BellSouth representative.¹⁶ BellSouth thus cannot plausibly claim that it did not know of the requirements established in NANC specification 1.8 until its mid-February discussions with Lockheed, or that it did not know that Perot Systems (or any company replacing that vendor as LNPA for the Southeast Region) would have to build to that standard. At bottom, BellSouth attempts to make the untenable claim that it should be permitted to operate as far behind schedule as Perot Systems did -- despite the fact that no other carrier in any of the three affected regions has suggested that it cannot support NANC specification 1.8 by the May 11, 1998 NPAC/SMS "live" date.

¹⁵ Id. (footnotes omitted, emphasis added).

¹⁶ See, e.g., Exhibit 1 to these comments (minutes of the November 13-14, 1997 meeting of the NANC Technical and Operational Requirements Task Force, indicating attendance by BellSouth representative).

Moreover, BellSouth should have known for some significant period of time that its interface was not capable of meeting the current NANC specification. Rather than simply relying on the fact that the Perot Systems NPAC/SMS was at least as far behind as its own development, BellSouth should have filed its petition for waiver no later than 60 days prior to the March 31, 1998 Phase I deadline. Section 52.3(e) of the Commission's rules requires petitions for waiver of the LNP schedule to be filed at least 60 days in advance of the deadline for which waiver is requested. The Phase I Waiver Order authorized carriers to file waivers 30 days in advance of the Phase I deadline only for "deployment delays that specifically relate to the availability of the vendor-supplied [NPAC/SMS]." ¹⁷ If BellSouth was itself not prepared to provide PLNP even if the Southeast Region NPAC/SMS were available, then it was obligated to provide more than 30 days notice of its request for a waiver. The Phase I Waiver Order makes plain that carriers were required to complete, no later than March 31, 1998, all modifications and upgrades within their own networks and systems which are necessary to implement PLNP in Phase I MSAs. ¹⁸

B. The Problems BellSouth Identifies Should Not Require 35 Weeks to Resolve

Although BellSouth refers at several points to the fact that it must upgrade its NPAC/SMS interface "a full seven software releases," its petition nowhere describes

¹⁷ Phase I Waiver Order, ¶ 8.

¹⁸ See id.

what this upgrade actually requires. In fact, the vast majority of changes between NANC releases 1.1 and 1.8 involve documentation, not coding changes.

There are only two coding changes which BellSouth must make in order to upgrade from NANC version 1.1 to 1.8: "port to original" and "NPA splits." The "port to original" function supports the ability to return a number to the original code holder in the Local Exchange Routing Guide ("LERG") -- it is essentially a means to "cancel" porting and return to 6-digit routing for a particular number. The "NPA splits" capability permits updating of the NPA (area code) for all ported numbers in the event of an NPA split.

BellSouth's petition nowhere explains why it requires 35 weeks to implement the two coding changes described above. Further, the petition does not even attempt to explain why BellSouth has not already implemented these changes. The Minutes of the November 13-14, 1997 meeting of the NANC Technical and Operational Requirements Task Force, attached to this pleading as Exhibit 1, indicate that the Port to Original and NPA Split functions were planned for introduction by Lockheed in December 1997, and by Perot Systems in the first quarter of 1998. The minutes also plainly show that a BellSouth representative attended the meeting. Thus, BellSouth knew no later than mid-November of last year that it needed to perform these upgrades, and gave no indication at that time that it believed they would require 35 weeks to implement. Indeed, there appears to be no reason that BellSouth could not upgrade its systems to NANC specification 1.8 prior to the May 11, 1998 NPAC/SMS "live" date.

Based on this evidence, and on the fact that no other carrier has indicated that it needs any additional time -- much less two-thirds of a year -- to upgrade to NANC specification 1.8, it may be that BellSouth has PLNP systems problems that are not related

to the NPAC/SMS delay in its region -- and which it has not offered as a basis for its waiver request. In all events, based on BellSouth's representation that the only tasks it must perform in order to implement PLNP for Phase I are those required to upgrade its NPAC/SMS interface from NANC specification 1.1 to specification 1.8, the Commission should reject BellSouth's request to extend Phase I implementation into mid-November 1998.

To the extent the Commission even considers BellSouth's petition, it should require that carrier to clearly and completely explain what tasks it contends must be completed before it can implement PLNP. BellSouth's petition also is silent as to what alternatives and workarounds, if any, it has considered that might permit it to support PLNP on an interim basis, stating only that it has "investigated whether there are expeditious avenues for delivering" PLNP, without specifying what investigations it actually conducted.¹⁹ The Commission should order BellSouth to rectify these omissions before even considering granting any relief of the PLNP deadlines that extends beyond the dates AT&T proposes in its petition. In addition, BellSouth simply states as a *fait accompli* that it will need 35 weeks to prepare its systems for PLNP, without describing whether -- or if -- it has assigned additional personnel to these tasks, authorized overtime or extra shifts, or taken other steps to ensure that its PLNP deployment gets back on track as soon as possible. AT&T urges the Commission to require, as an element of any waiver, that

¹⁹ BellSouth, p. 15; McDougal Affidavit, ¶ 7.

BellSouth prepare an aggressive implementation plan and file weekly, publicly available reports documenting its progress in executing it.

C. BellSouth Can Complete Implementation Two Weeks Following Testing

Even putting aside BellSouth's unsupported claim that it will require 35 weeks to upgrade to NANC specification 1.8, its petition seeks to extend PLNP deployment far longer than is reasonable. BellSouth alleges that it will be prepared to begin intercompany testing (also known as "end-to-end testing") on September 1, 1998. Its petition agrees with the estimates of other carriers by proposing that intercompany testing will take 30 days.²⁰ BellSouth proposes to begin Phase I PLNP implementation on the day following testing, and to complete it on November 14, 1998.

The petition's proposal to spend more than six weeks gradually rolling out PLNP should be rejected outright.²¹ Two weeks following inter-company testing should be ample time for carriers to implement PLNP in Phase I MSAs. Accordingly, unless BellSouth elects to seek a waiver because of problems unrelated to the NPAC/SMS delay (as it has not yet done), that carrier should be prepared to complete intercompany testing on

²⁰ BellSouth, p. 14 (stating that BellSouth will "certify with the Lockheed NPAC/SMS" on 9/1/98 and that, following end-to-end testing, porting can begin on 10/1/98). See also AT&T, p. 5; GTE, p. 9 (table proposing to begin testing on 5/12/98 and complete it on 6/14/98, a total of 32 days); Pacific, pp. 19, 20 (proposing a "30 day cooperative testing period"); U S West Attachment 1, p. 5 (chart showing 30-day testing intervals).

²¹ Sprint also proposes that its "implementation will be phased in" over more than a month, but gives no rationale of any kind for such a strategy, and nowhere indicates that it actually needs that long to implement PLNP. See Sprint, p. 2.

June 11, 1998 (or 30 days after the Lockheed NPAC/SMS "live" date). BellSouth should then be prepared to complete its implementation of PLNP in Phase I no later than June 26, 1998 (or two weeks after the completion of intercompany testing).

The two-week interval AT&T proposes between testing and implementation is more than adequate to permit carriers to do any last-minute clean-ups to their own systems and processes, and to prepare themselves to accept orders for PLNP. This is especially so when one considers that "implementation" of PLNP means nothing more than being prepared to accept and fulfill orders for that service. Carriers have agreed that conversion of customers from ILNP to PLNP will be conducted on a separate timetable. Conversion should occur within 90 days following the availability of both PLNP and an operational interface to permit CLECs to order conversions from interim portability methods to PLNP.

BellSouth's petition seeks to justify its unreasonably long periods for PLNP implementation by comparing them to the intervals in which the LNP Reconsideration Order allowed carriers to phase-in PLNP. This comparison is simply inapposite. According to the express terms of the Phase I Waiver Order, carriers in the Western, Southeast, and West Coast regions should not have delayed their implementation of LNP in any respect other than those that "specifically relate to the availability of the vendor-supplied [NPAC/SMS]." ²² The LNP Reconsideration Order addressed the full range of issues involved in carriers' implementation of PLNP, and established a schedule accordingly. In

²² Phase I Waiver Order, ¶ 8.

stark contrast, as the Phase I Waiver Order makes plain, the vast majority of network modifications required to implement PLNP must be completed for Phase I MSAs no later than March 31, 1998 -- more than a month before the NPAC/SMS "live" date in the affected regions.

Thus, the only aspects of LNP that have yet to be finalized are those that directly relate to carriers' ability to place "orders" for porting with the NPAC/SMS, and to download routing information from that system to local SMSs. In light of the fact that, as shown above, the Commission's Second LNP Order required the use of identical interfaces for both the Lockheed Martin and Perot NPAC/SMSs, BellSouth has long known the specifications to which it was required to build in order to interface with the NPAC/SMS for these functions. In short, once inter-company testing is complete, implementation of LNP should be a straightforward matter.

In addition, by AT&T's proposed June 26th deadline, the industry will already have gained valuable experience and knowledge from implementing Phases I and II in the other four LNP regions, as the LNP Reconsideration Order requires LNP implementation in Phase II MSAs no later than May 15, 1998. Even those carriers that do not participate in Phases I and II of LNP implementation in other regions will benefit from the experiences vendors (many of which work for more than one carrier), regulators, and other carriers will gain in working with the Lockheed NPAC/SMS, and significant knowledge transfers can be expected through industry fora such as the LLCs, as well as through informal contacts.

V. ANY WAIVER SHOULD SEEK TO PLACE CLECS IN THE SAME POSITION THEY WOULD HAVE OCCUPIED, BUT FOR BELL SOUTH'S FAILURE TO TIMELY IMPLEMENT PLNP

As an condition of any waiver granted to BellSouth that would permit that carrier to extend its Phase I PLNP implementation beyond the schedule AT&T proposes, the Commission should attempt to place CLECs as nearly as possible in the same position they would have occupied had BellSouth been prepared to implement PLNP in a timely manner, and should prevent BellSouth from profiting by its waiver. To that end, the Commission should order that any charges BellSouth imposes on CLECs for ordering ILNP or for providing that capability during the life of any waiver may not exceed the charges, if any, that BellSouth would have imposed on CLECs had it been prepared to implement PLNP in accordance with the schedule AT&T proposes.

Such a requirement would be both reasonable and equitable in light of the fact that CLECs will bear the costs of the NPAC/SMS for BellSouth's territory and other PLNP-related costs during any waiver period, and so should not be required to pay for both PLNP and ILNP during that time. In addition, BellSouth should not be permitted to charge CLECs in any way for converting from ILNP to PLNP those customers that were forced to port their numbers using interim portability methods during any period in which the LNP Reconsideration Order would have required BellSouth to make PLNP available for that customer.²³

²³ To the extent that an ILEC obtains a waiver based solely on Perot Systems' failure to provide an NPAC/SMS for its region, rather than its own problems, the above recommendations should not apply to that carrier, as the entire industry is affected

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VI. THE COMMISSION SHOULD USE THE INSTANT PROCEEDING TO COMPLETE ITS ADJUSTMENT OF THE LNP TIMETABLE IN THE AFFECTED REGIONS

AT&T urges the Commission to complete its realignment of the entire LNP schedule in this proceeding. It would be an inefficient use of the already heavily taxed resources of both the Commission's staff and carriers to conduct repeated rounds of comments on subsequent LNP Phases that inevitably would present precisely the same issues as the instant petitions. Once the Phase I schedule is adjusted, establishing a timetable for the remaining Phases is a straightforward matter.

After intercompany testing of the Lockheed NPAC/SMS is completed for Phase I MSAs in each region, there is no valid reason for that testing to be repeated in subsequent MSAs. Further, as the Phase I Waiver Order required for Phase I MSAs, carriers in the Western, Southeast, and West Coast regions should be continuing their efforts to complete all necessary modifications and upgrades in their own networks to prepare themselves to offer PLNP in subsequent Phases according to the schedule established in the LNP Reconsideration Order. Thus, after completion of Phase I, carriers approaching Phase II should need no more than two weeks to complete implementation in those MSAs -- just as they required two weeks following the completion of testing to complete Phase I. Similarly, Phase III can, and should, be completed two weeks after

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by, and is without fault for, Perot's failure. However, no ILEC should be permitted to profit in any way from its own failure to make PLNP available to its CLEC competitors.

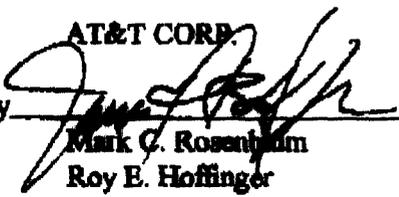
completion of Phase II. If the Commission adopts AT&T's proposal, it can return to the LNP Reconsideration Order's schedule beginning in Phase IV.

CONCLUSION

For the reasons stated above, the Commission should establish the following deadlines for Permanent Local Number Portability implementation in the Western, Southeastern and West Coast regions by all carriers:

- NPAC "live" date: May 11, 1998 (or the date a "live" NPAC is actually available)
- Inter-company testing completed: June 11, 1998 (or 30 days after "live" date)
- LNP implementation in Phase I MSAs completed: June 26, 1998 (or 14 days after testing)
- LNP implementation in Phase II MSAs completed: July 10, 1998 (or 14 days after Phase I)
- LNP implementation in Phase III MSAs completed: July 24, 1998 (or 14 days after Phase II)
- Remainder of LNP implementation in compliance with the schedule established in the Commission's LNP Reconsideration Order.

Respectfully submitted,

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March 12, 1998

EXHIBIT 1

**LNPA Technical and Operational Requirements Task Force
Meeting Minutes 11/13-14/97
Washington, DC**

Attendees

Roger Marshall	- Ameritech	David Heath	- MCI	Via Conference Bridge
Donna Navickas	- Ameritech	Ron Rotondi	- MCI	Karen Kay - Time Warner
Bonnie Baca	- AT&T	Ken Kohl	- Nortel	Colleen Collard - Tekelec
H.L. Gowda	- AT&T	Jackie Klare	- Pacific Bell	
Beth Watkins	- AT&T	Phil Evans	- Perot Systems	
Dan Currie	- Bell Atlantic	Marilyn Murdock	- SBC	
John Malyar	- Bellcore	Dave Garner	- Sprint	
Dennis Davis	- BellSouth	Leigh Blood	- Tel Tek Solutions	
Holly Hogue	- Evolving Sys.	Lisa Marie Maxson	- Telecom Software Ent.	
Jim Rooks	- Evolving Sys.	Phil Presworsky	- TCG	
Bob Angevine	- GTE - Info. Tech.	Dan Gonos	- WinStar Comm.	
Jim Gray	- GTE - Network Sys.	Kim Wise	- WorldCom	
Karen Boyer	- Illuminet			

Bonnie opened the meeting with introductions around the room and on the conference bridge. The minutes of the previous meeting were approved as written.

Requirements

Lisa Marie distributed a handout that further clarified the NPA Split Requirements which was discussed and closed. Lisa provided another handout that clarifies the Port to Original process flows in the IIS which was also discussed and closed. Lockheed will implement these processes on 12/3; Perot will be later in the first quarter, 1998.

It was agreed that once requirements are closed, a new change order must be issued to make any further changes so as not to impact the current price quote for work in progress or under negotiation.

There were no Open Release 1 change orders for this meeting.

Release 2- See attached for the final requirements for change orders included in Release 2

It was agreed that all the Release 2 requirements must be closed at this meeting in order for the price quotes requested by the LLCs to be delivered on time. It was also noted that Release 2 requirements will not be updated to the FRS until the LLCs have completed their negotiations with the vendors and reached agreement for implementation, and therefore, have been removed from the WEB.

Each change order was discussed until agreement was reached. All agreements are reflected in the requirements documents attached.

Change Management Process Flow

All participants agreed with the new T&O/LLC process flow. David Heath agreed to bring in suggested time-frames associated with the functions included on the flow at the January T&O meeting. Updated documents will follow.

NPAC scheduled downtime

Lockheed regional Service Providers have agreed to an interim weekly scheduled downtime to accommodate network testing and SP and NPAC system maintenance. The window is scheduled early every Wednesday morning for between 3 and 6 hours depending the activities involved. Perot will look at the same window and report back.