

interface requirements and data base integrity requirements. Based upon the amount of time required to complete all of these activities, utilizing a third party for LNP would cause further delay.

VI. SBC MEETS THE STANDARD FOR A WAIVER

Our Petition set out the detailed facts as to why a waiver is needed, the extraordinary circumstances beyond our control, and the steps we've taken and will take to deploy LNP. The Commission has delegated to the Chief of the Common Carrier Bureau the authority to review waiver requests and to "adjust the schedule for ... the deadline for Phase I implementation, as appropriate to ensure network reliability."²⁸ Our waiver shows our concerns with network reliability and the very reasonable ways we are addressing the issues in our network.

MCI argues that we do not meet the waiver standard because of the delay in filing the waiver. Quoting the correct standard²⁹ states that waivers cannot be filed based on speculation, MCI neglects to recognize that if we filed this waiver at least 60 days in advance, as the orders requires, we could not have met the standard. Sixty days prior to the deadline, we only knew we had some test failures. We didn't know why, we didn't

²⁸ *Reconsideration Order*, at 83.

²⁹ Elsewhere, MCI misconstrues the waiver standard. MCI incorrectly quotes the Commission standard on waivers on page 3 of its filing "The Commission has also declined to grant requests of LECs to obtain a waiver 'if they cannot meet the schedule for reasons beyond their control.'" In fact the Commission standard is LECs can obtain a waiver if they cannot meet the schedule for reasons beyond their control. See *First Report and Order*, at 85.

know the scope, we didn't know the fix, and we certainly didn't know the timing. Had we filed for this waiver prior to January 28, we suspect MCI would have loudly complained that the petition was speculative and therefore should be denied. Here, now that we waited to file so that we could meet the substantive waiver standard, MCI argues that it is untimely and therefore denied. Evidently, MCI will always find an argument. The Commission needs to look through the bluster to the substance of the matter. SBC filed this waiver as soon as it had enough information to satisfy the requirements.

VII. INP WILL CONTINUE TO BE OFFERED IN THE AFFECTED MSAs

Time Warner wants to make sure that during the pendency of the extension of time, INP will continue to be offered and supported in the affected MSAs.³⁰ Pursuant to our obligations under the Telecommunications Act and the Commission's Rules, SBC will continue to offer INP in all areas until LNP is fully deployed into that area.

VIII. PACIFIC WILL BE UNAFFECTED BY THE DSC ISSUE

In summarizing the Petition, MCI mistakenly states that we have sought an extension for the California and Nevada MSAs to the same dates as for Texas and Missouri. As we stated in our Petition, it is only SWBT seeking the extension from Phase I to May 26, 1998; Phase II to June 26, 1998; and Phase III until July 27, 1998.

³⁰ Time Warner, p.4.

For Pacific, no specific dates were requested because of the pendency of the NPAC waiver. In the subsequently filed NPAC waiver (filed March 2, 1998), Pacific detailed the extensions sought, and confirmed that the STP issues would not cause that schedule to be extended. The NPAC availability is the key factor in the Pacific implementation timeline.

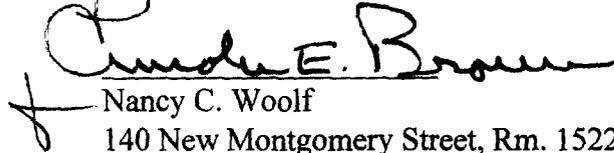
Although the Petition was filed jointly by SWBT and Pacific, it is now apparent that Pacific will not be affected by the STP issue. At the time the instant Petition was filed, we were still evaluating the effect the change in NPAC provider would have on Pacific. We now know that the new Pacific schedule will not be affected by the delay in STP software since the NPAC is the critical part of the network for the California timeline. AT&T takes issue with the Declaration of Sally D. Swan, Pacific's Director - Local Number Portability, that states "with the exception of Perot NPAC functionality we have been on track to implement LNP in accordance with the FCC mandated timeline" However, Pacific's LNP program has been on track. Necessary upgrades have been performed on over 60 systems applications; and deployment of LNP in Pacific's switches has been progressing on schedule, with preconditioning and translations work complete in 98% of the Phase I switches at the time the affidavit was signed. As SBC's petition points out, the STP interoperability issues are an additional exception that affects Pacific, and specifies that the affect will not determine the ultimate implementation deadline as the NPAC functionality is the exception that will drive the Pacific LNP implementation schedule.

IX. CONCLUSION

Therefore, SBC requests that its extension of time for Phases I, II and III be granted in accordance with the timelines set forth in the Petition.

Respectfully submitted,

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Appendix A

Inter-Service Provider LNP Operations Flows

Code Opening Processes Figure 9

NPA-NXX Code Opening

Step	Description
1. NPA-NXX holder notifies NPAC SMS of NPA-NXX Code(s) being opened for porting.	<ul style="list-style-type: none">The service provider responsible for the NPA-NXX being opened must notify the NPAC SMS via the SOA or LSMS interface within a regionally agreed to time frame.
2. NPAC SMS updates its NPA-NXX databases	<ul style="list-style-type: none">NPAC SMS updates its databases to indicate that the NPA-NXX has been opened for porting.
3. NPAC SMS sends notification of code opening to all Service Providers via LSMS.	<ul style="list-style-type: none">The NPAC SMS provides advance notification of the scheduled opening of NPA-NXX code(s) via the LSMS interface.

First TN Ported in NPA-NXX

Step	Description
1. NPAC SMS receives subscription create request for first TN in NPA-NXX	<ul style="list-style-type: none">Service Provider notifies NPAC SMS to create subscription for the first telephone number in an NPA-NXX.
2. NPAC SMS sends notification of first TN ported to all service providers via SOA and LSMS	<ul style="list-style-type: none">When the NPAC SMS receives the first subscription create request in an NPA-NXX, it will broadcast a "heads-up" notification to all service providers via both the LSMS and SOA interfaces. Upon receipt of the NPAC message, all service providers, within five (5) business days, will complete the opening for the NPA-NXX code for porting in all switches.

Appendix B

Update #2: 3/10/98

LNP Interoperability Recommended Testing Guidelines
from the Southwest Region Network Operations Team

Number portability (LNP) is one of the largest and most complex projects ever undertaken by the telecommunications industry. It has required development/modification of software and hardware by multiple suppliers for virtually every signaling and switching network component in carriers' networks. In addition, it has required introduction of several new network elements and the development/modification of operational support systems for ordering, provisioning, and service assurance. Because of the enormity and complexity of this project, testing is a critical and integral part of the implementation process.

Testing guidelines for service providers initial test within Southwest Region:

Except as otherwise provided in an interconnection agreement, a service provider who has not previously tested LNP within the Southwest Region should perform cooperative inter-company LNP testing as defined in the Southwest Implementation Team - Field Test Plan within 30 days prior to offering service. The Field Test Plan, which has been endorsed by the Southwest Region Network Operations Team, is available on the Internet at <http://www.npac.com/regions/southwest/swdocs/texas/swFieldTestPlan.doc>.

These tests are designed to verify the LNP capabilities between service providers. Prior to inter-company testing each service provider should have successfully completed the intra-company interoperability tests as described in the Field Test Plan.

Testing guidelines for new serving areas/environments with service providers after initial testing has been completed within the SW Region:

Due to the diversity in our networks and the complexity of LNP, the following minimum subset of the Field Test Plan should be performed in each subsequent serving area in which the service provider will port numbers:

* Submit LSR(s) to complete test calls for the following scenarios:

Service Provider 1	Service Provider 2
Ported Number	Ported Number
Non-Ported Number	Ported Number
Ported Number	Non-Ported Number

- * Verify 0+ credit card calls from the ported-out number
- * Verify 0- Operator to third party bill calls from the ported-out number
- * Verify ANI and ALI information on 911 calls made from ported-out numbers
- * Complete the disconnect of the ported number

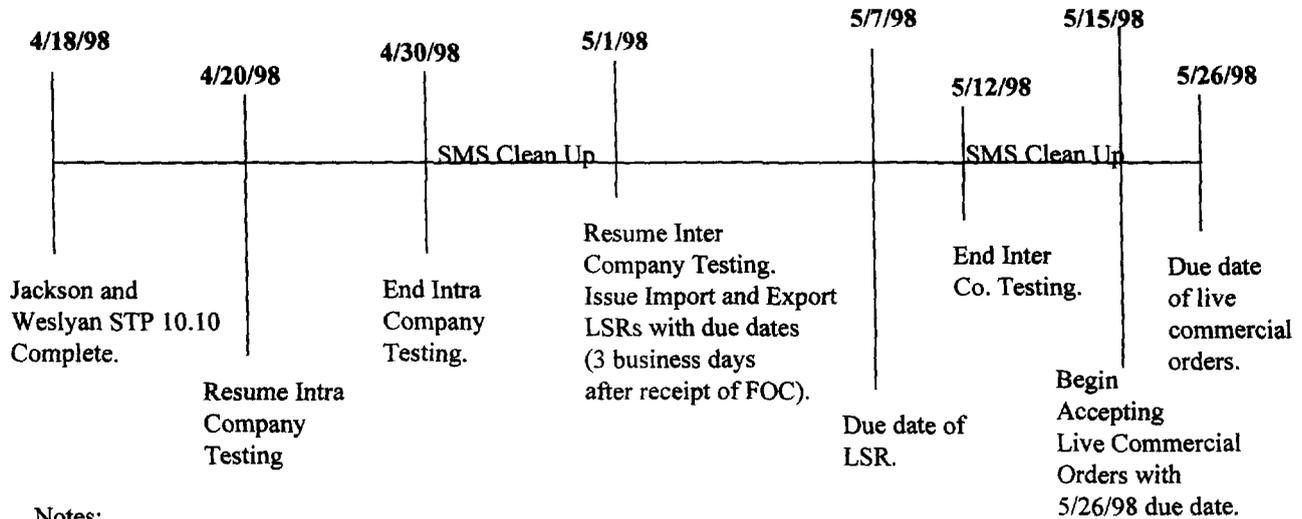
All Testing Scenarios:

All service providers within the serving area are encouraged to participate in testing with requesting companies. If a service provider elects not to perform testing, proper interoperability of networks and the ability to accurately provision porting within the industry cannot be verified.

Tests are designated as follows: "I"- initial intra-company tests; "R"- minimum inter-company tests
recommended for new participants; "C"- conditional tests.

Appendix C

SWBT Proposed Houston MSA LNP Test Timeline 2/13/98

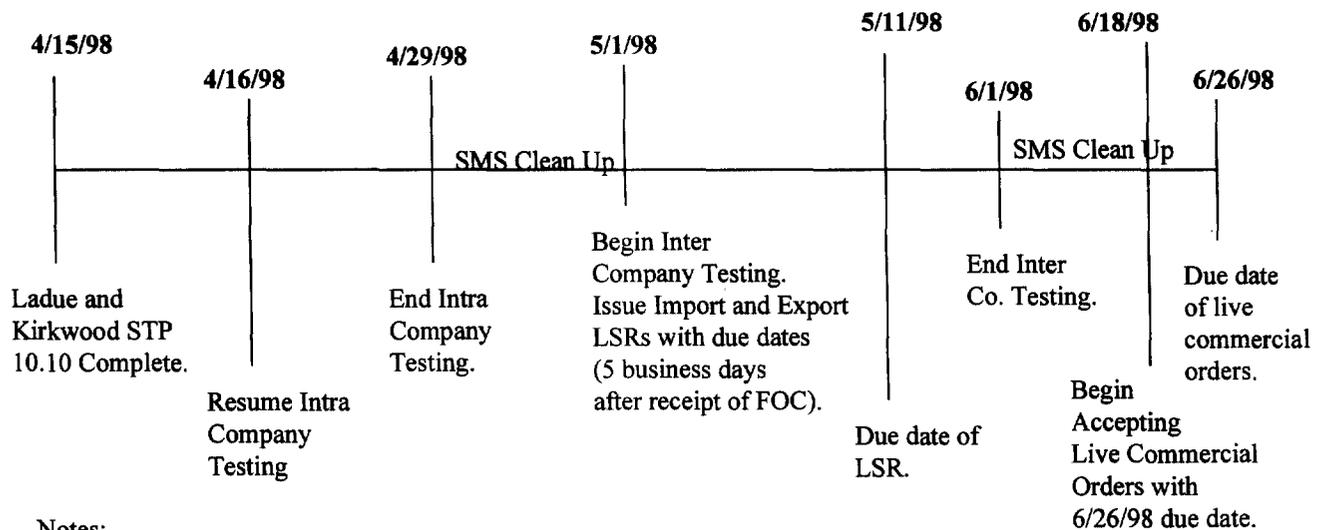


Notes:

Intra Co. Testing requires full regression testing, plus MRS and LIDB testing.

Inter Co. Testing requires MRS and OS Testing, plus any regression testing which may be required by an ILEC or CLEC.

SWBT Proposed St. Louis MSA LNP Test Timeline 2/18/98

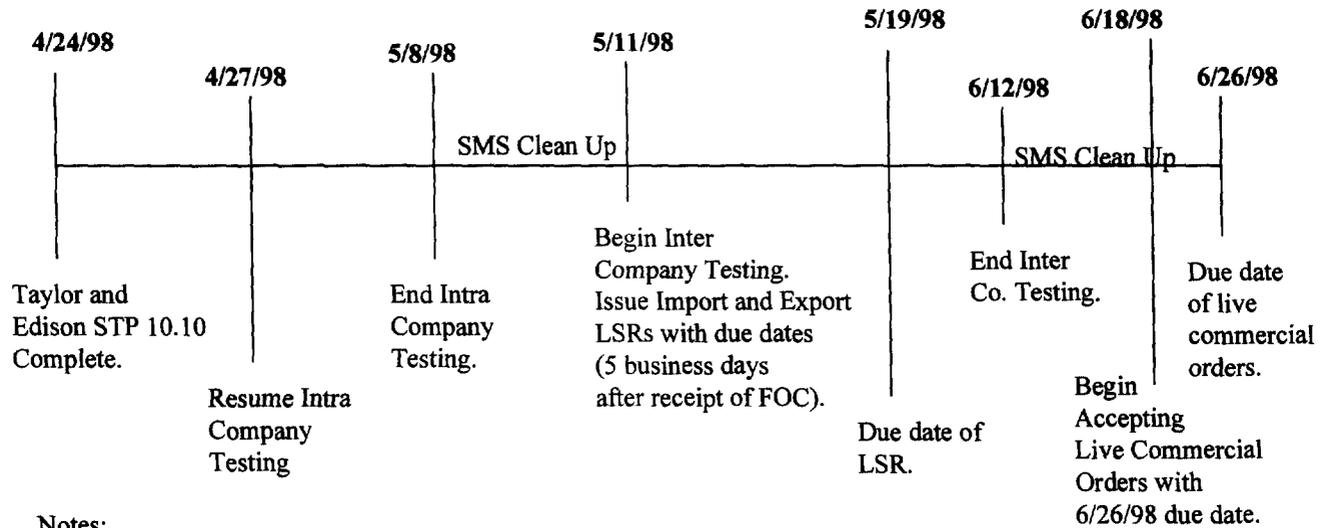


Notes:

Intra Co. Testing requires full regression testing, plus MRS and LIDB testing.

Inter Co. Testing per the Texas LNP Inter Company Implementation Team Test Plan as endorsed by the SW Region LNP Operations Team.

SWBT Proposed Dallas MSA LNP Test Timeline 2/18/98

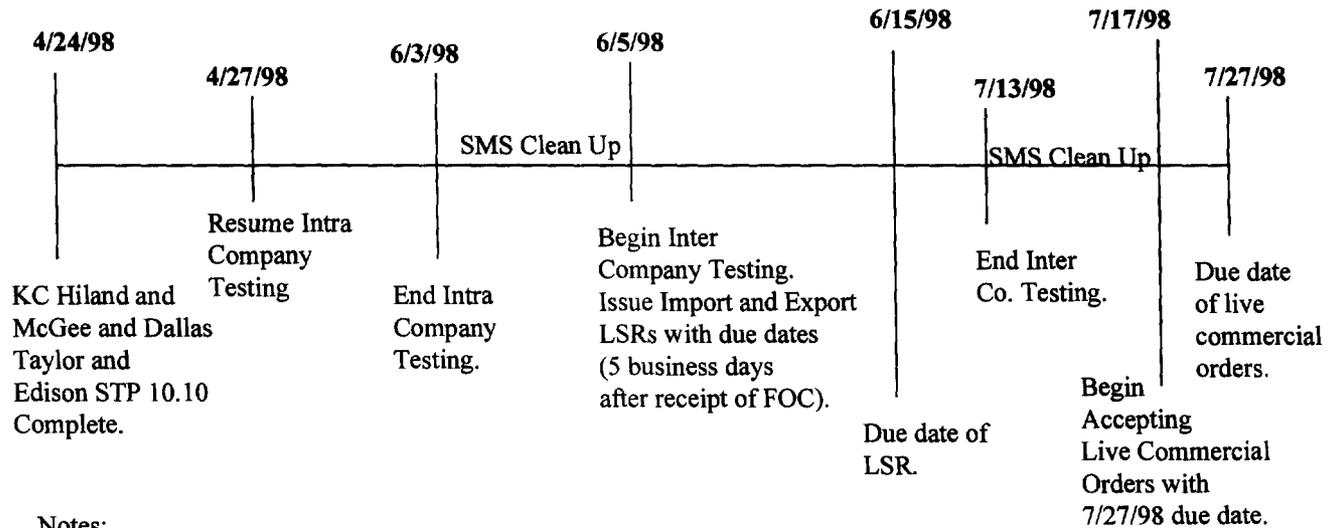


Notes:

Intra Co. Testing requires full regression testing, plus MRS and LIDB testing.

Inter Co. Testing per the Texas LNP Inter Company Implementation Team Test Plan as endorsed by the SW Region LNP Operations Team.

SWBT Proposed Fort Worth and Kansas City MSAs LNP Test Timeline 2/18/98



Notes:

Intra Co. Testing requires full regression testing, plus MRS and LIDB testing.

Inter Co. Testing per the Texas LNP Inter Company Implementation Team Test Plan as endorsed by the SW Region LNP Operations Team.