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

In the Matter of	)	
	)	
Allegiance Telecom, Inc.	)	NSD File No. L-98-20
BellSouth Corporation	)	NSC File No. L-98-27
DeltaCom, Inc.	)	NSD File No. L-98-24
GST Telecom of California, Inc.	)	NSD File No. L-98-21
Next Link California, LLC	)	NSD File No. L-98-26
Sprint Local Telephone Companies	)	NSD File No. L-98-22
Teleport Communications Group	)	NSD File No. L-98-23
WorldCom, Inc.	)	NSD File No. L-98-25
AT&T Corporation	)	NSD File No. L-98-28
GTE Service Corporation	)	NSD File No. L-98-29
MediaOne, Inc.	)	NSD File No. L-98-30
Pacific Bell	)	NSD File No. L-98-31
US West Communications, Inc.	)	NSD File No. L-98-32
Telephone Number Portability	)	CC Docket No. 95-116

REPLY COMMENTS OF PACIFIC BELL

These reply comments are submitted on behalf of Pacific Bell ("Pacific") in response to comments provided with regard to its above-captioned Petition.[1] As demonstrated by the evidence presented in the Petitions filed in this proceeding and as supported by the Comments of the parties, the Petitioners have met the standard for an extension of time due to the failure of Perot Systems Corporation to provide Number Portability Administration Centers ("NPACs") to the Southeast, Western and West Coast

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[1] Specifically, these Reply Comments respond to the Comments of MCI Telecommunications Corporation in Opposition to Petitions for Extension of Time of US West, Pacific Bell and GTE ("MCI Comments"), the Comments of WorldCom, Inc.("WorldCom Comments"), Comments of BellSouth Corporation, (BellSouth Comments), and the Comments of AT&T Corp. ("AT&T Comments"), filed in this

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LLC Regions. The one issue remaining in controversy is the additional amount of time which should be granted by the Commission to Pacific and the other Petitioners to enable them to comply with the Commission's Local Number Portability ("LNP") requirements. For the reasons discussed herein, the Commission should adopt deadline dates no earlier than those specified in the Pacific Bell Petition with relation to the West Coast Region .

I. THERE IS NO INCENTIVE FOR PACIFIC TO UNDULY DELAY THE IMPLEMENTATION OF LOCAL NUMBER PORTABILITY.

MCI and AT&T, while recognizing the need for an extension of Phase I implementation, would have the Commission believe that Pacific's time schedule and those of U.S.West and GTE are founded upon a desire to impair the LNP implementation. MCI Comments, pp. 4-5; AT&T Comments, pp. 3-5. Rather Pacific's proposed schedule is intended to ensure that the implementation once it takes place does not adversely impact the customers of the CLECs as well as the LECs. The position of MCI and AT&T ignores the obvious costly effect of a delay upon Pacific. Pacific has already incurred, and will continue to incur, significant expenditures in manpower and monies in the implementation of LNP. Any extension in conversion will likely mean a delay in cost recovery and thus a significant financial loss. In addition, to the extent that Pacific is operating as a CLEC in neighboring territories, it too will be required to wait for LNP. Finally, continued use of the interim number portability during the proposed extensions shall add to the transition load that Pacific faces when LNP is implemented. Yet despite these factors, Pacific will not submit an irresponsible time schedule which would disregard its obligations to the users of the public telephone network, such as that

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proceeding on March 12, 1998.

proposed by MCI and AT&T.

II. THE ASSUMPTION THAT LOCKHEED SHALL SUPPLY A CERTIFIED NUMBER PORTABLITY ADMINISTRATION CENTER (NPAC) BEFORE MAY 11,1998 IS HIGHLY IMPROBABLE AND WITHOUT FACTUAL BASIS.

MCI and WorldCom assert that the delivery of a certified NPAC is likely to occur prior to the May 11, 1998 date specified by all of the Petitioners in this proceeding. However, the timeline that MCI provided in its Comments is not the most current schedule supplied by Lockheed Martin. The Lockheed Martin February 12, 1998 NPAC project plan timeline states that a commercially viable Number Portability Administration Center/Regional Service Management System ("NPAC/RSMS") shall be delivered on May 11, 1998. While the Lockheed Martin NPAC may have been certified in other Regions, as MCI asserts, such is not the case with regard to the West Coast, the Western and Southeast Regions. Lockheed Martin until recently had not had the production platforms, the network interconnection data and the software necessary for commercial NPAC support in these Regions. As a member of the West Coast LLC, MCI was present at industry meetings with Lockheed Martin in which this timeline, the activities required and specific delivery dates were discussed and agreement reached. It is disingenuous for it now to claim that such is unreasonable.

Nor does the May 11, 1998 date evidence an unwarranted delay. The test plans for the NPAC being provided by Lockheed Martin have been compressed in comparison to the earlier Perot Systems testing schedules. While the test phases of the two products are the same, the specific test cases and conditions are not. Perot and Lockheed Martin

did not share their specific NPAC/RSMS test plans. Although each vendor built their platforms based on industry standards, the actual implementation process and procedures, and their associated test cases, differ. It is not, as MCI asserts, that the Lockheed Martin testing activities will repeat those already performed with regard to the Perot System. Moreover, while it is true that Southwestern Bell Telephone Company ("Southwestern Bell"), another subsidiary of SBC Communications Inc., has experienced NPAC certification with Lockheed Martin in the Southwest Region, Pacific's approach to LNP is independent of Southwestern Bell's plans, involving different network interconnections and topology as well as different methods and procedures for implementing LNP. Pacific must complete the NPAC certification testing unique to the West Coast Region.

The Petitioners did not independently select the May 11th date as MCI and WorldCom would imply. Lockheed Martin has not represented to the Petitioners that the NPAC will be available for testing prior to this date. For this reason, the carriers preparing for LNP have keyed their plans to the May 11th date. Pacific has received no requests, including any request from MCI, which would indicate any expectation on the part of a carrier that the NPAC will be available for testing on an earlier date.

III. THE FAILURE TO PROVIDE AN ADEQUATE TIME SCHEDULE FOR INTER-COMPANY TESTING JEOPARDIZES CUSTOMER SERVICE AND POSES THE POTENTIAL FOR A NETWORK OUTAGE.

Pacific's Petition sets forth the need for a 30 day period of time to conduct cooperative/industry testing during Phase I implementation. There is general consensus among the carriers, including AT&T, that this period is reasonable in order to preserve the integrity of the network. Only MCI puts forth the proposition that this testing can be performed in 15 days, a stance at odds with the industry position. This argument is not

supported by any cited studies or reports and would appear to be mere speculation on MCI's part. The 30 day period is inherent in the plans developed by the West Coast Testing Subcommittee which were used as inputs to Pacific's cooperative test planning. The Subcommittee used the Illinois FCC Trial Test Plan as a common reference for all CLECs and incumbent LECs to define required testing. The tests planned for California by Pacific are a subset of those performed during the Illinois trial. The cooperative testing that Pacific will perform will be a combination of the required testing defined by the Subcommittee and testing of Pacific's internal functions.

MCI has been a party to the discussions of the West Coast Testing Subcommittee with regard to Phase I testing. During these meetings, MCI initially agreed with the other members as to the appropriate testing approach. However, recently, it recanted its former position. Neither in these meetings, or in its Comments, does MCI offer any viable changes to the testing agreed upon by the other carriers. Rather, in Subcommittee discussions, it has taken the risky position that LNP testing is an unnecessary burden to its company and that it is unwilling to commit to formal testing in the Los Angeles MSA.

MCI's position, that since the technical basis of LNP is in service, "what remains to be tested is inter-company processes and any new network elements..." overly simplifies the complexity of the testing process. MCI Comments, pg. 21. The technical basis for LNP is not in question. It is the actual infrastructure that each company must put in place to support it that must be tested. No two carriers' systems are alike in every respect. For this reason, the interrelation of the various carriers' systems must be synchronized and thoroughly tested to avoid potential network outages. Although Pacific has closely observed and monitored the testing undertaken in other regions, observation

cannot take the place of prudent testing and validation procedures. While MCI seems fully prepared to risk customer service and public trust in the country's telecommunications network, Pacific is not.

IV. FOLLOWING INTER-COMPANY TESTING, PHASE I IMPLEMENTATION WILL REQUIRE AN ADDITIONAL 42 DAYS FOR COMPLETION.

Both AT&T and MCI contend that the time schedule set forth by Pacific to complete Phase I implementation is unnecessarily long. AT&T proposes that Pacific can fully implement Phase I within two weeks following the 30 day testing cycle. As discussed in our Comments to AT&T's Petition, this position ignores several key implementation factors. First, implementation poses a significant undertaking on the part of Pacific. The Los Angeles MSA, alone, in Phase I contains 97 host switches and 17 remote switches. The third and fourth phases of deployment contain an additional 173 hosts and 90 remotes, all of which have been selected by CLECs for LNP deployment. A phased-in approach allows Pacific to introduce LNP activation transactions in an organized and controlled process. Such a process is crucial given that LNP requires new processes, new hardware, software, platforms and architecture. While Pacific believes all of its systems and nodes are ready for LNP, the prudent method to implement a network cutover of this magnitude is to perform the implementation in phases. This approach requires more than the two week period envisioned by AT&T.

Second, while the CLECs may be capable of accepting LNP transactions on a more compressed basis, the FCC must realize that there are decided differences in magnitude between the implementation of the LNP in the existing incumbent network and those of new entrants, like AT&T. Incumbents have significant numbers of nodes to

be turned (Pacific has a total of 439 host switches serving the mandated MSAs); CLECs have far fewer. In addition, as BellSouth discusses in its Comments, while AT&T may be able to implement LNP in essentially a "turnkey" fashion, the majority of telephone numbers initially will be ported away from RBOCs, not from CLECs. BellSouth Comments, pp. 5-6. In addition, incumbents must ensure that the network and process flows of LNP work with multiple providers. All providers have deployed new provisioning and ordering systems and all of these systems must work together (e.g. a disconnect by one provider envisions a new connect with a second provider). If these processes do not work properly, it will affect not only the customer who is porting their number, but also any end user trying to call that customer. While Pacific is managing the introduction of LNP on a phased approach to protect network reliability, it can foresee that customer affecting issues could result once LNP is implemented in a switch. Pacific and the CLECs with which it will interface, must have the time to isolate and manage any problems which do arise.

AT&T argues that only two weeks of implementation activity is required because ". . . the industry will already have gained valuable experience and knowledge from implementing Phases I and II in the other four LNP regions. . ." AT&T Comments, pg. 10. Yet, while important knowledge may be gained from the experiences of the other regions, such observations are of only limited value since the participants are not the same. Clearly, the backbone of the West Coast LNP, the Pacific system, is in no way involved in this other regional implementation. Pacific has no actual experience with the Lockheed Martin NPAC and has yet to participate in the actual experience of implementing the NPAC.

Nor is MCI's position viable that the experience gleaned by Southwestern Bell in Houston should expedite Pacific's implementation process in Los Angeles. Pacific has monitored the Houston testing activities and, as a result, is aware of the differences between regions and among the various service providers. For example, with regard to E911/911 service, the systems and processes in the West Coast region are significantly different with regard to those in other regions. Moreover, as the Commission must recognize, there are underlying differences among service providers in relation to systems, network topology and methods and procedures.

It was for these reasons that the Commission initially ordered a 90 day period for implementation in each of the Phases for LNP implementation. Pacific has attempted to compress these periods in its Petition in order to minimize the effect of the NPAC delay while still retaining the phased approach so that network reliability and customer service will not be compromised. Indeed, as the time schedules advanced by GTE and U.S.West in their Petitions demonstrate, the schedule proposed by Pacific is reasonable and takes into consideration the need for expediency.

V. IT IS NOT SUFFICIENT TO SIMPLY EFFECT AN EXTENTION TO PHASE I WITHOUT MAKING COMENSURATE ADJUSTMENTS TO PHASE II, III AND IV DEADLINES.

MCI contends that Phase II need not be delayed past the testing in Phase I and that Phase II should be implemented when Phase I testing is complete. It further argues that Phases III through Phase IV can be deployed as currently scheduled. Similarly, WorldCom misguidedly states that Phases I, II, and III could be implemented simultaneously. Neither supports its argument with any evidence or viable explanation for its conclusory assumptions. As discussed above, implementation of LNP severely

taxes the resources of Pacific in even its current format. MCI's approach would require Pacific to deploy 270 host switches and 113 remote switches in less than 3 weeks. WorldCom would seemingly have all of these switches deployed simultaneously. In either event, deployment of this magnitude clearly would involve more than the resources Pacific has available. Moreover, the potential for a network problem of a service affecting nature would be exponentially increased. While it is to be expected that these carriers would propose schedules which deliberately ignore the realities of LNP implementation, it is incumbent upon this Commission to adopt a schedule which will safeguard customer service to the greatest extent possible and not invite disaster. The Commission should recognize, as does AT&T and the other Petitioners, that extensions to Phases II, III and IV are required.

However, while AT&T agrees to the need for commensurate adjustments, it states that testing need not be repeated in the subsequent MSAs, and therefore, shorter extensions of the deadline dates than those proposed by Pacific are warranted. This position fails to take into consideration the fact that various service providers planning to do business in the West Coast Region will not be involved in the Phase I implementation. Several of these providers have requested Pacific perform testing in subsequent LNP Phases and MSAs. Primarily these providers are either small CLECs or are unique to a specific MSA or West Coast market. To deny adequate testing to these carriers would place them at a decided competitive disadvantage. None of these providers nor any other carriers have indicated that they can complete their implementation activities within the two week window offered by AT&T.

VI. CONCLUSION

As discussed fully above, compression of the time schedule proposed by Pacific is logistically infeasible. There is no reason to believe that the Lockheed Martin NPAC shall be delivered earlier than the projected date of May 11, 1998. In addition, the 30 day testing period, generally accepted by the industry, is necessary to ensure uninterrupted customer service. Given the magnitude of the implementation and the resources required, a deliberate approach within the reasonable timeframe proposed by Pacific is necessary.

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March 17, 1998

CERTIFICATE OF SERVICE

I, Kathy Moody, hereby certify that the "Reply Comments of Pacific Bell" have been served on March 17, 1998, to the Parties of Record.

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