

Gina Harrison  
Director-  
Federal Regulatory

SBC Communications Inc.  
1401 I Street, N.W.  
Suite 1100  
Washington, D.C. 20005  
Phone 202 326-8882  
Fax 202 408-4805



EXHIBIT 111-111-111

Ex Parte

April 21, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Mail Stop Code 1170  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

RECEIVED

APR 21 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: CC Docket No. 95-116, Number Portability

Dear Ms. Salas:

Yesterday, Bruce Beard, Senior Counsel, Southwestern Bell Mobile System, and Michael W. Bennett, Director-Regulatory Planning, Southwestern Bell Telephone, and I discussed issues summarized in the attachment with the following staff: from the Wireless Telecommunications Bureau, Jeanine Poltronieri, Associate Bureau Chief, and Diane Conley, Deputy Chief, Charlene Lagerwerff, Janice M. Jamison, Michael D. Rosenthal, Todd R. Slamowitz, and Clint Odom, all of the Commercial Wireless Division; from the Common Carrier Bureau, Lawrence E. Strickling, Deputy Bureau Chief, and Geri Matise, Chief, Anna Gomez, Deputy Chief, Erin Duffy, Gayle Teicher, Patrick E. Forster, and Marian Gordon, all from the Network Services Division; and from the office of the Chairman, Ari Fitzgerald and Thomas Power, Legal Advisors.

We are submitting two copies of this notice in accordance with the Commission's rules. Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions.

Sincerely,

Attachment

Cc: D. Conley

E. Duffy

A. Fitzgerald

P. Forster

A. Gomez

M. Gordon

J. Jamison

C. Lagerwerff

G. Matise

C. Odom

J. Poltronieri

T. Power

M. Rosenthal

T. Slamowitz

L. Strickling

G. Teicher

cc Copies rec'd  
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# WIRELESS NUMBER PORTABILITY

SOUTHWESTERN BELL MOBILE SYSTEMS,  
INC.

APRIL 20, 1998

EX PARTE PRESENTATION

# CTIA PETITIONS

- Petition for Extension of Implementation Deadlines (Authority Delegated to WTB)
- Petition for Forbearance from Enforcing Wireless Number Portability Deadline
- Petitions Raise Different Issues--Technical Ability to Provide Wireless Number Portability including Roaming Environment Vs. Public Interest/Competitive Need

# PETITION FOR EXTENSION- IMPLEMENTATION ISSUES

- Appropriate standards work is being pursued
- Splitting MDN/MIN
- NANC Wireless LNP Requirements Due Mid-May
- Hardware and software design and development required--network, billing & support systems--testing also required

# IMPLEMENTATION ISSUES-ROAMING

- Roaming is the ability for a subscriber of one CMRS provider to place and receiving calls on the network of another CMRS provider with whom the subscriber has no preexisting service or financial relationship
- Commission has declared that **“Roaming is an increasingly important feature of mobile telephone communications. It is one of the attributes that prominently sets mobile telephony apart from landline service. . . We conclude that we should take any steps necessary to support roaming.”** CC Docket 94-54, Second Notice of Proposed Rule Making

# IMPLEMENTATION ISSUES--ROAMING

- Roaming system today relies on the ability to match NPA-NXX combination to a specific wireless carrier
- Wireless Number Portability destroys the roaming process efficiencies associated with being able to rely on a single NPA/NXX or specific block of numbers being assigned to a specific carrier
- Understanding the impact of number portability on roaming requires a basic primer of how roaming works
- Implementation of Wireless Number Portability will have a drastic affect on Seamless Roaming

# IMPLEMENTATION ISSUES-ROAMING

- Telephone number consists of 10 digits (NPA-NXX-XXXX)
- Cellular telephone emits its ten digit phone number assigned by the carrier it has service with (i.e... Home Carrier) and the unique electronic serial number of the phone
- MIN/ESN combination is used for validation, billing and routing purposes
- Home Carrier informs its “roaming partners” of the various NPA/NXX codes it has been assigned--Roaming Partner loads such information in its switch

# IMPLEMENTATION ISSUES-ROAMING

- Serving Carrier (Visited Market) uses NPA/NXX information in switch to validate from roaming partner
- NPA/NXX used to determine appropriate system ID or SID and BID assigned to Home Carrier (Industry Billing Standard--Cellular Intercarrier Billing Exchange Records)
- Serving Carrier uses MIN and SID to validate Customer through Home Carrier
- Number Portability drastically changes roaming and all processes and methodologies supporting it
- Nationwide issue--Not just 100 largest MSAs

## PETITION FOR FORBEARANCE

- Filed Pursuant to Section 10 of the Communications Act
- Forbearance must be consistent with the public interest
- Will forbearance promote competitive market conditions, including competition among providers of telecommunications services

# COMPETITION IS THRIVING WITHOUT WIRELESS NUMBER PORTABILITY

- Rationale for Number Portability--facilitate entry of new service providers--provide incentives for incumbents to lower prices and increase service choice and quality
- Competition in CMRS has been increasing dramatically without number portability
- Prices continue to drop--Average Local Monthly Bill in 1994 was \$58.65--1997 was \$43.86 (CTIA Survey)
- Analysts predict availability of PCS to 170 million people by year end
- Increased focus on customer service reported

# FORBEARANCE WILL ENHANCE COMPETITION

- New entrants overwhelmingly agree--forbearance will enhance competition
- Resources better spent building out networks and marketing service
- Experience demonstrates that new entrants are attracting significant number of customers without number portability
  - PrimeCo Reports 50% of all new customers were previously subscribers of another provider
  - Andersen Consulting found wireless customers switch at annual rate of 30%

# FACILITY BASED COMPETITORS, OLD AND NEW, OVERWHELMINGLY SUPPORT FORBEARANCE

- PrimeCo
- Sprint PCS
- Personal Communications Industry Association
- American Mobile Telecom. Assoc., Inc..
- GTE Service Corporation
- CTIA
- Century Cellunet, Inc.
- 360
- Southwestern Bell Mobile Systems/Pacific Bell Mobile Services
- Bell Atlantic Mobile, Inc.
- Rural Telecommunication Group
- Airtouch
- United States Cellular
- Upstate (N.Y.) Cellular Network

# RESELLERS OPPOSE FORBEARANCE

- MCI
- WORLDCOM
- TELECOMMUNICATIONS RESELLERS ASSOCIATION
- Opposition is not surprising--Resellers not faced with the redesign and reengineering associated with wireless number portability in a facilities based environment

# COSTS OF WIRELESS NUMBER PORTABILITY

- Still being calculated as standards being developed
- Airtouch estimates implementation costs of between \$55 million and \$75 million over next five years
- Cost not limited to those carriers in 100 largest MSAs-- must be able to support roaming
- In addition--CMRS will be paying to deliver traffic in landline number portability requirement regardless of outcome of either Petition
- Sprint estimates query costs alone could run into tens of millions of dollars per year and could will reach over \$100 million by year 2001

CONCERNS REGARDING IMPACT ON  
NUMBER ADMINISTRATION ARE  
UNWARRANTED

- Forbearance will not detrimentally impact number administration
- Efficiencies available through pooling--assigning numbers in less than full NXXs
- Pooling requires ability to participate in local number portability

# CMRS POOLING IS NOT CRITICAL TO EFFICIENT NUMBER ADMINISTRATION

- Can implement pooling without CMRS participation
- Primary basis for pooling is CLECs need to emulate LEC rate centers-need NXX presence in each rate center
- CMRS providers do not need to emulate landline rate center-use not bound by landline rate centers
  - CMRS carriers use numbers more efficiently assign anywhere within service area-will continue to efficiently use full NXXs

# COMPETITION IS BETTER SERVED BY FORBEARANCE

- The success of the new PCS entrants indicates that the Lack of Number Portability is not hindering competition
- Commission recognized in its CMRS “Competition Report” to Congress that “Competition is developing throughout the industry”
- Our experience with PCS (Pacific Bell Mobile Services) is that number portability is not essential to our ability to enter and compete in the CMRS marketplace--able to attract competitors customers w/out number portability
- Building out networks is more essential to ability to compete than number portability