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PACIFIC  **TELESIS**
Group-Washington

EX PARTE OR LATE FILED

June 7, 1996

EX PARTE

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, DC 20554

Dear Mr. Caton:

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

The attached letter from Jerry M. Abercrombie, Director of Public Policy and Competitive Safeguards for Pacific Bell, was delivered today to Mindy Littell of the Common Carrier Bureau. Please associate this material with the above-referenced docket.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Alan F. Ciamporcero (JLB)

cc: M. Littell

Attachment

RECEIVED

JUN 7 1996

Federal Communications Commission
Office of Secretary

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Jerry M. Abercrombie
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Public Policy &
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PACIFIC BELL.
A Pacific Telesis Company

June 6, 1996

Ms. Mindy Littel
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W. Suite 544
Washington, D.C. 20554

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

This letter will respond to your telephone request for information on the number of wire centers by MSA in Pacific Bell's service area in California. The attached matrix displays the 24 Metropolitan Service Areas (MSAs) in California. Pacific has wire centers in all but one, Santa Barbara/Santa Maria/Lompoc, which is served by GTE of California, Inc. Additionally, I have provided the prioritization of MSA implementation that MCI and AT&T have suggested to the California Local Number Portability Task Force. To that prioritization, I have overlaid the very aggressive implementation schedule that AT&T first suggested in its letter to Jason Karp, from Betsy Brady, dated April 24, 1996. AT&T, along with MCI, have continued to advocate this unreasonable schedule in the California Local Number Portability Workshop, as well.

It is not unreasonable to expect that at least one (1) telephone line per NXX will be ported to a competitive local carrier (CLC) in California in the early phases of local exchange competition. That means even if only one number is being ported from a prefix, all 9,999 other telephone numbers must be subjected to queries under LRN. Local competition has been authorized statewide in Pacific's and GTE of California's service areas. Assuming this likely outcome, every NXX under AT&T's inefficient LRN database proposal would be required to be queried for every interswitch call. This means that every wire center in a MSA would need to be number portability capable, with new switch software generics. The resulting network would need to be greatly augmented with additional Service Control Point (SCP) pairs and signaling links, as well as tremendous modifications to operational support systems. Business process flows would have to be developed and modified to accommodate local number portability.

AT&T, in the above cited letter, suggests that their implementation schedule is a "slow ramp up". This characterization is not only disingenuous, but it is impractical. AT&T's idea of a "phased" implementation of LNP is to begin in the most populated MSA, Los Angeles-Long Beach, in the state. **The Los Angeles-Long Beach MSA is ranked as the top MSA in the nation** (based upon census population estimates), with approximately 30% of the total businesses, employees, population and households in the state. From a telephone demographic perspective, this MSA contains 14% of Pacific's Wire Centers, 20% of Pacific's NXXs and 24% of telephone lines.

Within the next three months after initial implementation, AT&T suggest that it would be simple to have over a third of all wire centers, half of all NXXs and a little over half of all lines capable of LNP. Nine months after implementation would commence, AT&T would require, in California, over half of all of Pacific's wire centers be LNP capable, impacting almost three quarters of Pacific's NXXs and lines. In this period, eight of the top fifty U.S. markets would be required to have LNP implemented. These eight highly desirable MSAs constitute one third of all of our MSAs in the state. And, by the end of the third quarter of 1998, AT&T proposes to have its LRN architecture be implemented in 85% of Pacific's wire centers, 93% of our NXXs and 89% of our lines.

AT&T's proposed implementation schedule is illogically premised upon promised (but not yet realized) initial availability of switch generic software for their LRN proposal, potentially in the mid 1997 timeframe. However, AT&T, and others, ignore the basic facts that no requirements for LRN have been accepted nationally, or even in California, for that matter. While some states are attempting to have Chicago and Atlanta be "beta tests" for AT&T's unproved architecture, significant work must still be completed before any LNP solution can be considered "flight ready"; the blue prints are still in pencil and the requirements are yet to be developed. For example, Bellcore requirements for LRN and QoR are not expected to be released until July 1996. California requirements are expected in approximately the same timeframe. However, these requirements only address service provider number portability where there is "rate center consistency". In California, the Public Utilities Commission has allowed carriers to utilize inconsistent rate centers, which is not supported by any vendor as of this date in their LNP software development. And, while Bellcore is planning to have requirements that address location portability and LNP with inconsistent rate centers in the fourth quarter of 1996, significant analysis and development will be necessary by Pacific and the industry to accommodate this tremendous deviation from today's North American Number Plan construct.

AT&T glosses over the fact that requirements for a nationally administered SMS have not even been discussed by the national industry, let alone agreed to. In fact, there are no plans for a national RFP. And in California, the industry is just beginning to develop initial requirements for an SMS. These requirements, and any resulting RFP, will most likely be reviewed by the California Public Utilities Commission. A neutral third party will need to be selected, and systems will need to be developed from scratch. Once a system is developed, end-to-end testing will need to be completed between carriers and the vendor to assure integrity of the systems and interfaces. No credible timetable is yet available in California for this endeavor, and no agreement has been reached, or order rendered, that will deal with the funding and cost recovery of work necessary for the development and ongoing administration of the SMS and related number portability administration.

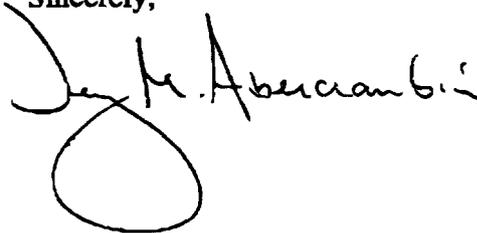
AT&T, in proposing this "hypothetical" schedule, conveniently leaves out the fact that requirements and specifications for the required expansion to 10-digit global title translations (GTTs), as required by LRN and QoR, are yet to be developed, let alone agreed to by the industry. And AT&T's implementation schedule is completely silent to the issues of Operation Support Systems (OSSs) impacts and development. The majority of carriers have indicated that significant work must still be undertaken in the area of OSSs before LNP, in any form, can be ready for implementation. **For Pacific, and many other incumbent LECs, the readiness of the OSSs is the critical path, not switch software availability.** Pacific has identified over 33 initial systems that will be

significantly impacted by LNP. I have attached a list and description of those systems impacted. It is worth noting that LNP will cause critical systems, such as COSMOS and PREMIS to need to be replaced, due to current capacity limitations. Most systems will need to be modified to directly support LNP, with some requiring complete replacement; and, this is irrespective as to what form of LNP is implemented (QoR or LNP).

Pacific is currently projecting that Operational Support Systems will not be available until the 4th Quarter of 1998. Requirements must still be developed, and more importantly, end-to-end testing and appropriate methods and procedures must be in place to effectively deal with local number portability. Given the fact that CLCs desire LNP to be deployed in many of the top MSAs in the nation, we cannot afford to employ manual, or "blue-line" paper work arounds. Mechanized, and repeatable processes will be required to ensure system integrity and quality customer service. If possible, Pacific will attempt to further expedite the timeline for OSSs to facilitate implementation of overlays and number portability in the 415 NPA, currently projected to exhaust, for purpose of an overlay, in the second quarter of 1998.

To conclude, AT&T's proposed implementation timetable is premature, overly aggressive and unworkable. It does not take into account all the necessary work required to efficiently implement LNP, and ignores the realities of NPA exhaust schedules and the need to implement NPA overlays as quickly as possible, concurrent with the implementation of LNP. In California, AT&T proposes to first implement LNP, which has yet to be actually tested, in the top MSA in the nation. AT&T's proposal will negatively impact customer service and could negatively impact network reliability. AT&T's schedule is not a "slow ramp up" but rather a head first dive into a shallow pool.

Sincerely,

Handwritten signature of Jay M. Abercrombie in cursive script.

Sheet2

MSA	# Wire Centers	% Wire Centers	PB NXXs	% PB NXXs	Total Lines (Millions)	% Lines	AT&T/MCI Prioritization	AT&T Impl (Proposed)
Los Angeles-Long Beach	68	14%	954	20%	3.4	24%	1	3Q97
San Diego	52	11%	503	11%	1.5	11%	2	4Q97
Orange County	29	6%	356	8%	1.4	10%	3	4Q97
San Francisco	36	8%	533	11%	1.4	10%	4	4Q97
Riverside-San Bernadino	11	2%	117	2%	0.3	2%	5	1Q98
San Jose	18	4%	417	9%	1.0	7%	6	1Q98
Oakland	39	8%	515	11%	1.4	10%	7	1Q98
Ventura County	10	2%	52	1%	0.2	1%	8	2Q98
Bakersfield	21	4%	91	2%	0.2	1%	9	2Q98
Vallejo-Fairfield-Napa	12	3%	68	1%	0.2	1%	10	2Q98
Sacramento	40	8%	333	7%	0.8	6%	11	2Q98
Stockton-Lodi	10	2%	119	3%	0.2	1%	12	3Q98
Santa Rosa	18	4%	115	2%	0.3	2%	13	3Q98
Salinas-Monterey	19	4%	97	2%	0.2	1%	14	3Q98
Fresno	22	5%	160	3%	0.3	2%	15	3Q98
Santa Cruz-Watsonville	8	2%	44	1%	0.3	2%	16	4Q98
Modesto	11	2%	48	1%	0.1	1%	17	4Q98
Chico	9	2%	35	1%	0.1	1%	18	4Q98
Yolo County	6	1%	24	1%	0.1	1%	19	4Q98
Merced	7	1%	24	1%	0.1	1%	20	1Q99
Redding	7	1%	27	1%	0.1	1%	21	1Q99
Yuba City	11	2%	22	0%	0.1	1%	22	1Q99
Santa Barbara-Santa Maria-Lompoc	0	0%	0	0%	-	0%	23	1Q99
SLO-Alexandero-Paso Robles	14	3%	78	2%	0.2	1%	24	1Q99
Total	478	100%	4722	100%	14	100%		

LNP Systems Impacts

Ordering, Provisioning, and Service Assurance

Bellcore Systems Impact:

CCRS - Centrex Customer Rearrangement System
CCSN - Customer Contact Services Node
COSMOS (capacity limited, replacement) - Computer System for Mainframe Operations
EXCHANGE PLUS
FEPS - Facility & Equipment Planning System
LIDB - Line Identification Data Base
LOMS - LAC (Loop Assignment Center) Operations Management System
LFACS - Loop Facilities Assignment & Control System
MARCH(TM) - Memory Activate/Assignment Recent Change Host
NMA-F: Network Monitoring and Analysis Facilities
NSDB - Network Services Data Base
PREMIS (replacement) - Premises Information System
SOAC - Service Order Analysis & Control
TIRKS - Trunk Information Record Keeping System
WFA - Work Force Administration

Pacific Bell Systems Impact:

AMOS - Access Mechanized Order System
APTOS - Automated Pricing, Terminals Options and Services
CESAR - Customer Enhanced System for Access Requests
CLC (entry system, TBD)
CSFT - Customer Services Feature Translator
CSTAR - CSC Smart Tools Auto Resolver
FIRST - FACS Internal Resolution System Technology
FWS - Frame Work Station
ORGIS - Order Repository Generation and Implementation System
PBITS - Pacific Bell ISDN Testing System
PBVS - Pacific Bell Verification System
SORD (edits for NXX) - Service Order Retrieval & Distribution

Pacific Bell New Systems Impact:

NAA - Number Assignment and Administration
AP - Application Platform

Other Vendor Systems:

LMOS (Lucent) - Loop Maintenance Operating System
IPMS - Integrated Process Management System
MLT - Mechanized Loop Test
Predictor - A service assurance system which tests twisted pair.
Starwriter - Order entry system for single line residence service

- Service Order Interface to the Regional SMS (Unknown)
- Local SMS development

Does not include Billing Systems impacted

Note: this is not an all inclusive list.

LNP Systems Impacts

Ordering, Provisioning, and Service Assurance

Bellcore Systems:

- CCRS:** Centrex Customer Rearrangement System - Provisioning - Provides Centrex customers the ability to make their own rearrangements. (e.g., TN swaps)
- CCSN:** Customer Contact Services Node - Provisioning - Provides call routing to Business Office and Repair Service for simple residence and small business customers.
- COSMOS:** Computer System for Mainframe Operations - Provisioning - Primary source of telephone number (TN) assignment. Component of FACS (Facility Assignment and Control System).
- Exchange Plus:** Ordering - Assist service reps in the order negotiation process by providing them, on-line, with information about exchanges, directory, etc.
- FEPS:** Facility and Equipment Planning System - Provisioning - Mechanized tool in planning and implementing the way network facilities and transmission equipment should be used by provisioning.
- LIDB:** Line Identification Data Base - Validation - Performs validation of calling card services for both Pacific Bell customers and some IEC customers (InterLATA).
- LFACS:** Loop Facilities Analysis Control System - Provisioning - Component of FACS (Facility Assignment and Control System). Assigns and inventories local loop outside plant (cable, etc.)
- LOMOS:** LAC (Loop Assignment Center) Operations Management System - Provisioning - Tracks and creates work packages of RMAs (Request for Manual Assistance) in MLACs (Mechanized Loop Assignment Center). Tracks service order activity.
- MARCH:** (was Mechanized Activate/Assignment Recent Change Host) - Provisioning - System communicates with the switch; converts USOCs and FIDs to switch language. Tracks and provisions pending service orders.
- NMA-F:** Network Monitoring and Analysis Facilities - Service Assurance - Monitoring, surveillance, and analysis of network transport elements.
- NSDB:** Network Services Database - Provisioning - Data layer building block which provides a shared corporate database for Operations Support Systems. It provides an end-to-end view of the circuit data.
- PREMIS:** Premises Information System - Provisioning - Database information retrieval system used for Service Order negotiation. Prime source of spare TNs, street address validation, status of service and available TN assignment information for residence and small businesses.
- SOAC:** Service Order Analysis & Control - Provisioning - Primary controlling component of FACS. Contains the Service Order until it is complete and purged from the database.

Note: this is not an all inclusive list.

LNP Systems Impacts

Ordering, Provisioning, and Service Assurance

TIRKS: Trunks Integrated Record Keeping System - Provisioning - Manages the inventory, design, engineering and planning of the interoffice network.

WFA/C: Work Force Administration Control - Provisioning - Maintains line record data for customer services. Provides trouble ticket handling for Special Services Centers.

Pacific Bell Systems:

AMOS: Access Mechanized Order System - Provisioning - Provides work force administration for Special Service and HICAP design, testing and installation work groups.

APTOS: Automated Pricing, Terminals Options and Services - Ordering - APTOS performs many sales support functions, (e.g., pricing, configurations, circuit ID, etc.)

CESAR: Customers' Enhanced System for Access Requests - Ordering - Allows common carriers (e.g., ATT, MCI, Spring, etc.) to input their own service orders via a standard data dictionary.

CLC entry system: Competitive Local Carrier entry system, TBD.

CSFT: Customer Services Features Translator - Provisioning - Provisions features for ISDN (home and business), some features for P-Phones (electronic business sets) and SDS (small business customers).

CSTAR: Customer Service Center Smart Tools & Auto Resolver - Provisioning - Automatic resolution of System (MARCH & PBVS) generated errors.

FIRST: FACS Internal Resolution System Technology - Provisioning - Provides mechanized resolution of specific Requests for Manual Assistance (RMAs) within the FACS (Facility Assignment and Control System) system.

FWS: Frame Work Station - Provisioning - an order delivery system for provisioning of non-designed services and local loop for message and special services designed orders.

ORGIS (ISDN support): Order Repository and Generation System - Ordering - A front-end to SORD.

PBITS: Pacific Bell ISDN Test System - Provisioning & Service Assurance - Performs mechanized ISDN Testing, digital loop test, line card verification, etc.

PBVS: Pacific Bell Verification System - Provisioning - Verifies that a switch has been activated as requested in the service order.

SORD: Service Order Retrieval and Distribution - Ordering - Mechanized on-line application which accepts, edits, stores, and distributes service order for installation and/or modification of telephone and related services.

Note: this is not an all inclusive list.

LNP Systems Impacts

Ordering, Provisioning, and Service Assurance

Pacific Bell New Systems (under development)

NAA: Number Assignment and Administration system - Ordering and Provisioning -
Provides a single corporate database for use in the assignment and administration of
TNs.

AP: Application Platform - Provisioning - Manages the provisioning of service requests for
assembled circuits.

Other Vendor Systems:

IPMS - Integrated Process Management System - Provisioning and Service Assurance -
Key functions are: order status and completion, trouble ticket status and closure,
automatic billing to name a few.

LMOS: Loop Maintenance Operating System - Service Assurance and Provisioning -
Trouble reporting system for customer loop. (Lucent)

MLT: Mechanized Loop Test - Provisioning and Service Assurance - Testing of copper
loop facilities.

Predictor: Service Assurance - Has a circuit to every CO in the State. Test (overnight)
twisted pairs to determine potential trouble.

Starwriter: Ordering - Order entry system for service reps to order residential service.

Note: this is not an all inclusive list.