

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

RECEIVED

JUN - 1 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Telephone Number Portability)
)
GTE Service Corporation's Waiver Of)
The Phase III Local Number Portability)
Implementation Deadline)

CC Docket No. 95-116

NSD File No. L-98-29

GTE's COMMENTS

Dated: June 1, 1998

GTE Service Corporation and its affiliated
domestic telephone operating companies

John F. Raposa
Richard McKenna
GTE Service Corporation
600 Hidden Ridge, HQE03J36
P.O. Box 152092
Irving, TX 75015-2092
(972) 718-6362

Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W., Suite 1200
Washington, DC 20036
(202) 463-5214

Their Attorneys

File of Copies rec'd 024
GTE

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

In the Matter of)	
)	
Telephone Number Portability)	CC Docket No. 95-116
)	
GTE Service Corporation's Waiver Of)	
The Phase III Local Number Portability)	NSD File No. L-98-29
Implementation Deadline)	

GTE's COMMENTS

GTE Service Corporation and its affiliated domestic telephone operating companies (collectively "GTE")¹ respectfully submit GTE's Comments on the Public Notice (the "Notice")² addressing carrier Petitions for Waiver of Phase III Local Number Portability ("LNP") implementation deadlines, with special reference to GTE's Request for Adjustment of Wireline Deadlines submitted March 2, 1998 ("GTE's Request").

¹ GTE Alaska, Incorporated, GTE Arkansas Incorporated, GTE California Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc., Contel of the South, Inc., and GTE Hawaiian Tel International Incorporated.

² Common Carrier Bureau Seeks Comment on Petitions For Waiver Of Phase III Local Number Portability Implementation Deadline, CC Docket No. 95-116 (DA 98-960 released May 20, 1998).

Specifically, GTE asks for clarification inasmuch as GTE's Request³ addressed Phases I through IV for all three regions that are affected by the replacing of Perot Systems Corp. with Lockheed Martin IMS as the Number Portability Administration Center/Service Management System ("NPAC/SMS") vendor. The requested clarification is that the waiver granted to GTE for Phases III and IV (under the terms discussed infra) covers all three of the affected regions for which a waiver request was filed. Thus, it should be made clear that Phase III LNP Deadline relief for GTE applies to the West Coast and Western regions along with the Southeast region.

Further, GTE's Request asked for a Phase III implementation date of November 1, 1998.⁴ Upon further review, and taking account of favorable developments that have occurred since the submission of GTE's Request, GTE now believes it will be able to implement LNP in Phases III and IV in the three regions affected (Southwest, West Coast, and Western) concurrently with LNP implementation of the RBOC in each MSA.⁵ This is based on the results of GTE's earlier efforts and significant accomplishments to date that have encouraged GTE to reduce the time originally requested, assuming there are no unexpected negative developments. Due to

³ GTE Petition at page 3 says: "In light of the inability of a major vendor (Perot) to meet its contractual commitments, GTE in the Southeast, West Coast, and Western regions will be unable to meet the March 31 deadline for Phase I, as well as subsequent Phase deadlines." And again at page 9, it says: "GTE requests that the Commission realign the additional four implementation Phases to remove the overlapping of implementation and permit graduated deployment, commencing with Phase II upon the completion of Phase I and continuing through Phase V."

⁴ GTE Petition at page 9 says: "[B]ut in any event not less than 30 days after the completion of Phase II."

⁵ In Honolulu, Hawaii, GTE proposes to implement LNP by September 30, 1998.

network routing considerations, GTE requests that in no event should the specified implementation date for GTE be earlier than LNP implementation by the largest carrier in each MSA.

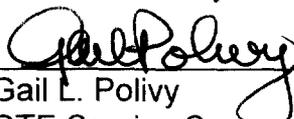
Accordingly, GTE hereby modifies GTE's Request by re-emphasizing the need for waivers for all three regions affected (Southwest, West Coast, and Western); and by noting that GTE's request for a November 1 implementation date should be regarded as withdrawn.

Dated: June 1, 1998

Respectfully submitted,

GTE Service Corporation and its affiliated
domestic telephone operating companies

John F. Raposa
Richard McKenna
GTE Service Corporation
600 Hidden Ridge, HQE03J36
P.O. Box 152092
Irving, TX 75015-2092
(972) 718-6362

By 
Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W., Suite 1200
Washington, DC 20036
(202) 463-5214

Their Attorneys

Certificate of Service

I, Ann D. Berkowitz, hereby certify that copies of the foregoing "GTE's Comments" have been mailed by first class United States mail, postage prepaid, on June 1, 1998 to the following parties of record.

Alvin McCloud*
Common Carrier Bureau
Federal Communications Commission
2000 M Street, NW
Suite 235
Washington, DC 20554

Brenda Crosby
Rio Virgin Telephone Company
P.O. Box 1889
Estacada, OR 97023

M. Robert Sutherland
BellSouth Corporation
1155 Peachtree Street
Suite 1700
Atlanta, GA 30309-3610

James H. Bolin, Jr.
AT&T Corporation
295 North Maple Avenue
Room 3247H3
Basking Ridge, NJ 07920

Teresa Marrero
Teleport Communications Group, Inc.
Two Teleport Drive
Suite 300
Staten Island, NY 10311

Jay C. Keithley
Sprint Corporation
1850 M Street, NW
Suite 1100
Washington, DC 20036

Sandra K. Williams
Sprint Corporation
P.O. Box 11315
Kansas City, MO 64112

Wendy S. Bluemling
Southern New England Telephone Company
227 Church Street
New Haven, CT 06510



Ann D. Berkowitz

*Hand Delivery