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JUN 12 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

June 12, 1998

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

Re: Telephone Number Portability – GTE Service Corporation's
Waiver of the Phase III Local Number Portability
Implementation Deadline, CC Docket No. 95-116

Dear Ms. Salas:

As encouraged by the Federal Communications Commission in the Public
Notice, GTE is submitting a diskette of Reply Comments of GTE Service
Corporation and one hard copy in the above-captioned proceeding.

Sincerely,

Andre J. Lachance

Enclosure

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List A B C D E

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

JUN 12 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Telephone Number Portability)

) CC Docket No. 95-116

) NSD File No. L-98-29

GTE's REPLY COMMENTS

Dated: June 12, 1998

GTE Service Corporation and its affiliated
domestic telephone operating companies

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

In the Matter of)	
)	CC Docket No. 95-116
Telephone Number Portability)	NSD File No. L-98-29

GTE's REPLY COMMENTS

GTE Service Corporation and its affiliated domestic telephone operating companies (collectively, "GTE")¹, with regard to comments submitted with reference to the Public Notice (DA 98-960 released May 20, 1998) addressing carriers' Petitions for Waiver of Phase III Local Number Portability ("LNP") implementation deadlines, and with special reference to GTE's Request for Adjustment of Wireline Deadlines submitted March 2, 1998 ("GTE's Request"), offers the following Reply to the Opposition to Petition for Waiver of MCI Telecommunications Corporation ("MCI") submitted June 8, 1998 (the "MCI Opposition").

I. DISCUSSION

The MCI Opposition opposes GTE's Request as follows: (1) opposes (at 2-4) a delay in GTE's final LNP implementation till November 1, 1998; and (2) opposes (at 4-5) GTE's LNP implementation on a "flash cut" basis.

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.

With regard to the first point, GTE has called MCI's attention to GTE's Comments herein filed June 1 which indicate (at 2-3) that GTE -- taking account of favorable developments -- no longer requests the November 1 date. GTE states instead 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.

With regard to the second point, GTE has informed MCI that "flash cut" implementation is not GTE's plan. GTE expects to roll out LNP over a suitable interval rather than attempting "flash cut" implementation in a single day.²

ACCORDINGLY, GTE renews its request for Commission waiver action for all three regions affected (Southwest, West Coast, and Western); and points out that its request for a November 1 implementation date should be regarded as withdrawn.

² MCI has indicated no objection provided GTE furnishes an updated implementation schedule within fourteen days of the FCC's order on Phases III and IV.

Dated: June 12, 1998

Respectfully submitted,

GTE Service Corporation and its affiliated
domestic telephone operating companies

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Certificate of Service

I, Judy R. Quinlan, hereby certify that copies of the foregoing "GTE's Reply Comments" have been mailed by first class United States mail, postage prepaid, on June 12, 1998 to the parties listed below:

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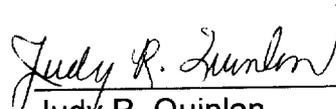
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