The first year projected LNP demand is as follows:

	End Office		Tandem	
	Prearranged	Default	Prearranged	Default
	(In 000's)			
Competitive Local Exchange Carriers (CLECs)	4,432	233	39,761	4,418
Wireless	8,631	163,992	81,731	1,552,882
Interexchange Carriers	214,146	23,794	2,027,803	225,311
Independents	37,977	13,343	359,615	126,351

Cost Development

1. Cost Elements

The cost elements associated with LNP Query Service are:

- Capital Costs - Regional, State Specific, Central Office Related, SS7
- Expenses - Regional, State Specific, Central Office Related, Administration, Billing Implementation

2. Cost Methodology

a) Capital Costs - Regional, State Specific, Central Office Related, SS7

1) Capital investments associated with LNP Query Service were obtained either from the LNP Budget detail for Retail LNP or from existing cost models for SS7. The budget detail was analyzed to determine which capital investments supported both Retail LNP and LNP Query Service, and which supported only Retail LNP. Those capital investments which support only Retail LNP were excluded from the LNP Query Service analysis. Capital investments which support both services were allocated between services as described in 2)a)9) below.

2) The LNP Budget detail was used to identify areas requiring capital investments to implement LNP Query Service. The following areas were identified:

- Service Control Point / Service Management System (SCP/SMS)
- Number Portability Administration Center (NPAC)
- Central Office Hardware Requirements
- Systems Integration Lab (SIL) Upgrades
- Link Monitoring
- Operational Support Systems (OSS)

3) The capital investments from 2)a)2) were identified by state jurisdiction for 1997 - 1999.

4) The capital investment items from 2)a)2) were mapped into three investment categories. The three categories were: "Regional" or those investments associated with regional query processing, "State Specific" or those investments associated with individual state query processing, and "Central Office Related" or those investments associated with end office or tandem query processing.

5) The capital investment items from 2)a)2) were categorized by state jurisdiction, investment category, and plant account for 1997-1999.

6) The Present Value of the capital investment was then calculated for the capital investment items from 2)a)5) by state and investment category.

7) The capital investment items from 2)a)6) were multiplied by annual cost factors to calculate the annual cost for the capital investment by state and investment category. The annual cost factors used included depreciation, cost of money, income tax, maintenance and ad valorem taxes.

8) The annual costs from 2)a)7) for each state were added to obtain the total regional annual cost for the capital investment items by investment category.

9) The annual costs from 2)a)8) were multiplied by the percentage of LNP Query Service queries to total LNP queries (LNP Query Service queries plus Retail LNP queries) to obtain the annual costs associated with LNP Query Service.

10) The annual costs for each investment category from 2)a)9) were divided by the annualized Present Value of the LNP Query demand (based on a 3 year forecast) to obtain the costs per query by investment category.

11) The resultant costs per query were:
    a) Cost per Query - Region
    b) Cost per Query - State
    c) Cost per Query - Central Office Related

12) The investment sources for SS7 were vendor Engineered, Furnished and Installed (EF&I) material and installation costs obtained from central office and SS7 cost models and the Ameritech Facility Investment Calculator. The capital investments for SS7 are as follows:

    - End Office switching
    - Tandem switching
    - Local STP switching
    - Hub STP switching
    - Links

13) The capital investments from 2)a)12) were developed on a per octet basis.

14) The capital investments from 2)a)13) were multiplied by an Engineering estimate of the number of octets per LNP query.

15) The investments per query from 2)a)14) were multiplied by annual cost factors to determine a cost per query. The annual cost factors used included depreciation, cost of money, income tax, maintenance and ad valorem taxes.

b) **Expenses - Regional, State Specific, Central Office Related**

1) Expenses associated with LNP Query Service were obtained from the Budget detail for Retail LNP. The budget detail was analyzed to determine which expenses supported both Retail LNP and LNP Query Service, and which supported only Retail LNP. Those expense items which support only Retail LNP were excluded from the LNP Query Service analysis. Expenses which support both services were allocated between services as described in 2)b)8 below.

2) The LNP Budget detail was used to identify the expense items associated with the following:

- SCP/SMS
- NPAC
- Central Office Software Requirements
- SIL Upgrades and Testing
- Link Monitoring
- OSS
- Bellcore Consulting

3) The expense items from 2)b)2) were identified by state jurisdiction for 1997 - 2000.

4) The expense items from 2)b)2) were mapped into three expense categories. The three categories were: "Regional" or those expenses associated with regional query processing, "State Specific" or those expenses associated with individual state

query processing, and "Central Office Related" or those expenses associated with end office or tandem query processing.

5) The expense items from 2)b)2) were categorized by state jurisdiction and expense category for 1997- 2000.

6) The Present Value of the expense items was then calculated for the expense items from 2)b)5) by state and expense category.

7) The expense items from 2)b)6) for each state were added to obtain the total regional expense by expense category.

8) The expenses from 2)b)7) were multiplied by the percentage of LNP Query Service queries to total LNP queries (LNP Query Service queries plus Retail LNP queries) to obtain the annual costs associated with LNP Query Service.

9) The expenses from 2)b)8) were divided by the total Present Value of LNP Query Service demand (based on a 3 year forecast) which was appropriate for each expense category to obtain the expenses per query by expense category.

10) The resultant expenses per query were:

a) Expense per Query - Region
b) Expense per Query - State
c) Expense per Query - Central Office Related

c) Administration

1) Administration expenses included costs associated with Product Management and other employee labor related expenses.

2) The Product Management expenses were developed for 1998 - 2000 by multiplying the annual productive hours by the appropriate labor rates.

3) The Present Value of the Product Management expenses was calculated based on the yearly expenses from 2)c)2).

4) Management and Non-Management hours to support Retail LNP for 1997 - 1999 were obtained from the Retail LNP budget.

5) The labor hours from 2)c)4) were multiplied by the appropriate labor rates to obtain the labor related expenses for 1997 - 1999.

6) The Present Value of the labor related expenses was calculated based on the yearly expenses from 2)c)5).

7) The Present Value of labor related expenses from 2)c)6) was multiplied by 10 percent to determine the additional labor related expenses associated with the Query Service. The 10 percent factor was based on an engineering estimate of the relationship between LNP Query Service labor related expenses and Retail LNP labor related expenses.

8) The total Administration expense was determined by adding the Product Management expenses from 2)c)3) and the labor related expenses from 2)c)7).

9) The Administration cost per LNP Query Service query was determined by dividing the total Administration expense from 2)c)8) by the Present Value of the LNP Query Service demand.

d) **Billing Implementation**

1) The Billing Implementation expense includes the cost for updating the billing systems in order to be able to bill customers for the LNP Query Service.

2) The number of hours required to updated the billing systems were obtained from Billing Solutions Organization (BSO).

3) The hours from 2)d)2) were multiplied by the appropriate labor rates to obtain the total cost for Billing Implementation.

4) The total cost from 2)d)3) was divided by the Present Value of the LNP Query Service demand to obtain the Billing Implementation cost per LNP Query Service query.

3. **Summary**

The cost per LNP Query Service query is the sum of the costs per LNP Query Service query from 2)a)11)a), 2)a)11)b), 2)a)11)c), 2)a)15), 2)b)10)a), 2)b)10)b), 2)b)10)c), 2)c)9) and 2)d)4). The actual cost per LNP Query Service query is shown on Exhibit 1.

Overhead Loading Factor

LNP Query Service is not the number portability which LECs must provide under Section 251(b)(2) of the Telecommunications Act of 1996. Rather, under the Commission's Second Number Portability Order, LNP Query Service is a call related database service -- a service

provided by a LEC either on its own behalf, or to another carrier (the N-1 carrier) who is responsible for performing the query. [4]

Like other call related database services (800 number portability and LIDB), LNP Query Service is clearly an access service. For instance, in the 800 Data Base Access Tariffs Docket the Commission found that 800 number portability was an access tariff service and required the LECs to file access service tariffs governing this database access service. [5]

LNP Query Service is a similar service, where the Commission' Second Number Portability Order makes the N-1 carrier responsible to perform or arrange for the queries. [6] The Commission also requires LECs to process queries on behalf of other N-1 carriers, including the processing of unqueried traffic from an N-1 carrier where no prearrangement has been made to perform the query. The Commission has also found that the LECs should be compensated when they perform this function.[7] Thus, since number portability is a call-related database, and the LNP Query Service performs a query service for other carriers, Ameritech is filing LNP Query Service as a new access service[8].Like other new switched access services, LNP Query Service rates contain reasonable overhead loadings to recover costs not directly attributable to the new service.

A Fully Distributed Cost (FDC) Annual Charge Factor (ACF) was developed from the 1996 ARMIS report for Local Switching. The FDC ACF represents the annual costs associated with Local Switching investment as determined by Part 69 Rules. This factor is developed by dividing the portion of the total direct and indirect costs or revenue requirement allocated to Local Switching by the portion of equipment investment allocated to Local Switching.

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4 Second Number Portability Order at paragraphs 73-75.

5 See generally, 800 Data Access Tariffs and the 800 Service Management System Tariff, and Provision of 800 Services, CC Docket No. 93-129 and No. 86-10, Report and Order, released October 28, 1996 ("800 Data base Access Tariff Order Docket").

6 Id.

7 Supra, Paragraph 75.

8 Number portability downstream database was declared to be a call-related database in Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers, First Report and Order, released August 8, 1996 ("First Interconnection Order"), paragraph 148.

A ratio which represents the overhead loadings for Local Switching was calculated by dividing the FDC ACF by the Direct Unit Cost Annual Charge Factor. The ratio is applied to the direct unit cost to produce the FDC unit costs.

Basis of Ratemaking

The proposed rates for LNP Query Service are above incremental costs and include a reasonable amount of overheads.

Price Cap Impact

LNP Query Service constitutes a new service under the Price Cap rules as it adds to the range of options already available to customers. The Cost to Investment Ratio is displayed in Exhibit 1 and the Cost to Rate Ratios are displayed in Exhibit 2. First year's revenue generated by this service is displayed in Exhibit 3.

Exhibit 1

Ameritech
Local Number Portability, Cost Per Query

End Office / Tandem, Prearranged / Default

Per Query Investment	0.001011
Recurring Costs	
Depreciation	0.000137
Cost of Money	0.000083
Income Tax	0.000031
Maintenance	0.000059
Ad Valorem Tax	0.000006
Other Direct Expenses	0.002662
Total Cost Per Query	0.002948
Cost/Investment Ratio	2.9159248

Exhibit 2

Ameritech
Local Number Portability

Costs with Overhead Loading

Line #	Description	Source	Prearranged End Office	Prearranged Tandem	Default End Office	Default Tandem
1	Incremental Costs, per query	Exhibit 1	0.002948	0.002948	0.002948	0.002948
2	Overhead Loading Factor		1.7747	1.7747	1.7747	1.7747
3	Fully Distributed Costs (FDC)	Ln1 * ln2	0.005232	0.005232	0.005232	0.005232
4	Rate, per query	Marketing	0.005232	0.005232	0.005232	0.005232
5	Cost/Rate Ratio	Ln1 / Ln4	0.56348	0.56348	0.56348	0.56348

Exhibit 3

Ameritech
Local Number Portability

Revenue Impact

	(In Thousands)			
	Prearranged		Default	
	End Office	Tandem	End Office	Tandem
Competitive Local Exchange Carriers (CLECs)	4,432	39,761	233	4,418
Wireless	8,631	81,731	163,992	1,552,882
Interexchange Carriers (IXCs)	214,146	2,027,803	23,794	225,311
Independent Operating Companies (IOCs)	37,977	359,615	13,343	126,351
Total Queries, Subtotal	265,186	2,508,910	201,362	1,908,962
Rate	0.005232	0.005232	0.005232	0.005232
Revenue, subtotal	1,387	13,128	1,053	9,987
Total Revenue				25,554

ATTACHMENT B

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of

Number Portability Query Services	)	CC Docket No. 98-14
	)	
Ameritech Tariff F.C.C. No. 2	)	CCB/CPD 97-46
Transmittal Nos. 1123, 1130;	)	
	)	
Bell Atlantic Tariff F.C.C. No. 1,	)	CCB/CPD 97-52
Transmittal No. 1009;	)	
	)	
Southwestern Bell Tariff F.C.C. No, 73,	)	CCB/CPD 97-64
Transmittal No. 2680;	)	
	)	
Pacific Bell Tariff F.C.C. No. 128,	)	CCB/CPD 97-65
Transmittal No. 1962	)	

DIRECT CASE OF AMERITECH

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Dated: February 13, 1998

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Before the
FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of

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Bell Atlantic Tariff F.C.C. No. 1,	)	CCB/CPD 97-52
Transmittal No. 1009;	)	
	)	
Southwestern Bell Tariff F.C.C. No, 73,	)	CCB/CPD 97-64
Transmittal No. 2680;	)	
	)	
Pacific Bell Tariff F.C.C. No. 128,	)	CCB/CPD 97-65
Transmittal No. 1962	)	

DIRECT CASE OF AMERITECH

I. SUMMARY AND INTRODUCTION.

Ameritech files its direct case in response to the Order Designating Issues for Investigation ("Order") released in this matter on January 30, 1998. In its Order, the Commission designated for investigation certain issues regarding the long-term number portability query service and tariffs ("Query Service") tariffs of Ameritech, Bell Atlantic, Pacific Bell, and Southwestern Bell. Ameritech must admit that it was surprised by the Commission investigation, since its Query Service cost support and pricing

was scrupulously performed in conformance with the Commission's orders and prevailing practice concerning new switched access services. Moreover, its tariff provisions for traffic forecasts and discontinuance of service in the event that unqueried traffic creates a risk of network impairment are fully consistent with the Commission's policies and comparable provisions in Ameritech's access service tariffs.

In its direct case, Ameritech will respond to each of the issues raised by the Commission, and prove that Ameritech properly conducted cost studies and priced its Query Service as a new switched access service. In its Second Number Portability Order,[1] the Commission found that although LECs are not responsible to perform queries on traffic they receive from other carriers, they are still required to process that traffic. However, the Commission also held that LECs are entitled to be compensated for that function. To that end, Ameritech determined its direct costs of this new access service using accepted methodologies. Ameritech added to those costs a general overhead factor to recover costs not directly attributable to the service, as authorized for new access services.

Ameritech will show that all costs allocated to the Query Service are in fact direct costs attributable to the service. That is to say, each cost was

[1] Telephone Number Portability , CC Docket No 95-116, Second Report and Order, released August 18, 1997 ("Second Number Portability Order") at ¶¶73-75.

necessary to develop, establish or provide the service, and would not have been incurred but for the obligation to offer long term number portability ("LNP") and/or Query Service. Ameritech will also show in Attachments 1 and 2 that it incurred significant direct costs to modify, enhance and augment its provisioning and maintenance support systems, and SS7 network to implement LNP and provide the Query Service all of which meet the above "but for" test.

In most cases, equipment, facilities or software required to provide the Query Service are also required to implement LNP. For that reason, the joint direct costs associated with these shared facilities was allocated between the two services based upon relative utilization. Ameritech will show that the allocation of direct costs to the Query Service was supported by demand forecasts that are based upon the best available information. Ameritech has carefully allocated any costs used to provide both LNP and Query Service between the two services (and thereby not included them for recovery for the other service). The bottom line is that there is no double recovery.

In its direct case, Ameritech will also show that its request for forecasts of projected traffic from carriers using its Query Service is a normal and necessary part of the relationship between a local exchange carrier ("LEC") and an interexchange carrier, or for that matter, any other

interconnecting carriers. Forecasts are an essential ingredient to the provision of reliable service, and should be supported and encouraged by the Commission.

Ameritech will also demonstrate that its proposal for blocking of traffic that is creating an undue risk of network impairment is designed to carefully balance the preservation of high quality service for all users, with providing every carrier a reasonable opportunity to avoid blockage. Moreover, consistent with the Commission's policies, the provision applies on a nondiscriminatory basis to all users of the Query Service who create a risk of network congestion. Included should be carriers that grossly exceed their forecasts. The proposal provides, to the extent feasible, reasonable advance notice sufficient to enable carriers to either correct the condition, or make alternate arrangements. Even in cases where an offending carrier fails to respond, Ameritech will only block traffic to the extent necessary to reduce traffic levels to reasonable levels.

I. ANSWERS TO THE COMMISSION'S QUESTIONS.

1. Ameritech Properly Used Unseparated Costs.

In paragraph 9 of the Order, the Commission asks each carrier to indicate whether it used separated or unseparated costs. Ameritech used unseparated costs to develop the unit cost per query, since it is charging the same per query charge at the federal and state level. Mirroring of the

interstate rate at the state level is appropriate here, since the same facilities, equipment, databases and software are used to perform queries, regardless of whether the call is interstate or intrastate. As a result the per unit cost and rate of a query should be the same in both jurisdictions.

2. Only Direct Costs Were Considered.

In paragraph 9 of the Order, the Commission asks carriers to indicate "whether costs such as those incurred to modify SS7, OSS and billing systems are costs that are not directly related to providing number portability, and therefore not properly included in query charges." In answer to the Commission's question, Ameritech only considered the direct costs directly attributable to the Query Service. Included were applicable direct costs related to SS7, OSS and billing system modifications, enhancements and augmentations to the extent they were necessary for the provision of the Query Service.

In order to isolate the direct costs attributable to the Query Service, Ameritech first identified those costs directly applicable to long-term number portability. For that purpose, Ameritech assigned a unique initiative account code to all capital and expense expenditures that are directly attributable to providing LNP generally, and/or the Query Service, i.e., carrier-specific costs directly required to provide number portability. However, this unique initiative account contains expenditures used to

implement LNP generally, as well as to provide the Query Service. In fact, it turned out that number portability-related costs fall into three baskets. First, a few costs, such as certain billing systems modifications, are required solely for the Query Service. Second, some costs are required for both the Query Service and LNP generally. Third, most costs are required for LNP generally, but are not used to provide or bill the Query Service.

Since not every number portability cost is related to the Query Service, each capital and expense budget item in the account was analyzed by Ameritech to determine whether it was in fact directly associated and required to develop, provision, maintain, or bill the Query Service. If an item was required to implement LNP only (but was not used to provision, maintain, or bill the Query Service), it was excluded from the Query Service cost analysis. If a cost item was used to implement LNP and also to provide the Query Service, it was allocated between the functions based on the projected percentage of Query Service database queries to total queries.[2] Costs in the account required to solely provision, provide or bill the Query Service are recovered solely from that service. For instance, the billing implementation costs represent the cost to modify Ameritech's usage and

[2] To the extent that the Commission or other parties are tempted to use Query Service costs as a surrogate for LNP costs, it is important to note that even though there is significant overlap, there are also significant differences between the costs of LNP and the Query Service that mean that a separate inquire must be conducted to calculate LNP costs. The fact is that the Query Service does not benefit from many modifications, enhancements and augmentation that were necessary to provide LNP and that none of those costs were allocated to the Query Service.

billing processes. These modifications are needed solely to properly identify/capture queries, format query usage, rate query charges and change billing format to bill Query Services for both Prearranged and Default Traffic carriers.

The account reflects employee related expenses required only for LNP. Realizing that additional employee related expenses would be required to implement and provide the Query Service, Ameritech projected these expenses by multiplying the employee related expenses for LNP by a factor representing the percent of additional employee related expenses required to provision the Query Service.

The bottom line is that all costs used to price the Query Service are direct costs. Costs that are common to both the Query Service and LNP generally were allocated. Thus, they will not be double recovered. Moreover, if these costs are not recovered from the Query Service, the will remain as direct costs of LNP, and will inflate the amount that will be recovered from end users through the LNP competitively-neutral cost recovery mechanism.

Ameritech does not agree with the assumption that underlies the Commission's question -- that the Query Service may not require utilization of SS7, OSS and billing systems, or that certain modifications, enhancements and augmentations of those systems and networks was not

required to provide the Query Service. The fact of the matter is, the Query Service requires the use of these systems and networks, and that Ameritech incurred significant costs modifying, enhancing and augmenting them in order to implement and meet the traffic demands of LNP and the Query Service. The modifications, enhancements and arrangements for Query Service are discussed in Attachments 1 and 2.

Since these modifications, enhancements and augmentations were necessary to provide the Query Service, they clearly qualify as direct costs. Stated another way, these costs would not have been incurred but for the obligation to provide LNP and the Query Service. However, even though these costs would not have been made but for LNP and the Query Service, in a few cases the associated systems could support other service applications. In those instances, Ameritech chose to make the enhancement or modification available for those other applications. This approach is efficient, cost effective and enhances customer service. As such, it should not be discouraged by the Commission by disqualifying the entire amount cost as a cost of the Query Service. Of course, in such cases Ameritech allocated the costs between all applications that benefited from them based upon relative usage.

3. Ameritech Properly Included Reasonable Overheads.

The Commission designated for investigation in paragraph 9 of the Order the issue of whether "carriers may include a fully distributed cost annual charge factor in query charges, and, if so, whether the carriers calculate their proposed factors appropriately." The answer is that the Query Service, like other new switched access services, contains reasonable overhead loadings to recover costs not directly attributable to the new service.

In this regard, Ameritech would first like to clarify that it did not use a fully distributed cost methodology to develop its Query Service rates. Rather, it determined the incremental forward-looking costs of providing the service, and added a reasonable loading factor to those costs. The inclusion of an annual cost factor is consistent with how Ameritech and other LECs are authorized to develop new switched access rates since the inception of open network architecture ("ONA"). Because the Query Service is also a new switched access service, it likewise should receive reasonable loadings.

It must be remembered that Query Service, unlike those of LNP generally, is not the number portability required to be provided by LECs under Section 251(b)(2) of the Telecommunication Act of 1996, and that its costs are thus not subject to the "competitively-neutral cost recovery

requirement of Section 251(e)(2).[3] Rather, under the Commission's Second Number Portability Order, the Query Service is a call-related database query service -- a service provided by a LEC to another carrier (the N-1 carrier) who is responsible for performing the query.[4]

The Query Service like other call-related database services (800 number portability and LIDB) is clearly an access service. For instance, in the 800 Data Base Access Tariffs Docket the Commission found that 800 number portability service is an access tariff service. In conjunction with the 800 service, the Commission further required that LECs perform queries on 800 traffic to determine the interexchange carrier that the 800 user had selected to carry the call. The Commission required that the LECs file access service tariffs governing this database access service.[5]

Under the Commission's Second Number Portability Order, the N-1 carrier is responsible to perform or arrange for the queries.[6] However, the Commission also held that LECs should process unqueried traffic upon which no prearrangement had been made ("Default Traffic") received from N-1 carriers, and that the LEC is to perform the query on behalf of the N-1 carrier. The Commission also found that the LECs would be compensated

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[3] 47 U.S.C. 251(b)(2) and 251(e)(2).
[4] Second Number Portability Order, at ¶¶73-75.
[5] See, generally, 800 Data Access Tariff and the 800 Service Management System Tariff, and Provision of 800 Services, CC Docket No. 93-129 and No. 86-10, Report and Order, released October 28, 1996. ("800 Data Base Access Tariff Order Docket").
[6] *Id.*

for the queries they perform on Default Traffic.[7] Thus, since number portability is a call-related database, and the Query Service performs a query service for other carriers, Ameritech filed it as a new access service.[8]

Not only is the Query Service a new access service, but it is a competitive one. Under the Commission's rules, N-1 carriers are able to establish their own LNP databases and provide queries to themselves. N-1 carriers can also obtain query services from other carriers, such as Illuminet, who have established their own LNP databases. Moreover, under the Commission's First Interconnection Order incumbent LECs are required to offer unbundled access to their downstream number portability databases at cost-based rates.[9] Since, the Query Service is competitive, there is no reason why users of that service should not pay the direct costs applicable to it, plus reasonable overheads. In fact, the only limit on rates should be imposed by market conditions, since if an N-1 carrier is dissatisfied with Ameritech's rates, the carrier is free to provide the service itself, obtain it from Ameritech's competitors, or order unbundled access to Ameritech's downstream database at cost-based rates.

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[7] Supra ¶75.

[8] Number portability downstream database were declared to be a call-related database in Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers, First Report and Order, released August 8, 1996 ("First Interconnection Order"). ¶148.

[9] *Id.*