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

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AUG 10 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Telephone Number Portability)

CC Docket No. 95-116
NSD File No. L-98-84

COMMENTS OF GTE

GTE Service Corporation and its affiliated domestic telephone operating and wireless companies (collectively "GTE")¹ respectfully submit their comments in response to the Public Notice in the above-captioned proceeding.² In the Notice, the Commission seeks comment on the North American Numbering Council ("NANC"), Local Number Portability ("LNP") Administration Working Group Report on Wireless Wireline Integration ("the Report"), dated May 8, 1998.

I. INTRODUCTION.

In the Second Report and Order in CC Docket No. 95-116, the Commission charged NANC with the task of developing recommendations for the implementation of

¹ These comments are filed on behalf of GTE's domestic telephone operating companies and GTE Wireless Incorporated. GTE's domestic telephone operating companies are 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., and Contel of the South, Inc.

² Common Carrier Bureau Seeks Comment On North American Numbering Council Recommendation Concerning Local Number Portability Administration wireline and Wireless Integration, *Public Notice*, (CC Docket No. 95-116), NSD File No. L-98-84, DA 98-1290 (released June 29, 1998) (hereinafter "*Notice*").

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LNP among wireless carriers within nine months of the release of the Order. GTE, as a member of the NANC Wireless and Wireline Integration Task Force (WWITF), has been actively involved in meeting the Commission's requirement. However, as the cover letter submitting the Report states, GTE voted not to accept the report.³ As discussed below, GTE does not believe that the timeframes proposed in the Report for the review of systems and processes necessary to shorten the interval for wireline to wireless porting are sufficient to allow a reasoned recommendation by December 31, 1998.

II. THE PROPOSED SCHEDULE WILL NOT ALLOW WWITF TO MAKE A REASONED RECOMMENDATION ON THE REDUCTION OF THE PORTING INTERVAL FROM WIRELINE TO WIRELESS CARRIERS.

Section 3.3.3.3 of the Report sets out the requirements needed for WWITF to be able to analyze and recommend whether the interval should be reduced for porting wireline telephone numbers to wireless carriers. The Report states:

Before a determination to shorten porting intervals can be considered, the wireline industry recommends that an analysis be performed to evaluate the impacts of actual porting experience on systems and work process effected by proposed shortened porting intervals. It is necessary to gather sufficient porting data to complete this analysis. In addition to evaluating porting experience, the analysis will consider several other issues such as competitive parity to insure that equal treatment by all service providers in the porting process.

There are two most salient points in the above work plan: (1) the impacts on systems and work process should be based upon actual porting experience, and (2) sufficient data must be gathered to complete the analysis. GTE does not believe that the industry, at this time, has sufficient actual data regarding the impact of porting on systems and processes to permit a complete analysis. Indeed, it is highly unlikely that

³ See, Alan C. Hasselwander letter to Richard Metger dated May 18, 1998.

carriers will gain sufficient experience in the next few months such that an analysis can be completed before the recommendation due date. As the Commission is aware, the industry is still in the middle of the phased implementation of LNP. The deadline for completing the implementation of LNP in the top 100 MSAs, is December 31, 1998 – the date when the Report would require WWITF to have its recommendation submitted to NANC. Although today there are a number of MSAs that have implemented LNP, the actual number of ported customers is too small to be representative of the long-term impact on carrier systems and processes.

GTE believes that an analysis performed on early, incomplete data runs the very real risk of leading to an incorrect conclusion. Only when sufficient actual porting experience is available, can the WWITF begin the analysis that will be the basis for its recommendation. The systems changes that may be required by the final recommendation could potentially cost carriers huge amounts of resources. The stakes are too high to rush a recommendation based on incomplete data.

BellSouth issued a minority opinion on the Report, also withdrawing its support for the timeline in Section 3.3.3.3. As BellSouth pointed out, the report as originally submitted by the WWITF recognized the problem with data availability and included a longer timeline than the edited final report NANC forwarded to the Commission. GTE agrees with BellSouth and concurs that sufficient data regarding this issue will not be available until after fourth quarter 1998. Therefore, by necessity, a recommendation based on proper analysis of this data must be due after this date.

III. CONCLUSION.

The Commission should make clear that NANC's forthcoming recommendation on shortening the interval for wireline to wireless porting, must be based on an analysis

of sufficient actual carrier experience. Due to the current lack of actual experience, the Commission should request NANC to re-examine the date upon which a reasoned recommendation can be presented.

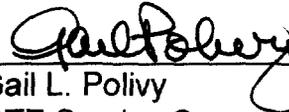
Dated: August 10, 1998

Respectfully submitted,

GTE Service Corporation and its affiliated
domestic telephone operating and wireless
companies

John F. Raposa
GTE Service Corporation
600 Hidden Ridge, HQE03J27
P.O. Box 152092
Irving, TX 75015-2092
(972) 718-6969

By



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

Their Attorneys