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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

In the Matter of	)	
	)	CC Docket No. 95-116
	)	NSD-L 98-38
Local Number Portability	)	DA 98-1080

REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint") respectfully submits the following replies to the July 20, 1998 comments offered by MCI in this matter.

Specifically, Sprint vehemently disagrees with MCI's assertion that the use of the Location Routing Number ("LRN") for high-volume call-in ("HVCI") network will not necessarily increase the risk of network reliability failures, as indicated by the North American Numbering Council (NANC) HVCI Report. Sprint believes that use of LRN for the HVCI network would have a major impact on network reliability.

Existing HVCI or "choke" networks were designed specifically to ensure that network reliability is maintained at all times. Mass calling programs - such as those used by radio stations, for example - have the potential to tax even the existing choke network arrangements. If the LRN architecture were forced to support such mass calling programs, the call volume loads would literally bring the telecommunications network to its knees.

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By way of illustration, Sprint offers the following tables which outline the potential impact of mass calling programs in transactions per second ("TPS") on the service control points ("SCPs") used in the LRN architecture. For example, Table 1, Scenario 1 tracks a call-in situation involving a radio station with an audience of 100,000 listeners in one service provider's operating area. If 60% of those listeners call in for a major give-away program, the potential impact would be 60,000 TPS. Even assuming a rather meager 10% participation rate, the impact would be 10,000 TPS. Table 2 sets up the same four scenarios, but this time assumes that 10 radio stations are participating in the give-away program at precisely the same hour.

TABLE 1

	Scenario 1	**Scenario 2**	**Scenario 3**	**Scenario 4**
Mass Calling Customer Base	100,000	100,000	100,000	100,000
Percent Off Hook	60%	50%	30%	10%
TPS	**60,000**	**50,000**	**30,000**	**10,000**

TABLE 2

TPS for 10 Simultaneous Mass Calling Events	**600,000**	**500,000**	**300,000**	**100,000**
Note: (1) TPS - Transactions Per Second				
(2) Service Control Points (SCPs) TPS capacity - some vendors offer 850 TPS with others offering 1,500 - 1,800 TPS.				

The LRN architecture supporting Local Number Portability ("LNP") is only as reliable as the service provider with the lowest SCP TPS capacity. If that service provider's SCP is engineered to handle 1,800 TPS, then that service provider would need 55 times its existing network capacity to handle 10

simultaneous mass calling events, as evidenced in Table 2, Scenario 4 above. That same service provider would need 333 times its engineered network capacity to handle the call volumes produced by 10 simultaneous mass calling events, as outlined in Table 2, Scenario 1. The Commission must agree that such an outcome is unreasonable.

Sprint asserts that the industry has worked together over the last year to analyze the effects of choke networks on the public switched network. As is evidenced by the comments filed in this matter, that analysis has lead all parties - except MCI - to the same conclusion as that proposed by NANC. MCI's reasoning on this issue is seriously flawed. Sprint urges the Commission to deny MCI's request to have the NANC spend any further time reviewing HVCI and instead adopt NANC's recommendation.

Respectfully submitted,
SPRINT CORPORATION

By _____

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August 10, 1998

CERTIFICATE OF SERVICE

I, Pete Sywenki, hereby certify that I have on this 10th day of August 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of Sprint Corporation" in the Mater of Local Number Portability, CC Docket No. 95-116, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.

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