

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Telephone Number Portability

North American Numbering Council
Report on High Volume Call-in Networks

CC Docket No. 95-116
NSD-L 98-83

RESPONSE OF BELL ATLANTIC

Bell Atlantic¹ supports the recommendations of the North American Numbering Council concerning the provision of number portability for high volume call-in networks. There is broad consensus in the industry that an LRN-based form of number portability cannot be implemented in the near future and that the NANC-recommended approach is a good substitute. Bell Atlantic does not object to MCI's proposal that NANC look at this issue again in the future and report to the Commission if the situation has changed.²

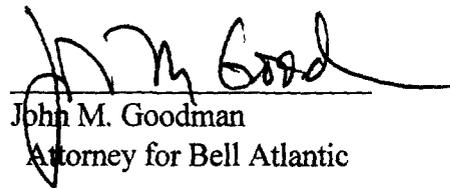
Bell Atlantic does disagree with MCI on another point, however. MCI argues that the cost a carrier incurs to augment its own trunking facilities to support number portability for high volume call-in services is not a "carrier specific" cost under the Commission's number portability cost recovery rules. Rather these individual carrier expenditures should be deemed "shared costs" and,

¹ Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc.; New York Telephone Company and New England Telephone and Telegraph Company.

² MCI at 4.

as a result, paid for by all telecommunications carriers.³ The Commission should reject MCI's request. These augmentations are no different from those already undertaken by carriers to provide number portability, such as the augmentation of SS7 facilities, and which are plainly "carrier specific" under the Commission's rules. MCI claims that these upgrades should be treated as shared because they "benefit the network in general -- that is, all carriers and end users -- rather than just the specific carrier to whom the HVCI numbers have been ported."⁴ If this were the standard, it would eliminate the distinction between the two categories and turn all carrier-specific number portability costs into shared costs.

Respectfully submitted,



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³ MCI at 5-6.

⁴ MCI at 6.