

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

In the Matter of

Request For Expeditious Review of the Transfer of the  
Lockheed Martin Communications Industry Services Business

CC Docket No. 92-237

NSD File No. 98-151

**COMMENTS OF SBC COMMUNICATIONS INC.**

SBC Communications Inc. ("SBC"), on behalf of its subsidiaries providing wireline and wireless services,<sup>1</sup> submits the following comments on the proposed transfer of North American Numbering Plan Administration ("NANPA") and Local Number Portability Numbering Plan Administration Center ("NPAC") responsibilities from Lockheed Martin IMS to a corporation controlled by Warburg, Pincus & Co.

Allowing the transfer to proceed is the only practical alternative available at this point. While SBC remains concerned that a Warburg-controlled NANPA might be subject to undue influence due to Warburg's investments, there is no other current alternative that allows the continuation of NANPA and NPAC responsibilities by the same entity. Lockheed asserts that no prospective purchaser other than Warburg has been willing to take over both the NANPA and NPAC obligations, and Warburg has stated that it does not intend to reduce its investments in other telecommunications carriers to under ten percent, as would be required to comply with

---

<sup>1</sup> Southwestern Bell Telephone Company, Pacific Bell, Nevada Bell, Southern New England Telephone Company, Southwestern Bell Wireless, Pacific Bell Wireless, and SNET Wireless.

