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September 23, 2003

John B. Muleta  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> St. S.W.  
Washington, D.C. 20554

*Re: CC Docket No.95-116, Wireless Local Number Portability Implementation*

Dear Mr. Muleta:

AT&T Wireless Services, Inc. ("AWS") submits this response to your letter dated September 9, 2003, regarding AWS' implementation efforts to meet the local number portability ("LNP") deadline of November 24, 2003.

As discussed below, AWS has devoted substantial resources and time to implement LNP by the Federal Communications Commission's ("FCC" or "Commission") November deadline. AWS has opened its switches for LNP; certified its systems with the Number Portability Administration Center ("NPAC"); trained personnel to handle porting requests and procedures; engaged in intercarrier testing; and negotiated LNP agreements with other carriers. AWS, however, has encountered significant difficulty in establishing LNP agreements with certain carriers (both wireless and wireline), which are critical to AWS' ability to port. Further, as AWS has noted in other filings before this Commission, there remain substantial unresolved issues regarding wireless-wireless and wireless-wireline porting that have yet to be addressed by the Commission. AWS is concerned that the lack of such guidance will further complicate and hinder the porting process, despite all our efforts to meet the mandate.

Set forth below are our specific responses to your questions with respect to the local Seattle market in which we provide service. For purposes of responding to this letter, we have defined "local Seattle market" as comprising the following counties, which are part of the Seattle Metropolitan Statistical Area ("MSA"): King, Pierce, and Snohomish counties.

**For all Porting:**

- 1. Identify the switches for which your company has received a request for the provision of LNP by another carrier. Identify the carriers that have submitted requests for the provision of LNP to your company.**

AWS has not received requests to open specific switches for portability. Instead, pursuant to agreed-upon industry guidelines, AWS has received requests for portability for particular MSAs, including the Seattle MSA.

The following wireless carriers submitted requests to AWS for the provision of LNP in the local Seattle market: Cingular Wireless, El Dorado Cellular, Nextel Communications, Sprint PCS, T-Mobile, Qwest Wireless, and Verizon Wireless. No wireline carriers submitted such requests to AWS for LNP in the local Seattle market. Of course, under the FCC's rules, only one carrier needs to submit a request to open a switch for LNP.<sup>1</sup>

For your information, the following switches serve the local Seattle market, as defined above:

- Seattle MSC 1, STTLWA02CM1
- Seattle MSC 2, STTLWA02CM4
- Tacoma MSC, TACMWA02CM3
- Tacoma RDC (GSM), TACNWADNCMO

- 2. Indicate whether your company has completed testing with the Number Portability Administration Center ("NPAC") and the date such testing was completed. If testing is not complete, indicate the date by which testing will be completed.**

AWS completed testing with the NPAC and received certification for its initial local service management system ("LSMS") in late 1998 in preparation for Phase I number portability. AWS completed testing with the NPAC and received certification of its service order administration ("SOA") in May 2003. AWS plans to complete certification/registration of its *second* LSMS (which will be used for disaster recovery) in the first week of October 2003.

- 3. Indicate whether your company has completed training of customer service personnel. Indicate the length and scope of the training provided. If training is not complete, indicate the date by which training will be completed.**

There are various personnel that need to be trained in order to implement LNP. AWS has implemented training programs for (i) its customer services group handling incoming calls from customers and providing technical support and trouble shooting; (ii) its porting administration group ("PAG"), which is responsible for trouble-shooting porting issues and problems with other

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<sup>1</sup> See 47 C.F.R. Sections 52.23(b)(2)(ii) and (iii).

carriers and the NPAC; and (iii) all of its sales and activation channels.<sup>2</sup> The scope of training varies by group but generally encompasses a variety of areas, including training on systems for porting activation, initiation, and inter-carrier communications; new processes and procedures for handling ports; and trouble-shooting.

The duration of training depends on the group being trained and their relative responsibilities, and may vary from several hours to several days. Training began in July 2003 and will be ongoing and complete by November 23, 2003.

**For Porting with Other Wireless Carriers:**

**4. Indicate whether your company has completed intercarrier testing. Identify the carriers your company has tested with, and the date such testing was completed. If testing is not complete, indicate the date by which testing will be completed.**

AWS and the industry has implemented four phases of intercarrier testing for wireless carriers. The four phases of intercarrier testing are: (1) network testing (executing call delivery tests); (2) SOA/intercarrier communications procedure (ICP) (testing a carrier’s ability to communicate with other carriers and exchange port transactions with the NPAC); (3) end to end (testing communications with other carriers and back office systems that provision service to the ported number); and (4) round robin (testing back office systems and requiring three carriers to test porting the same number through the porting life cycle). AWS has generally completed most intercarrier testing in the first two phases with the major wireless carriers.

Because AWS has tested with wireless carriers in a variety of markets but not with all carriers in every single market such as the local Seattle market, this response is not specific to the local Seattle market. Set forth below is a chart of the status of AWS’ testing efforts with the major wireless carriers and approximate dates of test completion. Where AWS has yet to complete intercarrier testing with a specific carrier, the chart lists approximate projected dates that it plans to complete such intercarrier testing.

<b>Carrier</b>	<b>Network</b>	<b>SOA/ICP</b>	<b>End to End</b>	<b>Round Robin</b>
Verizon Wireless	8/15/02	8/8/03	10/10/03	10/3/03
Cingular	8/21/02	9/19/03	9/26/03	10/3/03
Sprint PCS	8/21/02	9/26/03	10/27/03	Verbally indicated that it did not want to participate in industry testing for this phase
Qwest Wireless	10/14/02	Despite AWS attempts,	Despite AWS attempts, Qwest has not	Despite AWS attempts, Qwest has not provided

<sup>2</sup> Some of AWS’ training of personnel is not specific to the local Seattle market.

<b>Carrier</b>	<b>Network</b>	<b>SOA/ICP</b>	<b>End to End</b>	<b>Round Robin</b>
		Qwest has not provided firm test dates	provided firm test dates	firm test dates
Nextel Communications	Did not participate in industry testing for this phase	10/10/03	10/24/03	10/3/03
T-Mobile	Did not participate in industry testing for this phase	Rescheduled to 10/3/03	11/3/03	10/3/03
Alltel	Did not participate in industry testing for this phase	10/31/03	10/21/03	Not applicable
Cricket Communications	Did not participate in industry testing for this phase	8/22/03	11/7/03	Not applicable
US Cellular	Did not participate in industry testing for this phase	10/3/03	10/3/03	10/3/03

Although AWS expects to complete all four phases of intercarrier testing before the November 2003 deadline with at least some wireless carriers, AWS continues to negotiate with various wireless carriers the intercarrier agreements establishing LNP obligations. Some carriers have stated that porting agreements must be finalized before they can complete intercarrier testing through phase 4 with AWS, which may affect the testing schedule.

**5. If your company provides roaming services, indicate whether your company has updated business arrangements with non-porting roaming partners to ensure that they will support roaming for customers with ported numbers.**

Commencing in the end of 2000, AWS began working with its roaming partners (both porting and non-porting) to ensure that they would be prepared to support the roaming of customers with pooled and ultimately ported numbers. In particular, AWS focused its efforts on ensuring its partners’ networks and software were updated to accommodate mobile identification number/mobile directory number (“MIN/MDN”) separation and their billing and settlement systems were modified to support the roaming of ported numbers. As a result of testing it has conducted and its “live” experience with pooled numbers, AWS has a high degree of confidence that nearly all of its roaming partners will be able to support roaming for customers with ported numbers.

**For Porting with Wireline Carriers:**

**6. Indicate whether your company has coordinated with wireline carriers to facilitate porting. Identify the carriers your company has coordinated with and the date any coordination was completed.**

AWS has made extensive efforts to coordinate with the major wireline carriers to facilitate porting, including most significantly, negotiating or attempting to negotiate intercarrier agreements for the establishment of business arrangements and intercarrier communications processes for LNP; and preparing to test with these carriers.<sup>3</sup> However, AWS has been unable to negotiate successfully a single agreement with a wireline carrier. Although the reason for the delays have varied from carrier to carrier, it is abundantly clear to AWS that, as a general matter, wireline carriers have no interest in negotiating to resolve issues in these agreements. The two major obstacles to AWS’ ability to enter into an LNP agreement with wireline carriers have been: (i) wireline carriers’ insistence that porting essentially be limited to those instances where the customer continues to maintain some geographic association with the rate center; and (ii) the constant shifting of some wireline carriers’ position as to the form that the LNP agreement should take (e.g., service level agreement; amendment to interconnection agreement; tariff; or even web site), and for those carriers that support an agreement, their constant offering of new forms of agreement (with Qwest holding the record at proposing three different LNP agreements).

Set forth below is a chart of the wireline carriers with which AWS has attempted to negotiate LNP agreements, with the approximate dates that AWS first contacted the carrier to initiate negotiations; as well as the approximate subsequent dates of contact by AWS and/or communications between the carriers; major obstacles in negotiations; and the current status of such negotiations.

Carrier	Approx. Date of	Subsequent approx.	Major Obstacles	Status
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<sup>3</sup> Intercarrier testing efforts are discussed below in response to question 7.

	<b>AWS Initial contact</b>	<b>contact dates</b>		
AT&T	1/31/03	2/21/03 03/04/03 7/14/03 7/30/03 8/19/03	Failed to respond to the draft LNP agreement AWS proposed (which is based on the CTIA model agreement). Unable to get AT&T to start negotiations	Negotiations have not begun
BellSouth	12/27/02	1/31/03 2/21/03 3/3/03 3/25/03 4/18/03 5/6/03 5/16/03 5/28/03 7/11/03 7/14/03 7/16/03 7/31/03 8/12/03 8/21/03 8/29/03 9/04/03	Continual change of position on the form of LNP agreement that it would negotiate.  On September 4, BellSouth forwarded an entirely new LNP agreement to AWS and proposed that this be part of an interconnection agreement.	AWS sent an escalation letter to BellSouth on 9/12/03.
Comcast	5/9/03	5/12/03 5/22/03 6/2/03 6/9/03	Rate center issue.  Failed to respond to the draft LNP agreement AWS proposed (which is based on the CTIA model agreement).	Still negotiating
Cox	3/7/03	5/16/03 6/9/03 6/10/03	Rate center issue.  Failed to respond to the draft LNP agreement AWS proposed (which is based on the CTIA model agreement).  Insists that LNP agreement be part of interconnection agreement.	Still negotiating
Qwest	1/7/03	2/21/03 6/10/03	Rate center issue.	Still negotiating

<b>Carrier</b>	<b>Approx. Date of AWS Initial contact</b>	<b>Subsequent approx. contact dates</b>	<b>Major Obstacles</b>	<b>Status</b>
		7/3/03 7/16/03 7/24/03 8/5/03 8/21/03 8/28/03 9/3/03 9/4/03 9/9/03 9/19/03	Proposed 3 different forms of LNP agreement throughout negotiations, most recently on 9/5/03.  Insists that LNP agreement be part of interconnection agreement.	
SBC	1/6/03	1/31/03 2/7/03 2/17/03 3/13/03 6/2/03 6/13/03 6/25/03 7/16/03 7/24/03 7/31/03 8/7/03 8/11/03 8/12/03 8/13/03 8/19/03 8/27/03 8/28/03 9/5/03 9/8/03 9/18/03	Rate center issue  Failed to respond to the draft LNP agreement AWS proposed (which is based on the CTIA model agreement).  Insisted on negotiating from SBC's interconnection amendment containing language appropriate for CLECs but not wireless carriers.  Onerous and detailed OSS language.	Still negotiating
Sprint	1/16/03	1/31/03 2/21/03 2/25/03 3/28/03 4/9/03 4/22/03 4/26/03 5/16/03	Rate center issue  Constant change in position on which agreement and form of agreement to negotiate.	Still negotiating

<b>Carrier</b>	<b>Approx. Date of AWS Initial contact</b>	<b>Subsequent approx. contact dates</b>	<b>Major Obstacles</b>	<b>Status</b>
		5/21/03 5/28/03 5/30/03 6/5/03 6/17/03 6/18/03 7/16/03 8/26/03 9/3/03 9/15/03		
Time Warner	4/2/03	4/3/03 5/6/03 7/24/03	Negotiations have yet to begin.  Failed to respond to the draft LNP agreement AWS proposed (which is based on the CTIA model agreement).	Negotiations have yet to begin.
Verizon	12/27/03	1/31/03 2/21/03 3/4/03 3/12/03 6/24/03 6/25/03 7/9/03 7/16/03 7/30/03 7/31/03 8/14/03 8/20/03 8/21/03 8/22/03 8/26/03 8/27/03 9/5/03 9/19/03	Constant change in positions regarding form of agreement to negotiate  After months of negotiation on addendum proposed by Verizon, Verizon proposed entirely new stand-alone agreement on 8/26.	AWS sent escalation letter to Verizon on 9/12/03.

In the absence of such agreements, it is impossible for AWS to determine whether it will be able to engage in the porting process with these carriers.



**7. Indicate whether your company has completed intercarrier testing with wireline carriers. Identify the carriers your company has tested with and the date such testing was completed. If testing is not complete, indicate the date by which testing will be completed.**

AWS and the wireless industry have also implemented four phases of intercarrier testing with wireline carriers. The four phases of intercarrier testing are: (1) network testing (executing call delivery tests); (2) SOA/intercarrier communications procedure (ICP) (testing a carrier's ability to communicate with other carriers and exchange port transactions with the NPAC); (3) end to end (testing communications with other carriers and back office systems that provision service to the ported number); and (4) round robin (testing back office systems and requiring 3 carriers to test porting the same number through the porting life cycle).

AWS has requested that all the major wireline carriers participate in intercarrier testing with it; however, to date, only Sprint and SBC have completed some network testing with AWS. Sprint completed the network testing phase (and no other phases) on July 25, 2002, while SBC completed network testing (and no other phases) with AWS on January 15, 2003. The reasons that wireline carriers have refused to participate in intercarrier testing with AWS vary, but some have stated that they cannot test with AWS in the absence of a finalized porting agreement. Thus, it is uncertain when testing with the wireline carriers will be complete.

**Conclusion**

As demonstrated above, AWS is making diligent efforts to meet the Commission's LNP mandate. However, without guidance from the Commission on critical outstanding issues raised in the pending CTIA petitions, and related petitions and ex partes, there likely will be significant delays and operational problems with wireless to wireless porting, and it is highly questionable whether wireline to wireless porting will proceed at all. This will not only adversely affect the carriers that are in good faith attempting to support the porting process, but will also negatively affect customers who desire to port their numbers. Accordingly, AWS urges the Commission to avoid these adverse impacts by immediately providing the guidance requested by AWS and the other wireless carriers on these critical pending matters.

If you have any questions or would like to discuss this response, please call me.

Sincerely,

/s/

Douglas I. Brandon