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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into temporary) Docket No. ~~95-0896-TP~~
local telephone number portability)
solution to implement competition) Filed: 11/06/95
in local exchange telephone markets)
_____)

**BELLSOUTH MOBILITY INC'S
POSTHEARING STATEMENT OF ISSUES AND POSITIONS
AND BRIEF**

BELLSOUTH MOBILITY INC (BMI) hereby files this posthearing brief, including a statement of issues and positions, pursuant to Rule 25-22.056, Florida Administrative Code and Order No. PSC-95-0896-PCO-TP.

Introduction

The Stipulation approved by the Commission on September 12, 1995, appropriately indicates that Remote Call Forwarding (RCF) should be the interim service provider number portability solution. BMI is not a party to the stipulation and has no number portability obligations, but will be affected by whatever solution the Commission selects in this docket. Although RCF appears to be the least onerous number portability solution available at this time, the Commission should keep in mind its negative effects on customers, including commercial mobile radio service (CMRS) customers, when determining a permanent service provider number portability solution. Remote Call Forwarding interferes with the proper function of several services offered or contemplated by CMRS and other telecommunications providers, such as BMI's Pro-Link,

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calling number identification service and the ability to identify published calling numbers on customer bills.

ISSUES

ISSUE 1: What is the definition of temporary number portability pursuant to Section 364.16(4), Florida Statutes?

** BMI has no objection to the service provider portability definition included in the stipulation signed by the parties and approved by the Commission in this docket (the "Stipulation"). **

ISSUE 2: What technical solutions will be available by January 1, 1996, to provide temporary number portability?

** BMI agrees with the terms of the Stipulation that Remote Call Forwarding will be the only technical solution available by January 1, 1996, and also agrees that LECs should continue to negotiate other feasible options with interested parties, particularly in light of the adverse effect of remote call forwarding on CMRS services. **

ISSUE 3: What are the advantages and disadvantages of each solution identified in Issue 2?

** Remote Call Forwarding interferes with the proper function of several services offered or contemplated by CMRS providers, such as BMI's Pro-Link, calling number identification service and the ability to identify calling numbers on customer bills. **

Discussion:

All parties to this docket agree that while Remote Call Forwarding is an imperfect method of provisioning service provider number portability, it is the only method that is both technically feasible and readily available at this time. The Commission should not lose sight, however, of RCF's limitations as a number portability solution and the effect of those limitations on customers, including CMRS customers. Further, RCF results in an

inefficient use of resources: it requires the use of two telephone numbers to reach one customer.¹

The technical process by which RCF is accomplished causes the loss of full CLASS feature transparency. [Tr. 28, 54, 212; Ex. 7] As a result, some services desired by customers will not function properly if the calling number is "ported" via RCF.

This loss of CLASS feature transparency affects CMRS customers as well as landline customers. Whenever the calling party's number is ported via RCF, the called party -- whether a LEC customer, an ALEC customer or a CMRS customer -- will lose the value of any service that identifies the calling party's number to the called party. [Tr. 231 - 232] Calling party identification services can be of particular importance to cellular customers, who typically incur airtime charges for each call they receive and accept. The Commission should be aware of these adverse effects when ordering its interim number portability solution.

ISSUE 4: What costs are associated with providing each solution identified in Issue 2?

** Although not a direct cost of providing remote call forwarding, BMI notes that there are substantial unquantifiable costs to CMRS providers associated with the adverse impact of Remote Call Forwarding on various cellular services offered by BMI and others. These include lost revenues associated with the above-mentioned services. **

¹ The Commission's recent experience in Docket No. 941272-TL shows that increasing demand for telephone numbers accelerates area code exhaustion. Given the expense and confusion that accompanies area code changes, an interim number portability solution that contributes to area code exhaust is less than optimal.

Discussion:

Customers prefer not to purchase services perceived to be of limited utility. While services that identify calling parties are of particular value to cellular customers who incur charges on a per-call basis, RCF will reduce the utility (and therefore the sales) of these services. The Commission should note the associated loss of revenue to service providers, including CMRS providers, as one of the unquantifiable costs associated with implementation of RCF as an interim service provider number portability solution.

ISSUE 5: How should the costs identified in Issue 4 be recovered?

** No position. **

ISSUE 6: What is/are the most appropriate method(s) of providing temporary number portability?

** While Remote Call Forwarding appears to be the least onerous method that is technically feasible at this time, it adversely affects CMRS customers. **

ISSUE 7: What are the appropriate parameters, costs and standards for the method(s) identified in Issue 6?

** No position. **

ISSUE 8: Should this docket be closed?

** Yes. **

Respectfully submitted this 6th day of November, 1995.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of BellSouth Mobility Inc's Posthearing Statement and Issues and Positions and Brief in Docket No. 950737-TP has been furnished this 6th day of November, 1995, to the following:

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