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**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of )  
 )  
Application by SBC Communications Inc., )  
The Ohio Bell Telephone Company d/b/a )  
Ameritech Ohio, And Southwestern Bell ) CC Docket No. \_\_\_\_\_  
Communications Services, Inc. d/b/a )  
Ameritech Long Distance for Provision )  
Of In-Region InterLATA Services in Ohio )

**AFFIDAVIT OF JEFFREY A. MONDON  
ON BEHALF OF AMERITECH**

**STATE OF CALIFORNIA** )  
 )  
**COUNTY OF CONTRA COSTA** )

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NUMBER PORTABILITY AFFIDAVIT**

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I, Jeffrey A. Mondon, being of lawful age and duly sworn upon my oath, do hereby depose and

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state as follows:

1. My name is Jeffrey A. Mondon. My business address is 2600 Camino Ramon, Room 2S650BB, San Ramon, California. I support SBC Operations, Inc. ("SBC") and serve as Area Manager - Network Regulatory - Numbering. I am responsible for area code relief planning and implementation and policy development for long-term Number Portability ("LNP"), among other numbering issues, for the 13-state SBC region, including Ohio.

## **PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND**

2. I received my Bachelor of Science in Business Administration from San Francisco State University in 1984. From 1988 until 1997, I held numerous management positions within Customer Service, Claims, and Administrative Service departments for Crum and Forester, Vision Service Plan and Plymouth Rock Assurance Corporation. In 1997, I was hired by Pacific Bell Telephone Company ("Pacific") as an Area Code Relief Planner, with the responsibility of coordinating the telecommunications industry's area code relief planning efforts in California and Nevada. Additionally, my work group served as Central Office Code Administrator ("Code Administrator"). This work group provided non-discriminatory access to telephone numbers, both before and after the adoption of numbering guidelines. In 1999, I was appointed to the position of Area Manager-NPA Relief Planning & Implementation, with the responsibility of overseeing all NPA relief planning and implementation efforts for Pacific and Nevada Bell Telephone Company ("Nevada Bell"). Since that time, I have assumed responsibility for policy development for long-term Number Portability (LNP) and other numbering issues for SBC on a 13-state basis, including Ohio. I have represented SBC on the North American Numbering Council's ("NANC") Number Resource Optimization Working Group.

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### **EXECUTIVE SUMMARY**

3. My affidavit describes the steps that The Ohio Bell Telephone Company d/b/a Ameritech Ohio or Ameritech (“Ameritech”) has taken to implement Number Portability in compliance with the Telecommunications Act of 1996 (the “Act”) and associated regulatory requirements.<sup>1</sup> Specifically, I discuss actions taken by Ameritech to comply with the requirements of Section 271, checklist item (xi), and relevant FCC orders relating to number portability. Generally speaking, Ameritech’s actions with respect to this checklist item are similar to the actions explained in affidavits filed by Southwestern Bell Telephone (“SWBT”) in the Texas, Oklahoma and Kansas applications, which were approved by the FCC as meeting the requirements of Section 271 of the Act.<sup>2</sup>

### **AMERITECH COMPLIANCE WITH REGULATORY REQUIREMENTS**

4. Number portability is defined as the ability of users of telecommunications service to retain, at the same location, their existing telephone numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another. Checklist item (xi) in section 271 of the Act requires the provision of number portability in full compliance with the FCC’s regulations. Ameritech has not only met its obligations under the Act, through its deployment of long term number portability (“LNP”) in Ohio, but

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<sup>1</sup> The Ohio Bell Telephone Company, an Ohio corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Ameritech Corporation is a wholly owned subsidiary of SBC Communications, Inc. Ohio Bell offers telecommunications services and operates under the names “Ameritech” and “Ameritech Ohio” pursuant to trade name registrations with the state of Ohio.

<sup>2</sup> Memorandum Opinion and Order, Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecom Act of 1996 to Provide In-Region, InterLATA Services in Texas, 15 FCC Rcd 18,354, 18,535-536, ¶¶ 371-372 (2000); Memorandum Opinion and Order, Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance, for Provision of In-Region, InterLATA Services in Kansas and Oklahoma, CC Docket No. 00-217, FCC 01-29, ¶ 255 (rel. Jan. 22, 2001).

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has done so in a collaborative manner by its participation and leadership in state and federally sponsored industry groups.

5. Ameritech has not only successfully completed the deployment of LNP in its top 100 Metropolitan Statistical Areas (“MSAs”), specified within the FCC’s requirements that are within the state of Ohio, but also in all of the other exchanges it serves. As a result, as of October 1999, Ameritech has equipped all of its 292 switches within its operating territory in Ohio with LNP capabilities, representing 100% of its access lines. Ameritech’s full compliance with the Act and federal regulations has allowed competing carriers to port, using LNP, over 219,000 telephone numbers from Ameritech through April 2001.
6. In addition, Ameritech continues to be an active participant in numerous industry groups to resolve issues and to develop and improve processes to minimize service disruptions for customers switching service providers and retaining their telephone numbers.
7. Furthermore, Ameritech’s revised federal tariffs to recover its LNP costs are fully compliant with the FCC’s order of July 1, 1999.

## **ACT AND FCC REQUIREMENTS**

8. The Act defines number portability as “the ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another.” 47 U.S.C § 153(3). Under the Act, Local Exchange Carriers (“LECs”) are required to “provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission.” *Id.*, § 251(b)(2). Checklist item (xi) of section 271 requires interim number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible, until the Commission issues regulations requiring

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long-term number portability. After that date, the 271 applicant must be in full compliance with the number portability regulations. In addition, the FCC established the requirements of long term number portability in its First Report and Order, First Memorandum Opinion and Order on Reconsideration, Second Report and Order, Third Report and Order and Second Memorandum Opinion and Order on Reconsideration.<sup>3</sup>

9. The LNP deployment requirements established in the FCC's orders include the following:

- a) specific performance criteria;
- b) implementation rules and schedule;
- c) adherence to technical, operational, architectural and administrative requirements established in the FCC's Second Report and Order; and
- d) cost recovery in accordance with the FCC's Third Report and Order.

10. In its First Report and Order, the FCC set forth nine performance criteria that local exchange carriers' number portability architecture must meet. The FCC acknowledged the planned use within the industry of Location Routing Number ("LRN") for providing number portability, and precluded the Query on Release ("QoR") method.<sup>4</sup> In its First Memorandum Opinion and Order on Reconsideration, the FCC removed criterion four, reaffirmed the prohibition of

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<sup>3</sup> First Report and Order and Further Notice of Proposed Rulemaking, Telephone Number Portability, 11 FCC Rcd 8352 (1996) ("First Report and Order"); First Memorandum Opinion and Order On Reconsideration, Telephone Number Portability, 12 FCC Rcd 7236 (1997) ("First Memorandum Opinion and Order On Reconsideration"); Second Report and Order, Telephone Number Portability, 12 FCC Rcd 12,281 (1997) ("Second Report and Order"); Third Report and Order, Telephone Number Portability, 13 FCC Rcd 11,701 (1998) ("Third Report and Order"); Second Memorandum Opinion and Order on Reconsideration, Telephone Number Portability, 13 FCC Rcd 21,204 (1998) ("Second Memorandum Opinion and Order on Reconsideration").

<sup>4</sup> With LRN, an end user remaining at the same location that changes to a different local service provider may retain or "port" their existing telephone number. Porting is accomplished by the assignment of an LRN, which identifies the central office switch of the end user's service provider for routing purposes, to each ported telephone number. The LRN's format is NXX-NXX-XXXX where "N" represents the digits 2-9 and "X" represents the digits 0-9. The first six digits are comprised of an NPA-NXX assigned to the new local service provider's switch. The last four digits of the LRN are not currently used for routing and therefore may be assigned any value. Generally, all numbers ported to the same switch will be assigned the same LRN. Attachment A describes how the LRN method of providing number portability is performed. Under QoR, the signaling used to set up a telephone call would be routed to the end office switch to which the dialed telephone number was originally assigned according to the NPA-NXX of the dialed number. If the dialed number has been transferred to another carrier's switch, the previous switch in the call path would query the database to obtain the routing information. The call would then be completed to the new carrier's switch.

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QoR, and reaffirmed the obligation that the remaining eight performance criteria, listed below, be met:

- a. support existing network services, features and capabilities;
- b. efficiently use numbering resources;
- c. not require end users to change their telecommunications numbers;
- d. not result in unreasonable degradation in service quality or network reliability when implemented;
- e. not result in any degradation of service quality or network reliability when customers change carriers;
- f. not result in a carrier having a proprietary interest in any long-term method;
- g. be able to accommodate location and service portability in the future; and
- h. have no significant adverse impact outside the areas where portability is deployed.<sup>5</sup>

11. Ameritech has complied with the eight criteria set forth by the FCC for providing number portability, through its use of the LRN method, and has provided the CLECs with unbundled access to its downstream number portability databases.<sup>6</sup> Ameritech has met the requirements established in the FCC's orders in providing interim and long-term number portability.

### **AMERITECH HAS IMPLEMENTED LNP FOR ALL OF ITS SWITCHES IN OHIO**

12. In its First Report and Order, the FCC directed that number portability implementation commence in the top 100 MSAs according to a phased deployment schedule that began October 1, 1997, and concluded December 31, 1998.

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<sup>5</sup> Criterion four required that any long-term number portability methods must not require telecommunications carriers to rely on databases, other network facilities, or services provided by other telecommunications carriers in order to route calls to the proper termination point. Based on an analysis of the record, the FCC concluded that criterion four should be removed because all interconnected carriers are likely to rely upon each other's networks to some extent to process and route calls in a market in which a long-term number portability method has been deployed.

<sup>6</sup> The FCC found LRN to be consistent with the performance criteria it had established in the First Memorandum Opinion and Order on Reconsideration.

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13. In addition to the schedule for the largest 100 MSAs, the FCC also established rules for the following:
- a) waiver or stay of implementation schedule dates;
  - b) switch selection for the 100 largest MSAs; and
  - c) implementation for MSAs beyond the initial 100 MSAs.
14. The FCC's mandatory LNP deployment schedule for the five Ameritech states, which includes Ohio, is included in Attachment B of this document. Ameritech successfully completed deployment of LNP in its top 100 MSAs in accordance with the FCC's requirements as shown in Attachment B.
15. In the First Report and Order, the FCC ruled that, after implementation of the initial 100 MSAs, each LEC must make number portability available in smaller MSAs within six months after a bona fide request has been made by another telecommunications carrier. Additionally, in the First Memorandum Opinion and Order on Reconsideration, the FCC also established rules for requesting LNP deployment in switches located in the largest 100 MSAs that were not selected in the switch selection process. The FCC also adopted the time frames proposed by Ameritech for converting the selected switches to LNP. The state commissions were charged with developing the most efficient procedures, overseeing the switch selection process and reviewing the switch requests to ensure that the requests were not unreasonable. Switch selections were required to be completed no later than nine months prior to the implementation deadline for each MSA. The order also provided that carriers could negotiate agreements to exclude specific switches within the MSA in exchange for conversion of additional switches within or outside of the MSA.
16. Ameritech worked with the industry and the OPSC to develop and execute an appropriate switch selection process.

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17. While switch selection was essential for number portability implementation, it was only one step in a number of technical and administrative requirements that had to be met so that number portability could be successfully deployed. Successful deployment required that numerous other steps occur on a prearranged schedule, in close succession and within a specific time frame. In coordination with the industry and state and federal regulators, Ameritech proactively worked to establish the framework for number portability deployment in Ohio and the other Ameritech states. Ameritech chaired the majority of the subcommittees that developed and wrote the technical specifications that became the foundation for the national LNP standards.<sup>7</sup> In addition to its work with the industry to establish administrative, operational and intra- and inter-company testing processes, Ameritech initiated extensive internal network and support system modifications and additions required for implementation of the LRN method of number portability. What follows is a brief description of these activities:

- a) Switches: Every end office switch has been equipped with LRN software. In some instances this required a processor upgrade or replacement. In addition, the tandem and operator service switches serving these customers have been equipped for LNP. The number portability software loads, along with the required generic and hardware upgrades, were completed in compliance with the FCC schedules.
- b) Signal Transfer Points ("STPs"): The queries required for number portability have increased the traffic load on the STPs serving the area of portability. Additional SS7 link ports to the portability databases and to the STPs were provided where required to accommodate the increased load.
- c) Number Portability Database: Number portability database functionality, including LRN functionalities, was provided for all Ameritech region MSAs via the Lucent Advantage Service Control Point ("SCP") architecture. Besides handling LNP (routing) queries, the SCPs provide Global Title Translation ("GTT") functions to properly route Signaling System 7 ("SS7") messages that require Line Information Database ("LIDB") or other database interactions such as Customer Local Area Signaling Services ("CLASS"), Advanced Intelligent Network ("AIN") and Alternate Billing Service ("ABS") validation.

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<sup>7</sup> Ameritech chaired the Midwest Operations, Switching Requirements, SCP Requirements and the NPAC subcommittees of the Illinois Commerce Commission LNP Steering Committee.

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- d) Local Service Management System (“LSMS”): A new service management system, called the LSMS, was developed for number portability. It provides provisioning functionality to the SCPs. It also provides operations, administration and maintenance (“OA&M”) functionalities. The LSMS serving Ameritech is located in Elgin, Illinois.
- e) Number Portability Administration Center Service Management System (“NPAC SMS”): The NPAC SMS is a shared database administered by a neutral third party. The NPAC provider administers and maintains the NPAC database, which contains information on all ported numbers in a particular geographic area. This information is downloaded to the Local Service Management System (“LSMS”) and subsequently into the SCP databases. The FCC, in its Second Report and Order, adopted the NANC’s selection of Lockheed Martin as the NPAC supplier for Northeast, Mid-Atlantic, Midwest and Southwest regions. Interconnection between Ameritech’s LSMS and the NPAC for number portability service order activation and database downloads is in place.
- f) Testing: Ameritech worked extensively with the industry through the Illinois Testing Committee, which was comprised of experts from the various participants of the Illinois LNP Steering Committee, including Ameritech, AT&T, MCI, Sprint and TCG, to develop complete and thorough testing procedures and timelines. In addition to its extensive intercompany testing with multiple carriers, Ameritech also completed extensive intracompany testing in accordance with the industry test plan. The FCC LNP Field Test was conducted by Ameritech and other carriers. Ameritech participated in the Midwest Region Operations Team’s development of guidelines for LNP testing by new CLEC entrants. These guidelines were published in May 1998.
- g) Operational Support Systems (“OSS”): Ameritech implemented extensive modifications in over 100 software applications for OSSs that provide ordering, provisioning, billing and service-assurance functionalities required for the provision of number portability. Extensive testing of ordering and testing processes and systems was conducted during the intra- and inter-company testing referenced in (f) above.

18. In its Second Report and Order, the FCC adopted with minor modifications several recommendations made by the NANC with regard to technical, operational, architectural and administrative requirements for number portability. The order adopted the NANC recommendation that Lockheed Martin (now NeuStar) serve as local number portability database administrator for the Midwest Region (paragraph 33). The FCC also adopted the recommendations set forth in the Technical & Operational (“T&O”) Task Force and

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Architecture Task Force Reports. These technical, operational and administrative requirements include:

- a) Inter-Service Provider LNP Operations Flows;
- b) compliance with the Functional Requirements Specifications (“FRS”) and the Interoperable Interface Specifications (“IIS”);
- c) policy of reserved and unassigned numbers;
- d) N-1 carrier call routing obligations and default routing;<sup>8</sup>
- e) policy on the treatment of disconnected ported numbers;
- f) Change Management Process to ensure the consistent and uniform provision of number portability and that individual carriers or industry segments are not disadvantaged.

Ameritech, through its SBC affiliation, continues to be an active participant in the NANC by recommending, developing and implementing new processes and procedures.

19. Ameritech is in full compliance with the requirements contained in the Second Report and Order. Ameritech has played an active role within the NANC in guiding development and resolution of these key portability requirements, including leadership roles and active participation in the NANC T&O Task Force and LNPA Working Group. Examples of this participation and leadership are as follows:

- a) Ameritech integrated the Inter-Service Provider LNP Operations Flows into its ordering and provisioning OSS modifications.
- b) Ameritech’s implementation of number portability is in compliance with both the FRS and IIS.
- c) Ameritech designed its network to handle queries required as the N-1 carrier and prearranged and anticipated default queries performed on behalf of other N-1 carriers.<sup>9</sup> Ameritech also established processes to ensure that any network management controls required to prevent potential overload conditions on default routed calls, as allowed by the FCC, are taken in a nondiscriminatory fashion.

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<sup>8</sup> The “N” carrier is the entity terminating the call to the end user, and the “N-1” carrier is the entity transferring the call to the N, or terminating, carrier.

<sup>9</sup> In the FCC’s Second Report and Order released August 18, 1997, the Commission established the rules and regulations for determining which entity would be required to make the database query to determine the service provider of the called party (N-1 Call Routing), and whether carriers could block default call (Default Routing). Ameritech is in compliance with these rules and regulations.

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- d) Ameritech integrated the process for “snapback” of disconnected ported numbers to the service provider listed in the Local Exchange Routing Guide (“LERG”) for the assigned NXX, as required by the FCC.
  - e) As a member of the LNPA Working Group, Ameritech was involved in directing the change management process in accordance with the provisions in the NANC recommendation, which was adopted by the FCC.
20. Ameritech has worked with the industry through the Midwest Region Operations Team, which has since consolidated with the OPWest Team and has now become the National Number Portability Operations Team (“NNPO”), and its implementation teams to develop processes to minimize any service disruptions for customers porting numbers when they change service providers.<sup>10</sup> Specifically, Ameritech has agreed to utilize an unconditional 10-digit trigger (“UCT”) feature for LNP porting orders. UCT became available on most LNP orders beginning April 1, 2000. UCT, which is activated on the customer’s number with the initial porting order, causes a query to be performed on all intra-switch calls to that number. From a query perspective, this makes call processing the same for intra-switch and inter-switch calls to the customer’s number since inter-switch calls are queried on all calls to NXXs where portability exists. Prior to the new service provider activating the port in the NPAC, the queries will not return an LRN, so calls will be completed to the Ameritech switch serving the customer. When the new service provider activates the port, queries will return the LRN of the new service provider, and calls to the customer’s telephone number will be routed to the new service provider’s switch. This eliminates the need to coordinate Ameritech’s disconnect translation with the new service provider’s switch translations and with any physical loop work that may be required.
21. There are some limited instances where UCT will not be available, and in these instances, Ameritech advises the CLECs that a coordinated cutover is recommended. In addition, Ameritech recommends coordination on the conversion of some large complex services

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<sup>10</sup> Ameritech chaired the Midwest Operations Committee of the Midwest Region Operations Team.

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such as DID orders. Ameritech has also developed processes for coordinating cutovers involving porting and unbundled loops with the new service provider to meet the objectives agreed to in the NNPO that coordinated cuts be completed within one hour (for less than ten lines) or two hours (for 10-24 lines) of the coordination notification call by the new service provider. These objectives were designed to minimize the chance of prolonged service disruptions. The LNP-related performance measurements are discussed in Mr. Salvatore Fioretti's Affidavit.

22. Recent interconnection agreements with facilities-based providers in the Ameritech region include provisions stating that both parties will provide LNP, also called Permanent Number Portability ("PNP"), in conformance with the Act and the FCC rules. Existing contracts will be amended with the LNP provisions as they are renewed. The provisions of the contract provide the CLECs:

- a) with use of the Ameritech PNP database, PNP software and SS7 network via the Service Provider Number Portability Query and
- b) PNP services and facilities where technically feasible.

The Appendix Number Portability Section of SBC's current standard interconnection contract addressing number portability is included in the Multi-State Generic Interconnection/Resale Agreement ("GIA").<sup>11</sup> Examples would be the American Fiber Network, Inc., Bullseye Telecom, and Intra Community Communications interconnection agreements. The GIA is available to all competitive local exchange carriers in Ohio. Ameritech, however, will negotiate in good faith the terms and conditions of a particular agreement should a service provider seek different terms and conditions than those of the generic agreement.

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<sup>11</sup> This is the Multi-State Generic Interconnection Resale Agreement (GIA) and can be found at <https://clec.sbc.com/unrestr/interconnect/multi/index.cfm>.

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23. Implementation of LNP has been a matter of enormous scope and technical complexity, involving development, modification and deployment of new software and/or hardware by multiple suppliers for every switching and signaling network component within Ameritech's network, in addition to the provision of several new network components. It has also required modification and development of ordering, provisioning, billing and service assurance systems, which by itself has been a task of enormous proportions. In basic terms, it was likely the biggest, most complex and costly undertaking in the history of the telecommunications industry.
24. To initiate a Number Portability request, a service provider will issue a Local Service Request ("LSR") to Ameritech to port out the number(s). Once Ameritech's Unbundling Service Center receives the LSR, it is processed and a firm order confirmation ("FOC") is returned to the requesting service provider, generally within 24 hours. After the service provider receives the FOC, it must input a create message to the Number Portability Administration Center ("NPAC") indicating its intent to port the telephone numbers ("TNs"). Ameritech will also create a matching message concurring with the service provider's intent to port the TN(s). Once these steps have been completed, the requesting service provider may activate the ported Telephone Number (TN) on the due date. The NPAC SMS will then broadcast the TN(s) with the associated LNP routing information to all of the LNP capable service providers' Local Service Management Systems ("LSMS").
25. The minimum interval to port a number is three business days. The interval was adopted by the NANC's Local Number Portability Administrative Working Group as an industry guideline. There may be situations where the FOC and porting interval take longer due to the complexity and/or size of the LNP request. In these situations, the interval may be negotiated between Ameritech and the service provider, or prescribed intervals may be used if the request meets certain line size and service type designations.

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26. As a result of the above, Ameritech has equipped each of its 292 switches within Ohio with LNP capabilities, representing 100% of its access lines as of October 1999. The number of telephone numbers ported out, or away from, Ameritech Ohio from 1999 through April 2001 is over 219,000.

## **AMERITECH IS IN COMPLIANCE WITH THE FCC'S LNP PRICING AND COST**

### **RECOVERY RULES**

27. In its Third Report and Order, the FCC ordered “an exclusively federal recovery mechanism for long-term number portability.”<sup>12</sup> In adopting such a mechanism, the FCC allowed incumbent LECs to recover their directly related, carrier-specific costs by establishing tariffs with the FCC for a monthly number-portability charge starting no sooner than February 1, 1999, and a number portability query-service charge.
28. Ameritech filed a federal tariff for query services on September 16, 1997, which was subsequently superseded by a November 4, 1997, effective tariff, Transmittal No. 1123. On January 15, 1999 Ameritech filed revised query charges to comply with the FCC’s Memorandum Opinion and Order (Cost Order), DD Docket 95-116, released December 14, 1998, as amended by the FCC’s Order released January 8, 1999. The tariff filing for query services, Tariff FCC No. 2, Transmittal No. 1186, was consistent with the Checklist item (x) requirement to provide unbundled access to LNP databases. Ameritech developed two distinct database access services. The service provider number portability (“SPNP”) services include 1) LNP Query Service - Default; and 2) LNP Database Access Query Service.
29. An end user LNP charge of 41 cents was included in the January 28, 1999 FCC 2 Transmittal No. 1187 tariff filing. This charge, as well as the database query service

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charges, became effective February 1, 1999. The end user LNP monthly charge is to remain in effect for a period of 60 months.

30. On January 29, 1999, the FCC's Competitive Pricing Division released an order suspending the long-term number portability tariff filing, imposing an accounting order and initiating an investigation into the legality of the query services and end user rates. The FCC completed its investigation and adopted an order on July 1, 1999, lowering Ameritech's end user charge to 28 cents and the query charges to \$0.002002 for default queries and \$0.001003 for database queries.<sup>13</sup> Ameritech filed tariff revisions to comply with the FCC's decision on July 23, 1999 in FCC Transmittal No. 1210.

## **CONCLUSION**

31. Ameritech has fulfilled its obligations relating to the deployment of long-term number portability within Ohio, in accordance with the Act, Checklist item (xi), and all applicable FCC rules and regulations. Ameritech implemented LNP in Ohio in accordance with the prescribed performance criteria and has complied with switch selection, implementation and LNP deployment requirements. Ameritech has adhered to the technical, operational, architectural and administrative requirements established by the FCC, and is compliant with the FCC rules on cost recovery. Furthermore, Ameritech and SBC continue to be active participants in industry and regulatory activities that address LNP policy and deployment matters.
32. This concludes my affidavit.

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<sup>12</sup> FCC Third Report and Order, released May 12, 1998, par. 29.

<sup>13</sup> Memorandum Opinion and Order, Long-Term Telephone Number Portability Tariff Filing of Ameritech Operating Companies, GTE System Telephone Companies, GTE Telephone Operating Companies, Pacific Bell and Southwestern Bell Telephone Company, 14 FCC Rcd 11,883, 11,886-887, ¶ 5 (1999).

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on \_\_\_\_\_, 2001.

\_\_\_\_\_  
Jeffrey A. Mondon  
Area Manager - Network Regulatory - Numbering

STATE OF CALIFORNIA  
COUNTY OF CONTRA COSTA

Subscribed and sworn to before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 2001.

\_\_\_\_\_  
Notary Public