In the Matter of

Telephone Number Portability

CC Docket No. 95-116

Comments of The Ericsson Corporation

The Ericsson Corporation (hereinafter "Ericsson"), by its attorney hereby submits its comments in the Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding. In support of its comments Ericsson states the following:

Through various affiliated companies, Ericsson manufactures a wide variety of telecommunications systems and equipment for wired and wireless networks. Its equipment must be designed to accommodate existing and future numbering requirements, including any new rules adopted for number portability. Accordingly, Ericsson is interested in the above-captioned proceeding.

At the outset, Ericsson is in full agreement with the Commission that a national standard for number portability would serve the public interest for a number of reasons. One of the primary benefits of a uniform, national standard for implementing number portability is a likely reduction in the cost of equipment

\[1\] In the matter of Telephone Number Portability, Notice of Proposed Rulemaking in CC Docket No. 95-116, FCC 95-284 (released July 13, 1995).
and/or systems necessary to provide number portability. However, the most important benefit to be obtained by adopting a national standard for number portability is that it will provide consumers and businesses with the widest variety of choices and allow for the development of a robust, competitive telecommunications environment.²

To ensure development of a national standard for number portability on a timely basis, Ericsson believes the FCC must use its jurisdiction to require industry to adopt standards for number portability. However, Ericsson also believes that adoption of specific technical rules to implement number portability should be promulgated by appropriately sanctioned industry fora, subject to FCC review and approval. Industry fora are in a better position than the FCC to fully understand the technical intricacies of the variety of wired and wireless networks that are being used today and which may be implemented in the future.

Despite the fact that the FCC should allow industry fora to develop number portability standards subject to FCC review and ultimate approval, it must adopt certain rules which serve as guidelines for industry fora to follow. First, the FCC should decide which particular industry segments should be required to provide number portability. Second, the FCC should require that industry fora adopt procedures which prevent any entity from using its position in the marketplace to thwart competition by impeding development of appropriate standards. Third, the FCC should require that recommendations on how to

² Ericsson also believes a uniform standard for international number portability would serve the public interest.
implement long-term number portability be provided to the FCC within a reasonable time frame. Fourth, the FCC should mandate that long-term number portability rules be implemented in the market place within a reasonable time frame after adoption thereof.

With respect to the long term solutions for number portability and the various call processing scenarios described in the NPRM, Ericsson submits that each has advantages and disadvantages. More importantly, there may be other ways to achieve long-term number portability which the FCC has not yet identified. Ericsson requests that the Commission not limit its analysis of a requirement for long term number portability only to those proposals described in the NPRM.

Respectfully submitted,

The Ericsson Corporation

[Signature]

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