

EX PARTE OR LATE FILED

**United States Telephone Association**

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September 19, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

RECEIVED**SEP 19 1994**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

RE: Ex Parte Meeting
CC Docket No. 92-237

Dear Mr. Caton:

On September 16, 1994, Paul Hart of USTA met with Peyton Wynns regarding the above-referenced docket. The discussion was consistent with USTA's written filing in that docket. A copy of material prepared by USTA and discussed at the meeting is attached.

Due to the lateness of the meeting, an original and a copy of this ex parte meeting notice are being filed in the office of the Secretary on September 19, 1994. Please include it in the public record of this proceeding.

Respectfully submitted,

A handwritten signature in cursive script that reads 'Mary McDermott'.

Mary McDermott
Vice President and General Counsel

Attachment

cc: P. Wynns

No. of Copies rec'd
List ABCDE

Handwritten initials 'OCH' written in a cursive style, positioned above a horizontal line.

RECEIVED

SEP 19 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

SEPTEMBER 16, 1994

**USTA/COMMISSION CONTACT ON IMPLEMENTATION ISSUES
OF INDEPENDENTS IN REGARD TO PROVISION OF
N00 NXX ACCESS**

THIS CONTACT IS IN THE INTEREST OF PROVIDING INSIGHT TO THE COMMISSION IN ORDER TO UNDERSTAND THE UNIQUE ISSUES AND THEIR EFFECTS ON PROVISION OF ACCESS FOR N00 NXX TRAFFIC ORIGINATED IN INDEPENDENT END OFFICES. THE DISCUSSION WILL PROVIDE SOME HISTORICAL INFORMATION, A COMPARISON OF ISSUES REGARDING N00 AND 800 NXX SCREENING, AND ISSUES FOR TRANSITION TO NATIONAL SERVICE PROVIDER PORTABILITY IN PERSONAL NUMBERS.

HISTORICAL CONSIDERATIONS

- **SOME EXCHANGE CARRIERS HAVE IMPLEMENTED ADVANCED NETWORK CAPABILITIES, BUT MANY INDEPENDENTS RELY ON OTHER CARRIERS IN SUPPORT OF MUCH OF THEIR SERVICE PROVISION - SUCCESSFUL IMPLEMENTATION MUST OCCUR WITHIN THE ENVIRONMENT OF THESE DEPENDENCIES. EXAMPLES:**
 - **800 SERVICE**
 - **SS7 NETWORK SUPPORT**
 - **OPERATOR SERVICES**
 - **AMA RECORDINGS**
 - **TANDEM SWITCHING**
- **"IN THE BEGINNING", 800 SERVICE WAS IMPLEMENTED BY AT&T IN THE LATE 60s, ORIGINALLY BY MEANS OF SCREENING FUNCTIONS. A DATABASE STRUCTURE WAS IMPLEMENTED IN 1981. MANY INDEPENDENTS PARTICIPATED BY DIRECTING 800 TRAFFIC TO BELL COMPANIES FOR PROCESSING**

IMPLEMENTATION OF NXX

800

SERVICE DEFINED, UNDERSTOOD AND IMPLEMENTED

ALL DIALING 1+

CALLED PARTY PAYS

NO END OFFICE RECORDING CAPABILITY

NO0

NO UNIVERSAL SERVICE DEFINITION EACH NO0 SERVICE PROVIDER UNIQUELY DEFINES SERVICE REQUIREMENTS

0+ AND 1+ DIALING OPTIONS

BILLING OPTIONS VARY - SERVICE PROVIDER DEFINED

RECORDING MAY BE REQUIRED

FUTURE TRANSITION TO NATIONAL SERVICE PROVIDER PORTABILITY

800 NXX TO PORTABILITY

IMPLEMENTED AS A RESULT OF A REGULATORY MANDATE

CENTRAL POINT EXISTED FOR NUMBERING PLAN ADMINISTRATION AND DATABASE SYNCHRONIZATION

PROCEDURES IN PLACE FOR ENTRY OF RECORDS AND CHANGES INTO NATIONAL ADMINISTRATIVE SYSTEM

COMMON INTERFACE DEFINED FROM SMS TO SERVICE CONTROL POINTS

PORTABILITY REQUIRED INTELLIGENT NETWORK FACILITIES

NO0 NXX TO PORTABILITY

DEPLOYMENT OF A NATIONAL SERVICE STRUCTURE NOT CURRENTLY SUPPORTED BY A VALID BUSINESS CASE

REQUIRES DEVELOPMENT

REQUIRES DEVELOPMENT

NO STRUCTURE - NO DEFINED INTERFACES - WILL BE DIFFERENT FROM 800

PORTABILITY WILL REQUIRE ADVANCED INTELLIGENT NETWORK FACILITIES

SERVICE PLATFORM SUITABLE FOR EXPANSION WAS AVAILABLE AND OPERATIONAL - STILL WAS A MAJOR UNDERTAKING

NATIONAL SERVICE PLATFORM NOT DEFINED - MAJOR TECHNICAL AND OPERATIONAL CHALLENGE

BOCs FUNDED DETAILED TECHNICAL REQUIREMENTS IN ACCORDANCE WITH PRE EXISTING SERVICE STRUCTURE

DETAILED TECHNICAL REQUIREMENTS CANNOT BE DEVELOPED UNTIL A NATIONAL STRUCTURE IS DEFINED AND AGREED TO IN THE INDUSTRY

SERVICES AVAILABLE FROM SERVICE MANAGEMENT SYSTEM ARE TARIFFED

NATIONAL ADMINISTRATOR MUST BE FUNDED BY SERVICE PROVIDERS

800 WAS EXISTING PRODUCT WITH KNOWN DEMAND

UNKNOWN CONDITIONS APPLY TO DEMAND FOR PERSONAL NUMBER SERVICES

COST RECOVERY ACCOMPLISHED IN ACCORDANCE WITH COMMISSION DETERMINATIONS

DEVELOPMENT OF VALID BUSINESS CASE REQUIRES ADEQUATE COST RECOVERY