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JEFFREY S. LINDER
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October 27, 1995

William F. Caton
Federal Communications Commission
1919 M Street, N.W., Suite 122
Washington, D.C. 20554

Re: Ex Parte Filing in CC Docket No. 95-116

Dear Mr. Caton:

Please include this summary of the Comments of Independent Telecommunications Network, Inc. (ITN) in the record for this proceeding. At the time my firm prepared and filed its summary of the opening comments, ITN's comments were unavailable from the Commission's docket file.

Respectfully submitted,

Jeffrey S. Linder

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INDEPENDENT TELECOMMUNICATIONS NETWORK, INC.

Interest: Intelligent network services provider.

Long-term solutions regarding number portability:

Any national solution should satisfy the following requirements: (1) minimize the number of unnecessary SS7 transactions; (2) avoid impacting non-portable switches; (3) use network resources in the most efficient way possible; (4) allow for the use of current network routing methods; (5) not favor one service provider over another; and (6) allow for a seamless transition from various local solutions to one national solution (3-4).

ITN proposes a plan capable of being implemented in up to three sequenced stages (4).

Stage 1 requires that each switch or service switching point (SSP) be able to query the service control point (SCP) via AIN 0.1 software. In Stage 1, the switch looks up each 10 digit number in order to determine whether it is ported or non-ported. If it is ported, the switch then queries a local SCP and maps the dialed number to its correct physical address (PA). Generally, each customer with a ported number will have a service profile manager, which is an SCP which contains data such as the customer's PA, virtual address (VA), and IXC of choice (4-9).

Stage 2 adds the following features: (1) the 10 digit translation will be changed to a 6 digit translation (NPA-NXX); and (2) service provider ID (SPID) is introduced in the SS7 signalling protocol so that downstream switches will know whether the dialed number has been "dipped," and to what PA it is to be routed (10-11).

Stage 3 marks the consolidation of local number domains, up to and including a fully interoperable national system. However, to seamlessly transition from various independent local number domains, there must be a national signal/control infrastructure (11-16).

Staged implementation results in the following limitations: (1) during Stage 1, the PAs of ported numbers can not be re-used; and (2) before the completion of Stage 3, various domains will exist as islands, not a national TNP domain (16-17).

ITN's proposal contemplates multiple options for data management functionality. Local service providers may maintain and manage the service profiles and records of their own customers, or have a third party perform these functions. The possibility of distributed data management avoids "bottlenecks" and encourages fair competition (18-21).

Services excluded from number portability:

Cellular providers already offer service mobility using an HLR/VLR (home location register/visiting location register) architecture which is conceptually similar to ITN's proposed architecture (17-18).

At best, deferring the issue of CMRS number portability will lead to expensive retrofitting. At worst, such deferral will lead to incompatible systems (18).